

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log									
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document	
Executive Summary									
1	MPTX	Verified	Exec. Summary	Might be good to include overview/description of the GIS Dashboard in Executive Summary. Emphasize its future utility and statewide pre-eminence.	Dashboard not posted on RFPG website at the moment. No change to the RFP text.	FNI - Mat	FNI - Mat	N/A	
2	MPTX	Verified	Exec. Summary	Might be good to show (map) and discuss the entire Sabine watershed (including LA side). Various reasons: SRA-LA, 2016, TBPIO, TB Partners, spillway, Sulphur, Calc./Cameron Par. NAI, etc.	Recommending to stick to just Texas items at this time. No change made to the document.	FNI - Mat	FNI - Mat	N/A	
3	MPTX	Verified	Exec. Summary	Diversions (legislative background, current, history, future).	Inserted general statement, ES-18	MPTX - Greg	FNI - Mat	ES-18	
4	MPTX	Verified	Exec. Summary	Might be better to title this section 'Document Structure', or 'Document Structure, Chapter Assignments, and RFP Task Correlation'	Recommending to keep it as it is at this time. No change made to the document	FNI - Mat	FNI - Mat	N/A	
5	MPTX	Verified	Exec. Summary	Should this table be sorted in order of largest discharge volume per area (highest to lowest)? Or rank? The graph on following page is nice.	Table is formatted in the same way as the TWDB website. Recommending to keep it as it is at this time.	FNI - Mat	FNI - Mat	N/A	
6	MPTX	Verified	Exec. Summary	Good info, possibly better sorted highest to lowest.	Table is formatted alphabetically in the same way as the TWDB website. Recommending to keep it as it is at this time.	FNI - Mat	FNI - Mat	N/A	
7	MPTX	Verified	Exec. Summary	Possibly better in intro to say, 'Relative to the rest of the nation, the region is subject to intense rainfall and multiple flooding types. Primary among these is riverine flooding, with storm surge as an additional significant risk.'	inserted , ES-7	MPTX - Greg	FNI - Mat	ES-7	
8	MPTX	Verified	Exec. Summary	My opinion, this would be a good place to make the case for increased higher level (state or river basin) involvement, coordination, and construction of flood mitigation work. Legislature could establish a permanent structure and system for doing so. In other words, move away for hyper-local (and the perennial confusion and inefficiency it creates), and move towards state-level coordination. Not sure if that's palatable to RFPG but might be worth considering.	Several discussions have been had regarding items being applied at the regional or state level. Generally, the group has avoided recommended things that would be applied in a larger scope rather than on a smaller level. For example, the Upper Sabine region has been more hesitant to adopt particular floodplain management standards that the Lower Sabine area uses, primarily because the flooding types are quite different. Recommending no change at this time, but the topic could be revisited during the second RFP cycle.	FNI - Mat	FNI - Mat	N/A	
9	TWDB	Resolved	General	1. 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.	FNI - Allison			
10	TWDB	Verified	General	42. 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" were changed to "Cursory Floodplain Data"	FNI - Allison	FNI - Mat	Multiple Locations	
11	TWDB	Verified	General	43. Please review certain plan figures, as necessary, for legibility. Figure 2-12, for example, may appear difficult to distinguish differences in colors assigned to portions of the chart. Please consider accessibility of readers, as appropriate, and update graphs and figures as appropriate.	Figures reviewed for color clarity and accessibility. Figure 2-12 updated.	FNI - Alanna	FNI - Mat	2-25	
12	FNI	Verified	Exec. Summary	s were a;sp included in the planning process		FNI - Allison	FNI - Mat		
13	FNI	Verified	Exec. Summary	Canadian River not included in Table ES-5	Table with Planning Region Numbers with flow volume comes directly from TWDB website. We don't have numbers at the moment to split out the regions.	FNI - Mat	FNI - Mat	N/A	
Chapter 1									
1	MPTX	Verified	TABLE 1-1: PRINCIPAL CITIES IN THE REGION	Might be tter to list these in a 2 column table. It would be easier to read and push the following section (1.A.1.b. to the top of the next page).	When in 2 columns, the table goes onto the next page, but only for the last row. Recommend keeping it as is.	FNI - Mat	FNI - Mat	N/A	
2	MPTX	Verified	FIGURE 1-9: EXTENT OF FLOODPLAIN REGULATIONS FOR CITIES	Legend item should maybe be 'Floodplain' (one word).	Updated legend to reflect comment.	FNI - Andrew	FNI - Mat	1-22	
3	MPTX	Verified	1.A.7.a. Flood Plain Ordinances	Same, should maybe be 'Floodplain' (one word).	Updated	FNI - Mat	FNI - Mat	1-24	

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
4	MPTX	Verified	1.A.7.c. Zoning and Land Use Policies	Might be worth mentioning again the majority of the region is predominantly rural with low population bases and low growth. That means modern zoning and land use practices should be customized to suitable fit the communities.	Added text in Section 1.A.7.c	MPTX - Greg	FNI - Mat	1-25
5	MPTX	Verified	1.B.2.a. Dams, Reservoirs, Levees, and Weirs (Toledo Bend)	Suggest focused discussion of FERC purposes (does not include flood control). 92 MW electric (~46k homes). Water supply contracts, incl. TB Partners WSA.	Added column to Table 1-9 to note that no dams were designed for flood control purposes. Also added a sentence to the paragraph on the Toledo Bend reservoir.	MPTX - Greg	FNI - Mat	1-28
6	MPTX	Verified	FIGURE 1-10: EXISTING FLOOD PROJECTS	Is data missing from this map?	Update symbology to show regionwide "Sabine Stream Gages" with hatch to allow other projects to be seen.	FNI - Alanna	FNI - Mat	1-34
7	MPTX	Verified	1.B.4. Ongoing Flood Infrastructure Improvements	Might be good to spell out the grant funding sources acronyms (HMGP, CDBG-DR, etc.).	The acronyms were defined in the paragraph.	FNI - Allison	FNI - Mat	1-35
8	TWDB	Verified	FIGURE 1-10: EXISTING FLOOD PROJECTS	6. Existing Projects (Exhibit C, Section 2.1): Figure 1-10 does not appear to show the extent of projects, other than the largest which covers the remaining projects. Please revise the map	The figure was updated.	FNI - Alanna	FNI - Mat	1-34
9	TWDB	Verified	Figure 1-9	44. Planning Area Description, Text (Exhibit C, Section 2.1): a. For maps similar to Figure 1-9 on page 1-22, please consider modifying map labels, as appropriate, to avoid covering the colored city polygons with their own name labels, especially for smaller cities.	The labeling was updated.	FNI - Andrew	FNI - Mat	1-22
10	TWDB	Verified	Section 1.A.6	44b. Please consider adding more detailed region analysis under Section 1.A.6.	There is not much additional information that FNI has on Agriculture & Natural Resources. Text was added under Section 1.A.6.d.	FNI - Allison	FNI - Mat	1-23
11	TWDB	Verified	Section 1.A.7.d	44c. Please review text included in Chapter 1 for redundancy. For example, within Section 1.A.7.d, on page 1-25, there appears to be a sentence that is repeated in both paragraphs of the section starting with "drainage master plans describe a community's...".	The noted sentence was removed from Section 1.A.7.d	FNI - Allison	FNI - Mat	1-25
12	TWDB	Verified	Section 1.A.2.C and Section 1.A.4	44d. Section 1.A.2.C and Section 1.A.4 include different percentages related to region NFIP participation, 87% and 97% respectively. Please reconcile or provide additional clarification as to why these numbers are different.	The text below Table 1-7 was updated to reflect the 87% number shown earlier in Section 1.A.2.c	FNI - Allison	FNI - Mat	1-20
13	TWDB	Verified	Page 1-35	45. Existing Flood Infrastructure, Text (Exhibit C, Section 2.1): a. Please consider defining abbreviated items and acronyms including HMGP, CDBG-DR, and FIF the first time they are used, or consider including a section on abbreviations and acronyms. For example, on page 1-35 these three terms are used without prior definition in the plan, and members of the public may not be familiar with these terms. HMGP, does not appear to be defined until Chapter 9.	Acronyms were defined in the paragraph.	FNI - Allison	FNI - Mat	1-35
14	TWDB	Verified	Chapter 1B	45b. Please provide a description in Chapter 1 of how Low Water Crossings were identified.	Text added under Section 1.B.2 "The TWDB-provided several data sources to assist with the identification of flood management infrastructure in the Flood Data Hub, such as Dams, Levees, Reservoirs, Stream gages, High Water Marks, and Low Water Crossings. Low Water Crossings included in the Sabine RFP were provided by TxDOT."	FNI - Allison	FNI - Mat	1-27
15	TWDB	Verified	1.B.4. Ongoing Flood Infrastructure Improvements	47. Previous Studies, Text (Exhibit C, Section 2.1): Previous studies were mentioned and discussed within the draft plan text, but a list of the previous studies was not also included. Please consider including a list of previous studies, if available.	The "previous studies" mentions within the text refer to costs within Chapter 4. These previous studies were ones performed by Freese and Nichols on similar types of projects which aided in identifying a potential cost for FMXs recommended in the Sabine region as well as other regions.	FNI - Allison	FNI - Mat	N/A
16	TWDB	Verified	1.B.4. Ongoing Flood Infrastructure Improvements	48. Existing Projects (Exhibit C, Table 2): Please consider including ongoing project FMA-PJ-06-TX-2019-008. This is a 2019 FMA Grant that Orange County received to mitigate six flood prone structures by elevation with \$1,003,984.04 in total project costs and is expected to be complete by Sept 15, 2023.	Added text in Section 1.B.4 and added to Table 2	FNI - Allison	FNI - Mat	1-33
17	TWDB	Verified	1.B.4. Ongoing Flood Infrastructure Improvements	50. Existing Projects (Exhibit C, Table 2): Please ensure that all ID fields are entered correctly in all tables and geodatabases. Unique IDs must be accurate for the database to connect and work properly. Please refer to Exhibit D Table 2 or more recent updates for Unique ID guidance. For example, it appears that there are differing starting IDs listed under "Existing Project ID". Some start with '4' where guidance requires the unique ID to start with '04'.	The geodatabase uses ID fields which start with 04. In instances of the provided geodatabase, some fields were numeric and would not allow a leading zero to be used in the field. In text fields, a leading zero could be used.	FNI - Allison	FNI - Mat	N/A
18	TPWD	Verified	General	Incorporate: Flood is a natural process that has many benefits to human and natural systems.	Text was added to Section 1.A.6. Agricultural and Natural Resources Most Impacted by Flooding	FNI - Allison	FNI - Mat	1-23
19	TPWD	Verified	General	Incorporate: Promoting some flooding as desirable and making room for water promotes native species, maintains vital ecosystem services, and reduces the chance of flooding elsewhere	Text was added to Section 1.A.6. Agricultural and Natural Resources Most Impacted by Flooding	FNI - Allison	FNI - Mat	1-23
20	TPWD	Verified	General	Incorporate: Natural landscapes and watersheds provide flood mitigation functions that should be promoted, protected, enhances, and restored	Text was added to Section 1.A.6. Agricultural and Natural Resources Most Impacted by Flooding	FNI - Allison	FNI - Mat	1-23

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
21	TPWD	Verified	General	Incorporate: Prioritize risk reduction over flood control by focusing on reducing loss of life and injury	The overarching goal of all regional flood plans must be "to protect against the loss of life and property" as set forth in the Guidance Principles (31 TAC §362.3). The actions recommended by the Sabine RFPG are flood risk reduction and not focused entirely on flood control. No update was made to the text	FNI - Allison	FNI - Mat	N/A
22	TPWD	Verified	General	Incorporate: Utilize limited resources fairly	State Flood Plan will rank actions. There will be a public comment period to provide input on criteria used to rank actions. Sabine RFPG does not have the authority to rank actions, only recommend. No change was made to the text	FNI - Allison	FNI - Mat	N/A
23	TPWD	Verified	General	Incorporate: Address flood risk using a portfolio approach to first implement non-structural (policy, land management, emergency management) followed by structural (grey and natural and nature-based) strategies.	Plan has recommended FMXs related to all aspects of this noted portfolio approach including criteria updates, freeboard requirements, flood awareness, as well as structural measures with a mention of nature-based alternatives.	FNI - Allison	FNI - Mat	N/A
24	TPWD	Verified	General	Incorporate: Criteria for assessing projects strategies should include a comprehensive suite of measures spanning economical, operational, societal, and environmental advantages and disadvantages. Assessments focusing economics alone (number of buildings, acres) should be avoided.	The Task 4A analysis included evaluating Social Vulnerability (SVI) in assessing potential projects. An assessment of the number of buildings was a requirement of TWDB. In addition, the RFPG has made multiple mentions that flood mitigation is needed in areas where structural flooding is greatest as this has a massive impact both socially and economically in the region. The RFPG has recommended that the TWDB reasses requirements for potentially feasible FMPs. We can also cite the 4A analysis has defining flood need using more than just economic values. No change was made to the text.	FNI - Allison	FNI - Mat	N/A
Chapter 2								
1	MPTX	Verified	Chapter 2	Good comments here, but it seems there is still room for extended discussion of flood forecasting data (existing quality and accuracy in terms of X, Y, Z, T, and P (probability)). But it also understood that is a big subject. IMO, this topic (improved accuracy of flood risk analysis) should be one of the highest FME priorities for the region.	Section 2.A.1.a covers the existing flood risks in the region, and the types of flood risks. A section/text on flood forecasting is already included in Chapter 7.	FNI - Mat	FNI - Mat	N/A
2	MPTX	Verified	Chapter 2	Might be good to produce a chart/graph (or map) showing number of structures in FHAs per county. Similar to Table 2-9, for example.	Figure 2C-2 in Vol 2 already shows this information.	FNI - Allison	FNI - Mat	N/A
3	MPTX	Verified	Chapter 2	I realize its probably sensitive, but should glacial ice melt be mentioned (in list of 'affects'). Maybe call it something like 'glacial contraction'?	Added to list under Section 2.B.4.a, Sea Level change	FNI - Mat	FNI - Mat	2-15
4	MPTX	Verified	Chapter 2	Area any sedimentation studies or data available? If so that might be helpful to include.	No action/updates on this as we don't have sedimentation studies	FNI - Mat	FNI - Mat	N/A
5	MPTX	Verified	Chapter 2	Also, land subsidence is potentially important magnifying factor (along with RSLC). TWDB Groundwater division has good data, maps, studies available on subsidence (historic/projected).	Inserted language	MPTX - Greg	FNI - Mat	2-17
6	MPTX	Verified	Chapter 2	It might be worth mentioning that from a methodology and results standpoint, future flood exposure is a very 'fluid' analysis. By that I mean there are multiple variables, constant change. Having said that, there is a general trend of increased future flood exposure for the lowest portions of the basin.	Statement added to Section 2.B.4 regarding the fluidity of future conditions analysis.	FNI - Mat	FNI - Mat	2-14
7	MPTX	Verified	Chapter 2	Does Figure 2-12 repeat from earlier section?	Figure 2-12 shows future conditions numbers. Figure 2-5 shows existing conditions numbers.	FNI - Allison	FNI - Mat	N/A
8	TWDB	Verified	Chapter 2	7. Existing Condition Flood Risk Analyses, Text (Exhibit C, Section 2.2.A): Please include a reference to Exhibit C Table 3 in the text as per guidance document (page 27): Once Task 2A Existing Condition Flood Risk Analyses is complete, RFPGs must include a summary table with findings summarizing flood risk by county (Exhibit C Table 3).	Table 3 in Appendix 2-B is referenced throughout Section 2.A.2. Table 2-5 within the text was added to summarize the areas of flood risk by county.	FNI - Allison	FNI - Mat	2-7 & 2-8
9	TWDB	Verified	Chapter 2	8. Existing Condition Flood Hazard Analysis, Text (Exhibit C, Section 2.2.A.1): Please include total land areas (square miles) of each flood risk by flood risk type, county, region, and frequency as per guidance document (page 24): Submittal requirement number 2.	Table 2-5 within the text was added to summarize the areas of flood risk by county.	FNI - Allison	FNI - Mat	2-7 & 2-8
10	TWDB	Verified	Chapter 2	9. Existing Condition Flood Exposure (Exhibit C, Table 3): The Structure and Residential Structure counts in Table 3 do not appear to match the ExFldExpAll feature class counts. Please review and reconcile. [31 TAC §361.33 & Exhibit C 2.2.A.3].	FNI verified the structure counts in Table 3 matched the geodatabase, chapter text, and Appendix 2C	FNI - Allison	FNI - Allison	Table 3

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
11	TWDB	Verified	Chapter 2	13b. The Structure and Residential Structure counts in Table 3 do not appear to match the ExFidExpAll feature class counts with the 0.2% Annual Chance Flood Risk. Table 3 lists the Structure count as 48,703 and the Residential Structure count as 34,839. In contrast, the ExFidExpAll Structure counts are 24,453 and the Residential Structure counts are 10,773. Please review and reconcile [31 TAC §361.33(c), (d) & Exhibit D 3.5.3].	FNI verified the structure counts in Table 3 matched the geodatabase, chapter text, and Appendix 2C	FNI - Allison	FNI - Allison	Table 3
12	TWDB	Verified	Chapter 2	13d. The feature class does not appear to contain any entries with the 'SOURCE' listed as "Public". Exhibit C Section 2.2.A.1 includes the requirement to identify additional flood prone areas in the region that may not have been identified in the initial map(s) generated by the RFPG. Please confirm that the public did not identify any additional flood prone areas included in this feature class and, in event they did, please note "Public" as the data source [31 TAC §361.33(c), (d) & Exhibit D 3.5.3].	All flood prone areas identified during public outreach are within the mapped 1% ACE. Thus, the public did not identify and additional areas.	FNI - Mat	FNI - Mat	N/A
13	TWDB	Verified	Chapter 2	14. Model Coverage GIS Feature Class, ModelCoverage: There appears to be invalid entries for refer to the Summary Update to Exhibit D document available on the TWDB website [31 TAC §361.33(b)(2)].	MODEL_SOFTW updated from EPA-SWMM to SWMM in accordance to updated Exhibit D document.	FNI - Allison	FNI - Allison	N/A
14	TWDB	Verified	Chapter 2	15. Future Condition Flood Risk Analyses, Text (Exhibit C, Section 2.2.B): Please include a reference to Exhibit C Table 5 in the text as per guidance document (page 35): Once Task 2B Future Condition Flood Risk Analyses is complete, RFPGs must include a summary table with findings summarizing flood risk by county (Exhibit C Table 5).	Section 2.A.1.a. Possible Flood Prone Areas (Page 2-7) addresses the lack of Public flood prone areas.	FNI - Allison	FNI - Mat	2-7
15	TWDB	Verified	Chapter 2	16. Future Condition Flood Hazard Analysis, Text (Exhibit C, Section 2.2.B.1): Please include total land areas (square miles) of each flood risk by flood risk type, county, region, and frequency as per guidance document (page 33): Submittal requirement number 3	Table 2-6 added to Section 2.B.4.c	FNI - Allison	FNI - Mat	2-20
16	TPWD	Verified	Chapter 2	We should acknowledge that additional BLE data became available after all analyses were completed and preliminarily reviewed by TWDB. BLE publicly released after March 2022 was not incorporated into the plan but will be considered in future planning efforts.	A statement was added to section 1.A.b.2 to note that BLE data for the entire region became available after the Task 2 Existing Conditions Flood Hazard Analysis was performed. Future cycles of Regional Flood Planning can consider the newly released BLE data.	FNI - Mat	FNI - Mat	1-13
Chapter 3								
1	MPTX	Verified	3.A.4. Recommendation of Minimum Floodplain Mngt and Land Use Standards (Roadways and Habitable Structures)	Should higher standards be suggested that take into account future increases to 1% BFE? Including RSLC, increasing rainfall, subsidence, development runoff, etc?	Not recommending to add higher standards on top of what is already existing, per direction from RFPG over the course of the RFP process. No change to RFP.	FNI - Mat	FNI - Mat	N/A
2	MPTX	Verified	TABLE 3-4: FLOOD MITIGATION AND FLOODPLAIN MANAGEMENT GOALS	Could this table be sorted starting with Short Term (10-year) first, then Long Term (30-year)?	Recommend keeping it as is.	FNI - Allison	FNI - Mat	N/A
3	TWDB	Verified	Chapter 3/1	21. Existing Floodplain Management Practices, Text (Exhibit C, Section 2.3.A): Please review the information included in the draft plan and related tables. It appears that the information and tables in Chapter 1 do not match all the information and tables in Chapter 3, for example Tables 1-7 and 3-1 do not appear to align regarding the number and type of entities with flood-related authority. Please review and reconcile [31 TAC See §361.35 & Exhibit C 2.3.A].	Tables updated to align with GIS data.	FNI - Allison	FNI - Mat	3-3
5	TWDB	Verified	TABLE 3-4: FLOOD MITIGATION AND FLOODPLAIN MANAGEMENT GOALS	24b. Please ensure goals adhere to Exhibit C guidance regarding setting objectives, being measurable, etc. It appears that some goals, including but not limited to goal number 18, do not appear to meet this requirement. Please review grammar and goal descriptions to provide a better understanding of how and why policies and criteria would reduce floodplain development, and what their impact would be on education [31 TAC §361.36 & Exhibit C 2.3.B].	Some goals were revisited during the November 2022 RFPG meeting. All goals that did not have a measurable goal were revised to have a measurable goal.	FNI - Mat	FNI - Mat	3-17 & 3-18
6	TWDB	Verified	Chapter 3	52. Existing Floodplain Management Practices, Text (Exhibit C, Section 2.3.A): a. Please consider expanding, in greater detail, upon the level of enforcement of floodplain management practices within the chapter as they are outlined in Table 6 and the associated GIS submittal.	Tables added to outline the entities with various level of enforcement practices within Chapter 3. Text added after Table 3-1	FNI - Allison	FNI - Mat	3-5 & 3-6
7	TWDB	Verified	Chapter 3	52b. Please review the information pertaining to NFIP minimum requirements. The related NFIP BFE and building elevation requirements appear to be left off. Please review and consider revising as appropriate.	Added stairstep requirements based on data available to minimum NFIP requirements	FNI - Allison	FNI - Mat	3-5
8	TWDB	Verified	Table 6	53. Existing Floodplain Management Practices Table (Exhibit C, Table 6): It appears that at least one city may be represented incorrectly in Appendix 3-B, Table 6. For example, Winona does not appear to be included in the FEMA list of NFIP participating communities.		FNI - Allison	FNI - Mat	Vol. 2 Table 6
9	TWDB	Verified	Map 13	55. Existing Floodplain Management Practices Map (Exhibit C, Map 13): Please consider modifying Figure 3-1 within the draft plan on page 3-6 for legibility as may be difficult for some members of the public to interpret including due to the lack of city names in many instances.	Map 13 and Figure 3-1 were updated.	FNI - Andrew	FNI - Mat	3-7

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log									
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document	
10	TWDB	Verified	Chapter 3	56. Goals, Text (Exhibit C, Section 2.3.B): Please consider elaborating within the text section of "Transformed and Residual Risk" by providing descriptions of such risks as they apply if goals are achieved.	Residual risk added to Table 3-7. Paragraphs added to page 3-22 and 3-23	FNI - Mat	FNI - Mat	3-20	
Chapter 4									
1	MPTX	Verified	Chapter 4.A. Flood Mitigation Needs Analysis	Nice job. This is a tough section to make clear based on the subject matter and prescribed TWDB methodology.	Noted.	FNI - Mat	FNI - Mat	N/A	
2	MPTX	Verified	4.B.4.a. Classification of FMPs, FMSS, and FMEs	Nice job. Once again this is a tough section to make clear based on the subject matter and prescribed method from TWDB. FMX's, all very tough to methodically and accurately classify/categorize. I still think one of the better things for TWDB/RFPGS to consider (if possible) is a reclassification of buyout/acquisition as a FME or FMP...and also keeping FMS limited to institutional or regulatory actions which have no physical substance.	Noted.	FNI - Mat	FNI - Mat	N/A	
3	MPTX	Verified	TABLE 4-11: LIST OF POTENTIALLY FEASIBLE FMPS	I think this table might benefit with a preamble, such as: 'FMP is a relatively strict definition per TWDB (and thus only a short list technically qualified). The following table list the two FMPs which met all the FMP criteria as outlined by TWDB. It is expected that in future iterations this list will grow as FMEs are completed and mature into future FMPs'. (or something to that affect). I also like listing FMP first, but might suggest listing FME's second, with FMS's last. Just an idea, though I understand that is presumably the TWDB prescribed method of listing.	Inserted, 4-8.	MPTX - Greg	FNI - Mat	4-7	
4	MPTX	Verified	TABLE 4-11: LIST OF POTENTIALLY FEASIBLE FMPS	043000017: This sea wall project seems like it might stretch the definitions, scope, geography, and purpose of the Sabine Regional Flood Planning Group. Just an observation. Also, I wonder if it truly meets the presumed standard of being a 'shovel-ready' project. Feasibility? Signed sealed design? NA? I realize it might be politically popular but also might lead to questions whether it technically qualifies as an FMP. Just wondering.	This is a high priority project for the Sabine Region. Recommend no change at this time.	FNI - Mat	FNI - Mat	N/A	
5	MPTX	Verified	TABLE 4-12: POTENTIALLY FEASIBLE FMS TYPE DISTRIBUTION	Preamble might be slightly better to say: 'Table 4-12 classifies by type the 49 potentially feasible FMSs, and Table 4-13 provides the complete listing of all potentially feasible FMSs regardless of type.	Added	MPTX - Greg	FNI - Mat	4-8	
6	MPTX	Verified	TABLE 4-13: LIST OF POTENTIALLY FEASIBLE FMS	In addition to prior comments re. moving Acquisition and Elevation to FME/FMP category... the following FMS IDs might be more appropriate as FMEs: 2, 4, 9, 39, 40, 45.	Classifications based on TWDB guidance. No update needed.	FNI - Allison	FNI - Mat	N/A	
7	MPTX	Verified	TABLE 4-14: POTENTIAL FME TYPE DISTRIBUTION	Page transitions for this and prior table could possibly eliminate a blank page or two.	Printing setup. No update needed.	FNI - Mat	FNI - Mat	N/A	
8	MPTX	Verified	TABLE 4-15: POTENTIAL FMEs	I like the 'post-ambly' (narrative following the table), very good. Might consider moving it to the top and making it a preamble description of the table data.	Similar text was already included on page 4-8. No change to the RFP.	FNI - Mat	FNI - Mat	N/A	
9	MPTX	Verified	TABLE 4-17: FMS ESTIMATED COST ASSUMPTIONS	I think we could improve upon the Cost Estimate Ranges, by both modify the \$ figures and providing clarifying notes.	At this time, the costs associated with FMXs are simply estimates based on engineering costs FNI has experienced on previous projects and estimates based on judgment from limited information.	FNI - Mat	FNI - Mat	N/A	
10	MPTX	Verified	TABLE 4-20: FUNDING SOURCES AVAILABLE FOR FMES, FMSS, AND FMPS	Suggest adding Hazard Mitigation Grant Program (HMGP) to FEMA list. Also, suggest adding Community Development Block Grant – Disaster Recovery (CDBG-DR) to HUD list.	Table updated	MPTX - Greg	FNI - Mat	4-22	
11	MPTX	Verified	4.B.4.h. Residual Risk	If you have flexibility to do so, I recommend either removing or demoting to #4 or 5 the: 'Potential failure or overtopping of dams and levees'. I say that because generally speaking it has been a sensitive topic with SRA. Might be preferable to avoid mention when possible, depending on SRA opinion.	SRA has had no comment. No update needed.	FNI - Allison	FNI - Mat	N/A	
12	TWDB	Verified	Table 12	25. Flood Management Evaluations (FME) Table (Exhibit C, Table 12): It appears that FME_ID 04100060 is missing from Table 12. Please review and reconcile.	Table 12 has been updated	FNI - Allison	FNI - Mat	Vol. 2, Table 12	
13	TWDB	Verified	Map 16	26. Flood Management Evaluations (FME) Map (Exhibit C, Map 16): It appears that an indication of whether an FME area is associated with previous studied area is not noted, as required by the Submittal Requirements for FMEs in Exhibit C Section 2.4.B. Please reconcile [31 TAC §361.38(m) & Exhibit C 2.4.B].	Map 16 and Map 19 updated to include overlap of ongoing studies.	FNI - Andrew	FNI - Allison FNI - Mat	Map 16 / Map 19	
14	TWDB	Verified	FMP	27. Flood Mitigation Projects (FMP) Text (Exhibit C, Section 2.4.B): It appears that the estimated cost of the "Sabine Pass to Galveston Bay" FMP in Table 4-11 (\$2,270,100,000) does not match the estimated cost in Table 13 in the Appendix (\$2,390,000,000). Please review and reconcile as appropriate [31 TAC §361.38(c-e) & Exhibit C 2.4.B].	Costs have been updated in the text to match the FMP cost within the tables.	FNI - Allison	FNI - Mat	Multiple Locations	
15	TWDB	Verified	FMP	28. Flood Mitigation Projects (FMP) Table (Exhibit C, Table 13): It appears that the estimated cost of the "Sabine Pass to Galveston Bay" FMP in Table 4-11 (\$2,270,100,000) does not match the estimated cost in Table 13 in the Appendix (\$2,390,000,000). Please review and reconcile as appropriate [31 TAC §361.38(c-e) & Exhibit C 2.4.B].	Costs have been updated in the text to match the FMP cost within the table 13.	FNI - Allison	FNI - Mat	Multiple Locations	

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
16	TWDB	Verified	FMS	30. Flood Management Strategies (FMS) Text (Exhibit C, Section 2.4.B): a. Please review entries for Table 4-12. It appears Table 4-12, and the FMS feature class lists a total of 49 FMSs in contrast to Table 4-13 that lists 51 and the associated Table 14 within the appendix that lists 50. Please review and revise accordingly [31 TAC §361.38(h) & Exhibit C 2.4.B].	Table 4-13 now shows 49 FMSs	FNI - Allison	FNI - Mat	4-10 thru 4-12
17	TWDB	Verified	FMS	30b. For any Maintenance FMS, please review and verify that costs are non-recurring, non-capital. Please review and revise accordingly [31 TAC §361.38(h) & Exhibit C 2.4.B].	Costs were updated. The Maintenance FMSs are anticipated to be non capital, but recurring since maintenance is a continual process.	FNI - Mat	FNI - Mat	
18	TWDB	Verified	FMS	31a. Flood Management Strategies (FMS) Table (Exhibit C, Table 14): a. It appears Table 4-12 and the FMS feature class lists a total of 49 FMSs in contrast to Table 4-13 which lists 51 FMSs and the associated Table 14 within the appendix that lists 50 FMSs. Please review and revise accordingly [31 TAC §361.38(d) & Exhibit C	Table 14 now has 49 FMSs	FNI - Allison	FNI - Mat	Table 14
19	TWDB	Verified	FMS	31b. Please review if the FMS_ID 042000024 City of Fate Flood Access Improvement is considered an FMS or includes associated capital costs. If it has no capital costs, please provide brief additional description to clarify the nature of the strategy [31 TAC §361.38(d) & Exhibit C 2.4.B].	The access improvement appears to be a single time cost to provide secondary access and likely would not have a reoccurring capital costs. It would have a capital cost, but this does not appear to be something that would need a flood study associated with it like a typical flood mitigation project.	FNI - Allison	FNI - Mat	N/A
20	TWDB	Verified	FMS	b. It appears Table 4-12 and the FMS feature class lists a total of 49 FMSs in contrast to Table 4-13 which lists 51 FMSs and the associated Table 14 within the appendix that lists 50 FMSs. Please review and revise accordingly [31 TAC §361.38(d) & Exhibit C 2.4.B].	Table 14 now has 49 FMSs	FNI - Allison	FNI - Mat	Table 14
21	TWDB	Verified	FME	58. Flood Management Evaluations (FME) Text (Exhibit C, Section 2.4.B): a. Please consider if some FMEs should be FMPs. For example, see FME_ID: 041000034, where the name and description appear to indicate this action may be an infrastructure project. Please expand the description field to clarify why it is an FME or consider moving to FMP category if appropriate.	FME 041000034 cannot be an FMP because this study does not have a model, a BCR, structure counts, etc. that TWDB required for a project to be considered as an FMP. Will update FME names and descriptions accordingly.	FNI - Allison	Table 12	N/A
22	TWDB	Verified	FME	58b. For county-wide watershed strategies where a majority of the county falls outside of the RFPG boundary, please include justification how the strategy benefits the region and coordinate with other RFPGs to make sure the efforts are not duplicated. Additionally, please consider including an entire HUC-10 for the county-wide studies.		FNI - Allison	FNI - Mat	5-2
23	TWDB	Verified	FME	58c. For areas with existing BLE models, please state how the FME will improve upon the current BLE models. BLE is available for the entire Region 4 here: https://webapps.usgs.gov/infrm/estbfe/		FNI - Allison	FNI - Mat	5-2
24	TWDB	Verified	FME	58d. In areas where there is an ongoing TWDB-funded, FIF Category 1 study, please describe how this would be incorporated into the proposed FME. For example, FME 041000059 is a duplication of FIF ID 40027 (Hunt County Countywide Drainage Study). Please review FIF IDs 40027 (Hunt County Countywide Drainage Study), 40045 (Flood Protection Planning for Watersheds – Lower Sabine River Basin), 40058 (Flood Protection Planning for Watersheds – Upper Sabine River Basin), and 40019 (Sabine River Relief Ditch Extension & Expansion).	FME 0059 does not appear to be a duplication of the Hunt County FIF study. FNI coordinated internally with the staff working on that FIF study and found out that the FIF study was going to be relatively limited due to the available budget. FME 0059 is a remapping effort for Hunt County which is intended to be a regulatory floodplain study with FEMA to remap rather than the typical Cat. 1 scope of an FIF study. Information added just below Table 4-14.	FNI - Allison	FNI - Mat	4-14
25	TWDB	Verified	FME	59b. Please consider documenting existing or ongoing BLE and FIF studies.	Added text about ongoing FIF studies	FNI - Mat	FNI - Mat	4-14
26	TWDB	Verified	FMS	61. Flood Management Strategies (FMS) Text (Exhibit C, Section 2.4.B): For county-wide watershed strategies (i.e., Franklin County) where a majority of the county falls outside of the Flood Planning Region boundary, please consider including justification for how the FMS benefits the region.	The Sabine RFPG does not have any countywide FMSs recommended for Franklin County. Line left in Table 14 and 4-13 was removed.	FNI - Allison	FNI - Mat	Table 14
27	TWDB	Verified	FMS	62. Flood Management Strategies (FMS) Table (Exhibit C, Table 14): Please verify that all non-recurring, non-capital cost fields are \$0 in Table 14. FMSs should include non-recurring, non-capital costs if they are known.	GIS data had NRNC cost = to total cost, table had all 0, updated to all 0	FNI - Allison	FNI - Mat	N/A
28	TPWD	Verified		TPWD encourages the inclusion of the ecological and societal benefits of flooding in any education program and appreciates the repeated mention of nature-based solutions in the education and outreach goals of the Sabine RFP.	Ecological and societal benefits of flooding in all education and outreach FMS descriptions where possible. Added to Table 5-2	FNI - Allison	FNI - Mat	5-4
29	TPWD	Verified		TPWD encourages the RFPG to protect existing streams, riparian areas, and floodplains.	Text was added to Table 5-1 regarding nature based solutions that protect existing streams, riparian areas, and floodplains while reducing flood risk to people	FNI - Allison	FNI - Mat	5-2
30	FNI	Verified	FMEs	Add 3 FMEs to the Sabine RFP - Lawrence Road Detention Pond - Cow Bayou Diversion Channel - Elevation of Feeder Road Bridge at Cole Creek	FMEs were added to the final version of the Sabine RFP.	FNI - Mat	FNI - Mat	Multiple Locations

Chapter 5

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
1	MPTX	Verified	TABLE 5-1: RECOMMENDED FME BY EVALUATION TYPE	Similar to comments on Residual Risk, might want to be sure SRA is on board with including. If so, also, I assume this exercise if conducted would extend on past studies (originally conducted by Brown and Root that modeled dam failure projections for two scenarios: "Sunny Day Breach", and "Worst-Case Scenario". I think I have that data on file somewhere. Also, that cost estimate might be a little light depending on how detailed the analysis is. Cost estimate may be too low for "Floodplain mapping for dam failure hydrologic and hydraulic modeling to determine flood hazard areas in the event of a dam breach". Also, it might be worthwhile to re-confirm that this FME/evaluation remains a priority for SRA.	As noted in our comment response on Chapter 4, SRA did not have any issues with the item (potential failure from overtopping dams or levees) noted in Chapter 4. The dam inundation study is also in the City of Lone Oak (FME 041000040) which is not one of the 3 SRA dams. The cost for a dam failure and mapping analysis in Table 5-1 was an estimate based on a relatively small dam (City of Lone Oak) and is not a major dam like Lake Fork, Lake Tawakoni, or Toledo Bend. Thus, the \$500,000 estimate appears to be reasonable. Recommending no change to the RFP.	FNI - Mat	FNI - Mat	N/A
2	MPTX	Verified	TABLE 5-3: RECOMMENDED FLOOD MITIGATION PROJECTS	Good details, interesting project. Also see prior comments on the sea wall though.	Noted, no updated needed.	FNI - Mat	FNI - Mat	N/A
3	TWDB	Verified	FMP	33. Flood Mitigation Project (FMP) Recommendations, Text: a. Each recommended FMP must be accompanied with an associated model or supporting documentation to show no negative impact. Please confirm in the plan that this was done and provide reference to supporting materials. As per the draft report (page 4-18), "For Structural FMPs and FMSs, signed and sealed reports were checked for certified statements that the associated project or strategy would not cause negative impacts upstream, downstream, or within the project area in events up to and including the 1% annual chance flood event. For FMPs and FMSs that certified statements could not be located for, existing H&H models were reviewed for negative impacts as defined above." For each recommended FMP, please identify in the plan how no negative impact was determined as required by the Exhibit C Section 3.6.A (page 108), either via a model or a study, and submit the associated model or include the study name.	Table 5-3 added to summarize the source of No Adverse Impact Verification. Appendix 5F added to include Final Feasibility Report and Orange County Engineering Appendix from USACE project. Model ID for Kilgore included in Table 5-3	FNI - Allison	FNI - Mat	5-5
4	TWDB	Verified	FME	34. Flood Management Evaluation (FME) Recommendations Table (Exhibit C, Table 15): FME_ID 04100060 is included in the FME feature class but appears to be missing from Table 15. Please revise Table 15 accordingly to include all FMEs [31 TAC §361.39(c), (f) & Exhibit C 2.5.A].	FME Table 15 was updated.	FNI - Allison	FNI - Mat	Table 15
5	TWDB	Verified	FMP	35. Flood Management Project (FMP) Recommendations Table (Exhibit C, Section 2.5.B): 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. For example, the Sabine Pass to Galveston Bay project does not appear to refer to or describe any associated model or supporting documentation to show no negative impact. The City of Kilgore project includes a model, however there is no description how this model relates to the determination of no negative impact.	Additional documentation was gathered from Orange County and Orange County Drainage District on the proposed USACE levee. Kilgore model proves no adverse impact	FNI - Allison	FNI - Mat	Table 5-3
6	TWDB	Verified	FMP	37. Flood Mitigation Project (FMP) Details (Exhibit C Section 3.9, Tables 23-40, and Exhibit D Section 3.11.3 FMP_Details Geodatabase file): Please ensure agreement across plan elements of the FMP costs. The FMP costs included in the report, table, and feature class do not appear to be in alignment with each other. For example, the FMP_COST for the Sabine Pass to Galveston Bay Coastal Storm Risk Management Program is listed as \$2,270,100,000 in the written portion of the plan on page 5-5 while the cost listed in the geodatabase is \$2,390,000,000. Please reconcile, as appropriate [31 TAC§361.39 & Exhibit C 2.5.B].	Tables were updated. RFP text already explains the cost split in Section 5.C.6.a	FNI - Allison	FNI - Mat	
7	TWDB	Verified	FMS	38. Flood Management Strategy (FMS) Recommendations, Text (Exhibit C, Section 2.5.c): a. It appears Table 4-12 and the FMS feature class lists a total of 49 FMSs in contrast to Table 4-13 which lists 51 FMSs and the associated Table 14 within the appendix that lists 50 FMSs. Please review and revise accordingly [31 TAC §361.38(d) & Exhibit C 2.4.B].	Table 12 was updated so that there are only 49 FMSs	FNI - Allison	FNI - Mat	Table 14
8	TWDB	Verified	FMS	38b. Please review if FMS_ID 042000024 City of Fate Flood Access Improvement is considered an FMS or includes associated capital costs. If it has no capital cost, please provide brief additional description to clarify. Please review the recommended FMS list for similar occurrences [31 TAC §361.39 & Exhibit C 2.5.C].	The access improvement appears to be a single time cost to provide secondary access and likely would not have an recurring capital costs. It would have a capital cost, but this does not appear to be something that would need a flood study associated with it like a typical flood mitigation project. Fate FME is \$400,00. NRNC was incorrectly equal to total cost in submittal. NRNC is now 0	FNI - Allison	FNI - Mat	N/A
9	TWDB	Verified	FMS	39. Flood Management Strategy (FMS) Recommendations Table (Exhibit C, Table 17): a. It appears Table 4-12, and the FMS feature class lists a total of 49 FMSs in contrast to Table 4-13 that lists 51 and the associated Table 14 within the appendix that lists 50. Please review and reconcile, as appropriate [31 TAC §361.39 & Exhibit C 2.5.C].	Table 12 was updated so that there are only 49 FMSs	FNI - Allison	FNI - Mat	Table 14

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
10	TWDB	Verified	FMS	39b. Please review if FMS_ID 042000024 City of Fate Flood Access Improvement is considered an FMS or includes capital costs associated. If there are no capital costs, please provide brief additional description to clarify. Please review the recommended FMS list for similar occurrences. [31 TAC §361.39 & Exhibit C 2.5.C].	The access improvement appears to be a single time cost to provide secondary access and likely would not have an recurring capital costs. It would have a capital cost, but this does not appear to be something that would need a flood study associated with it like a typical flood mitigation project. Fate FME is \$400,00. NRNC was incorrectly equal to total cost in submittal. NRNC is now 0	FNI - Allison	FNI - Mat	N/A
11	TWDB	Verified	FME	63. Flood Management Evaluation (FME) Recommendations, Text (Exhibit C, Section 2.5.A): a. The first FME_ID listed is 04100002. Please consider, if practical, starting FME_ID numbering at 04100001.	Updated to use Parker Creek as FME 01	FNI - Allison	FNI - Mat	Table 12
12	TWDB	Verified	FME	63b. Please consider if some FMEs should be FMPs. For example, see FME_ID 041000034, where the name and description appear to indicate this action as an infrastructure project. Please expand description fields to clarify why they are an FME or consider moving to FMP category if appropriate.	FME 041000034 cannot be an FMP because this study does not have a model, a BCR, structure counts, etc. that TWDB required for a project to be considered as an FMP. Will update FME names and descriptions accordingly.	FNI - Allison	Table 12	N/A
13	TWDB	Verified	FME	63c. For county-wide watershed FMEs where a majority of the county falls outside of the RFPG boundary, please include justification how the strategy benefits the region and coordinate with other RFPGs to make sure the efforts are not duplicated. Additionally, please consider aligning the county-wide study areas with full watershed boundaries.	Coordination with adjacent consultatns for adjacent RFPGs to verify costs were not duplicated.	FNI - Allison	FNI - Mat	N/A
14	TWDB	Verified	FME	63d. For areas with existing BLE models, please state how the FME will improve upon the current BLE models. BLE is available for the entire Region 4 here: https://webapps.usgs.gov/infrm/estbfe/	Will add text about BLE.	FNI - Allison	FNI - Mat	Section 5.A.2
15	TWDB	Verified	FME	63e. In areas where there is an ongoing TWDB-funded, FIF Category 1 study, please describe how this would be incorporated into the proposed FME. For example, FME_ID 04100059 is a duplication of FIF ID 40027 (Hunt County Countywide Drainage Study). Please review FIF IDs 40027 (Hunt County Countywide Drainage Study), 40045 (Flood Protection Planning for Watersheds – Lower Sabine River Basin), 40058 (Flood Protection Planning for Watersheds – Upper Sabine River Basin), and 40019 (Sabine River Relief Ditch Extension & Expansion).	FME 0059 does not appear to be a duplication of the Hunt County FIF study. FNI coordinated internally with the staff working on that FIF study and found out that the FIF study was going to be relatively limited due to the available budget. FME 0059 is a remapping effort for Hunt County which is intended to be a regulatory floodplain study with FEMA to remap rather than the typical Cat. 1 scope of an FIF study.	FNI - Mat	FNI - Mat	N/A
16	TWDB	Verified	FME	64b. Please consider documenting existing or ongoing BLE and FIF studies.	Text regarding ongoing FIF studies was included on page 4-14.	FNI - Allison	FNI - Mat	4-14
17	TWDB	Verified	FMS	67. Flood Management Strategy (FMS) Recommendations, Text (Exhibit C, Section 2.5.C): For county-wide watershed strategies (i.e., Franklin County) where a majority of the county falls outside of the Flood Planning Region boundary, please include justification for how the FMS benefits the region.	The cost associated with recommended FMSs that extend beyond the Sabine Flood Planning Region boundary were split based on coordination with bordering flood planning regions.	FNI - Allison	FNI - Mat	N/A

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
18	OCDD	Verified		<p>As a precautionary measure, and only to the extent necessary for projects currently designated as FMEs to be changed to FMPs in the Sabine Region Flood Plan, I am providing the following comment to the Draft Sabine Region Flood Plan.</p> <p>The following projects, currently classified as FMEs, should be classified as FMPs under the Sabine Region Flood Plan:</p> <p>041000052 Flood Protection Planning Study Cow Bayou & Adams Bayou Alternative @CDD Ponds A-Adams Bayou Detention Ponds Study@ 041000053 Flood Protection Planning Study Cow Bayou & Adams Bayou Alternative @CDD Ponds B-Cole Creek Detention Ponds Study@ 041000054 Flood Protection Planning Study Cow Bayou & Adams Bayou Alternative @CDD Ponds C-Cow Bayou Detention Ponds Study@ 041000061 Lawrence Road Detention Pond Study@ Lawrence Road Detention Pond Study@ 041000045 Flood Protection Planning Study Cow Bayou & Adams Bayou Alternative @CDD Ponds D-Feasibility Assessment and Conceptual Design of Constructing a Stormwater Detention Pond Adjacent to Cow Bayou near Claiborne Park@ 04100050 Orange County Drainage Improvements at Kinard Estates Study@ First-time sewer service, detention pond, and other drainage improvements to reduce flooding and environmental impacts.@ 041000057 Flood Protection Planning Study Cow Bayou & Adams Bayou Alternative @CDD Ponds E-Terry Gully Detention Ponds Study@ 041000047 Feasibility Assessment and Conceptual Design of increasing Capacity of Drainage Ditches and Channels that Convey Stormwater from Neighborhoods @&H Study and Modeling for Determination of Need and Feasibility Assessment of the Capacity of Drainage Ditches and Channels that Convey Stormwater from Neighborhoods Located Within Orange County@ 041000046 Feasibility Assessment and Conceptual Design of Increasing the Size of Culverts and Railroad Trestles on Major Drainage Structures @&H Study and Modeling for Determination of Need and Feasibility Assessment for Increase in Size of Culverts and Railroad Trestles on Major Drainage Structures Throughout Orange County@ 041000060 Elevation of Feeder Road Bridge Along IH-10 at Cole Creek Study@ Elevation of Feeder Road Bridge Along IH-10 at Cole Creek Study@</p>	<p>Because these particular studies do not have a valid model and BCR ratio, these cannot be elevated to FMPs at this time. Many of these are expected to be performed during the amendment period with the Task 12 funding and can be elevated to FMPs when that data is created in 2023.</p> <p>No change to the RFP at this time.</p>	FNI - Mat	FNI - Mat	N/A
Chapter 6								
1	MPTX	Verified	TABLE 6-1: REDUCTION IN FLOOD RISK EXPOSURE DUE TO REC.FMPS	Good analysis. Benefits surprisingly low relative to cost, but I understand its purpose is mainly to protect industrial installations and shipping (benefits would look better if there was a way to take industrial benefits into account). P.S. I see a discussion on that is presented on page 168. National strategic importance, probably true.	Noted. No updated needed.	FNI - Mat	FNI - Mat	N/A
2	MPTX	Verified	6.A.1.c. No Adverse Impact	Might want to soften the preamble language to say 'The recommended FMPs do not appear to negatively affect neighboring areas located within or outside of the flood planning region.' It's probably the case that the USACE has attested to the NAI for this FMPs, but keeping arms length from such statements might be appropriate.	Wording updated	FNI - Mat	FNI - Mat	6-3
3	MPTX	Verified	6.A.3. Other Impacts	Nice job on this section.	Noted. No updated needed.	FNI - Mat	FNI - Mat	N/A
4	MPTX	Verified	FIGURE 6-1: WATER PLANNING AREAS AND SABINE FLOOD PLANNING REGION	Might remove 'Chapter 7' reference below map.	Corrected to remove inadvertent "Chapter 7" as a page divider from the last page of Chapter 6.	FNI - Mat	FNI - Mat	6-8
5	TPWD	Verified	Chapter 6		Based on engineering judgement, it was determined that all FMSs and FMPs recommended by the Sabine RFPG align with the Texas Conservation Action Plan (TCAP). The TCAP outlines actions to protect and manage Species of Greatest Conservation Need (SGCN) and important habitats which include freshwater and riparian ecosystems. Texas was added under 6.A.3.b noting the FMXs align with the TCAP.	FNI - Allison	FNI - Mat	6-5
				Comment cites TCAP handbook on priority habitat .				

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
6	TPWD	Verified	Chapter 6	The removal of low-water crossings can benefit rare species such as mussels and fish if the crossing is replaced with a bridge or culvert that does not form a barrier to species movement. Conversely, building dams and channelizing streams can adversely affect aquatic habitats and species. TPWD would like to encourage all the FMXs proponents to consider stream crossing designs that allow for sediment transport and passes of aquatic organisms and do not impound water. Basically, designs that are invisible to the creek. This includes bridges that span the creek where possible or culverted crossings designed with the culvert(s) in the active channel area lower than those in the floodplain enches so that the flow in the channel is not overly spread out. The central/low-flow culvert(s) should be large enough to handle a 1.5 year flood without backing up water. The bottoms of these lower culverts should be set at least a flood below grade to allow natural substrate to cover the culvert bottom and allow for aquatic organisms passage. These lower, recess culverts should be installed in the thalweg or deepest part of the channel and be aligned with the lower flow channel (Clarkin et.al., 2006)	Comment addressed in 3.B.3 because no FMPs are removing LWCs. Additionally, none of the FMXs recommended in the Sabine Plan aim to impound water along streams. Impounding water along streams would cause a negative impact related to flooding as impounding would restrict water from moving downstream and hold it back upstream and cause a negative impact. The goal of the RFP is to improve flooding conditions and ensure that none of them cause a negative impact. Furthermore, items recommended in the RFP must evaluate the 100-year storm, which far exceeds the 1.5 yr flood noted in the comment.	FNI - Mat	FNI - Mat	N/A
7	TPWD	Verified	Chapter 6	TPWD understands that the goal of the RFP is to mitigate floods to reduce risk to life and property and would also like to encourage the use of nature-based solutions where possible. The Draft Sabine RFP states that none of the projects or strategies are anticipated to have negative downstream effects.	A requirement of all recommended FMEs, FMPs, and FMSs is no negative impact. Chapter 3 contains a recommended solution noting "RFPG recommends that all new construction consider nature-based and sustainable solutions."	FNI - Mat	FNI - Mat	N/A
Chapter 7								
1	MPTX	Verified	7.A.4. Flood Recovery	Might consider adding a discussion of HUD CDBG-DR to this section. There would need to be a separate preamble since it's HUD, and mention that only the most severe disasters result in CDBG-DR. I can work on this if advisable to include.	Inserted	MPTX - Greg	FNI - Mat	7-8
2	MPTX	Verified	7.B.6 Hazard Mitigation Action Plans	I realize this might be a TWDB prescribed section, but including HMP listing here seems off topic with regard to flood response (emergency activities).	Section 7.B.6 is no longer in the report. HMAP information was shifted to other parts of Chapter 7	MPTX - Greg	FNI - Mat	N/A
3	MPTX	Verified	7.B.6 Hazard Mitigation Action Plans	Also, this seems like an incomplete list. I could probably get you more if interested. Also, should probably mention all the official participating jurisdictions in the HMPs for the region (primarily cities covered in County-Multi-Jurisdictional HMPs).	This is the current list of HMAP that we were able to find during 2021 when the research was being conducted.	MPTX - Greg	FNI - Mat	N/A
Chapter 8								
1	MPTX	Verified	Chapter 8	My opinion, this would be a good place to make the case for increased higher level (state or river basin) involvement, coordination, and construction of flood mitigation work. Legislature could establish a permanent structure and system for doing so. In other words, move away for hyper-local (and the perennial confusion and inefficiency it creates), and move towards state-level coordination. Not sure where this fits.	Flood mitigation work is already being done on a state-wide level through TWDB via the FIF program. We made a recommendation in Chapter 8 already to continue funding the FIF program so that it can continue.	FNI-Mat	FNI-Mat	Section 8.A.1
2	MPTX	Verified	Chapter 8	Wild notion, but my opinion for the best floodplain regulatory move would be to turn over local floodplain admin. to either the SRA, or State of Texas. Multiple advantages to doing so.	SRA's focus is primarily on water supply, not floodplain management or regulatory aspects of flooding. No change to the RFP.	FNI-Mat	FNI-Mat	N/A
3	MPTX	Verified	Chapter 8	Totally agree! This is a brilliant observation about the contradictions and ironies with how TxDOT exempts itself out of local floodplain standards. Kudos for including this.	Noted. No change to the RFP.	FNI-Mat	FNI-Mat	N/A
4	MPTX	Verified	Chapter 8	Good observation.	Noted. No change to the RFP.	FNI-Mat	FNI-Mat	N/A
5	MPTX	Verified	Chapter 8	Update on prior comment, these are all very good recommendations. I have more, but this is good start.	Noted. No change to the RFP.	FNI-Mat	FNI-Mat	N/A
6	Jerry Cotter USACE	Verified	Chapter 8	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.	This is a comment specific to the Trinity RFPG	FNI-Mat	FNI-Mat	N/A
7	Jerry Cotter USACE	Verified	Chapter 8	Clarify the early 2000's state legislation that provide counties the authority to regulate floodplains to explicitly allow and encourage activities associated with floodplain management such as development of land use plans, regulatory authorities, 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 legislature bill lacks implementation guidance in the form of administrative rules. If development is occurring in unincorporated areas, this development can dynamically impact flood risk.	The only legislation noted within the Sabine RFP is regarding the 2021 STORM (Federal) legislation and the state legislation regarding dams. This comment appears to be related to a different region other than Sabine	FNI-Mat	FNI-Mat	N/A

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log									
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document	
8	Jerry Cotter USACE	Verified	Chapter 8	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 environmental permitting requirements.	This is a comment specific to the Trinity RFPG. The Sabine RFP does not have a Chapter 8 recommendation in this area.	FNI-Mat	FNI-Mat	N/A	
9	Jerry Cotter USACE	Verified	Chapter 8	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 through DFW stors more flood waters during of flood than any three of the USACE reservoirs that provide flood protection for DFW. The many other stream 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 stor flood water until sufficient time has laps 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.	This is a comment specific to the Trinity RFPG.	FNI-Mat	FNI-Mat	N/A	
10	Jerry Cotter USACE	Verified	Chapter 8	Establish future land use plans for unincorporated areas associated with rapidly growing urban areas.	In several Sabine RFPG, there were numerous mentions of not wanting to impose any additional regulation or on tracts that could be used for development. Recommending to not add this to the Sabine RFP at this time.	FNI-Mat	FNI-Mat	N/A	
11	Jerry Cotter USACE	Verified	Chapter 8	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.	This is a comment specific to the Trinity RFPG.	FNI-Mat	FNI-Mat	N/A	
12	Jerry Cotter USACE	Verified	Chapter 8	Encourage 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.	This is a comment specific to the Trinity RFPG.	FNI-Mat	FNI-Mat	N/A	
13	Jerry Cotter USACE	Verified	Chapter 8	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.	This appears to be a comment specific to the Trinity RFPG.	FNI-Mat	FNI-Mat	N/A	
Chapter 9									
1	MPTX	Verified	Chapter 9	Nice job on this Chapter, all very good!	Noted. No change to the RFP.	FNI-Mat	FNI-Mat	N/A	
2	MPTX	Verified	Chapter 9	An additional barrier is lack of access to federal databases that contain important flood damage details (HWM's, XYZT\$ for flood damage). Primarily FEMA, IA, but also PA and SBA-DL.	Text added	MPTX - Greg	FNI-Mat	9-9	
3	TWDB	Verified	Chapter 9	41. Flood Infrastructure Financing Analysis, Text (Exhibit C, Section 2.9): It appears that the draft plan does not describe how the data was collected or the survey methodology. Please provide this required information. [31 TAC §361.44 & Exhibit C 2.9].	Text added in Section 9.B - "Contact information for Sponsors was gathered through entity webistes and FEMA's Floodplain Manager contact list."	FNI-Allison	FNI-Mat	9-9	
4	TWDB	Verified	Chapter 9	68. Flood Infrastructure Financing Analysis, Text: Please consider reviewing text for proper usage of "Category 2" where appropriate. "Category 2" is referenced on page 9-4, however, there are currently no TWDB-funded, FIF Category 2 projects committed within the Sabine Flood Planning Region.	Text updated to talk about majority of funding being Cat 1 and not Cat 2.	FNI-Allison	FNI-Mat	9-4	
Chapter 10									
1	MPTX	Verified	Chapter 10	Nice job! All relevant, good info, you included many things I wouldn't have thought of.	Noted. No change to the RFP.	FNI - Mat	FNI - Mat	N/A	
2	MPTX	Verified	TABLE 10-2: SUMMARY OF RFPG MEETINGS	Only thing worth adding is extending the table to include remaining future steps in the process, with specific dates estimated or TBD.	Add paragraph outlining the timeline of future dates/key events	FNI - Mat	FNI - Mat	10-10	
Volume 2									
1	MPTX	Verified	Volume 2	It would be nice if the Volume 2 PDF had "bookmark indexing" per section. Also, TOC would be nice.	Volume 2 was bookmarked	FNI-Allison	FNI - Mat	Volume 2	
2	MPTX	Verified	LIST OF ABBREVIATIONS AND ACRONYMS	Might be good to include a list of acroynms and if so include HWM's (high water marks), and water-surface elevation (WSE)		FNI-Allison			
Geodatabase Submittal									
1	TWDB	Verified	Entites	Please review entites listed as having flood-related authority within the Entites feature class. It is not clear whether all entites listed under "Other" have flood-related authority [31 TAC§361.30(4) & (5)].	All "Other" entites with flood-related authority were added to Table 7-1 to be consistent with Entites feature class. All "Other" Entites were determined to have flood-related authority by the Sabine RFPG.	FNI - Allison	FNI - Allison	Entites	

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
2	TWDB	Verified	Entites	It appears that some entities crossing regional boundaries do not start with "00" as required. For additional entities crossing region boundaries, an ID should be requested from TWDB to ensure consistency across regions. Regions may create their own IDs for additional entities entirely within the region, and please refer to the TWDB email sent on December 3, 2021 for more information on adding new entities. [31 TAC§361.30(4) & (5)].	No update needed. All 61 entities that extend beyond the region boundary have IDs that start with 00.	FNI - Alanna	FNI - Allison	Entites
3	TWDB	Verified	ExFldInfraPol	Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "POP_PROTEC" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.31 & Exhibit D 3.3].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldInfraPol
4	TWDB	Verified	ExFldInfraLn	Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "POP_PROTEC" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.31 & Exhibit D 3.3].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldInfraLn
5	TWDB	Verified	ExFldInfraPt	Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "POP_PROTEC" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.31 & Exhibit D 3.3].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldInfraPt
6	TWDB	Verified	ExFldInfraPt	Please include all low water crossings (LWCs) identified during the flood planning process in this feature layer. The ExFldExpAll feature class appears to contain LWCs that are not included in the ExFldInfraPt feature class. Note: This is required in contrast to the optional LWC feature class. See Table 7 of Exhibit D for a list of valid entries [31 TAC §361.31].	ExFldExpAll layer contains 113 LWCs. ExFldInfraPt contains 132. The 19 LWCs excluded from the ExFldExpAll layer do not intersect with the ExFldHazard layer.	FNI - Alanna	FNI - Allison	ExFldInfraPt
7	TWDB	Verified	ExFldExpPol	10. Existing Condition Flood Exposure GIS Feature Class, ExFldExpPol: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.33(c) & Exhibit D 3.5.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldExpPol
8	TWDB	Verified	ExFldExpLn	11. Existing Condition Flood Exposure GIS Feature Class, ExFldExpLn: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.33(c) & Exhibit D 3.5.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldExpLn
9	TWDB	Verified	ExFldExpPt	12. Existing Condition Flood Exposure GIS Feature Class, ExFldExpPt: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.33(c) & Exhibit D 3.5.3].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFldExpPt
10	TWDB	Verified	ExFldExpAll	13. Existing Condition Vulnerability GIS Feature Class, ExFldExpAll: a. The ExFldExpAll feature class does not appear to include all ExFldExpLn segments. Please review all existing exposure features and ensure that all are included in the ExFldExpAll feature class [31 TAC §361.33(c), (d) & Exhibit D 3.5.3].	17,167 Line features were identified and 17,167 points are included in ExFldExpAll as ExpGEOM - Line. No update made.	FNI - Alanna	FNI - Allison	ExFldExpAll
11	TWDB	Verified	FutFldExpPol	17. Future Condition Flood Exposure GIS Feature Class, FutFldExpPol: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.34(c); Exhibit D 3.6.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	FutFldExpPol
12	TWDB	Verified	FutFldExpLn	18. Future Condition Flood Exposure GIS Feature Class, FutFldExpLn: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.34(c); Exhibit D 3.6.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	FutFldExpLn
13	TWDB	Verified	FutFldExpPt	19. Future Condition Flood Exposure GIS Feature Class, FutFldExpPt: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.34(c); Exhibit D 3.6.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	FutFldExpPt
14	TWDB	Verified	FutFldExpAll	20. Future Condition Flood Vulnerability GIS Feature Class, FutFldExpAll: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.34(c); Exhibit D 3.6.2].	Placeholder removed.	FNI - Alanna	FNI - Allison	FutFldExpAll
15	TWDB	Verified	ExFpMp	22. Existing Floodplain Management Practices GIS Table, ExFpMp: a. Please review the feature class as it appears there are differences between the ExFpMp table and the table from the chapter appendix. For example, Joaquin is listed as "Low" for "LEV_ENFC" in the ExFpMp table but listed as "None" in the Exhibit C Table 3 located in Appendix 3-B. Please reconcile [31 TAC §361.35 & Exhibit D 3.7].	Table 6 updated to align with ExFpMp table.	FNI - Allison	FNI - Allison	ExFpMp
16	TWDB	Verified	ExFpMp	b. It appears that some fields contain invalid entries. For example, fields such as "MIN_CODE" contain "999999". Please review all fields and populate with valid entries as referenced in Exhibit D Table 20 [31 TAC §361.35 & Exhibit D 3.7].	Placeholder removed.	FNI - Alanna	FNI - Allison	ExFpMp
17	TWDB	Verified	Goals Table	23. Goals Table (Exhibit C, Table 11): Please adhere to Exhibit D guidance regarding GOAL_ID structure. GOAL_ID should begin with the region number such as '04' and not '4' [31 TAC §361.36 & Exhibit C 2.3.B].	Table 11 updated to align Goal_ID to match Goals.	FNI - Alanna	FNI - Allison	Goals Table
18	TWDB	Verified	FMP	29. Flood Mitigation Projects (FMP) GIS Feature Class, FMP: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "REDSTRUCT100" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.38(c-e) & Exhibit D 3.11.1].	Placeholder removed.	FNI - Alanna	FNI - Allison	FMP
19	TWDB	Verified	FMP	36. Flood Mitigation Project (FMP) Recommendations GIS Feature Class, FMP: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "REDSTRUCT100" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile, as appropriate [31 TAC§361.39 & Exhibit D 3.11.1].	Placeholder removed.	FNI - Alanna	FNI - Allison	FMP

RESPONSE LOG TO COMMENTS DRAFT REGIONAL FLOOD PLAN



Innovative approaches
Practical results
Outstanding service

Client: Sabine RFPG (Sponsor: Sabine River Authority)
Project: Region 4: Sabine RFP
Document: Aug. 2022 Draft Regional Flood Plan - Combined Summary of Public Comments

Review Date: 12/6/2022
Discipline: Stormwater

Comment Response Log								
Comment #	Reviewer	Classification	Deliverable	Review Comment/Questions	Resolution/ Response	Action	Verified	Location in Final RFP Document
20	TWDB	Verified	FMP	37. Flood Mitigation Project (FMP) Details (Exhibit C Section 3.9, Tables 23-40, and Exhibit D Section 3.11.3 FMP_Details Geodatabase file): Please ensure agreement across plan elements of the FMP costs. The FMP costs included in the report, table, and feature class do not appear to be in alignment with each other. For example, the FMP_COST for the Sabine Pass to Galveston Bay Coastal Storm Risk Management Program is listed as \$2,270,100,000 in the written portion of the plan on page 5-5 while the cost listed in the geodatabase is \$2,390,000,000. Please reconcile, as appropriate [31 TAC §361.39 & Exhibit C 2.5.B].	Cost of this FMP is \$2,270,099,968. Text and tables updated to align.	FNI - Alanna	FNI - Allison	FMP
21	TWDB	Verified	FMS	10. Flood Management Strategy (FMS) Recommendations GIS Feature Class, FMS: Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "DAMAGE" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.39 & Exhibit C 2.5.C].	Remove placeholder.	FNI - Alanna	FNI - Allison	FMS
22	TWDB	Verified	ExFpMp	54. Existing Floodplain Management Practices GIS Feature Class, ExFpMp: Please consider reviewing the feature class for accurate entities. It is not clear that those listed all have flood authority (e.g., certain MUDs as NFIP participants) [31 TAC §361.35 & Exhibit D 3.7].	Union Valley Ranch MUD of Hunt County was updated to reflect no NFIP participation	FNI - Allison	FNI - Allison	ExFpMp
23	TWDB	Need Clarification	Streams	57. Streams GIS Feature Class, Streams: a. Please consider reviewing the Streams with the FMP and FME feature classes for alignment. For example, FMP_ID: 043000012 and 043000020 polygons do not appear to overlap with streams stated in the descriptions.	FMP_IDs stated were not included in the FMP feature class. Clarification requested from Ryke. No response.	FNI - Alanna		Streams
24	TWDB	Verified	Streams	b. It appears the Streams feature class may include erroneous streams. See STREAM_ID: 040041224 and 040033872; it appears to cut across the terrain unrealistically. Please consider reviewing the streamline process.	Will review streams layer. (Level 2)	FNI - Alanna	FNI - Allison	Streams
25	TWDB	Verified	Streams	c. Please consider joining unconnected stream segments. See STREAM_ID: 040050935 for an example stream segment with a gap.	All disconnected stream segments along the Sabine River were connected.	FNI - Alanna	FNI - Allison	Streams
26	TWDB	Verified	ExFldInfraPt	46. Existing Flood Infrastructure GIS Feature Class, ExFldInfraPt: Please use ENTITY_IDs from the Entities feature class for the OPER_ENT field. Please leave as "999999" or NULL if there is no data or unknown.	Remove placeholder.	FNI - Alanna	FNI - Allison	ExFldInfraPt
27	TWDB	Verified	ExFldProjs	49. Existing Projects GIS Feature Class, ExFldProjs: Please consider including projects FMA-PJ-06-TX-2019-008 as described in the comment provided for Table 2.	Project added to ExFldProjs feature class and Table 2.	FNI - Alanna	FNI - Allison	ExFldProjs
28	TWDB	Verified	ExFldProjs	50. Existing Projects (Exhibit C, Table 2): Please ensure that all ID fields are entered correctly in all tables and geodatabases. Unique IDs must be accurate for the database to connect and work properly. Please refer to Exhibit D Table 2 or more recent updates for Unique ID guidance. For example, it appears that there are differing starting IDs listed under "Existing Project ID". Some start with '4' where guidance requires the unique ID to start with '04'.	No update needed. All ID start with 04 in Table 2 and ExFldProjs	FNI - Alanna	FNI - Allison	ExFldProjs
29	TWDB	Verified	ExFldExpAll	c. Please refrain from using numeric placeholders (such as "999999") in numeric fields such as "VELOCITY" as this causes errors in calculations. Please leave NULL when the field is not applicable or unknown. Please reconcile [31 TAC §361.33(c), (d) & Exhibit D 3.5.3].	Remove placeholder.	FNI - Alanna	FNI - Allison	ExFldExpAll
30	TWDB	Verified	FutFldExpAll	51. Future Condition Flood Vulnerability GIS Feature Class, FutFldExpAll: If the CRITICAL field contains a "No" entry, then please leave CRIT_TYPE as NULL in associated entries.	Make null.	FNI - Alanna	FNI - Allison	FutFldExpAll
31	TWDB	Verified	FME	59. Flood Management Evaluation (FME) GIS Feature Class, FME: a. Please consider populating the "MODEL_DESC" field for clarity on existing studies to be used.	Model description and model availability fields updated to reflect BLE model availability.	FNI - Allison	FNI - Allison	FME
32	TWDB	Verified	FMP	60. Flood Mitigation Projects (FMP) GIS Feature Class, FMP: If the "WATER_SUP" field contains a "No" entry, then please leave WSUP_DESCR as NULL.	Make null.	FNI - Alanna	FNI - Allison	FMP
31	TWDB	Verified	FME	64a. Flood Management Evaluation (FME) GIS Feature Class, FME: a. Please consider populating the "MODEL_DESC" field for clarity on existing studies to be used.	Will add detail.	FNI - Allison	FNI - Allison	FME
33	TWDB	Verified	FMP_Details	66. Flood Mitigation Project (FMP) Details Geodatabase, 3.11.3 FMP_Details: There are NULL score values for multiple entries for FMP_ID 043000017. Please verify if these are correct or should be added.	Values are unknown and were intentionally left null.	FNI - Allison	FNI - Allison	FMP_Details