

## LOOK UPSTREAM

JUNE 2008

### What is NAI?

The Association of State Floodplain Managers published an article stating their position that rising flood losses can be remedied by adopting a broad principle of “no adverse impact” (or NAI) floodplain management.<sup>1</sup> The information in this month’s Look Upstream Newsletter is excerpted from this article which states, “Under an NAI framework, the action of one property owner within a watershed is not allowed to adversely affect the flood risks for other properties, as measured by flood stages, flood velocities, flood flows, and the potential for erosion or sedimentation, unless community-approved mitigation occurs.” It goes on to cite an article earlier in the year in the June 13, 2003 Houston Chronicle by Kevin Shanley, then President of the Bayou Preservation Association, in which several NAI concepts are supported.

...Effective watershed management has three key components: risk management; public policy; and engineering solutions. Effective watershed management can provide residents with a level of safety, security and assurance of protection from known flood hazards that they do not enjoy today. This should be one of the highest priorities of any municipality or regional government ...Properly executed, watershed management is a wise investment of community resources to reduce the risk of flood-induced damages while creating other sorely needed benefits: recreation opportunities, water quality, improvements and urban habitat.

Recommendations: ...Map all flood hazards in the city’s watersheds, not just those that are currently shown in the [Flood Insurance Rate Maps] ...Map the floodplain as it will be when the watershed is fully developed ...Adopt the “no adverse impact” standards being recommended by the Association

of State Floodplain Managers ...Establish a zero tolerance policy for increased runoff from any public or private project; there is not a bayou, stream, or storm water culvert in the city that can carry additional storm water flows ...Establish an immediate zero-tolerance policy for any loss of floodplain storage capacity, regardless of the size of the project ...Create floodplain and storage mitigation banks to compensate for the thousands of small projects that the city of Houston (and other municipalities) grants permits for that are not otherwise required to provide on site mitigation for increased runoff or floodplain fill. ...Change from the “better-drainage” model of storm water planning and engineering (which just increases flows into bayous and worsens flooding) to a “watershed-management” model of storm water planning and engineering, which controls and reduces the amount of water leaving a watershed.

*For the full article, “Two years after Allison, Houston has reached a watershed moment”, go to the Chronicle website at <http://www.chron.com/disp/story.mpl/storm2001/1939305.html>*

Five years after this article was published, it is worthy to note that key government agencies empowered to undertake some, but not all, of the actions envisioned in the cited article have implemented planning processes which CCFCC supports as being beneficial in achieving the NAI goals. Mayor Bill

White in 2004 created a new City of Houston Council Committee on Flooding and Drainage Issues responsible for related regulatory and permitting functions affecting flooding. Later in the year, Harris County Commissioners Court approved and funded an undertaking by a partnership of Harris County, Harris County Flood Control District, TxDOT and the City of Houston working in concert to accomplish an “Urban Stormwater Management Study” chartered to bring about a better understanding of flood issues. The challenging TSARP remapping of Harris County floodplains, completed last June by HCFCD / FEMA triggered the beginning of updating HCFCD’s Watershed Master Plans for all 22 Harris County watersheds; many of which are believed to have never had a master plan developed. It was announced these would provide a vision for growth requirement, proposals for regionalization of flood damage reduction measures, guidelines for future development and more. These and others are involving citizen, state, municipal, non-profit community groups and other players in partnerships addressing the problems we face and the solutions we need to create.

More information on undertakings to achieve the No Adverse Impact (NAI) principle promulgated by the Association of State Floodplain Managers will be reported in future news articles.

*Look Upstream* articles are written by the Cypress Creek Flood Control Coalition (CCFCC) as a public service. Visit website [www.ccfcc.org](http://www.ccfcc.org) for more information on needed flood protection, environmental preservation, flood insurance and membership. or e-mail to [floodalliance@ccfcc.org](mailto:floodalliance@ccfcc.org).

<sup>1</sup> “NO ADVERSE IMPACT - PROGRESS IS BEING REALIZED”, NEWS & VIEWS, Association of State Floodplain Managers, Inc. Vol. 15, No. 4, August 2003

