

To: CRTF@cjo.hctx.net

From: Susan Chadwick, President and Executive director, [Save Buffalo Bayou](#), a nonprofit environmental advocacy organization

Re: Comments on the proposed Harris County Community Resilience Task Force

Save Buffalo Bayou wholeheartedly endorses and supports the comments of Evelyn Merz of the Houston Sierra Club.

In addition, we make the following observations about the draft bylaws for the new task force.

Cost Benefit

The most pressing issue regarding the Harris County Flood Control District is the need for an overall assessment of its performance and whether its policies, practices, and methods are effective and meet modern standards nationally and worldwide. The issue of cost and benefit has been much discussed but not in regard to whether the costly methods used by the district result in the most benefit—or on balance any benefit—to the community.

In particular, the District continues to raze trees and vegetation and bulldoze streams in pursuit of its [costly and outdated “deepening and widening” strategy](#). It continues to harden banks with sheet pile and concrete when its own technical manual notes that this increases flooding and erosion. ([p. 21](#))

The District relies on a discredited, unscientific “natural stable channel design” to justify its destruction of our few remaining forested streams. (See [here](#) and [here](#) and [here](#).) The District routinely violates its legal responsibility for the conservation of forests. (See [p. 1](#) and [p. 35](#))

As an agency whose main function seems to be handing out public funds to private engineering companies, the District is pressured to ignore more beneficial and less costly nature-based flood risk reduction methods in favor of more expensive and questionable engineering projects. In part this is driven by the [need to “do projects.”](#)

Furthermore, its [stream maintenance practices are destructive and outdated](#). And more.

Recommendations. More Green, Less Gray as Established Policy.

We make the following recommendations in addition to the excellent suggestions made by the Houston Sierra Club:

Harris County commissioners should adopt a policy mandating the use of green or nature-based flood risk reduction methods over gray, engineered methods whenever possible. This would

provide the District with the support needed to institute truly cost-beneficial practices. [Edit: The [Harris Thrives resolution](#) passed by Commissioners Court in August 2019 instructed the Harris County Flood Control District to “emphasize an approach that respects, reclaims, and restores floodplains; preserves undeveloped prairies and forests that detain stormwater; and encourages the use of nature-based solutions, natural infrastructure, and cutting-edge technological methods where possible in public and private projects ...”]

No one who does business with or has any past or present financial connection to the District or Harris or surrounding counties should be appointed to the task force.

Scientific expertise rather than economic interest should be a priority qualification for membership on the task force.

The task force as a first priority should establish a committee to assess the policy and practice of the District in comparison to current standards nationally and worldwide.

Definitions

It is important to make sure that the public understands the different responsibilities of the county versus the city and other entities for drainage infrastructure.

The bylaws need to define “resilience.”

The bylaws need to define “infrastructure.”