

**American Bird Conservancy • Artist Boat • Bayou City Waterkeeper • Defenders of Wildlife
Galveston Bay Foundation • Gulf Restoration Network • Houston Audubon
Houston Sierra Club • Lone Star Sierra Club • National Wildlife Federation
Save Buffalo Bayou • Surfrider Foundation Galveston • Surfrider Foundation South Texas
Surfrider Central Texas • Turtle Island Restoration Network**

Response to Coastal Barrier Alternative

Environmental and Conservation Groups Raise Concerns About Current USACE Plan

Together with conservation groups across the Greater Houston-Galveston region, we offer these comments and concerns to the US Army Corps of Engineers (USACE), General Land Office (GLO), and the decision-makers who support the currently proposed Coastal Spine across Galveston Island, Bolivar Peninsula, and Bolivar Roads.

In October 2018, the Army Corps of Engineers released its Draft Integrated Feasibility Report and Environmental Impact Statement (DIFR-EIS) for the Coastal Texas Protection and Restoration Study, outlining its selected plan for the Galveston-Bolivar Coastal Barrier project. The selected Coastal Barrier Alternative—previously designated Alternative A during the alternatives analysis phase—primarily focuses on hard infrastructure consisting of floodwalls, floodgates, and surge barrier gates along and between Galveston Island and Bolivar.

Throughout the scoping process, many organizations have consistently raised concerns about the impacts to the ecology and overall health of Galveston Bay and its surrounding communities. Unfortunately, the Coastal Study and DIFR-EIS have not adequately addressed these issues. Our collective concerns are premised on the following:

The information provided in the Feasibility Report and Environmental Impact Statement is insufficient to enable thorough and informed comments. In particular:

- No clear indication of where the various structures will be placed, which seriously affects current residents and business-owners; and,
- Few details on the overall impacts that affect commercial/recreational fisheries and coastal wildlife habitat; and,
- Concerns regarding the accuracy of ecosystem modeling and the subsequent impacts to people, property, and the environment.

Representatives from the USACE and GLO have consistently indicated that the Coastal Barrier Alternative placement is “just a line on the map.” Recently a representative of the USACE stated that the Coastal Barrier is “only at 10% design.” (*Galveston Daily News*, Dec. 4, 2018) Knowing the placement and understanding the full scope of the project are vital for evaluating the impacts to people, property, and the environment, as well as the effectiveness of the proposed Alternative. Without this information it is impossible for the public to complete an assessment of the Study and DEIS.

Throughout this process, groups have asked the USACE to consider practicable non-structural solutions such as preservation and enhancement of prairies, riparian areas, barrier islands, and wetlands, buyouts/strategic withdrawal from areas that cannot be adequately protected, and appropriate land-use regulation to implement those concepts. A multi-tiered approach that focuses on these kinds of measures can be incrementally applied in the short-term to help provide protection for our communities now—and reduce major harm to the natural resources on which our region is dependent.

We believe that any alternative, or combination of alternatives, must be fully analyzed for environmental impacts as well as cost-benefit ratios – and that in evaluating the alternatives, we must consider the long-term future effectiveness of our selected remedy. Given rapidly changing climatic conditions and their effect on the coastal area, we believe that the projection should extend to 2100.

We believe that the following principles must be applied in formulating a successful flood and storm surge protection strategy:

1. Public, Private and Corporate Responsibility

- An industrial facility should provide its own first line of defense. All industrial facilities in the Greater Houston area should be required to protect themselves from anticipated storm surge and flood waters. This will further protect the general public from releases of hazardous materials caused by flooding.
- Our political subdivisions must pass regulations that prevent development in floodways and floodplains. This will keep people out of harm's way. To prevent contamination of surface water and disruption of essential services, authorities must not permit infrastructure, such as wastewater treatment plants or drinking water treatment plants, in the floodways and floodplains.
- Our development community must recognize that even a rare event, such as flooding from Hurricane Harvey, is an unacceptable disaster when thousands of people and billions of dollars in property have been deliberately placed in harm's way for profit.

2. Preserve and Restore Riparian Capacity, Open Space and Barrier Islands

- Conserve lands that provide more open space and flood capacity, by either the purchase of lands or private conservation easements. Our bayous, given sufficient floodplain, are our natural storm drains and detention systems. Preserving these areas also provides the important secondary benefit of recreational green space.
- Preserving the lands obtained through buyouts of flooded homes and other structures, such as riparian green space, will also increase the capacity of our natural floodways and floodplains. Banning redevelopment of these acquired lands will also contribute to keeping people out of harm's way.
- Preserving land on our barrier islands and along our Bayfront keeps people out of harm's way and provides a buffer zone to naturally absorb storm surge.

3. Minimize Building Dams, and Dikes and Elevating Roads

- Dams, dikes, and raised roadways should only be employed where nonstructural alternatives are not feasible to protect lives and critical infrastructure from storm surge and flooding.
- Any proposed dams, dikes or elevated roads must be assessed for their potential to exacerbate local and regional flooding, as well as beach/coastal erosion.
- These structural alternatives work against nature. These types of structures may also have the secondary effect of encouraging development in vulnerable areas, effectively moving people into harm's way.

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