SIERRA CLUB
LONE STAR CHAPTER

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To: The Honorable Will Metcalf, Chair
The Honorable Lulu Flores, Vice-Chair
Honorable Members, House Committee on Culture, Recreation and Tourism

From: Cyrus Reed, Legislative and Conservation Director, Lone Star Chapter, Sierra Club, cyrus.reed@sierraclub.org, 512-888-9411
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The Lone Star Chapter of the Sierra Club appreciates the opportunity to make brief comments on the first two charges being taken up by the Committee on Culture, Recreation and Tourism. Texas's oyster industry and population is an important part of our coastal economy, but is also a harbinger of the health and ecology of our vast system of bays and estuaries. Oysters, being a keystone species, play a vital role in the health of the Gulf, and form a part of the ecology that cleans our water while providing nurseries for many economically valuable fish species.

First, in terms of oyster buyback programs, the Sierra Club is supportive. We must balance the real needs of the oyster industry with a sustainable yield, and a buy back program is a market solution to balance development and population protection. For that reason, Sierra Club recently attended the LBB hearing on Texas Parks and Wildlife Department's proposed 28-29 LAR and supported Exceptional Item Request No. 6.

Oyster mariculture shows promise as an ecologically sustainable industry, but it cannot replace the ecological services of natural oyster reefs, which help turn many square miles of muddy coastal substrate into healthy, diverse, and productive aquatic ecosystems.

Sierra Club supports EIR 8: ACCESS TO & CONSERVATION OF FISHERIES AND WILDLIFE RESOURCES. The $5 million request includes a request for $1.2 million from GRD 9, Saltwater Fish Stamp, to continue the acceleration of the oyster license buyback program. The goal of the program is to allow for a more stable, sustainable, economically viable oyster ecosystem. This program was established in 2017 as a way to stabilize fishing efforts & support healthy fisheries stock by purchasing and retiring commercial licenses from willing license holders. The SIERRA CLUB Supports this program and this request.

In terms of the oyster mariculture economy, the health of the oyster is dependent on water quality, and assuring that the bays and estuaries have the necessary inflows, and that the gradient salinity of our systems stay within a normal historic range. Oysters are extremely sensitive to salinity levels. Too much salt can devastate oyster populations (as well as other wildlife), too little can similarly impact their health. Along those lines we recommend the following:

1. Texas, through the Texas Commission on Environmental Quality or legislative action, should update their 2027 Water Quality Standards to include salinity gradient standards - narrative or numeric - to better protect bays and estuaries salinity levels, and therefore have tighter controls on wastewater discharge permits from industrial projects, including desalination projects. We already have the data; we just need to establish and map the standards. Without standards, monitoring salinity data provides us little benefit;
2. Texas should adopt strong entrapment and entrainment standards for any diversion of waters from bays and estuaries;
3. Invest in coastal ecology through the General Land Office's coastal management plan and monies from the RESTORE Act to better protect wetlands;
4. Update adaptive management plans for environmental inflows by investing in the studies and process through the TWDB; Sierra Club believes an investment of $1 million per year could help update our inflow studies and standards on environmental flows to better protect freshwater flows.
5. Consider a prohibition on direct discharge of brine from desalination plants and diversion of waters for desalination plants that are closer than three miles from the barrier islands that could disrupt established salinity standards; or
6. At the very least, prohibit public funding of any desalination plant that would discharge directly into our bays and estuaries.