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September 25, 2024

Office of the Chief Clerk, MC 105  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

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David Yoskowitz, Ph.D.  
Executive Director

Dear Chief Clerk:

Texas Parks and Wildlife Department (TPWD) appreciates the opportunity to provide comment on Asphalt Inc, LLC's proposed air quality permit No. 176835, which would authorize construction of a rock crushing plant at 3221 FM 3509, Burnet, TX 78611. TPWD has a vested interest in this application and kindly requests continued notification of any future communications and correspondence.

TPWD is the agency with primary responsibilities of protecting the state's fish and wildlife resources, while also facilitating outdoor recreation opportunities for the public. In service to this mission, TPWD has managed Inks Lake State Park and Longhorn Cavern State Park for more than 80 years, which have main entrances on Park Road 4, approximately 3 miles from the proposed rock crushing plant. The park's resource management includes almost 2,000 acres of Central Texas Hill Country habitats with a wide variety of native plants and animals, including the federally endangered Golden-cheeked Warbler (*Setophaga chrysoparia*). Longhorn Cavern was designated a National Natural Landmark in 1971 and provides habitat for the Tricolored Bat (*Perimyotis subflavus*), which has also been proposed for listing as federally endangered species.

Since opening in 1930's and 1940's, Inks Lake and Longhorn Cavern State Parks have been treasured destinations by Texas' residents which currently host more than 300,000 visitors annually. The parks offer a diverse range of outdoor recreational opportunities include hiking, biking, paddling, fishing, camping, wildlife watching, outdoor education, children's playground facilities, as well as opportunities to enjoy multiple historic structures and landscapes built by the Civilian Conservation Corps. Visitors including individuals, small and large groups of various ages and abilities, may spend a couple of hours or an entire weekend hiking and camping in the outdoors while at the park.

While TPWD is not opposed to natural resource mining and processing operations, this particular facility raises concerns regarding potential adverse impacts on the fish and wildlife resources of Texas, as well as impacts to the outdoor environment and the health of Park visitors. The Parks are sensitive receptors for any particulate matter emanating from the planned rock crushing plant. Additionally, TPWD is concerned about impacts from the noise, vibration, light pollution, and traffic associated with resource mining and processing plants. Considering these concerns,

TPWD requests that the Applicant be required to initiate coordination with TPWD's Ecological and Environmental Planning Program's Environmental Review Team. The Environmental Review Team reviews development projects from a variety of industries and provides recommendations that help to protect fish and wildlife resources and minimize impacts to natural resources during the construction of the projects. In addition to this required coordination, TPWD requests that the Applicant be required to conduct air dispersion modeling that considers impacts to Inks Lake and Longhorn Cavern State Parks. TPWD hopes to use the information generated through the air dispersion modeling to better understand and respond to the expected negative impacts related to air quality.

TPWD appreciate the opportunity to offer comment and look forward to working with the Texas Commission on Environmental Quality, the Applicant, and other stakeholders on this matter. If you have any questions or need more information, please contact Greg Creacy at [greg.creacy@tpwd.texas.gov](mailto:greg.creacy@tpwd.texas.gov) or at (512) 389-4897. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Rodney Franklin". The signature is written in a cursive, flowing style.

Rodney Franklin  
Director, State Parks

RF:dl

cc: Mr. Todd McClanahan