



SIERRA CLUB

LONE STAR CHAPTER

To: Honorable members of the House and Senate Committee on The July 2025 Flooding Events, General Investigating

From: Cyrus Reed, Legislative and Conservation Director, Sierra Club, cyrus.reed@sierraclub.org, 512-888-9411

Dear Chairman and members of the Committee,

The Sierra Club supported SB 1, HB 1 and SB 3 last special session, but was disappointed that more issues were not addressed to better prepare the state to prevent floods and have better disaster preparedness. We were very disappointed with the failure of bills like HB 3 and SB 2 to pass and hope they will be addressed in the regular session. Our hearts of course go out to the thousands of Texans impacted by the devastating floods, but of course especially to the families impacted in Kerr County and other areas of Texas.

While the Sierra Club supported HB 1 and SB 1 and SB 3 from the special session, we would continue to encourage this Committee and the Legislature to prioritize other *prevention and resilience measures*. The Committee should work to ensure that flood prevention remains at the forefront of the state's disaster planning. [The State Flood Plan](#), developed through extensive public engagement, already outlines a number of preventative measures such as developing new standards for infrastructure and buildings as part of flood management, adopting FEMA's high hazard flood control standards and encouraging the development of even higher standards in communities with high flood risks, granting counties the authority to collect drainage fees to fund local flood mitigation infrastructure (see HB 108 by Zwiener and SB 45 by Eckhardt in special session), allowing counties authority over impervious cover (HB 117 by Zwiener in special session) the adoption and enforcement of modern building codes in unincorporated areas (see HB 225 by Reynolds in special session) - Texas is still using a minimum 2006 code in our counties and 2012 in our cities - and the recommendation to use the best available science, like Atlas 15 and climate projections, to guide the planning process going forward. Investments

made before a disaster are exponentially more cost-effective than those made in the wake of destruction. Finally, we believe the Legislature should consider a land buyout and floodplain conservation easement program.

In addition, we should consider directing the TWDB to establish some statewide floodplain management standards and guidance. Our state agencies should be making recommendations and even required standards that local entities could adopt to better protect infrastructure and buildings located in the floodplains. We believe that TWDB or another state agency should adopt either required or recommended floodplain management and drainage standards for infrastructure and buildings that may be adopted by municipalities and counties to provide increased flood protection.

We recognize the bill that passed included a general provision against the licensing of campgrounds with cabins in floodplains, we believed that more specific standards could have been adopted, which could include:

- requiring a minimum finished first floor elevation of all new development and substantial improvements within 100-year floodplain;
- adopting smaller allowances for increases to the base flood elevation to limit negative impacts and the potential cumulative impacts of new developments, including those outside of a floodplain; and
- adopting the flood protection aspects of the 2018, 2021 or 2024 version of the International Residential Code or International Building Code for all new development and substantial improvements within a 100-year floodplain.

We appreciate the opportunity to comment on the ongoing investigation.