

VOLUME 2  
Appendix 10-B to 10-C

# REGION 5 NECHES 2023 REGIONAL FLOOD PLAN

JULY 2023

DRAFT

PREPARED FOR THE  
REGION 5 NECHES FLOOD PLANNING GROUP

**APPENDIX 10-B  
RESPONSE TO COMMENTS RECEIVED ON DRAFT PLAN**



November 30, 2022

Sally Votteler  
4427 Pomona Rd  
Dallas, TX 75209

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Votteler,

The Neches Regional Flood Planning Group (NRFP) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFP appreciates your input in the public process associated with development of the 2023 RFP.

The NRFP agrees that nature-based solutions (NBSs) are important to consider when evaluating flood mitigation and management measures. The promotion of nature-based projects is covered in various sections of the Draft RFP. Some of these examples include:

- Incorporation of nature-based practices and floodplain preservation as a stated goal.
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Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

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*Public*

Brian McDougal  
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Robb Starr  
*Water Utilities*



November 30, 2022

Sandra Breakfield  
5610 Cliff Haven Dr  
Dallas, TX 75236

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Breakfield,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Sandra La Mont  
16 Enchanted Oaks St  
Orange, TX 77630

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. La Mont,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Sandra Ramos  
 1160 N 7th St  
 Beaumont, TX 77702

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Ramos,

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November 30, 2022

Sara Wood  
10718 Opal Ridge Dr  
Houston, TX 77095

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Wood,

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November 30, 2022

Sarah Sudheer  
 10500 Salt Block Cir  
 Austin, TX 78750

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Sudheer,

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November 30, 2022

Sharon Frank  
 2006 Pheasant Dr  
 Lewisville, TX 75077

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Frank,

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November 30, 2022

Solianni Cantu  
2390 Santa Maria Ln  
Corpus Christi, TX 78415

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Cantu,

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November 30, 2022

Stacey Benham  
 110 Quarry Point  
 New Braunfels, TX 78132

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Benham,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Stacey Francis  
4606 Everest Lane  
Austin, Texas 78727

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

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November 30, 2022

Stacy Moranville  
7445 Jubil Ln SE  
Salem, OR 97317

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

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November 30, 2022

Stephanie Cormier  
4900 Pear Ridge Dr  
Dallas, TX 75287

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Cormier,

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November 30, 2022

Stephen Englander  
 2308 Westrock Dr  
 Austin, TX 78704

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

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November 30, 2022

Susan Betourne  
 18902 Rustling Ridge Dr  
 Tomball, TX 77377

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Judge Jeff Branick  
*Chairman*  
*Counties*

Jospeh Majdalani, Ph.D., P.E.  
*Vice Chairman*  
*Water Districts*

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*Water Utilities*





November 30, 2022

Tanya Teneyuque  
2390 Bastrop St  
Houston, TX 77004

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Teneyuque,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

The NRFPG agrees that nature-based solutions (NBSs) are important to consider when evaluating flood mitigation and management measures. The promotion of nature-based projects is covered in various sections of the Draft RFP. Some of these examples include:

- Incorporation of nature-based practices and floodplain preservation as a stated goal.
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Thank you again for providing your comments on the Draft RFP.

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November 30, 2022

Tara Potts  
11205 Limoncillo Ct  
Austin, TX 78750

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Potts,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

The NRFPG agrees that nature-based solutions (NBSs) are important to consider when evaluating flood mitigation and management measures. The promotion of nature-based projects is covered in various sections of the Draft RFP. Some of these examples include:

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November 30, 2022

Taryn Geer  
 2721 Ashley Meadow  
 Schertz, TX 78154

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Geer,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Thomas Haines  
2608 N Leighton Cir  
Wichita Falls, TX 76309

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Haines,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

The NRFPG agrees that nature-based solutions (NBSs) are important to consider when evaluating flood mitigation and management measures. The promotion of nature-based projects is covered in various sections of the Draft RFP. Some of these examples include:

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November 30, 2022

Thomas Nieland  
415 Oakwood Dr  
Alamo, TX 78516

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Nieland,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Tina Weber  
1510 Garrison St  
Arlington, TX 76018

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Weber,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Tracey Bonner  
1707 Castle Rd  
Arlington, TX 76014

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Bonner,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

The NRFPG agrees that nature-based solutions (NBSs) are important to consider when evaluating flood mitigation and management measures. The promotion of nature-based projects is covered in various sections of the Draft RFP. Some of these examples include:

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*Water Utilities*



November 30, 2022

Trigg Wright  
 19206 Holly Shade Ct  
 Spring, TX 77379

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Wright,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Valerie Howell  
3633 Hendrick Dr  
Plano, TX 75074

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Howell,

The Neches Regional Flood Planning Group (NRFP) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFP appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Victoria Shih  
 7617 Brodick Way  
 Plano, TX 75025

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Shih,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

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November 30, 2022

Virginia Boucher  
 3701 Candleknoll Cir  
 San Antonio, TX 78244

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Boucher,

The Neches Regional Flood Planning Group (NRFP) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFP appreciates your input in the public process associated with development of the 2023 RFP.

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## RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN

### Comments From TWDB

Project:	Region 5 - Neches Regional Flood Plan
Document:	Draft RFP TWDB Comment Responses
Review Date:	12/08/22

ID	Comment Level	SOW Task	Comment	Response/Resolution
1	Level 1	General	Please ensure that all "Submittal requirements" identified in each of the Exhibit C Guidance document sections are submitted in the final flood plan.	FNI will review the submittal requirements again and adjust as needed to ensure all items are in the plan.
2	Level 1	General	For all mapbooks with inset maps, please also include a region-wide map displaying the data (e.g. Maps 4,6,8,10,11, and 12)	<p>Map 4 has been updated to include an overview map which displays existing condition flood hazard for the entire region.</p> <p>Map 6 has been updated to include an overview map which displays existing condition flood exposure for the entire region.</p> <p>Map 7B has been updated to include an overview map which displays existing condition vulnerability for the entire region.</p> <p>Map 8 has been updated to include an overview map which displays future condition flood hazard for the entire region.</p> <p>Map 10 has been updated to include an overview map which displays extent of increase for existing condition flood hazard for the entire region.</p> <p>Map 11 has been updated to include an overview map which displays future flood exposure for the entire region.</p> <p>Map 12B has been updated to include an overview map which displays future condition vulnerability for the entire region.</p>
3a	Level 1	Task 1	Section 1.A.4. states that there are 79 cities within the region, however, Section 1.A.1. states that there are 33 incorporated cities. Please review and reconcile as necessary.	New text to be added in Chapter 1: <b>"The region contains all or portions of 24 counties as well as 79 municipalities."</b>
3b	Level 1	Task 1	Section 1.A.4. states that 66 municipalities participate in the NFIP, however, Section 1.A.7.a. states that 35 cities and counties utilize ordinances. If a city or county participates in the NFIP, then it must have appropriate ordinances in place. Please review and reconcile as necessary	New text to be added in Chapter 1: <b>"In Region 5, 66 municipalities and 24 counties have been determined to utilize adopted ordinances to regulate floodplain development by virtue of their participation in the NFIP."</b>
4	Level 1	Task 1	Entities GIS Feature Class, Entities: It appears that some entities crossing regional boundaries do not start with "00" as required. For entities crossing region boundaries, this is expected to start with "00" and 'RFPG_NAME' should be left NULL. For additional entities crossing region boundaries, an ID should be requested from TWDB. ENTITY_IDs should match those provided by TWDB. Regions may create their own IDs for	Entities GIS feature class edited to comply with TWDB comment and guidance.
5	Level 1	Task 1	Existing Projects, Text: Table 1-22 does not appear to include the expected year of completion. Please include the estimated year of completion for existing projects listed in Table 1-22, or include an appropriate table reference in the text of Chapter 1 to where this information is located in Exhibit C Table 2 [31 TAC §361.32].	New text in Chapter 1: <b>"Table 1-22 details the existing structural and non-structural flood mitigation projects identified in the current planning cycle for the Neches region. Additional information on each project, such as the anticipated year of completion, can be found in Table 2 in Appendix 1-C."</b>

## RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN

### Comments From TWDB

<b>Project:</b>	Region 5 - Neches Regional Flood Plan
<b>Document:</b>	Draft RFP TWDB Comment Responses
<b>Review Date:</b>	12/08/22

ID	Comment Level	SOW Task	Comment	Response/Resolution
6a	Level 1	Task 1	(ExFldProjs) It appears that some fields contain invalid entries, including 'COST' and 'COMP_YR'. Please confirm that all NULL values utilized represent either "not applicable" or "unknown". Please ensure all required fields are populated with valid entries per Exhibit D Table 8 .	ExFldProjs GIS feature class edited to comply with TWDB comment and guidance.
6b	Level 1	Task 1	(ExFldProjs) Please refrain from using numeric placeholders (such as '999999') in numeric fields such as 'COST', 'COMP_YR', and 'EXHAZ_ID' as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.32].	ExFldProjs GIS feature class edited to comply with TWDB comment and guidance.
7	Level 1	Task 2A	Existing Condition Flood Exposure (Exhibit C Table 3): The day and night populations in Table 3 do not appear to match those in the ExFldExpAll feature class. Please ensure the population count in Table 3 is the maximum of day and night population. "Population (daytime)" and "Population (nighttime)" columns may be added to the left of "Population" in Table 3 to facilitate this check. Please review and Model Coverage, Text: Existing model coverage within the Flood Planning Region is only discussed relative to models used in FMPs. If more than 3 models exist within the Flood Planning Region, please include a specific, albeit brief, summary in Chapter 2 which summarizes H&H model availability across the region (not only those used in FMPs) [31 TAC §361.33(b)(2)].	The methodology behind the population calculations has been re-worked following clarification and guidance from TWDB. The highest daytime or nighttime population for each county was taken as the population to be used for the county.
8	Level 1	Task 2A	Existing Floodplain Management Practices (Exhibit C Table 6): The count of entities in Table 3-1 is 107, however, Table 6 appears to list 103 entities. Please ensure entries in Table 6 match chapter summary tables and the ExFpMp table [31 TAC §361.35 & Exhibit C 2.3.A].	New text in Chapter 2: <b>"Existing model coverage not tied to those used to generate NFHL data are summarized in Table 2.2. These models were created using a variety of different software and are detailed in the table. It is important to note that not all the models included were utilized in the construction of the existing conditions flood hazard layer."</b>
9	Level 1	Task 3A	(ExFpMP) Please review and confirm entities listed as having flood-related authority. It is not clear that all entities listed have flood-related authority.	Edits made to Table 3-1, Table 6, and the ExFpMP GIS table to ensure consistency between all three tables. Notable additions include Harris County, Angelina and Neches River Authority, and the Trinity River Authority of Texas.
10a	Level 1	Task 3A	(ExFpMP) It appears that some fields contain invalid entries, including 'LEV_ENFR'. Please ensure all required fields are populated with valid entries per Exhibit D Table 20 [31 TAC §361.35 & Exhibit D 3.7].	Edits made to Table 3-1, Table 6, and the ExFpMP GIS table to ensure consistency between all three tables. Notable additions include Harris County, Angelina and Neches River Authority, and the Trinity River Authority of Texas.
10b	Level 1	Task 3A	Flood Management Evaluations (FME) Map (Exhibit C Map 16): Please indicate on the map whether the identified FME area is associated with a previously studied area that requires an update or if the identified study area does not have any existing or anticipated flood mapping, models, etc., and therefore requires an initial study [31 TAC §361.38(m) & Exhibit C 2.4.B].	ExFpMP GIS table edited to comply with TWDB comment and guidance.
11	Level 1	Task 4B	Flood Mitigation Projects (FMP) (Text, Exhibit C Tables 13 & 16, FMP, FMP_Details, FMP_HazPost): It appears that there are inconsistencies in the cost listed in the Chapter 5 Table 5-2, Exhibit C tables, and the geodatabase. For example, FMP_ID 053000003 in Chapter 5 Table 5-2, Exhibit C Tables 13, 16, and the Project Details excel files all list a project cost of \$39,570,866 while the FMP feature class and FMP_Details table	Map 16 edited to delineate which FMEs are associated with previously studied areas or if the area does not have any existing or anticipating flood mapping or models.
12	Level 1	Task 4B		FMP GIS Feature Class and FMP_Details GIS Table to adjust cost to end in 866 to reflect what was listed on the FEMA BRIC application.

## RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN

### Comments From TWDB

<b>Project:</b>	Region 5 - Neches Regional Flood Plan
<b>Document:</b>	Draft RFP TWDB Comment Responses
<b>Review Date:</b>	12/08/22

ID	Comment Level	SOW Task	Comment	Response/Resolution
13	Level 1	Task 5	Flood Management Evaluation (FME) Recommendations Map (Exhibit C Map 19): Please indicate on the map whether the identified FME area is associated with a previously studied area that requires an update or if the identified study area does not have any existing or anticipated flood mapping, models, etc., and therefore requires an initial study [31 TAC §361.39 & Exhibit D 3.10].	Map 19 edited to delineate which FMEs are associated with previously studied areas or if the area does not have any existing or anticipating flood mapping or models.
14	Level 1	Task 5	Flood Mitigation Project (FMP) Recommendations: Each recommended FMP must be accompanied with an associated model or supporting documentation to show no negative impact. Please confirm that this was done and provide reference to supporting materials. As per the draft report (page 4-36), "For structural FMPs and FMSs, signed and sealed reports were checked for certified statements that the associated project	Additional documentation has been acquired to certify no adverse impact. Technical Memorandums obtained for both the Bayou Din and Orange County CSRM FMPs have been added to Appendix 5-E. Text in Chapter 5 has been added to specifically call out Appendix 5-E as possessing evidence of no adverse impact for each FMP. A new table was also added to summarize what was used to ascertain no adverse impact for each FMP.
15	Level 1	Task 5	Flood Mitigation Project (FMP) Recommendations GIS Feature Class, FMP_Details: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as 'REMSTRUC500' as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please ensure valid entries for all required fields per Exhibit D Table 24 [31 TAC §361.38(c-e)].	FMP GIS feature class edited to comply with TWDB comment and guidance.
16	Level 2	General	To better align with our agency's preferred nomenclature, please consider using the name, "Cursory Floodplain Data" instead of "Fathom" or Cursory Fathom Data" throughout the regional flood plan.	All instances of "Fathom" or "Cursory Fathom Data" replaced with "Cursory Floodplain Data" throughout the plan.
17a	Level 2	Task 1	Please consider providing a description of how Low Water Crossings were identified within the text of Chapter 1.	New text in Chapter 2: "Information on Low Water Crossings in the region was taken from data collected by the Texas Natural Resources Information System (TNRIS). A survey was sent out to stakeholders in the region that requested information on additional low water crossings that may have not been accounted for in TNRIS's data, but no additional LWCs were acquired from the survey."
17b	Level 2	Task 1	Please consider including the full list of entities with flood related authority as an appendix.	New text in Chapter 1: "This table includes all entities within the region that have been identified as having flood-related authority, regardless of their current participation status in the NFIP."
17c	Level 2	Task 1	Please consider adding more detailed region-specific analysis regarding farming, ranching, and natural resources most impacted by flooding under Section 1.A.6.	Corresponding sections in Chapter 1 have been edited to further detail impacts floods may have on farming and ranching operations within the region.
18	Level 2	Task 1	(Entities) Please consider including the FEMA-assigned community number (6-digit with the first two being "48" for Texas) or CID for entities.	Entities GIS feature class edited to comply with TWDB comment and guidance.
19	Level 2	Task 1	(Watersheds) Please consider linking this feature class to any relevant FME, FMS, or FMP when appropriate by populating the associated ID fields.	Watershed GIS feature class edited to comply with TWDB comment and guidance.

## RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN

### Comments From TWDB

<b>Project:</b>	Region 5 - Neches Regional Flood Plan
<b>Document:</b>	Draft RFP TWDB Comment Responses
<b>Review Date:</b>	12/08/22

ID	Comment Level	SOW Task	Comment	Response/Resolution
20	Level 2	Task 1	Previous Studies, Text: Chambers County Master Drainage Plan (Volume I) appears to be listed twice in Table 1-18. Please review	The second entry of the Chambers County Master Drainage Plan in Table 1-18 has been rectified to "Volume II."
21	Level 2	Task 1	Existing Projects Map (Exhibit C Map 2): Please consider revising the map to more easily differentiate the locations and extents of proposed or ongoing projects.	Map 2 has had its symbology edited to better differentiate existing and ongoing projects.
22	Level 2	Task 2A	Existing Condition Flood Hazard Analysis, Text: Please include total land areas (square miles) of each flood risk by flood risk type, county, region, and frequency as per guidance document (Exhibit C page 24): Submittal requirement number 2.	Tables 3 and 5 in Appendix 2-B have been edited to include information on total land areas of each flood risk by flood risk type, county, and frequency. The same information is also now conveyed in six new tables included in Chapter 2.
23	Level 2	Task 2A	(ExFldExpAll) If the 'CRITICAL' field contains a 'No' entry, then please leave 'CRIT_TYPE' as NULL.	ExFldExpAll GIS feature class edited to comply with TWDB comment and guidance.
24	Level 2	Task 2A	Existing Condition Flood Exposure Map (Exhibit C Map 6): Please consider modifying the map to improve legibility.	The Symbology for exposed features in Map 6 has been updated to use different colors and different shapes for various types of exposed features.
25	Level 2	Task 2A	Model Coverage (GIS Feature Class ModelCoverage, Exhibit C Map 22): Please consider including all models generated or modified to support the development of this regional flood plan.	The models contained in the Model Coverage GIS feature class already represent the models that were used to support development of the regional flood plan.
26	Level 2	Task 2B	Future Condition Flood Hazard Analysis, Text: Please include total land areas (square miles) of each flood risk by flood risk type, county, region, and frequency as per guidance document (Exhibit C page 33): Submittal requirement number 3.	Tables 3 and 5 in Appendix 2-B have been edited to include information on total land areas of each flood risk by flood risk type, county, and frequency. The same information is also now conveyed in six new tables included in Chapter 2.
27	Level 2	Task 2B	Future Condition Hazard Map (Exhibit C Map 8): Please consider reviewing certain map elements to avoid obscuring data. For example, the legend appears to cover a portion of the Future Condition Flood Hazard extent on Figure 17 of 29 (Sabine County).	Map 4, Map 6, Map 8, Map 7B, Map 11, and Map 12B have all been edited to fix the issue of data being obscured.
28	Level 2	Task 2B	Future Condition Flood Exposure GIS Feature Class, FutFldExpAll: If the 'CRITICAL' field contains a "No" entry, then please leave 'CRIT_TYPE' as NULL	FutFldExpAll GIS feature class edited to comply with TWDB comment and guidance.

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Project:	Region 5 - Neches Regional Flood Plan
Document:	Draft RFP TWDB Comment Responses
Review Date:	12/08/22

ID	Comment Level	SOW Task	Comment	Response/Resolution
29	Level 2	Task 2B	Future Condition Flood Exposure Map (Exhibit C Map 11): Please consider modifying the map to improve legibility.	The Symbology for exposed features in Map 8 has been updated to use different colors and different shapes for various types of exposed features.
30	Level 2	Task 3A	Existing Floodplain Management Practices, Text: Section 3.A.1. states "cities, counties, and flood districts" have flood-related authority, but the associated Tables 1-12 and 3-1 include water supply and utility districts, and drainage districts, respectively, as having flood related authority. Please consider reviewing and reconciling as necessary	Table 1-12 edited to remove water supply districts and also to reflect the 8 river authorities and drainage districts in the region with flood-related authority.
31	Level 2	Task 3A	Existing Floodplain Management Practices (Exhibit C Table 6): It appears that some entities listed, including Moore Station, New Chapel Hill, and Browndell, may not be active NFIP participants. Please consider reviewing list of NFIP participants to confirm status.	Moore Station, New Chapel Hill, and Browndell all removed from Table 6.
32	Level 2	Task 3B	Goals, Text: Please consider including region-specific detail on "Transformed and Residual Risk" in addition to defining these terms.	No action was deemed necessary upon meeting with TWDB representatives.
33	Level 2	Task 3B	Goals Table (Exhibit C Table 11): Please consider reviewing Table 11 as some goals state "Long Term (50 years)", whereas the stated target year is "2053". For example, Goal IDs 05000023 and 05000025.	Goals changed as necessary to have a long-term planning horizon of 30 years.
34	Level 2	Task 4B	Streams GIS Feature Class, Streams: Please consider linking this feature class to any relevant FME, FMS, or FMP when appropriate by populating the associated ID fields.	FutFIdExpAll GIS feature class edited to comply with TWDB comment and guidance.
35a	Level 2	Task 4B	FME_ID 051000156 description states "Installation of New Culverts." FMEs should generally focus on planning and feasibility study efforts rather than construction. Please consider verifying that all entries should be classified as FMEs and not as FMPs or FMSs.	Description changed to: "H&H Study to analyze most efficient alternatives to install new culverts along FM 1442 (Bridge City) at Colonial Outfall Ditch."
35b	Level 2	Task 4B	For some county-wide FMEs it appears that a majority of the county falls outside of the RFPG boundary, for example FME_IDs 051000019 and 051000022. Please consider including justification on how the FME benefits the region and please coordinate with other RFPGs to make sure the efforts are not duplicated.	County-wide FMEs found to overlap with FMEs found in Trinity, Sabine, or San Jacinto Flood Planning Regions had their costs altered to reflect the county area within the region.
35c	Level 2	Task 4B	There are several FMEs that appear to overlap with a TWDB-funded, FIF Category 1 study, but the TWDB-funded, FIF Category 1 study does not appear to be listed. For example, FME_ID 05100091 should utilize FIF_ID 40034. FME_ID 05100050 may be a duplication of FIF_ID 40022. Please consider verifying that FMEs do not duplicate efforts of any TWDB-funded, FIF Category 1 study.	New text in Chapter 4 - "Additionally, it is intended that the FMEs identified in the Regional Flood Plan will utilize existing information from FIF Category 1 studies to better identify alternatives for reducing flood risk within the region."



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ID	Comment Level	SOW Task	Comment	Response/Resolution
35d	Level 2	Task 4B	For areas in RFPG with existing FIF, BLE, GLO, or other models and/or ongoing studies, please consider stating how the FME will improve upon the preexisting model/study.	New text in Chapter 4: "It is important to note that some of the FMEs identified as part of this effort are intended to expand upon previous studies conducted for BLE, the GLO Combined Rivers Basin Study, and FIF grants. For FMEs identified in areas that have FIF or GLO studies, there is potential for the FME itself to identify alternatives that had initially not been examined in the studies. Additionally, the studies associated with FIF, BLE, and GLO focus on riverine flooding whereas some identified FMEs in the region pertain to urban flooding – the difference in flooding type will necessitate a change in modeling approach. It is intended that the FMEs identified in the Regional Flood Plan will utilize existing information from previous study efforts to better identify alternatives for reducing flood risk within the region."
35e	Level 2	Task 4B	Please consider adding identifiers to all models in the "Model Description" column, for example FIF_ID 40022.	FIF ID added behind TWDB FIF identifier in the "MODEL_DESC" field in the FME GIS feature class.
36	Level 2	Task 4B	Flood Management Evaluation (FME) GIS Feature Class, FME: It appears that some fields may be missing, including 'ASSOCIATED'. Please consider completing all fields with valid entries per Exhibit D Table 23.	FME GIS feature class edited to comply with TWDB comment and guidance.
37	Level 2	Task 4B	Flood Mitigation Project (FMP), Text: Please consider including a written list of FMPs that were identified but determined by the RFPG to be infeasible, including the primary reasons for them being infeasible.	A list of infeasible FMPs had already been included in Chapter 4.
38	Level 2	Task 4B	Flood Management Strategy (FMS), Text: Please consider including a written list of FMSs that were identified but determined by the RFPG to be infeasible, including the primary reasons for them being infeasible.	A list of infeasible FMSs had already been included in Chapter 4.
39a	Level 2	Task 5	FME_ID 051000156 description states "Installation of New Culverts." FMEs should generally focus on planning and feasibility study efforts rather than construction. Please consider verifying that all entries should be classified as FMEs and not as FMPs or FMSs.	Description changed to: "H&H Study to analyze most efficient alternatives to install new culverts along FM 1442 (Bridge City) at Colonial Outfall Ditch."
39b	Level 2	Task 5	For some county-wide FMEs it appears that a majority of the county falls outside of the RFPG boundary, for example FME_IDs 051000019 and 051000022. Please consider including justification on how the FME benefits the region and please coordinate with other RFPGs to make sure the efforts are not duplicated.	County-wide FMEs found to overlap with FMEs found in Trinity, Sabine, or San Jacinto Flood Planning Regions had their costs altered to reflect the county area within the region.
39c	Level 2	Task 5	There are several FMEs that appear to overlap with a TWDB-funded, FIF Category 1 study, but the TWDB-funded, FIF Category 1 study does not appear to be listed. For example, FME_ID 05100091 should utilize FIF_ID 40034. FME_ID 05100050 may be a duplication of FIF_ID 40022. Please consider verifying that FMEs do not duplicate efforts of any TWDB-	New text in Chapter 4 - "Additionally, it is intended that the FMEs identified in the Regional Flood Plan will utilize existing information from FIF Category 1 studies to better identify alternatives for reducing flood risk within the region."

## RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN

### Comments From TWDB

Project:	Region 5 - Neches Regional Flood Plan
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ID	Comment Level	SOW Task	Comment	Response/Resolution
39d	Level 2	Task 5	For areas in RFPG with existing FIF, BLE, GLO, or other models and/or ongoing studies, please consider stating how the FME will improve upon the preexisting model/study.	New text in Chapter 4: "It is important to note that some of the FMEs identified as part of this effort are intended to expand upon previous studies conducted for BLE, the GLO Combined Rivers Basin Study, and FIF grants. For FMEs identified in areas that have FIF or GLO studies, there is potential for the FME itself to identify alternatives that had initially not been examined in the studies. Additionally, the studies associated with FIF, BLE, and GLO focus on riverine flooding whereas some identified FMEs in the region pertain to urban flooding – the difference in flooding type will necessitate a change in modeling approach. It is intended that the FMEs identified in the Regional Flood Plan will utilize existing information from previous study efforts to better identify alternatives for reducing flood risk within the region."
39e	Level 2	Task 5	Please consider adding identifiers to all models in the "Model Description" column, for example FIF_ID 40022.	FIF ID added behind TWDB FIF identifier in the "MODEL_DESC" field in the FME GIS feature class.
40a	Level 2	Task 5	It appears that the field 'ASSOCIATED' is missing from the FME feature class. Please consider adding and populating this field with valid entries per the TWDB broadcast email sent on June 3, 2022.	FME GIS feature class edited to comply with TWDB comment and guidance.
40b	Level 2	Task 5	Please consider populating 'MODEL_DESC' field for clarity on existing studies to be used. Please make sure to document existing or ongoing BLE and TWDB-funded FIF Category 1 studies.	Wherever available, the FIF ID was added behind the TWDB FIF identifier in the "MODEL_DESC" field in the FME GIS feature class.
41	Level 2	Task 6B	Contributions and Impacts to Water Supply, Text: The plan includes a statement that "no anticipated measurable impacts" would occur. Please consider clarifying whether this includes potential measurable impacts (negative or positive) to water availability and/or supply.	New text in Chapter 6: "...no negative anticipated measurable impacts to water supply, water availability, or strategies in the State Water Plan would occur from implementation. It was also determined that the recommended FMSs and FMPs would not provide measurable benefits to water supply, water availability, or strategies."
42	Level 2	Task 7	Flood Response Information and Activities, Text: Please consider renaming the header "Hazard Mitigation Action Plans", if appropriate, to the more common term 'Hazard Mitigation Action Plans'.	All instances of "Hazard Mitigation Action Plans" substituted with "Hazard Mitigation Plans."



December 9<sup>th</sup>, 2022

Steve Moon

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Moon,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

Comments regarding the natural and constructed flood infrastructure discussed in Chapter 1 have been noted. Stormwater Pumps have been added to the list of natural and constructed features at the start of Chapter 1.B. In addition, a new section in Chapter 1 has been added to discuss the presence of stormwater pumps within the region. Concerning the Port Arthur Levee/Floodwall system, USACE regularly inspects levees within its Levee Safety Program to monitor their overall condition, identify deficiencies, verify that needed maintenance is taking place, determine eligibility for federal rehabilitation assistance (in accordance with P.L. 84-99), and provide information about the levees on which the public relies. The last assessment was completed 08/15/2017.

Comments regarding the values listed in the flood mitigation and floodplain management goals have been noted. The goals presented in the Neches Regional Flood Plan were adopted based on discussion held at several Regional Flood Planning Group meetings. These goals were defined to be specific, measurable, attainable, relevant, and time-bound.

Comments regarding the measurement of impact for the flood mitigation needs analysis have been noted. A new recommendation has been added to Chapter 8 that details incorporating structure value data and cost estimates for lost industrial production in the needs analysis for future planning cycles.

Comments regarding the presentation of figures and maps in the plan have been noted. Figure 0-2 in the Executive Summary has been edited to use points for cities rather than gray polygons. The region boundary in Figure 1-2 was provided by TWDB – the two southern boundaries seen in the figure were due the region boundary being drawn around the Gulf Intercoastal Waterway. The extent of the Existing Condition Flood Hazard seen in Map 4 was based on data provided by TWDB.

Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

[www.nechesfloodplanning.org](http://www.nechesfloodplanning.org)

Judge Jeff Branick  
*Chairman*  
*Counties*

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*Vice Chairman*  
*Water Districts*

Scott Hall, P.E.  
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*Flood Districts*

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*Municipalities*

John Beard, Jr.  
*Public*

Brian McDougal  
*Small Business*

Robb Starr  
*Water Utilities*



December 9<sup>th</sup>, 2022

Greg Wobbe

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Wobbe,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

An item for High Water Marks (HWMs) has been added to the list of acronyms and definitions for both Volume I and Volume II.

Comments regarding the presentation of data in Chapter 1 have been noted. Figure 1-3 has been edited for clarity to include the industry category underneath each value on the pie chart. Per TWDB, the collective area of the Neches region is 11,452 square miles – the area of 262 square miles estimated to be within potential flood prone areas represents 2.3% of the watershed. Additionally, Figure 1-15 has been edited to better show the locations of each reservoir within the region for clarity

Comments regarding the funding sources listed in Chapter 4 have been noted. “Local Taxes” has been added as an item to Table 4-19 under the Funding Source column.

Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

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December 9<sup>th</sup>, 2022

Helena Mosser

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Mosser,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

Comments regarding the interaction between B.A Steinhagen Lake and San Rayburn Reservoir have been noted. The methodology for the data collection process behind the Future Conditions Analysis in Task 2 was approved by TWDB by submission of a memorandum on February 8, 2022. The influence of Sam Rayburn Reservoir on the drainage area above B.A. Steinhagen Lake will be considered in future planning cycles as the data collection effort behind Task 2 is reworked and refined.

Comments received regarding which entities are responsible for enforcing flood management standards have been noted. Additional language has been added to the Executive Summary and Chapter 3 that clarifies that all the recommended standards apply to every entity in the region that regulates development in the region. Per Executive Order 11988, federally funded critical facilities are required to be elevated to the 500-yr water surface elevation. While the majority of critical facilities to be constructed in the region are not backed federally, the effort will still be made to protect them to the 500-yr level.

Comments regarding the flood response activities detailed in Chapter 7 have been noted. A new section, Section 7.B.8, has been added to Chapter 7 to provide a brief summary of the InFRM Flood Decision Support Toolbox (FDST).

Comments regarding the recommendations contained in Chapter 8 have been noted. Additional language has been added to Chapter 8 to clarify that implementation guidance for consistent interpretation and execution of model standards should also be included in their development. Establishing non-regulatory regional flood districts is an action that can be completed by the Texas Association of Regional Councils as they have defined members and counties they assist. The recommendation of communities and counties to regulate to a criteria of no loss of valley storage to the 500-year level for non-coastal areas will not be included in the Final RFP as the funding to accomplish the action is likely unable to be achieved in a number of communities within the region.

Comments regarding the funding sources in Chapter 9 have been noted. The Floodplain Management Services Program has been added to Table 9-1 as a potential funding source.

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REGION 5



REGIONAL FLOOD PLANNING GROUP

**Neches Regional Flood Planning Group**

c/o Lower Neches Valley River Authority  
7850 Eastex Freeway  
Beaumont, Texas 77708  
Telephone 409-892-4011

Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

DRAFT

Judge Jeff Branick  
*Chairman*  
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December 9<sup>th</sup>, 2022

Jerry Cotter

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Mr. Cotter,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

Comments regarding the recommendations contained in Chapter 8 have been noted. Section 8.B.3. already mentions providing technical assistance to smaller jurisdictions in the region. This recommendation includes assistance in preparing funding applications and provisions of a funding mechanism for smaller communities to acquire funds for studies that help identify FMPs and FMSs. The interpretation of floodplain regulations is recognized as an important issue - additional language has been added to clarify that implementation guidance for consistent interpretation and execution of model standards should also be included in their development.

The Neches Regional Flood Planning Group shares the same concerns related to the difficulties related to the operation and maintenance (O&M) of flood mitigation and other drainage infrastructure. The establishment of grant programs for O&M of this infrastructure is included as a recommendation in Chapter 8. It is important to note that the flood planning recommendations included in the chapter are intended to provide recommendations the NRFPG believes are needed and desirable to achieve regional flood mitigation and floodplain management goals. Detailed modeling efforts are not the focus of the Regional Flood Planning effort.

The recommendation of communities and counties to regulate to a criteria of no loss of valley storage to the 500-year level for non-coastal areas will not be included in the Final RFP as the funding to accomplish the action is likely unable to be achieved in a number of communities within the region.

Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

Judge Jeff Branick  
*Chairman*  
*Counties*

Josaph Majdalani, Ph.D., P.E.  
*Vice Chairman*  
*Water Districts*

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*Small Business*

Robb Starr  
*Water Utilities*



December 9<sup>th</sup>, 2022

Autumn Barker

**Re: Comments on Draft Region 5 Neches 2023 Regional Flood Plan**

Dear Ms. Barker,

The Neches Regional Flood Planning Group (NRFPG) has received and reviewed your comments on the Draft Region 5 Neches 2023 Regional Flood Plan (RFP). The NRFPG appreciates your input in the public process associated with development of the 2023 RFP.

Comments regarding the recommendations contained in Chapter 8 have been noted. A new section has been added to the text to detail recommendations for establishing flood warning and flood response activities that consider the needs of the disabled community.

Thank you again for providing your comments on the Draft RFP.

Sincerely,

Neches Regional Flood Planning Group Technical Consultant Team

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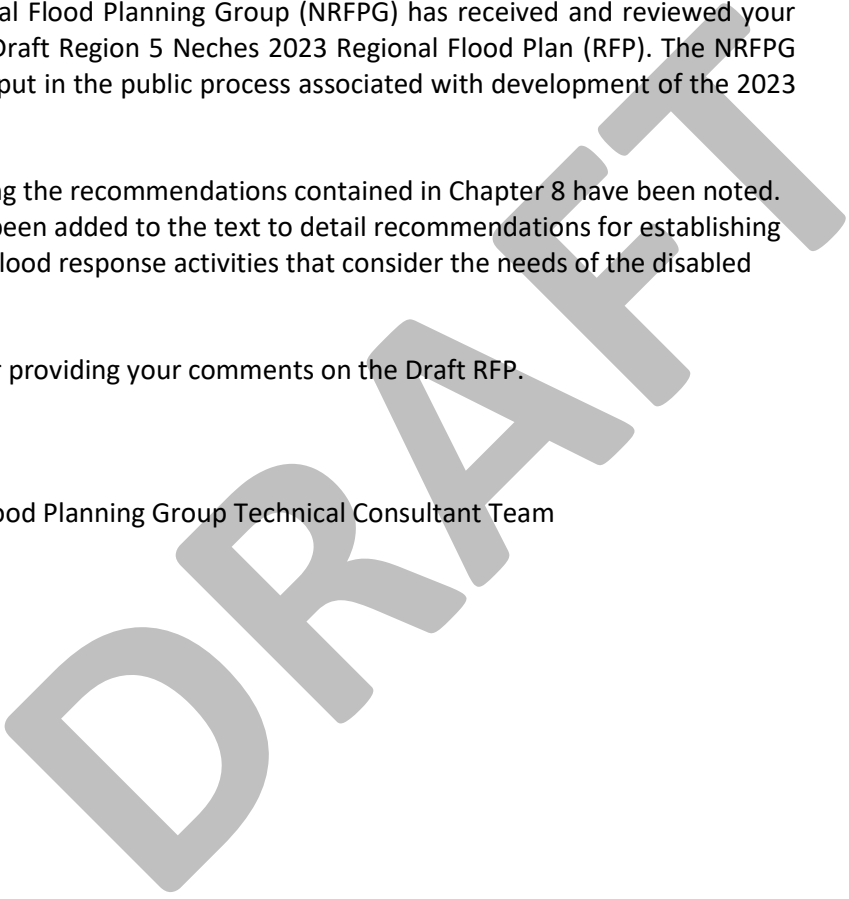
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DRAFT

**APPENDIX 10-C  
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