

Air Alliance Houston
Bayou City Waterkeeper
The Coalition for Environment,
Equity, and Resilience
Galveston Bay Foundation

Healthy Gulf
Houston Audubon
National Wildlife Federation
Port Arthur Community Action
Network

Save Buffalo Bayou
Sierra Club, Houston Regional
Group and Lone Star Chapter
Turtle Island Restoration
Network

December 17, 2021

The Harris County Commissioners Court

Lina Hidalgo, County Judge
Rodney Ellis, County Commissioner, Precinct 1
Adrian Garcia, County Commissioner, Precinct 2
Tom Ramsey, County Commissioner, Precinct 3
Jack Cagle, County Commissioner, Precinct 4

Re: Agenda item 302 (The Ike Dike, Galveston Bay Park Plan, and other alternatives)

Dear County Judge Hidalgo and Commissioners Ellis, Garcia, Ramsey, and Cagle:

We represent organizations and communities working across the greater Houston region and along the Texas coast on a range of issues: land and species conservation, environmental justice, reducing air, land, and water pollution, climate resilience and disaster recovery, and affordable housing. We share concerns about the Ike Dike and Galveston Bay Park Plan, as well as the Gulf Coast Protection District. In this letter, we ask this Court to help forge a more resilient path forward, and promote equity, transparency, and public engagement, as our region evaluates options for protecting ourselves from future storms.

The two proposals—Ike Dike and Galveston Bay Park Plan—were discussed by the Court last Tuesday, in response to agenda item 302. Taking storm surge as their target, both proposals:

- do not offer protection from other key threats facing this region, including flooding;
- do not act with sufficient urgency and instead delay protection for two decades; and
- will potentially create environmental harms that have not yet been sufficiently studied.

We outline our concerns in greater detail below. We ask this Court to show support for implementing a broader range of strategies on a faster timeline. We also ask the Court to work to increase transparency and community participation within the activities of the Gulf Coast Protection District, charged with generating and managing funding for the projects selected.

1. Significant concerns have been raised about the Bolivar Roads Gate System

Harvey showed us that climate change is here, and action is needed now. For Harris County and the counties within this broader region, the Army Corps' proposal misses the mark for the reasons summarized in the next section. During the Commissioners Court's December 14 public meeting we were surprised to hear characterizations of both the Bolivar Roads Gate System

(more commonly referred to as the Ike Dike) and the creation of the Gulf Coast Protection District as having widespread support. This is not true.

The public submitted hundreds of comments to the U.S. Army Corps of Engineers' Coastal Texas Study, which proposes the Bolivar Roads Gate System. These comments raised serious concerns about the proposal's scope, efficacy, cost, environmental impacts, and impacts on communities already bearing an unfair share of environmental pollution. A recent set of comments submitted by 20 organizations and community leaders (including some of those submitting this letter) captures many of these concerns. See <https://drive.google.com/file/d/1vbdKro76hGQ7n7adkMpNIV9cafyR1pkQ/view?usp=sharing>.¹

2. *Despite asking Harris County to cover 85%² of local cost share, current plans will not deliver the protections needed by local residents*

The Ike Dike and Galveston Bay Park Plan similarly focus on a single threat to our region: storm surge. Neither proposal will protect communities at greatest risk of flooding or damage from high winds. Because both proposals are highly engineered and massive in scope, they both will cost billions upon billions of dollars to complete: The Ike Dike is projected to cost more than \$26 billion, plus \$131 million more in annual maintenance costs, which will be funded by local taxpayers; the Galveston Bay Park Plan, which has not been as thoroughly studied, likely underestimates costs by projecting the need for \$3-5 billion plus additional yet-to-be-identified maintenance costs. Both projects will take years, if not decades, to fully permit and build—the Ike Dike projects a completion date of 2043; the Park Plan relies on materials that will be available no sooner than 2031, according to the County's analysis. Both projects will dramatically alter the ecology of Galveston Bay, and these impacts have not been adequately studied or accounted for.

The Galveston Bay Park Plan anticipates some of these concerns by promising faster execution and offering additional benefits beyond storm surge protection. But its dramatic scope—a 25-foot high island cutting across several miles of open water from Baytown to Texas City—and the permanent environmental alteration it proposes for Galveston Bay show that the projected 18-month permitting timeline and decade-long construction timeline are both unrealistic.

Our region does not need solutions twenty years from now. Our region needs protection now. As members of this Court acknowledged on Tuesday, we must be proactive.

3. *Harris County can chart a new path forward for our region*

We invite Harris County to consider a third option. A plan that takes a more holistic view of the risks posed: not just storm surge, but also flooding, high winds, climate change, and ongoing inequities in infrastructure and funding. One that can be implemented on a faster timeline,

¹ The concerns raised in the full set of comments are summarized in the 307-page [Appendix M-3 to the Final Environmental Impact Statement](#) and discussed in greater detail below.

² This number is based on testimony by David Berry at the 12/14 Commissioners Court meeting.

prioritizes communities most affected by flooding and other climate risks, and strengthens our natural systems. We must act now and take immediate steps to protect our communities, rather than delaying investments in climate resilience for another generation.

With leadership from Harris County, this region must commit to an array of localized non-structural options that, with funding, could begin to be implemented now:

- safeguarding the most vulnerable homes to withstand high winds, heavy rains, and storm surge, on a rapid timeline;
- where these safeguards are not feasible, helping frontline communities move to safer areas in a proactive, coordinated, equitable, and sustainable way;
- strengthening and enforcing floodplain and building regulations, with an emphasis on restricting any further development within the 100-year floodplain or along the coast;
- preserving natural flood protections, like wetlands and prairies within the 100-year floodplain and along the coast; and
- assessing infrastructure within the Houston Ship Channel, Texas City refining complexes, and the Bayport Industrial District, and spearheading a plan to weather-proof vulnerable infrastructure in a way that imposes a fair share of the costs on industrial operators.

Taking the time to evaluate and plan for the implementation of these strategies could reduce the footprint and cost of both the Galveston Bay Park Plan and the Ike Dike—if not altogether remove the need for either project.

4. Transparency and more robust community engagement are needed within the Gulf Coast Protection District

Last, we are concerned about the lack of transparency in the Gulf Coast Protection District's activities to date. Many of us have been monitoring and actively participating in public processes relating to these projects and the Coastal Texas Study for years. Communities across the region have relied on our participation to learn more about the Study and the projects it proposes. Troublingly, it was not until this week, when their website finally went live, that we found out that the District has been meeting since August. According to representatives at the Bay Area Houston Economic Partnership, notice for the public meetings had been posted on the door of their office in Nassau Bay, and nowhere else. Limiting public notice to a physical copy posted on the door of a building does not provide sufficient notice for a five-county effort which will potentially levy billions of dollars on local residents in the years to come. The communities most affected by flooding and other disaster-related risks deserve more, and the Texas Open Meetings Act demands more. See Tex. Gov't Code § 551.053.

Given the role the District will play in committing this County's residents to billions, their discussions must be transparent and provide robust options for public input. In addition to adhering to requirements under the the Texas Open Meetings Act, we strongly urge the District to make better use of their website and technology and have virtual options for members of the public to attend. We ask the County to help us hold the District accountable in this respect.

In the new year, we and our partners would welcome the opportunity to meet with members of this Court to discuss opportunities for the County to forge a new path forward. We are strongly committed to working together to protect our region and imagine a better future for all of us who live on this special stretch of the Texas coast. Kristen Schlemmer is our point of contact and may be reached at kristen@bayoucitywaterkeeper.org. We look forward to discussing this further with each of you or your staff.

Sincerely,

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