

Submitted by Mike Southerland, 3401 Parkway Ter, Bryan, TX 77802, 979 229 7805,  
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Subject: Region 8 Lower Brazos RPG: Public Comment: Operation of Lake Limestone

Agenda Item 4 of June 24, 2021 Meeting

June 14, 2021

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1. The purpose of this paper is to request that the damaging operations of Lake Limestone be included in the Region 8 – Lower Brazos Regional Flood Planning Group Study
2. Facts:
  - a. The current operations of Lake Limestone, not natural run off, causes damage to about 90,000 acres of good productive land between Lake Limestone and the City of Navasota. The river distance is about 65 miles, and the operators routinely release enough water to cover land about 2 miles wide the entire distance. If the average land value is \$3,500 per acre the total land value damage is \$315,000,000. Which does not include damage to public and private roads and bridges, private enterprises such as recreation, cattle operations, grass production, grazing, hunting, fishing, other recreation, damage to wetlands, and ever expansion of the flood plain. The BRA flooding also creates tremendous swarms of mosquitoes that transmit many dangerous diseases to humans, cattle, birds and other animals. At times the drying out takes as much as 3 months or more.
  - b. A recent letter from the Brazos River Authority Board President states, “I would like to make note, I do agree that flooding on the Navasota River is a significant issue, and it deserves further evaluation.” If President agrees that flooding is a “significant issue” why has no action been taken action? The President is appointed by the Governor and has all the authority to act. National Weather Service Historic Crests are attached below. From 1899 to 1966 there were 11 crests, from 1967 to 1078 there were 0 crests but after the dam was constructed 1979 to 2020 there have been 97 historic crersts.
  - c. President states “One of the recommendations of that study was to develop a hydraulic model for the Navasota River. Waller County requested and successfully received state funding through the Flood Infrastructure Fund for this purpose, which BRA supported.” It is hard to believe that Limestone was completed in 1978 and there is no operational model for lake control. How are release decisions made? Further to show how out of touch this Brazos River Authority is with the work they should be doing TAMU has models that could be used now.
  - d. President states: “Data that exists from before the construction of the reservoir and data from after the reservoir became operational shows that the reservoir does not worsen flooding downstream. Lowering or raising the reservoir in the ways you have suggested will only cause harm to those that rely on the vital water supply from the lake or to the infrastructure itself.” First the BRA has no data to prove the lake has not changed flooding conditions that they have produced. Without any modeling this claim is totally

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unfounded. Second the lake level is many times below 363, see charts at [navasotaflooding.com](http://navasotaflooding.com). There will not be harm of any kind to the “vital” water supply because the users at the lake can extend their intake lines to accommodate the lower levels. Copies of contracts the BRA has with cities does not show Lake Limestone as water provider. The City of Richmond which the BRA claims is supplied by Limestone takes the water from the Brazos River in Brazoria County and they resale it to a third party. They do not use it for the city.

- e. President states: “Emailing and writing letters back and forth is good communication for some matters however; this is very complex and will require lengthy explanations and discussions.” This comment, on the face, shows a great lack of understanding on the part of the BRA on how this extremely dangerous complex lake operation should be controlled safely. We have asked for plans the BRA has for Limestone nothing has been produced. To say such a complex endeavor can only be communicated verbally is a way to say the BRA does not want to be held to any standard. Again, they do not even have a model of the lake. How can a critical plan be verbal?
  - f. One of the staff claims is the operators only release the water that flows into the lake therefore they do not cause any flooding. But anyone can see from the photos in the website [navasotaflooding.com](http://navasotaflooding.com) that a current release from the lake covers about 1000 acres below the dam and above HWY 7 bridge to Marquez. This flood is not from rain run off it is from the poor planning and operation of the lake releases. One can also see in the pictures and charts at [navasotaflooding.com](http://navasotaflooding.com) that the lake is maintained at 363 feet with boat docks high and dry while productive land below the dam is 3 feet under water.
  - g. There is no rule of law, policy or procedure that allows a landowner to build a structure that causes flooding to a neighboring landowner.
  - h. The damage done to the Navasota River downstream channel is not repaired. The trees blocking the channel are allowed to remain causes deeper flooding.
  - i. More details and data can be found at [navasotaflooding.com](http://navasotaflooding.com)
3. Please include the operation of Lake Limestone in the Region 8 study.

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National weather Service Historic Crests at Easterly as of 6/22/2021													
Before Dam Const			AFTER Dam Const										
Order	Height in Ft	Date	Order	Height in Ft	Date						Order	Height in Ft	Date
25	24.00	01/01/1899	23	24.20	5/30/1979	81	21.00	2/17/2003	31	23.56	3/11/2015		
1	29.00	06/01/1899	58	22.00	5/15/1980	21	24.24	2/22/2003	95	20.27	4/26/2015		
6	26.40	5/30/1929	54	22.15	6/16/1981	22	24.24	2/22/2003	47	22.29	4/29/2015		
61	21.90	9/5/1932	48	22.25	10/15/1981	92	20.37	5/5/2004	107	19.05	5/2/2015		
94	20.29	12/7/1935	60	21.90	5/22/1983	45	22.38	6/11/2004	33	23.43	5/13/2015		
17	24.58	11/24/1940	59	21.92	2/26/1985	84	20.76	6/30/2004	76	21.24	5/20/2015		
55	22.13	5/2/1944	20	24.44	2/5/1986	36	23.21	11/25/2004	14	25.09	5/27/2015		
97	19.87	4/25/1957	82	20.93	12/25/1986	101	19.45	2/4/2005	105	19.06	6/3/2015		
100	19.54	12/9/1960	106	19.06	6/11/1987	74	21.49	2/26/2005	70	21.58	6/20/2015		
88	20.58	5/17/1965	96	20.05	6/16/1987	18	24.58	1/15/2007	30	23.68	11/2/2015		
93	20.30	4/26/1966	9	25.71	3/18/1989	24	24.03	3/13/2007	90	20.46	11/9/2015		
			12	25.12	5/19/1989	67	21.71	3/29/2007	103	19.31	11/21/2015		
			28	23.72	3/16/1990	57	22.02	5/29/2007	89	20.48	12/2/2015		
			29	23.70	1/11/1991	49	22.22	6/30/2007	39	23.03	12/15/2015		
			4	26.81	12/22/1991	52	22.20	7/8/2007	5	26.66	12/29/2015		
			91	20.44	1/21/1992	13	25.11	7/15/2007	3	27.31	3/11/2016		
			35	23.22	2/26/1992	65	21.79	8/21/2008	38	23.11	4/20/2016		
			85	20.72	3/6/1992	2	28.29	4/29/2009	107	19.05	5/2/2016		
			64	21.85	3/23/1993	40	22.94	10/28/2009	34	23.24	5/28/2016		
			56	22.04	2/24/1994	44	22.40	1/31/2010	63	21.85	6/5/2016		
			42	22.50	1/14/1995	68	21.60	2/7/2010	46	22.30	6/16/2016		
			72	21.52	3/16/1995	99	19.63	2/15/2010	80	21.01	4/5/2017		
			69	21.60	5/11/1995	53	22.17	3/11/2010	8	25.83	4/12/2017		
			50	22.22	8/4/1995	77	21.24	6/13/2010	43	22.41	12/10/2018		
			32	23.52	4/6/1997	104	19.08	3/14/2012	27	23.95	12/28/2018		
			16	24.60	1/8/1998	10	25.19	3/22/2012	19	24.50	1/4/2019		
			11	25.17	1/30/1999	7	26.20	11/1/2013	102	19.43	2/24/2020		
			98	19.71	6/15/2000	87	20.61	11/26/2013	66	21.78	3/24/2020		
			26	23.96	12/28/2000				41	22.64	4/14/2020		
			51	22.21	1/20/2001				86	20.70	5/19/2020		
			71	21.53	2/19/2001				83	20.85	7/11/2020		
			62	21.88	3/4/2001				75	21.37	9/7/2020		
			73	21.51	3/11/2001				37	23.12	1/2/2021		
			15	24.74	12/18/2001								
			78	21.07	1/3/2003								
			79	21.07	1/3/2003								