



CITY OF HOUSTON

Sylvester Turner

Mayor

P.O. Box 1562
Houston, Texas 77251-1562

Telephone – Dial 311
www.houstontx.gov

October 28, 2020

The Honorable Terry Wilson
Chair, House Aggregate Production Operation, Interim Study Committee
Texas House of Representatives
P.O. Box 2910
Austin, Texas 78768-2910

Dear Members of the House Aggregate Production Operation Interim Study Committee,

Environmentally hazardous facilities and infrastructure are more likely to be placed near communities of color or low-income communities, while higher-income communities with more white residents are more likely to have more trees and greater access to parks and open spaces. Environmental injustice is amplified as property values in white neighborhoods increase relative to those of polluted communities of color in a city famous for not having zoning.

The results: In Houston, there is a 24-year difference in life expectancy depending on what neighborhood you are from.

Despite Houston's global leadership in health services as home to the largest medical center in the world, many Houstonians continue to lack access to basic care. The effects of Houston's urban development on air quality, traffic safety, extreme heat, and industrial pollution negatively impact the health and safety of Houstonians.

COVID-19 has only reinforced the disproportionate health services and exacerbated negative impacts in the most vulnerable populations. One of the most harmful air pollutants negatively impacting human health is particulate matter 2.5 micrometers and smaller in diameter (PM_{2.5}).

- It is pervasive and poses a serious threat to human health in Houston. The underlying health issues exacerbated by inhalation of PM_{2.5} increase the risk of complications and death due to COVID-19. COVID disproportionately burdens local African-America and Hispanic populations in Houston.
- A recent study by Harvard University found that an increase of 1 µg/m³ in PM_{2.5} is associated with an 8% increase in the COVID-19 death rate (<https://projects.iq.harvard.edu/covid-pm>).

Residents of Houston, where PM2.5 levels are well above the national average, are particularly at-risk. Increased frequency of asthma and heart attacks in some neighborhoods are indicative of more pervasive air quality issues beyond PM2.5.

Concrete batch plants are a major source of PM2.5 emissions in Houston communities. Since 2014, Texas has led the nation in ready-mix concrete production, with around 1,700 permitted plants. These concrete batch plants dot the Houston map like confetti, often in “batches,” and are clustered in working class, minority neighborhoods that lack the political power to fight them.

- In south Houston, 18 concrete batch plants sit within a 4-mile radius.

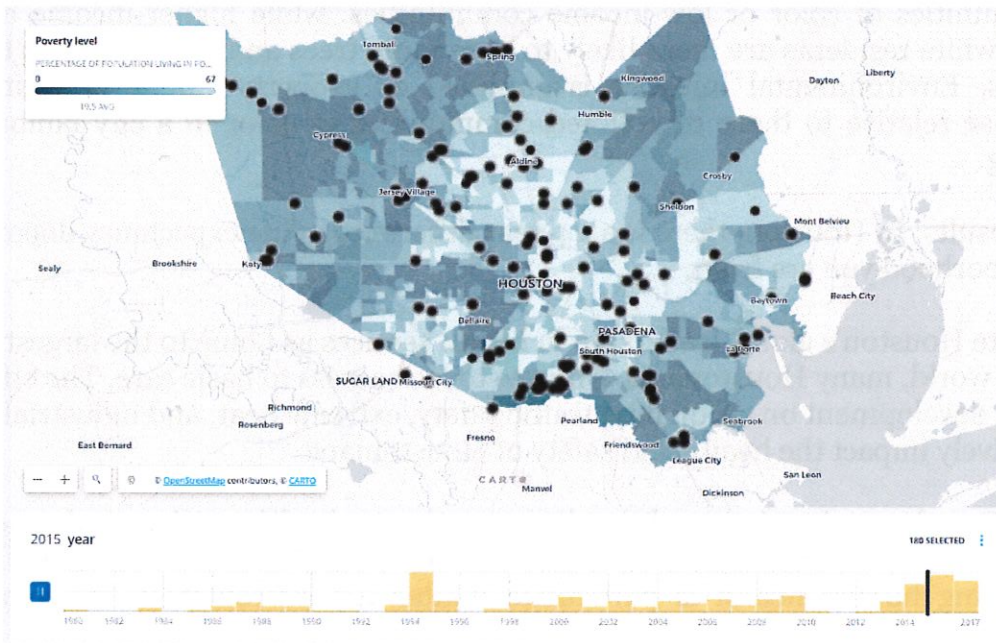
This map (Figure 1) shows the location of concrete batch plants in Harris County superimposed over local rates of poverty. Mostly, they are in working-class, minority communities in Harris County, which has 188 concrete batch plants, the most in the state.

Figure 1.

Map: Explore concrete batch plants in Harris County

Map: Explore concrete batch plants in Harris County

In Texas, and in Houston especially, frustrations are mounting over concrete batch plants, which can be loud, dusty and generate increased truck traffic. Mostly, they are in working-class, minority communities in Harris County, which has 188, the most in the state. The number of plants are expected to increase in coming years as Harris County's population continues to climb. Source: EPA | Data compiled by Matt Dempsey | Map created by Rachael Gleason



Source: Houston Chronicle

It is very difficult to stop the permitting or location of concrete batch plants in the region. In fact, TCEQ has never denied a concrete batch permit due to opposition by the community or local government. Houston is the largest city in America that lacks zoning power. Additionally, the Texas Supreme Court struck down a 2007 law that would have required city approval for concrete batch plants.

Attempts by community groups and environmentalists to persuade the TCEQ to regulate the cumulative impact of the plants have been unsuccessful. In fact, the TCEQ actually made it

more difficult to oppose a concrete batch plant permit by reducing the public comment period from 45 days to 30 days.

The aggregate result of these policies means that, in Houston, there are few tools to stop the growth of concrete batch plants in residential areas. Even after they are built, these batch plants do not have on-site monitoring.

Most municipalities control the location of concrete batch plants through land use regulations. Since Houston does not have land use regulations, the City's ability to restrict the location of these plants in residential areas is severely limited.

Policy changes are needed at the state level to give municipalities more power to regulate these facilities.

Sincerely,



Sylvester Turner
Mayor

