



CITY OF HOUSTON

Houston Health Department

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Mayor

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April 28, 2025

The Honorable Brooks Landgraf
Chair, House Committee on Environmental Regulation
P.O. Box 2910
Austin, Texas 78768

RE: TX89RSB 763

Dear Chairman Landgraf and Members of the Committee:

The City of Houston Health Department (HHD) regularly responds to environmental complaints related to concrete plants and reviews new permits and amendments of these facilities for comments to the Texas Commission on Environmental Quality (TCEQ). Concrete plants may be sources for air pollutants, storm water contaminants, and neighborhood nuisances. In areas with existing environmental stressors, these facilities can have a dramatic impact on public health. HHD respectfully submits this letter of support for Senate Bill 763.

With no zoning, concrete batch plants in Houston legally emit fine particulate matter in neighborhoods next to homes, schools, churches and parks in our city. Concrete Batch Plants produce air pollution, specifically particulate matter emissions including particulate matter 2.5 microns and smaller, referred to as fine particulate matter, that can be inhaled deep into the lungs. Inhalation of fine particulate matter poses serious human health risks including asthma attacks, cardiac arrest, stroke and premature death.

There are more than 89 concrete batch plants in the city limits of various operational statuses. Since 2016 the City's Bureau of Pollution Control and Prevention has conducted over 60 investigations of concrete batch plants within the City's limits and found 60 violations of TCEQ Standard Air Permit and City Ordinances. Violations included insufficient dust controls, nuisance conditions, inadequate buffer distances (i.e. for locating of stockpiles) among others.

The federal reference monitors in the Houston area shows the mean concentration for 2024 as 11.3 ug/m³. These concentrations exceed the EPA's National Ambient Air Quality Standards national yearly standard of 9 ug/m³ for PM_{2.5}. The city will be in nonattainment for PM_{2.5}, which is unhealthy for Houstonians and accompanied by additional federal requirements which will be costly.

Research indicates PM2.5 pollution has been shown to be a trigger for asthma attack, stroke, and cardiac arrest. The adverse health outcomes associated with PM2.5 exposure are only going to be exacerbated—this is already evidenced by the area around the concrete batch plant needing more ambulances for asthma attacks and cardiac arrests.

The Houston Health Department fully supports the proposed amendments to the bill. By requiring TCEQ to review permits at least every six years and consider background air pollutant concentrations, the bill ensures a more proactive and data-driven approach to regulating air emissions from permanent concrete plants. This regular assessment could identify situations where existing permits are not adequately protective of local air quality. If the review reveals concerns, TCEQ may amend the permits, potentially leading to stricter emission limits or operational requirements for these plants. This could directly translate to reduced air pollution in neighboring communities.

Signed by:

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