U.S. Army Corps of Engineers, Galveston District

Attn: Ms. Jennifer Morgan, Environmental Compliance Branch

Regional Planning & Environment Center

P.O. Box 1229

Galveston, Texas 77553-1229

Re: Coastal Texas Protection & Restoration Feasibility Study DIFR-EIS

Dear Ms. Morgan,

I am writing to provide the following comments on the Coastal Texas Protection and Restoration Feasibility Study (Coastal Texas Study) Draft Integrated Feasibility Report and Environmental Impact Statement (DIFR-EIS).

I do not believe that the Corps DIFR-EIS has met National Environmental Policy Act (NEPA) EIS requirements for (1) a full and fair discussion of significant environmental impacts nor (2) has it informed decision makers and the public of reasonable alternatives which would avoid or minimize adverse impacts. I base this on the following reasons:

1. The Corps has not provided an adequate analysis of the impacts to water quality and of the direct and indirect environmental impacts to habitat and the ecologically and economically critical living species of Galveston Bay, most notably to its oysters, finfish, shrimp and crab species.
2. There is uncertainty in the Tentatively Selected Plan (TSP) levee/floodwall alignment and the types of Bolivar Roads environmental gate structures to be utilized.
3. Related to item 2, the cost-benefit analysis is based on the TSP with an alignment that the Corps has indicated may change and environmental gate structures that may change, thus rendering the current cost-benefit analysis inaccurate.
4. The list of protected lands that may be impacted by the tentatively selected plan is incomplete, including the omission of lands owned and operated by the Galveston Bay Foundation and Houston Audubon Society.
5. The Corps incorrectly screened out the Severe Storm Prediction, Education and Evacuation from Disasters Center (SSPEED) Mid-Bay management measure (G-3-SSPEED) in the Planning Objective Screening Process.

For these reasons, I cannot support any structural CSRM alternatives at this time.

I request that the Corps complete a Supplemental DIFR-EIS that addresses the items above, most notably an adequate analysis of environmental impacts, for public review and comment. The DIFR-EIS should provide more certainty in the alternatives/alignments to be considered; all such alternatives should include a complete cost-benefit analysis and a complete list of protected lands that may be directly or indirectly impacted. The SSPEED Mid-Bay management measure should be examined again in the supplemental DEIS, ensuring that it has been properly screened against plan objectives.

The Corps should allow at least 120 days for public review of the supplemental DEIS and once again conduct public meetings to best inform the public of the TSP alignment and environmental impacts.

I do support the ecosystem restoration components of the Upper Texas Coast TSP. However, I would like to see an expanded use of oyster reef creation/restoration, beach/dune nourishment, and where appropriate, the expanded use of wetland creation/restoration.

Thank you for considering these comments.

Sincerely,