



Lower Colorado River Authority
3700 Lake Austin Blvd.
Austin, TX 78703

Date: 5/2/2025

Curt Campbell
Westward
#4 Shooting Club Rd
Boerne TX 78006
ccampbell@westwardenv.com

RE: Burnet Quarry
Application #2024-5606 U3 (Update 3)
Address: 3221 FM 3509, Burnet, TX 78611

Dear Curt Campbell,

We have reviewed the plans for the referenced permit application. The project proposes the use of Quarry Pits to meet the Performance Standards established by LCRA's Highland Lakes Watershed Ordinance. We have the following comments regarding the plans and application:

Notice of the Application

-in accordance with Section 6.0(e) of the Highland Lakes Watershed Ordinance.

A parcel map and supportive adjacent property owner information (10853-256) documented was submitted to demonstrate the applicant mailed a notice of the permit application to persons who own property located within 500 feet to the site or within 1,000 feet of the project limits.

1. Provide the first-class mailed receipts proving that each adjacent property owner identified on the parcel map was mailed the permit application notice.

U1- Comment addressed.

2. Please confirm with supportive documentation that a notice of quarry-mine activity was mailed to officials of nearby municipalities, county, and groundwater conservation district.

U1- Comment addressed.

Quarry Mine Operator/Owner

-in accordance with Section 3.0 of the Highland Lakes Watershed Ordinance.

The permit application was submitted listing Asphalt Inc, LLC as the owner. The evidence of ownership documentation demonstrates HVPR4 LLC (grantor) selling the subject property to Burnet Ranch Investments, LLC. Burnet County Appraisal District documents the property (ID No. 47495) owned by Burnet Ranch Investments LLC.

3. The permittee is a landowner or quarry mine operator authorized to undertake development or quarry mine activities pursuant to a permit granted. Please provide legal supportive documentation demonstrating an authorized agent of Burnet Ranch Investments LLC has allowed an authorized agent of Asphalt Inc LLC to be the permittee.

U1- Comment addressed.

Cost Estimates for Erosion/Sediment Control Fiscal Security

4. Review the following items in the engineer's cost estimate for erosion and sediment controls document:
 - Compare the cost per unit prices to the LCRA Cost Estimate for ESC Fiscal Security bulletin. Please update the prices accordingly or provide counter cost estimates from local contractors or recent bids to propose a price that is less than what is listed.

U1- Comment partially addressed. LCRA's standard minimum pricing for seeding is \$2.00/ SY (Cost estimate technical bulletin: lcra.org/download/cost-estimates-for-esc-tech-bulletin/?wpdmdl=31259). At \$2.00/SY, the total revegetation cost for approximately 1,040,440 SY would be \$2,080,880.00. The Cost per Unit pricing proposed for the "Seed Mixture (per acre)" item does not meet LCRA's revegetation minimum pricing. Please revise and update the cost per unit to meet LCRA's minimum pricing and provide an updated cost estimate.

U2- Comment addressed. Proof of current seed pricing was provided.

5. Add a quantity and pricing for a concrete washout to account for the wheel wash area.

U1- Comment addressed.

6. Add a quantity and pricing for the diversion/interception/perimeter berms item to account for the proposed berm areas.

U1- Comment addressed.

7. Add a quantity and pricing for rock berms, check dams, and high service rock berms. Refer to the markups on sheet C.2 for more information.

U1- Comment partially addressed. Based on LCRA's rock berm spacing requirements for varying slopes, the rock berm quantity will need to be updated. Please see markup on sheet 1 referencing the spacing revisions. Are these rock berms temporary or will they remain in place once the initial phase of construction is completed?

U2- Comment partially addressed. I measured 1040 LF of Rock Berms. Please revise and update the quantity within the cost estimate.

U3- Comment addressed.

8. All proposed work, including the final conditions need to be included within the limits of construction. The total acreage within the limits of construction needs to be the amount of seeding proposed (Seed mixture+ Hydromulching= Acreage within limits of construction).

U1- Comment partially addressed. Pit number 4 is exempt from the revegetation acreage measurement since the pit floor will be actively mined and the drainage will be self-contained within the pit walls.

U2- As stated in the previous comment letter, the quarry pit area (Pit #4=319.1 Acres) will not be included within the revegetation area on the cost estimate. Based on the limits of construction depicted within the final conditions sheet, the overall area needing to be revegetated is approximately 350 acres. This means the total revegetation amount would be more than \$250,000 using the current unit pricing provided within your cost estimate. Please revise the quantity to include the entire area within the limits of construction.

U3- Comment addressed. This comment will be finalized following the public meeting.

Cost Estimates for Erosion/Sediment Control Fiscal Security Additional Comments- U1

9. Changes to the Erosion and Sedimentation Control Plan have been requested. Please revise the cost estimate to include these changes. Once the cost estimate is approved, a letter of credit or other form of financial security acceptable to LCRA must be provided prior to issuance of a permit. A Letter of Credit shall have a minimum expiration of 3 years or shall renew automatically until LCRA determines that the project has achieved final stabilization. A letter of credit template can be found in the Development permit application [hyperlink: <https://www.lcra.org/download/hlwo-developer-application-packet-1-pdf/?wpdmdl=19704>].

U2- Comment partially addressed. Changes have been requested to the cost estimate. Refer to comments 7.- U2 and 8.- U2.

U3- Comment addressed.

Hydrologic Report

-in accordance with Section 5.2(b)(iv)(1)(a) of the Highland Lakes Watershed Ordinance.

1.2 Site Description, Post Development Conditions

10. Revise the section to describe any offsite areas draining to the project site or if those areas will be redirected around the site. Also, see comment below regarding offsite drainage.

The eastern property boundary has multiple drainage lows conveying offsite drainage through the property. The final conditions show berm breaks allowing offsite drainage to enter the main pit. If the drainage is not diverted from the quarry pit and the intent is to impound the offsite drainage, coordination with TCEQ and LCRA may be needed for the proposed impoundment.

U1- Comment partially addressed. If you intend to impound water in the quarry, please provide LCRA with a written determination by TCEQ of whether the impounded water would be state water.

U2- Comment partially addressed. Please revise your response to this comment since a response was submitted on 3/21/2025 and then on 3/27/2025, an updated final conditions plan sheet was submitted to address this comment. Based on the 3/27/2025 drawing, all offsite flows are being diverted around the quarry pit.

U3- Comment addressed.

11. Revise the section to describe the drainage features located onsite that drain into Peters Creek and reference the soil resource report included in this section.

U1- Comment partially addressed. The buffer zone was denoted as a "Potential Wetland" on sheet 3 of the Quarry and Mine Plans. Please provide a description within the hydrologic report of the drainage features and the stock pond since they appear on the US Fish and Wildlife wetlands mapper.

U2- Comment addressed.

12. Revise the section to include a detailed description of the 40-acre processing plant area including information about the rock crusher (stationary or portable), storage of chemicals used in washing of the aggregates, proposed water well (protection measures), process water storage area, reuse of water (e.g. closed-loop design), and include a description of best management practices designed to control runoff directly impacting this area or if all of it is diverted to on pit.

U1- Comment partially addressed. If applicable, please provide information within the report and on the Quarry plan sheets regarding the following items within the processing plant area:

- The storage of chemicals, the types of chemicals, proposed containment for the chemicals, and measures that will be implemented should any hazardous spills occur.

- The proposed water well, how it will be protected from daily processing activity, and what setbacks will be provided.
- The process water storage areas, a description of how the process water will be used, a description if a closed loop system will be utilized, and how/when/where the process water will be disposed of.
- Description of fuel types that will be located at the pad site and what types of containment will be utilized for the fueling areas. Will there be an SPCC plan for the tanks or any fuel located on this site? Please describe what measures will be taken to prevent stormwater contamination should any spills take place.
- Buildings, pad areas, and parking areas.
- Although the stockpiles drain to the pit, any drainage on these piles still has the potential to leave the processing pad site. Describe what practices will be implemented within the immediate vicinity of the stockpiles to prevent them from discharging sediment. For instance, this can be done with the use of internal berms around stockpiles. Whichever practice is proposed, it needs to be included on the Erosion and Sedimentation control plan as a note.

U2- Comment not addressed. The closed loop process was not described within the hydrologic report. Please revise.

U3- Comment addressed.

13. Provide a plan sheet to illustrate the processing plant area details. Include what is described above.

U1- Comment partially addressed. Provide a separate plan sheet for the processing plant area and include the items stated above within the plan sheet.

U2- Comment addressed.

14. Provide a plan sheet to illustrate the schematic of the office area, parking, scale house and proposed onsite sewage facilities (illustrate setbacks).

U1- Comment addressed. If the location of either changes, revisions will need to be submitted to LCRA HLWO.

15. State what the proposed depth for the quarry pit will be.

U1- Comment addressed.

16. Revise section to clarify the proposed Garman Pits (corrected to Gorman Pit) to include purpose of the pits (e.g. initial quarrying area), approximate mining depth, proposed future use of the area, if applicable.

U1- Comment partially addressed. Will walls be installed between the gorman pits to create stepped/terraced drainage from one pit to the other? Please show if applicable. Also, provide grading contour labels for the gorman pits and provide calculations proving these pits are self-containing as stated within the report.

U2- Comment partially addressed. The gorman pit stormwater runoff calculations state a ponding depth of 1.0' feet but the contours are showing a depth of 23 feet. Please revise.

U3- Comment addressed.

17. Will the Gorman Pits have a liner installed underneath?

U1- Comment addressed.

18. It is stated that two Gorman pits are proposed but the initial conditions plan sheet (C.2 of C.4) shows 3 pits with a total acreage of 6.99 acres.

U1- Comment partially addressed. The hydrologic report states “approximately 4.6 acres” within the Post-development conditions but the plan sheets are showing 6.9 acres. Please revise.

U2- Comment addressed.

19. Add to the following statement: *In an effort to be extremely conservative the site has been evaluated assuming that impervious surface may be placed anywhere onsite. This is a very conservative approach since there is no intent to develop the entire site as impervious surface.* Include language that other improvements that are not illustrated on the Final Conditions plan sheet will be submitted to LCRA for permit revision and approval.

U1- Comment partially addressed. What precautions will be taken to prevent development in drainage areas 3A and 2B? If these are to be left undisturbed, they must remain in their natural state. Also, what precautions will be taken to prevent additional development within Drainage areas 1 and 2A once the pits are constructed?

U3- Comment addressed.

20. In accordance with Section 5.2(b)(ii) of the Highland Lakes Watershed Ordinance a quarry pit can be used as a permanent BMP if it is sufficiently sized to contain the runoff of a 10-year (24-hr) storm without discharging during a rain event. At least five of the “pit BMPs” (pits 2B, 2A, 1, 3B & 3A) described in this report are in areas not proposed for quarrying activity. Please clarify the pit BMPs are designed for a 10-year (24-hour) storm event without any discharge. Additional information requested below.

U1- Comment addressed.

21. “Appendix I- Stormwater Runoff Calculations” was not provided in this submittal.

U1- Comment addressed.

1.2 Site Description, Post Development Conditions Additional Comments- U1

22. The hydrologic report on sheet 4 states “each of the six pits” but the quarry plans and calculations only show three. Please revise this statement within the report.

U2- Comment addressed.

XX Erosion Sedimentation Control

23. Add a section that briefly describes the erosion and sedimentation controls in place during the initial phases of the quarry project. The information should align with plan sheet C.1 and C.2, include details about sedimentation ponds in drainage areas DA-1 and DA-2.

U1- Comment addressed.

24. Describe a timeline when the initial phase will move into a more operational phase and how the BMPs will be updated. Refer to the language included in plan sheet notes. Also, describe the erosion control phasing for the various quarrying phases.

U1- Comment addressed.

25. Describe measures proposed to manage erosion and sedimentation during the operational stages of the quarry project. For example, use of water trucks, wheel wash, berms to direct runoff, etc.

U1- Comment addressed.

XX Onsite Features

26. Reference the wells described in the Hydrogeologic Report and state if the two wells (S-1 & S-3) will be maintained or closed.

U1- Comment partially addressed. Include the proposed well that will be located on the processing plant pad within this description.

U2- Comment addressed.

27. Reference the man-made stock ponds described in the Hydrogeologic Report and state if the stock ponds (S-2, S-4, & S-5) will be maintained onsite or mined through.

U1- Comment addressed.

2 Buffer Zones

28. Please revise section to include any details how the buffer zone will be protected from any heavy equipment, disturbances, and how access to the buffer zone will be prevented.

U1- Comment addressed.

29. The buffer zone was not delineated correctly on the Quarry and Mine plan sheets based on the field visit. The buffer zone boundary is currently shown 50' from the creek centerline, not 75'. Please revise.

U1- Comment partially addressed. Provide a buffer zone delineation to the proposed point of beginning based on the sites existing conditions. Based on LCRA's drainage area delineations for the buffer zone, the point of beginning is located further upstream than what is currently proposed on the quarry plan sheets (approximately 840 feet further upstream). The drainage area that feeds into the proposed point of beginning is roughly 340 acres.

Please revise the drainage area delineation and the limits of the buffer zone. If needed, contact LCRA to schedule a meeting regarding this comment.

U2- Comment addressed.

3 Roadway Treatment

30. Revise section to describe how the natural vegetative filter strip (NVFS) will be protected from vehicles. Revise to account for emergency shoulders, as needed, but please illustrate in the plan sheets.

U1- Comment addressed. FYI, the limits of the NVFS and pit bmps will need to be recorded via an easement once the project is close to being permitted.

U2- Comment addressed.

31. Describe how the NVFS was sized for the haul road and what type of NVFS is proposed.

U1- Comment addressed.

32. Describe if any roads will be proposed around the perimeter of the project site and what treatment will be proposed.

U1- Comment addressed.

33. Describe and illustrate access roads to stormwater pits for maintenance purposes.

U1- Comment addressed.

34. Describe and illustrate any access roads between the property line and the earthen berms.

U1- Comment addressed.

4 Proposed Stormwater Earthen Berms

35. Revise section to include language about perimeter buffer.

U1- Comment addressed.

36. Proof needs to be provided that the diversion berms and swales are sized for the 10-year, 24-hour storm event based on the criteria stated in section 2.2.3 sheet 270 within the HLWO technical manual.

U1- Comment addressed.

37. Swales are mentioned as a stormwater conveyance feature for the site. Revise the quarry plan sheets showing the proposed grading and locations of these swales.

U1- Comment addressed.

XX Stormwater Basins (Pits)

38. Add a section for Stormwater Basins (Pits) and update Stormwater Earthen Berm section as applicable. Provide the following details related to the basins in the narrative and supportive plan sheets.

- BMP sizing calculations need to be provided showing that these pit BMPs were designed based on the impervious cover assumptions for each drainage area and sized for the 10-year, 24-hour storm event.

U1- Comment addressed.

- Describe how any recharge features (e.g. fractures, cavities) on the floor will be mitigated during construction of these pits.

U1- Comment addressed.

- Describe how the collected stormwater will be managed.

U1- Comment partially addressed. Please describe how stormwater within the basins will be managed. For instance, if the water will be reused or how dewatering activities stated within the BMP maintenance plan-will be incorporated to make sure the storage requirements of the basins are being met after subsequent rainfall events.

Also, please clarify what contaminants will be treated by the BMP quarry pits.

U2- Comment addressed.

- Describe if the basins will incorporate outfalls or spillways and what storm event they're designed for.

U1- Comment partially addressed. The Quarry and Mine Activity Section within the HLWO technical manual (Section 2.4 Buffer zones, sheet 276) requires proper dissipation of high energy flow before entering buffer zones. As stated in the manual, "By-pass flows from storms in excess of the basin design storm must be conveyed in a stable manner through the buffer zone to the receiving water body. This can be accomplished through application of the outfall stabilization [rip-rap apron, scour hole design] and level spreader systems presented in Section I, Chapter 3." Please provide rip-rap aprons sized for the BMP quarry pit discharges. Refer to LCRA's pipe end treatment for riprap apron sizing and dimensioning (PIPE END TREATMENT).

U2- Comment addressed.

- Describe if those potential discharges will go through additional water quality best management practices prior to discharging the site.

U1- Comment partially addressed. In the event of a high precipitation storm event causing the pits to overflow, what measures will the permittee take to mitigate sediment laden discharge onsite and offsite once the storm event has passed? Please include these within the BMP maintenance plan.

U2- Comment addressed. This will be managed through LCRA's enforcement actions in conjunction with the state.

- Provide supportive plan sheets with construction details of each individual basin.

U1- Comment partially addressed. Provide an inset for pit 3.

U2- Comment partially addressed. Based off the contour measurements and stage storage calculations for pits 1 through 3, the volumes provided for all 3 pits do not equal the total pond volumes shown within the stormwater runoff calculations sheet of the hydrologic report (sheet 36). For example, I am calculating roughly 1,830,000 CF of storage within Pit 3. The calculation within the hydrologic report shows a total pond volume of 2,600,000 CF. Please revise each stormwater pit design to reflect the total pond volume calculated within the stormwater runoff calculations sheet.

U3- Comment addressed.

39. Within this section it states that there will be basin walls, but the pits are shown as embankments. Will any of the pits use retaining walls?

U1- Comment addressed.

40. Add sediment depth markers to the basins.

U1- Comment addressed.

XX Dewatering

41. Include a section that describes any dewatering activities in accordance with Section 3.3.14 of the LCRA HLWO technical manual (starts on sheet 149).

U1- Comment partially addressed. Describe how often the BMP pits will be dewatered and what practices will be used to treat the sediment laden discharge. The BMP pits will lose storage capacity during periods of recurring rain events or over time from accumulated stormwater leading to a higher potential for a discharge to take place.

U2- Comment addressed.

XX Quarry Pit (319.1-acre)

42. Include a section that describes the quarry pit ("Pit 4" 319.1-acres) and describe the approximate timeframe for quarrying the area.

U1- Comment addressed.

43. Describe the depth of the pit using the unit of ft below ground surface (bgs) to match well data and elevation.

U1- Comment addressed.

44. Describe how any recharge features (e.g. cavities or fractures) located on the surface of the quarry floor will be mitigated in accordance with Section 5.2(b)(ii) of the Highland Lakes Watershed Ordinance and Section 2.3.2 of the LCRA technical manual.

U1- Comment addressed.

5 Groundwater Monitoring Statement

This request is under review based on supportive information provided and review of hydrogeologic report

45. Describe the approximate separation depth proposed between the quarry pit floor and water table.

U1- Comment addressed.

46. Please revise the section to state LCRA will be contacted if during quarrying activity groundwater is encountered.

U1- Comment addressed.

47. Has any groundwater monitoring been completed for this site that can establish background conditions?

U1- Comment addressed.

6 Surface Water Monitoring Statement

This request is under review based on supportive information provided

48. Add a statement that monitoring information collected to meet TCEQ MSGP permit requirements will be submitted to LCRA in an annual report.

U1- Comment addressed.

Hydrogeologic Report

-in accordance with Section 5.2(b)(iv)(1)(b) of the Highland Lakes Watershed Ordinance.

49. Describe the tributaries to Peters creek located onsite in the Hydrogeologic Report, which is illustrated in the Soil Resource Report Soil Map attached to the Hydrologic Report.

U1- Comment partially addressed. The hydrogeologic report needs to describe the existing onsite drainage and the ridgeline to the east. Also, provide a description of Peter's creek and the drainage features located on site within the hydrogeologic report.

U2- Comment addressed.

50. Describe the buffer setback for the tributary located near the western property boundary.

U1- Comment partially addressed. A description for the buffer zone dedicated for the onsite drainages was not included within this report. Please revise.

U2- Comment addressed.

4.2 Karst Identification

It is stated, *A field investigation was performed at the site by Connor P. Tierney, P.G. on August 29, 2024.*

51. Please describe how the field study was conducted. For example, walking in equally spaced transects across the site etc.

U1- Comment addressed.

52. Please describe if any additional field investigations were completed at the site by Westward Geologist(s).

U1- Comment addressed.

5.2 DRASTIC Classification

DRASTIC Classification was calculated at 121.

53. Depth to Water Table referenced a well located 0.75 miles NW of the site. This well is not available in the Well & Spring Inventory map. Revise the Depth to Water Table criteria to reference one of the wells illustrated in the Well & Spring Inventory Map.

U1- Comment addressed.

54. Topography (Slope) documents a 4.61 percent slope for the site and noted a rating of 5. The table documents a rating of 9. Revise the table or noted rating in the narrative.

U1- Comment partially addressed. Section 1.2 of the hydrologic report states "Onsite slopes average approximately 3%" please match the descriptions in both reports to reflect the correct sloping and update the slope rating if applicable.

U2- Comment addressed.

7.0 Well & Spring Inventory

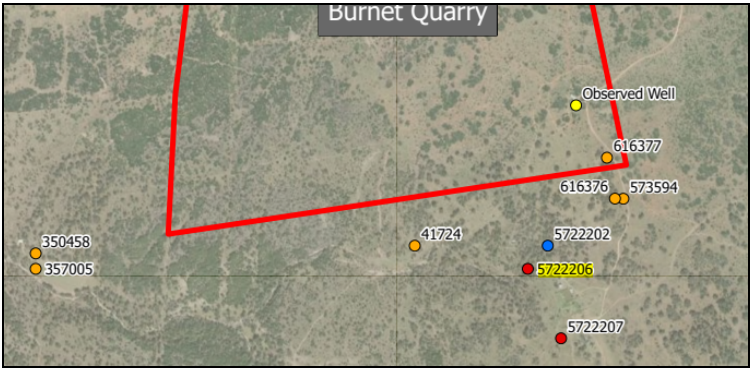
55. Update the following statement, if the location of this specific well was confirmed. *Well 164367 is mapped onsite, however the well address is for a location north of FM 3509. No evidence of this well was observed during the field investigation.*

U1- Comment addressed.

8.0 Discussion

Discussion states, *given the absence of sensitive karst features at the Site and significant depth to groundwater, quarrying activities likely will not impact groundwater quality. A groundwater monitoring plan is not proposed.*

The south and southeast portion of Burnet Quarry is proposed to be the main pit, approximately 319.1-acres to have a depth of approximately 80 feet from the surface level. A few wells identified in the vicinity range from 100-300 feet depth.



Well & Spring Inventory Map

WELL	DEPTH	WELL	DEPTH
350458	300 feet	616377	740 feet
357005	200 feet	573594	736 feet
41724	100 feet	616376	740 feet
Observed Well	No data	5722202	No data
5722207	650 feet	5722206	100 feet

56. Please provide additional supportive information to support a groundwater monitoring plan is not required with this submittal.

U1- Comment Addressed.

Hydrogeologic Report Additional Comments- U2

57. Comment provided by LCRA on Wednesday March 12, 2025:

“Section 5.2 Depth to Water Table, references State of Texas Well ID No. 357005, located 1,800 feet southwest of the site, and references an onsite well No. 616377. The two sources are used to demonstrate the onsite depth to water table. The result gives a DRASTIC rating of one (1). Can this section include additional references to support the depth to water table resulting in a DRASTIC rating of 1? In addition, please review and confirm the two sources represent the project site accordingly and fall within the same geologic formation.”

Westward Engineering Response submitted on Tuesday April 1, 2025:

“The above referenced spring is recorded as State of Texas Well Number 5722202. The available documentation on this spring is dated August 14, 1961 and remarks that it “Dried up in drought”. The well nearest the referenced spring is recorded as State of Texas Well Number 5722206 in 1961 was “originally 50’ deep. Deepened to 100’ because of failure in drought” it was also listed as a “weak well”. Given the age of the data, and both references to decline in water availability, these sources were not considered relevant to current site conditions. As indicated in the hydrogeologic report groundwater is anticipated to be absent within the proposed mining depth.

As previously stated, Asphalt Inc. will notify LCRA if groundwater is encountered and will coordinate with LCRA to develop an appropriate monitoring plan if necessary and the Central Texas Groundwater Conservation District (CTGCD) to complete any required permitting.”

U2-Comment Addressed. According to the latest Hydrogeologic Report, Section 9, Westward Environmental concludes that groundwater will not be encountered during the quarry and mining operations. Based on the information provided and to limit the number of direct connections to the aquifer, LCRA is not requiring additional wells to be constructed onsite for a Groundwater Protection and Monitoring Plan. If groundwater is encountered, LCRA and the Groundwater Conservation District will work in conjunction with the applicant to establish a Groundwater Protection and Monitoring Plan.

However, in the interim, to establish background conditions for the site, sampling on existing and proposed wells identified in Section 6 will be required quarterly, for the first year.

U3- Comment addressed.

58. According to the latest Hydrologic Report, Section 9, Westward Environmental completed a review of adjacent well logs and concluded the approximate groundwater table onsite is more than 250 feet below the surface.

A public comment received included a reference to a water well and stock tank located along State Hwy FM3509, less than 100 feet from the site. The commentor assumes the water well is less than 100 feet in depth. Please review and confirm if this well was included in the Well & Spring Inventory Map (Sheet 003) and SDRDB & TWDB Well Data reference sheet.



Approximate location of stock tank highlighted below.



U3- Comment addressed.

59. On April 9, 2025, a public hearing took place for House Bill 3482 with the Texas Natural Resources Committee. This bill was drafted for permit applications proposed for quarry and mine activities within specific parameters of the Highland Lakes watershed. Testimony was provided by witnesses and affected parties. A witness stated faults exist within the proposed quarry site and were not appropriately described in the permit application. Please review and confirm the hydrogeologic report appropriately describes faults or inferred faults within the project limits.

U3- Comment addressed.

Mine & Quarry Plan

-in accordance with Section 5.2(b)(iv)(1)(c) of the Highland Lakes Watershed Ordinance.

60. Please see marked up sheets to address any changes requested for this section or other sections.

- Plan sheet C.1 Erosion & Sedimentation Control Plan
- Plan sheet C.2. Initial Conditions
- Plan sheet C.3 Final Conditions
- Plan sheet C.4 Temporary General Notes

U1- Comment partially addressed. Please see plan sheet markups.

U2- Comment partially addressed. Please see plan sheet markups.

U3- Comment addressed.

61. Only one sheet was submitted as an erosion control plan. Since the quarry will expand gradually, ESC plan sheets need to be provided for the initial conditions, intermediate conditions, and the final conditions. The appropriate ESC's for each phase will need to be provided.

U1- Comment Addressed.

General Reclamation Guidance Plan

-in accordance with Section 5.2(b)(iv)(1)(e) of the Highland Lakes Watershed Ordinance.

BMP Maintenance Plan

62. Revise the maintenance plan to include the following:

- An introduction paragraph stating the type of BMP's to be maintained on site.

U1- Comment addressed.

- A schedule for maintenance activities.

U1- Comment partially addressed. The maintenance plan only states for inspections to occur a minimum of twice annually. Please propose more frequent intervals to perform inspections. Also, a schedule or specific criteria for the stormwater pit dewatering.

U2- Comment partially addressed. The detailed inspections section states inspections should occur twice annually, not quarterly. Please revise to reflect quarterly detailed inspections.

U3- Comment addressed.

- Provision for access to the tract by LCRA or other designated inspectors.

U1- Comment addressed.

- Name, qualifications, and contact information for the party(ies) responsible for maintaining the BMP's.

U1- Comment addressed. The BMP maintenance plan will need to be signed by both parties before the permit is issued.

63. Provide a detailed description of the various dewatering practices to be used for the pit basins.

U1- Comment partially addressed. Be more descriptive and propose features specifically for dewatering. For instance, how the pits will be dewatered should the sediment depth surpass 3 feet or how the accumulated storm water from various events will be removed. Include what features will potentially be used, where and how the stormwater will be disposed of/used , and finally what specific dewatering practices will be used to prevent sediment laden discharge from leaving the site (example: dewatering bag, faircloth skimmer, etc.).

U2- Comment addressed.

64. Within the detailed inspection section, include the second paragraph from section 5.5.1 within the HLWO technical manual.

U1- Comment addressed.

65. Within the maintenance plan describe how often the settled sediment will be removed from the BMP pits and how the sediment will be disposed of.

U1- Comment partially addressed. It is stated that “All sediment shall be used onsite...” Please clarify how this sediment will be used on site. Our concern is the sediment will be composed of fines and if not used properly, could potentially leave the site.

U2- Comment addressed.

66. Provide an example of an inspection form.

U1- Comment addressed.

67. Include a BMP specific section within the maintenance plan and include the following statement for the proposed VFS, “No portion of the filter area will be greater than a 10% slope. The vegetated density must be greater than 80% with no large bare areas. The filter area should be densely vegetated with a mix of erosion-resistant plant species that effectively bind the soil. Native or adapted Grasses are appropriate because they require less fertilizer and are more drought resistant than exotic plants.”

U1- Comment addressed.

68. Before the “Name and Signature of Responsible Party for maintenance of BMP’s” section, Include the following paragraphs:

The OWNER or SUBSEQUENT OWNER shall bear all expenses for the operation and maintenance of these permanent Best Management Practices (BMP) including but not limited to all general maintenance activities needed to keep this system in proper operation condition. If this system is abused or not maintained, then it may contribute to malfunction of the storm water system. All designated BMP areas shall remain free of construction, development, and encroachments.

You as the OWNER of this property have a responsibility to provide any SUBSEQUENT OWNER or your real estate agent with a copy of this Best Management Practices (BMP) Maintenance Plan if this facility is sold so that the BMPs can be properly maintained and operated. The same rights, duties, and responsibilities borne by the current OWNER shall be borne by each subsequent OWNER.

An amended copy of this document will be provided to the LCRA within thirty (30) days of any changes in the following information:

Responsible Party for Maintenance: [Insert New Owner name]

Address: [Insert Street Address]

City, State, Zip: [Insert Information]

Telephone Number: [Insert BMP Maintenance Provider Telephone Number]

U1- Comment partially addressed please edit the following to state “PERMITTEE” on sheet 5.


The PEERMITTEE
maintenance of the

U2- Comment addressed.

BMP Maintenance Plan Additional Comments- U1

69. Include a wheel wash section within the BMP maintenance plan and provide specific maintenance criteria for the wheel wash.

U2- Comment addressed.

70. Include a section for the maintenance of the Gorman Pits regarding dewatering and the removal/ disposal of the sediment within the Gorman Pits.

U2- Comment addressed.

71. See comment #39, Bullet Point #5 -U1.

U2- Comment (#38, bullet point #5-U1) addressed.

Other Local, State, and Federal Regulations (5.2(b)(iii))

-in accordance with Section 5.2(b)(iii) of the Highland Lakes Watershed Ordinance.

72. Provide the status for the following permitting/authorization applicable to the proposed quarry project. Please state if an authorization is not applicable and provide a copy of an approval, if issued.

- EPA National Pollutant Discharge Elimination System (NPDES) permit
U1- Comment Addressed. Please provide a copy of the authorization to LCRA upon approval.
- Mine Safety and Health Administration (MSHA/OSHA) authorization
U1- Comment Addressed. Please provide a copy of the authorization to LCRA upon approval.
- US Army Corp 404 permit
U1- Comment Addressed.
- TCEQ MSGP permit, Air New Source permit, Aggregate Production Operation (APO) registration
U1- Comment Addressed. Please provide LCRA with a copy of the TCEQ MSGP NOI, Issued Standard Air Permit,
- Central Texas Groundwater Conservation District (GCD) well approval
U1- Comment Addressed. Once approved, please provide LCRA a copy of the well approval.
- TxDOT safety certificate
U1- Comment Addressed. Once approved, please provide LCRA a copy of the safety certificate.

If you have any questions about these comments, please call me at 512-578-7500, or by e-mail at hlwo@lcra.org.

Additional information addressing these comments or revised application materials must be provided within 30 calendar days from the date of this letter. An extension of time to provide information may be requested, however the cumulative amount of time to provide additional information may not exceed 6 months from the date that the application for permit was filed.

Thank you,

Brian Burkitt

Water Quality Protection

CC: Herb Darling, Burnet County
Brett Poage, Burnet County
Mitchell Sodek, Central Texas Groundwater Conservation District