

Comments Recieved on Lower Brazos Regional Flood Plan

As of October 14th, 2022

Comment #	Comment Type	Associated Task #	Field / Section Name	Commenter	Comment	Date Received
1	Tables	5	Recommended FMX Lists	City of College Station	<p>On behalf of the City of College Station, we request that the following actions be included in the Regional Flood Plan as having a sponsor and to classify them as recommended Flood Mitigation Evaluations and Strategies:</p> <ul style="list-style-type: none"> • FMS ID #82001113 – College Station Early Flood Warning System • FMS ID #82001140 – College Station Property Acquisition • FME ID #81000226 – Bee Creek Basin Detention Pond <p>The above listings are representative of proposed flood mitigation and/or management actions that the City of College Station had previously agreed to support as the sponsor; however, they were listed as not-recommended due to lack of sponsorship within the draft flood plan. We believe this was done in error since the City previously agreed to be listed as a sponsor. The City would like to be listed as the sponsor for these needs and request that they be classified as recommended Flood Mitigation Evaluations and Strategies.</p>	9/8/2022
2	Tables	5	Recommended FMX Lists	City of Waco	<p>On behalf of the City of Waco, we request that the following needs be included in the Regional Flood Plan as recommended Flood Mitigation Evaluations, Strategies, or Projects:</p> <ul style="list-style-type: none"> • Waco Creek Diversion Tunnel • Oakwood Channel and Bridge Improvements • Upper Waco Creek Tributary Projects • Chapel Ridge Regional Detention • Primrose IH35 Betterments • Speegleville Road Bridges over Middle Bosque • Barron’s Branch Buyouts • 12th / 13th Street Storm Replacement • Sharondale Drainage Improvements • New Road & Homan Ave Channel and Culvert Improvements • Waco Creek buyouts • West Waco Drainage improvements and Erosion Control • Taylor Street Storm Infrastructure and Outfall • Elm Avenue Storm Infrastructure and Outfall • Loop 340 Berm and Frontage Road Improvements • Brentwood and Cougar Ridge Stormwater Infrastructure and Detention Modifications • South Fork Stormwater Infrastructure and Detention • Mary Street underground Storm and Outfall • Cottonwood Creek – Beverly to Bagby Improvements <p>The above listings are representative of proposed flood mitigation and/or management actions that the City of Waco had previously submitted to the regional flood planning group for consideration; however, they do not all appear in the Draft Regional Flood Plan. Additional information supporting these actions can be provided to the technical consultant team for evaluation, if needed.</p>	9/16/2022

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3	Tables	8	Table 8.1 Legislative	USACE - Jerry Cotter	Non regulatory regional flood control or drainage districts should be established and funded for rapidly growing urban areas such as DFW, Houston, San Antonio, etc. Responsibility would be to provide consistency, technical resources, funding and reviews in support of FME's, FMS's. These organizations would also implement or support implementation of FMP's. These organizations would augment communities and counties that just don't have the resources and expertise to manage flooding. Rapidly developing areas surrounding larger urban centers are at greater risk of having runoff patterns increasing because of development. These urban areas are comprised of many communities and unincorporated county areas. Many of the smaller communities are not funded or resourced to deal with the complexities of floodplain management and therefore there is a lack of or inconsistencies in floodplain management practices.	9/26/2022
4	Tables	8	Table 8.1 Legislative	USACE - Jerry Cotter	Clarify the early 2000's state legislation that provide counties the authority to regulate floodplains to explicitly allowed and encourage activites associated with floodplain management such as development of land use plans, regulatory authorites, e.g. permitting. Although state legislation was passed in the early 2000's which gave counties the ability to regulate floodplains, interpretation of these regulations varies widely from county to county. The legislate bill lacks implementation guidance in the form of administrative rules. If development is occuring in unincorporated areas, this development can dynamically impact flood risk.	9/26/2022
5	Tables	8	Table 8.2 Regulatory	USACE - Jerry Cotter	Require the use of n-values and channel conditions which would likely result if the channel or project were not maintained. Exceptions would be golf courses or other areas where an organization exists which would maintain the channel in perpetuity. Disallow maintence by marginal organizations such as home owners associations to justify acceptance of lower n-values as this is an unrealistic expectation. When channels are constructed, most often channel bed, banks and overbanks are cleared; however; with many miles of these channels, it is often difficult for communities to maintain those beds, banks and overbanks at their design conditions. Generally, there is a lack of channel maintenance to ensure flood conveyance areas, established as part of a development or improvement projects, to retain their design level n-values. This results in unexpected changes in channel conveyance and increased flooding. Channel maintenance is very expensive activity that can trigger environmenatl permitting requirements.	9/26/2022
6	Tables	8	Table 8.2 Regulatory	USACE - Jerry Cotter	No loss of valley storage to the 500-year level. Communities could allow redistribution of valley storage to allow interactions with natural areas but no loss of storage. Land development in upstream areas increases runoff in downstream areas. This happens because of increased impervious cover and decreased tree cover, and therefore less ability to absorb rainfall. Additionally, development, in most communities, encroaches into riparian areas and decreases the amount of storage available to accommodate flood waters. Just the main thread of the Trinity River though DFW stores more flood waters during of flood than any three of the USACE reservoirs that provide flood protection for DFW. The many other streams provide even more storage than the main stem. There is limited capacity in rivers and streams to convey floodwaters. This means that all areas above any given conveyance point have to store flood water until sufficient time has lapsed to pass the water away from the impacted area. The streams are where this water is stored and depleting these storage areas will impact DS areas.	9/26/2022

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7	Tables	8	Table 8.2 Regulatory	USACE - Jerry Cotter	Establish future land use plans for unincorporated areas associated with rapidly growing urban areas.	9/26/2022
8	Tables	8	Table 8.2 Regulatory	USACE - Jerry Cotter	Use of ultimate development land use conditions in the development of future flows. Require use of future flows for regulation of floodplains and development of FMP's.	9/26/2022
9	Tables	8	Table 8.3 State Flood Planning Recommendations	USACE - Jerry Cotter	Encorage storm shifting to validate 100-yr estimates and to provide a broader understanding of communities actual flood risk Storms identified and cataloged as part of the GLO funded USACE led Texas Storm Study could be the primary source of storms to be shifted. Great deal of uncertainty in 100-yr estimates. Use of observed storms that approximately match depth duration data from NOAA Atlas 14 or other precipitation frequency sources validates 100-yr estimates. Additionally wet, dry and average conditions as well as conditions at the time the storm occured can be presented. Additionally, communities have and can experience storms that exceed the 100-yr. While not regulatory, this information will provide additional hazard mitigation data so communities can address critical infrastructure impacts and be better prepared.	9/26/2022
10	Tables	8	Table 8.3 State Flood Planning Recommendations	USACE - Jerry Cotter	Add detail to Watershed Hydrology Assessments (WHA) for communities within basins with completed WHA's. The WHA for the Trinity has been completed. The WHA's, funded by FEMA, are considered the best available flood flow frequency estimates, e.g. 100-yr. These estimates consider the latest precipitation frequencies, the variations in watershed response and determine critical flood drivers by employing a wide range of sensitivity analysis for each computation point.	9/26/2022
11	Tables	8	Table 8.3 State Flood Planning Recommendations	USACE - Jerry Cotter	Update WHA's when future precipitation frequency estimates become available. Efforts to develop future precipitation frequency estimates for Texas are starting.	9/26/2022
12	Tables	8	Table 8.3 State Flood Planning Recommendations	USACE - Jerry Cotter	Establish regional efforts, for large urban centers to develop future land use data for all developing areas, not just incorporated areas, for use in developing future flood flow frequency estimates and future 100-yr (and other recurrence interval) hazard boundaries.	9/26/2022