

May 13, 2026

TO: David Yoskowitz, Ph.D., Executive Director
Texas Parks and Wildlife Department
4200 Smith School Road, Austin, TX 78744



RE: Formal Request to Halt Permitting — Proposed Rock Crushing Plant on FM 3509, Burnet County, Texas — Threat to Longhorn Cavern State Park and Public Safety

The proposed **rock crushing plant** on FM 3509 will be owned by **Construction Partners Inc.** (an Alabama-based, publicly traded company) through its subsidiary **Asphalt Inc.** This proposed quarry has become a major point of contention in Burnet County since late 2024. The site's proximity to **Longhorn Cavern State Park** — less than three miles away — has raised specific alarms regarding both the structural integrity of the cavern and the safety of the thousands of visitors inside it each year. **Camp Longhorn** (a prominent youth summer camp that has served the community since the 1950s) has also raised urgent concerns about the safety of thousands of youth campers who are outdoors, adjacent to the quarry, during blasting operations.

Longhorn Cavern State Park is a Texas State Park managed by TPWD and is listed on the **National Register of Historic Places**. Developed by the Civilian Conservation Corps (CCC) during the 1930s, it has served as a landmark of the Texas Hill Country for nearly a century. Under **Texas Parks and Wildlife Code §13.101**, TPWD has the authority and obligation to protect state park resources from activities that pose a threat to their physical integrity. This letter formally requests that TPWD exercise that authority immediately.

Below is an analysis of the risks, followed by a formal list of required environmental studies and a request to halt all permitting pending their completion.

1. Structural Risks to Longhorn Cavern State Park

While industrial blasting is regulated, the karst limestone of Central Texas presents unique risks that standard industrial impact models do not adequately address:

- **Vibration Transmission:** Blasting creates seismic waves that travel efficiently through dense limestone. At less than three miles, catastrophic structural

collapse is unlikely under standard mining models; however, cosmetic damage — cracking of delicate speleothems (stalactites, stalagmites, and flowstones, some thousands of years old) — and the loosening of “key blocks” in the cave ceiling are serious concerns that must be addressed before operations begin.

- **Fracture Propagation:** This region is a network of interconnected sinkholes and caves. Repetitive blasting can cause existing fractures to expand or shift, potentially altering the natural drainage of the cavern system or opening new conduits for silt and surface runoff to enter — irreversibly degrading water quality and cave ecology.
- **Groundwater Disruption:** On January 13, 2026, the Burnet County Commissioners Court unanimously passed a resolution formally opposing any new groundwater permits — temporary or permanent — until a thorough study is presented to the Central Texas Groundwater Conservation District. The resolution specifically targets high-volume industrial uses such as the proposed FM 3509 rock crusher and demands public environmental and hydrological impact studies to ensure no risk to domestic wells, natural resources, or the long-term sustainability of the Burnet County Aquifers. This unanimous, bipartisan action by the county’s governing body represents the expressed will of the local community and must be given full deference in TPWD’s review.

2. Safety of Visitors and Children Inside the Cavern

Longhorn Cavern State Park hosts guided tours year-round, welcoming thousands of visitors annually — a substantial portion of whom are children. Whether it is safe to have visitors inside the cavern during nearby blasting operations involves three critical factors:

- **The “Startle” Factor:** Even if a blast is not strong enough to damage cave structures, the audible concussive thump and vibration felt through the floor can trigger panic, trips, and falls in a confined, dark, subterranean environment — causing injury to tour groups, particularly children, the elderly, and visitors with sensory sensitivities.
- **Toxic Fumes and Air Quality:** Blasting produces gases including nitrogen dioxide (NO₂) and carbon monoxide (CO). While these typically dissipate in open air, they can travel through underground fissures and accumulate in “dead air” pockets in connected cave systems. Given the known geological connectivity of this karst region, this risk must be assessed by qualified specialists before blasting commences.
- **Particulate Matter and Respiratory Health:** Beyond blasting, the rock crushing process generates significant fine dust. Fine particulate matter (PM 2.5 and PM

10) can infiltrate the cave atmosphere, permanently coating irreplaceable formations and harming troglodytic (cave-dwelling) species — as well as the respiratory health of visitors and park staff.

3. Safety of Youth at Camp Longhorn

Camp Longhorn has operated on the shores of Inks Lake, adjacent to the proposed quarry corridor, since the 1950s and serves hundreds of children each summer. Unlike schoolchildren who spend their days under HVAC-filtered air, Camp Longhorn campers live, sleep, eat, and participate in all activities entirely outdoors — 24 hours a day, 7 days a week during the camp season. The cumulative daily effects of blasting vibrations, toxic fume releases, and fine particulate dust on these children represent a serious and unaddressed public health concern that has not been accounted for in any permitting documentation reviewed to date.

4. Required Environmental and Geological Studies

Standard industrial impact studies routinely underestimate the fragility of karst landscapes and the unique vulnerabilities of active show caves. The following specialized studies are essential and must be completed, independently peer-reviewed, and made available for public comment before any permits are issued or ground disturbance is permitted:

4a. Seismic Propagation & Peak Particle Velocity (PPV) Modeling

- **Site-Specific Attenuation Study:** Determination of how vibration travels through this specific limestone shelf, accounting for potential wave amplification upon striking cave walls.
- **PPV Safety Limits:** Establishment of a site-specific ceiling. While 2.0 in/sec may be acceptable for surface structures, cave protection may require limits as low as 0.05 to 0.1 in/sec to protect delicate formations and unstable ceiling blocks.

4b. High-Resolution Fracture Mapping

- **Electrical Resistivity Tomography (ERT):** Mapping of underground voids and fractures between the plant site and the cavern to identify hidden conduits that could transmit blasting energy directly into the cave system.
- **Borehole Camera Inspections:** High-definition imaging of rock strata to identify key blocks in the cave ceiling most vulnerable to dislodgement under repetitive vibration.

4c. Karst Hydrogeology & Dye Tracing

- **Dye Trace Analysis:** Biodegradable dye injection at the proposed plant site to establish whether surface spills or runoff from plant operations would travel through the karst aquifer and emerge inside the cavern or contaminate its water features.
- **Water Table Drawdown Study:** Assessment of whether groundwater pumping for dust suppression could destabilize underground voids and trigger sinkhole collapses — a known consequence of dewatering karst terrain.

4d. Continuous Microseismic Monitoring Program

- **Geophone Installation:** Seismic sensors placed inside the cavern and at the park boundary to establish a pre-construction baseline and monitor vibration in real time.
- **Automatic Alert System:** A real-time notification system that immediately alerts park rangers and the plant operator if a blast exceeds agreed-upon safety thresholds, enabling immediate cave evacuation if necessary.

4e. Air Quality & “Cave Breathing” Analysis

- **Particulate Infiltration Study:** Analysis of how fine rock dust (PM 2.5 and PM 10) from the crusher may be drawn into the cavern’s atmosphere, damaging formations and impairing the respiratory health of visitors and park staff.
- **Toxic Gas Dispersion Modeling:** Atmospheric modeling to determine whether blasting gases (NO₂, CO) could migrate through surface cracks or karst conduits into the cave under specific meteorological or pressure conditions.

4f. Cumulative Long-Term Impact Assessment

A single-event blast study is insufficient. A **multi-year cumulative impact model** must be performed to assess the effects of daily blasting over the anticipated operational life of the quarry (typically 20–50 years). Cumulative micro-fracturing can reach a geological tipping point years after operations begin. This long-term risk must be formally assessed and disclosed before any permits are granted.

5. Legal and Regulatory Basis for a Permit Stay

- **Texas Parks and Wildlife Code §13.101:** Authorizes TPWD to take measures necessary to protect state park resources from physical damage or destruction.
- **Texas Health and Safety Code §382 (Texas Clean Air Act):** Requires TCEQ review of air quality impacts from industrial operations; TPWD should formally request TCEQ coordination given the proximity to a public-use state park.
- **National Register of Historic Places (36 CFR Part 800):** As a listed property, Longhorn Cavern is entitled to Section 106 consultation review under the

National Historic Preservation Act for any undertaking with a federal nexus. TPWD should determine whether any federal permitting or funding is involved and trigger this review accordingly.

- **Burnet County Commissioners Court Resolution (January 13, 2026):** The unanimous resolution formally opposing new groundwater permits until thorough studies are completed represents the expressed will of the local governing body and must be given full deference in TPWD's review process.

6. Formal Request to TPWD

We formally request that TPWD stay the issuance of any further permits or authorizations related to the proposed FM 3509 rock crushing plant until all four of the following conditions are satisfied:

- **Condition 1:** All geological, hydrological, seismic, and air quality studies enumerated in Section 4 have been completed by qualified, independent experts.
- **Condition 2:** All completed studies have been independently peer-reviewed and made available for a minimum 60-day public comment period.
- **Condition 3:** TPWD, in coordination with TCEQ and the Central Texas Groundwater Conservation District, has formally determined that Longhorn Cavern State Park, its visitors, Camp Longhorn, and the surrounding community will suffer no adverse impacts from the proposed operations.
- **Condition 4:** A comprehensive, enforceable precautionary safety plan — including real-time monitoring, automatic blast-suspension protocols, and defined remediation obligations — has been accepted by TPWD in writing before any ground disturbance is permitted.

We further request that TPWD formally notify the TCEQ, the LCRA, and the Central Texas Groundwater Conservation District of this request and ask each agency to similarly stay the issuance of any permits or authorizations for this project pending completion of the above.

The safety of children touring a confined underground cave, the irreplaceable geological heritage of Longhorn Cavern State Park, the health of hundreds of youth campers at Camp Longhorn, and the long-term water security of Burnet County must take absolute priority over the commercial interests of an out-of-state company seeking to industrialize this geologically sensitive corridor.

Respectfully submitted,

Randy Printz 

On behalf of SaveBurnet.com

SaveBurnet.com | Burnet County, Texas

cc:

Rodney Franklin, Director, State Parks Division — Texas Parks and Wildlife
Department

Representative Ellen Troxclair, Texas House of Representatives, District 19

Senator Pete Flores, Texas Senate, District 24

Copies transmitted to the above legislative representatives to ensure full awareness of this matter and to request their active support in protecting the constituents and natural resources of Burnet County.