

Table of Contents

Chapter 10: Public Participation and Plan Adoption	10-1
Outreach to Cities, Counties, and Other Entities with Flood-Related Authority or Responsibility.....	10-3
Meetings with Local Political Subdivisions with Flood-Related Authority	10-11
Meetings with Other Entities and Interested Parties.....	10-11
Outreach to the Public.....	10-11
Digital Media: Website and Twitter	10-11
Informational Handouts	10-12
PowerPoint Slideshow Presentation	10-13
Press Releases and Media Advisories.....	10-13
Public Hearings, Public Meetings, and Open House Roadshow.....	10-15
Public Input.....	10-17
Plan Adoption and Approval Process	10-18
Conformance with Title 31 TAC §362.3 Guidance Principles	10-25

List of Figures

Figure 10.1: Online Data Collection Tool	10-5
Figure 10.2: Methods Used for June – July 2021 Data Collection and Related Public Outreach.....	10-6
Figure 10.3: Image of the Interactive Web Map Prior to June – July 2021 Public Input.....	10-7
Figure 10.4: Image Showing Public Input Received from Data Collection Process	10-8
Figure 10.5: Methods Used for February 2022 Interactive Web Map Public Outreach	10-8
Figure 10.6: Additional Public Input Received on Updated Interactive Web Map, February 2022	10-9
Figure 10.7: Image of the Survey Distributed to Sponsors of Potential Flood Mitigation Actions	10-10
Figure 10.8: Flood-Prone Areas Identified via Interactive Web Map.....	10-24

List of Tables

Table 10.1: Current Trinity Regional Flood Planning Group Voting Members	10-2
Table 10.2: Current Trinity Regional Flood Planning Group Non-Voting Members.....	10-3
Table 10.3: Trinity Regional Flood Planning Group Public Meetings	10-16
Table 10.4: List of Public Comments Received	10-22
Table 10.5: Title 31 TAC §362.3 Guidance Principles and Regional Flood Planning Group Response Satisfying Said Principles	10-25

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Chapter 10: Public Participation and Plan Adoption

This chapter describes the plan adoption and approval process for the Trinity Regional Flood Planning Group (RFPG) Regional Flood Plan and its 2023 amendments, as well as the efforts made to inform the public and encourage public participation in the planning process. Special efforts were made during this inaugural regional flood planning cycle to inform the general public and entities with flood-related authority or responsibility throughout the Trinity Region about this important, new planning effort – and to seek their crucial input. All public participation and plan adoption activities were conducted in accordance with the state’s flood planning guidance principles, as well as in accordance with the requirements of the Texas Open Meetings Act and Public Information Act.

Regional Flood Planning Group

The 86th Texas Legislature passed Senate Bill 8 in 2019, which authorized the Texas Water Development Board (TWDB) to oversee the regional flood planning and state flood planning processes. The legislation included specific information to be included in the regional flood plans. In addition, the TWDB established planning rules and guidance documents for the flood planning process and the plans themselves. The TWDB established 15 RFPGs across Texas to implement the flood planning process. Each RFPG includes designated representatives of 12 required interest categories:

- Agriculture
- Counties
- Electric-generating utilities
- Environment
- Flood districts
- Industry
- Municipalities
- Public
- River authorities
- Small business
- Water districts
- Water utilities

The initial voting members of the 15 RFPGs were designated by the TWDB during its October 1, 2020, board meeting. Each RFPG, at its discretion, added additional voting or non-voting members for any additional interest category needed to represent the region or added additional members to the required interest categories. Since its inception, the Trinity RFPG has added several members and replaced members to fill vacancies. Each member also had the opportunity to designate an alternate to represent their interest category in the event they were unable to attend a meeting.

The TWDB included multiple agencies as non-voting members to each RFPG, and each of those agencies assigned representatives. In addition, liaisons were selected from adjacent regions to participate as non-voting members to share information on activities occurring within their region that might be of interest or relevant to the Trinity Region.

The process for adding new voting or non-voting members, filling vacancies, or creating new interest categories or organizational representations is outlined in the Trinity RFPG bylaws adopted on October 27, 2020, which can be found on the RFPG website.

Table 10.1 lists the voting members of the Trinity RFPG as of June 2023, and the interests they represent. For the first round of regional flood planning, Glenn Clingenpeel (Trinity River Authority) served as the Trinity RFPG Chair, Sarah Standifer (City of Dallas) served as the Vice Chair, and Scott Harris (Gulf Coast Authority) served as the Secretary.

Table 10.1: Current Trinity Regional Flood Planning Group Voting Members

Interest	Member
River Authorities	Glenn Clingenpeel, Chair
Municipalities	Sarah Standifer, Vice Chair
Water Utilities	Scott Harris, Secretary
Small Business	Chad Ballard
Electric Generating Utilities	Sano Blocker
Agriculture	Melissa Bookhout
Flood Districts	Rachel Ickert
Public	Andrew Isbell
Environmental	Jordan Macha
Water Districts	Galen Roberts
Industry	Matt Robinson
Counties	Lissa Shepard

Table 10.2 lists the non-voting members of the Trinity RFPG as of June 2023 and the interest or organization they represent. Among the non-voting members were liaisons from neighboring regions who helped facilitate interregional cooperation, where necessary. These liaisons also supported efforts to resolve issues, including potential negative impacts on neighboring areas within and between regions.

Table 10.2: Current Trinity Regional Flood Planning Group Non-Voting Members

Interest and/or Organization	Member
TWDB	Richard Bagans
Texas Department of Agriculture (TDA)	Rob Barthen
Texas State Soil and Water Conservation Board (TSSWCB)	Steve Bednarz
*Council of Governments (COG) - Houston-Galveston Area Council	Justin Bower
Neches Flood Planning Group (liaison)	Ellen Buchanan
Region 6 San Jacinto Flood Planning Group (liaison)	Todd Burrer
*United States Army Corps of Engineers (USACE), Fort Worth	Jerry Cotter
Texas Commission on Environmental Quality (TCEQ)	Bert Galvan
*Federal Emergency Management Agency (FEMA)	Diane Howe
*COG - Deep East Texas Council of Governments	Lonnie Hunt
* North Central Texas Council of Governments (NCTCOG)	Kate Zielke
*USACE, Galveston	Lisa McCracken
General Land Office (GLO)	Kris Robles
Texas Division of Emergency Management (TDEM)	Andrea Sanders
*National Weather Service (NWS) - West Gulf River Forecast Center	Greg Waller
Texas Parks and Wildlife Department (TPWD)	Adam Whisenant

**These non-voting seats, not required by TWDB rule or statute, were added by the Trinity RFPG and the respective interests or organizations were invited to appoint representatives or submit nominees to serve as non-voting members.*

Outreach to Cities, Counties, and Other Entities with Flood-Related Authority or Responsibility

The Trinity RFPG made special efforts to contact cities, counties, and various other entities and individuals across the Trinity Region with flood-related authority – including flood planning, floodplain management, and/or flood mitigation responsibilities.

Securing input from these regional entities was a vital priority of the Trinity RFPG so outreach efforts focused on:

- Making certain regional entities were aware of the regional flood planning process
- Encouraging the exchange of necessary data to assist with development of the inaugural regional flood plan
- Providing abundant opportunities to be engaged with the planning process from beginning to end

The Trinity RFPG team began its outreach effort by developing a robust database of entities or individuals with flood planning, floodplain management, and/or flood mitigation responsibilities across the entire 38-county region. This database also included “interested parties” who requested electronic notifications about regional flood planning activities and milestones on the Trinity RFPG website or through team members. As of June 2023, the database included over 900 individual contacts, and the Trinity RFPG continues to update or add to the list as new contact information becomes available, or as individuals indicate their interest in the regional flood planning process. Among the entity types represented in the database were:

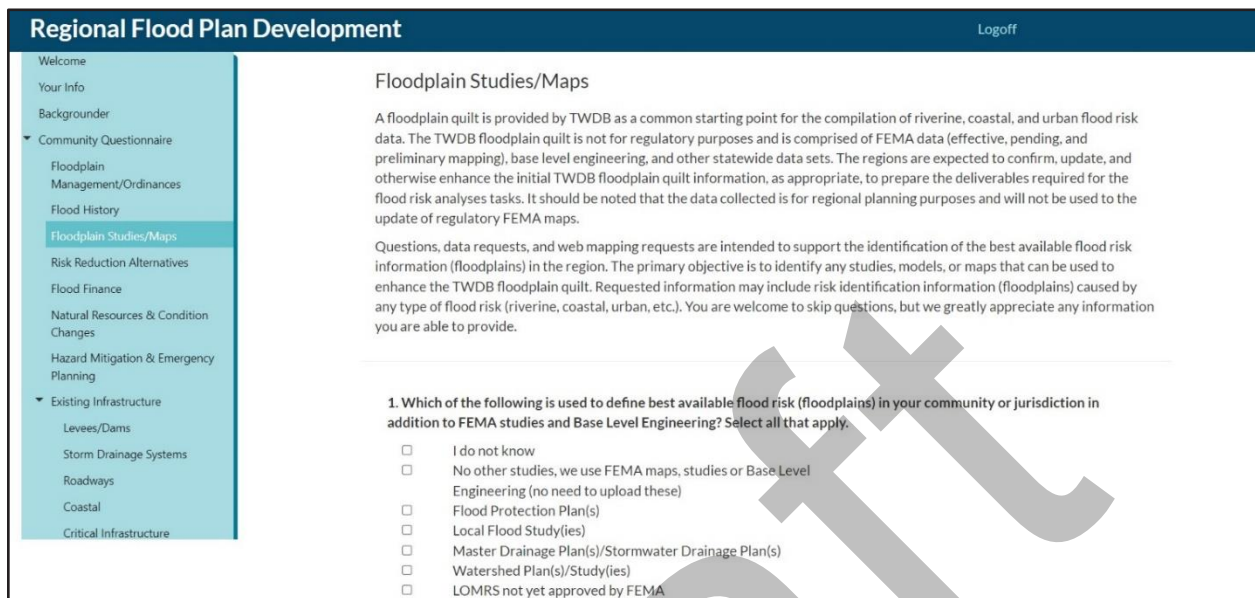
- Agriculture
- Cities and towns
- COGs
- Counties
- Districts of various types, such as:
 - Development Districts
 - Drainage Districts
 - Flood Control Districts (FCD)
 - Municipal Management Districts
 - Municipal Utility Districts (MUD)
 - Special Utility Districts (SUD)
 - Water Control and Improvement Districts (WCID)
 - Water Supply Districts (WSD)
- Electric generating utilities
- Environmental groups
- Federal agencies
- Industries
- Public (including “interested parties” who subscribed to receive electronic communications through the Trinity RFPG website)
- River authorities
- Small businesses
- State agencies or entities
- Water authorities
- Water utilities

In addition, many of these entity types or interest categories were represented among the voting and non-voting membership of the Trinity RFPG.

Data Collection Tools and Surveys

Several data collection surveys or tools were developed by the Trinity RFPG and made available to the regional entities, interested parties, and the general public to facilitate the data collection and mapping process essential for the development of the inaugural regional flood plan. This included an initial electronic data collection tool that was posted to the Trinity RFPG website in June 2021 to gather information on local flood planning resources, as well as existing and future flood-related risks in the Trinity Region. A screenshot of the data collection tool is shown in **Figure 10.1**.

Figure 10.1: Online Data Collection Tool



This survey included access to an Interactive Floodplain Web Map where participants could identify specific flood-prone areas. Entities and individuals were notified of the data collection tools, and were strongly encouraged to participate in the data collection process, via several methods (shown in **Figure 10.2**):

- Extensive discussion and demonstration of the data collection tool and Interactive Web Map occurred during a public meeting of the Trinity RFPG
- Emails were sent to the regional entities and interested parties (distributed via MailChimp)
- Postcard were sent via United States postal services to each entity or interested party with a known mailing address
- Two rounds of direct phone calls were made in June and July 2021 to try and contact each entity and identify alternative contacts, where needed
- Press releases were distributed to media across the region, resulting in news article placements

Based on the initial data gathered, an updated, preliminary version of the interactive flood risk web map was generated and made available on the Trinity RFPG website for public comment in February 2022. Entities and individuals were asked to review the map and identify any potential gaps or inaccuracies in the depiction of current flood-prone areas. Entities and individuals could add comments to the map by dropping points to indicate areas where there might be errors or missing areas of flood risk for their community or neighborhood. This preliminary interactive flood risk web map was publicized via:

- Extensive discussion and demonstration of the new, preliminary interactive floodplain web map during the Trinity RFPG public meeting
- Email blast to the regional entities and interested parties email list (distributed via MailChimp)
- Press releases distributed to media across the region, resulting in news article placements

As a result of the above public outreach efforts, the Trinity RFPG’s electronic data collection tool received responses from nearly 100 entities across the Trinity Region.

In early June 2022, the consultant Trinity RFPG team developed and distributed a survey to sponsors of recommended flood mitigation actions including Flood Management Evaluations (FMEs), Flood Management Strategies (FMS), and/or Flood Mitigation Projects (FMPs) to identify how much state and/or federal funding might be needed by sponsors to implement their recommended flood mitigation actions. In addition to distributing the survey via email, follow-up phone calls were made during the summer and fall by the Trinity RFPG team to potential project sponsors to maximize participation. Ultimately, 18 percent of those surveyed provided responses. The RFPG assumed that those sponsors that did not respond would be able to provide 10 percent local funding to implement the recommended action. Overall, the total cost of implementing the recommended actions in this plan is \$1,076,686,000. The RFPG anticipates that \$966,309,000 in state and federal funding is needed for implementation.

Figure 10.2: Methods Used for June – July 2021 Data Collection and Related Public Outreach

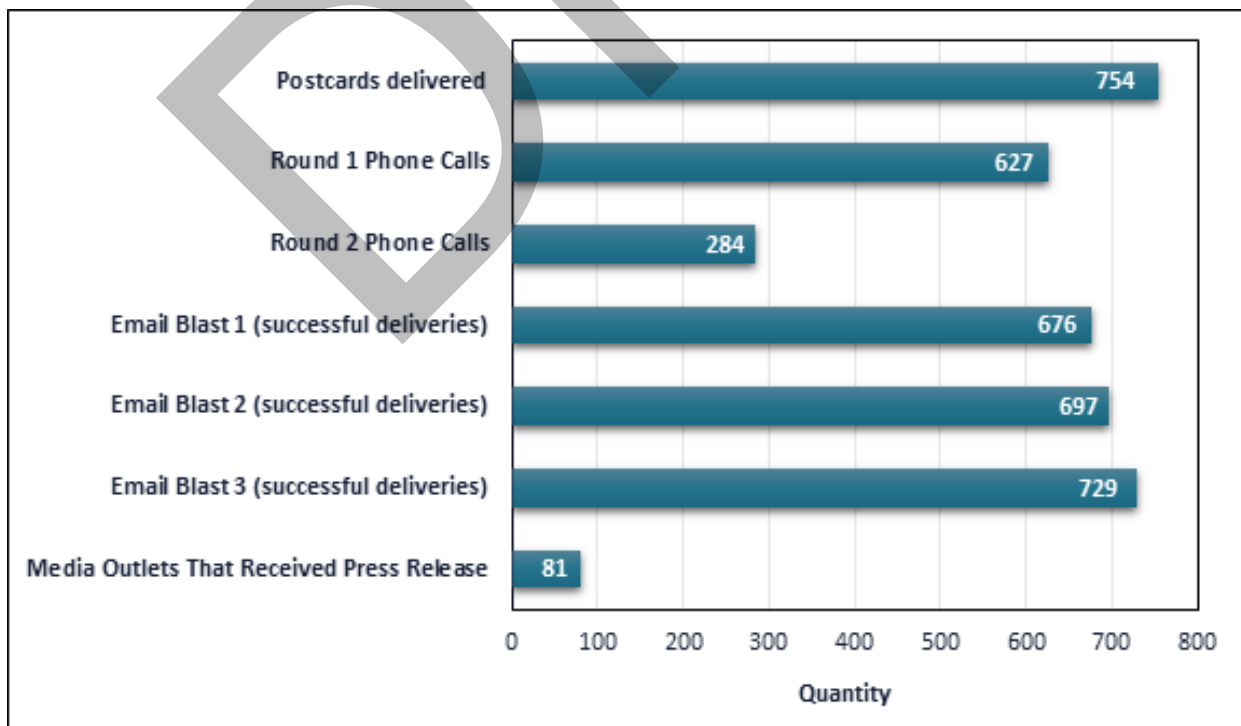


Figure 10.3: Image of the Interactive Web Map Prior to June – July 2021 Public Input

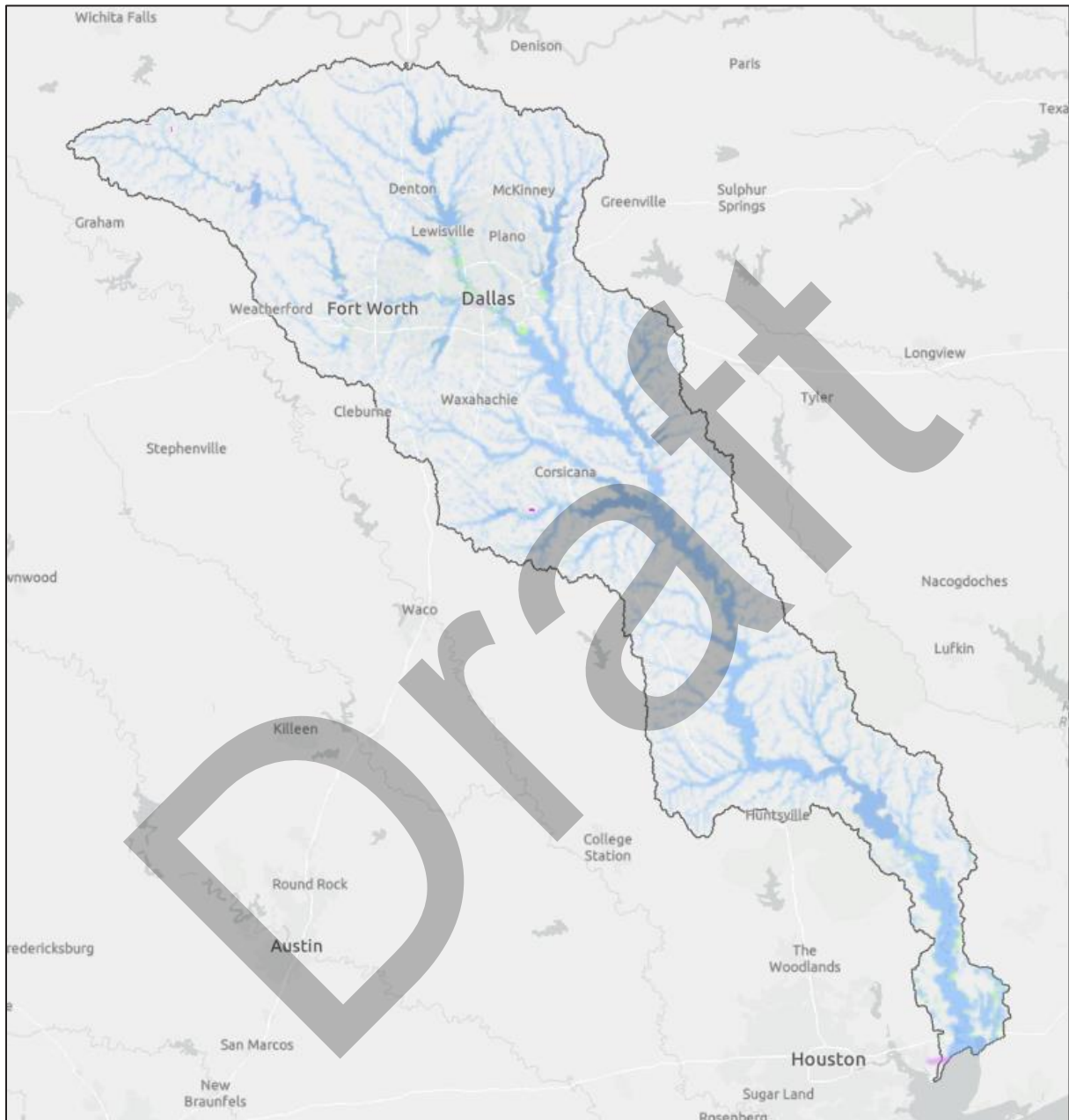


Figure 10.4: Image Showing Public Input Received from Data Collection Process



Figure 10.5: Methods Used for February 2022 Interactive Web Map Public Outreach

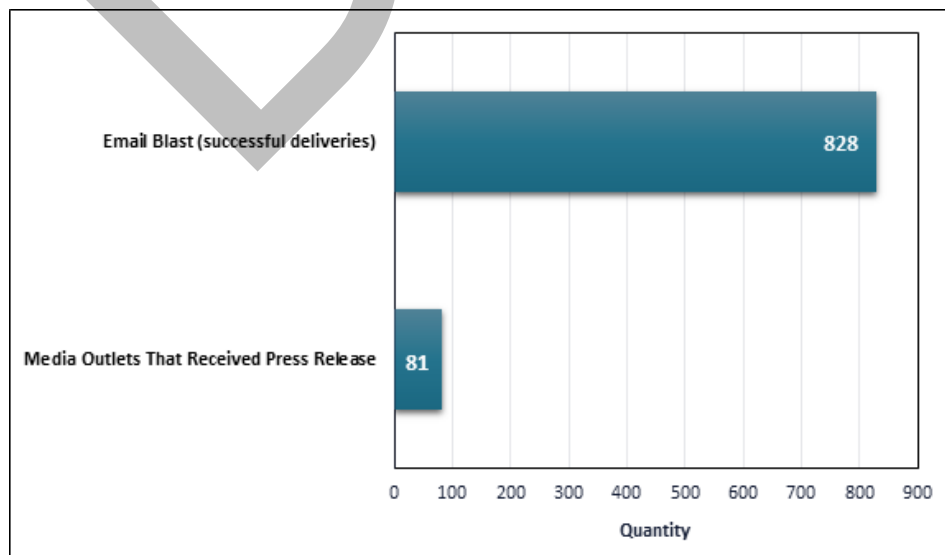


Figure 10.6: Additional Public Input Received on Updated Interactive Web Map, February 2022

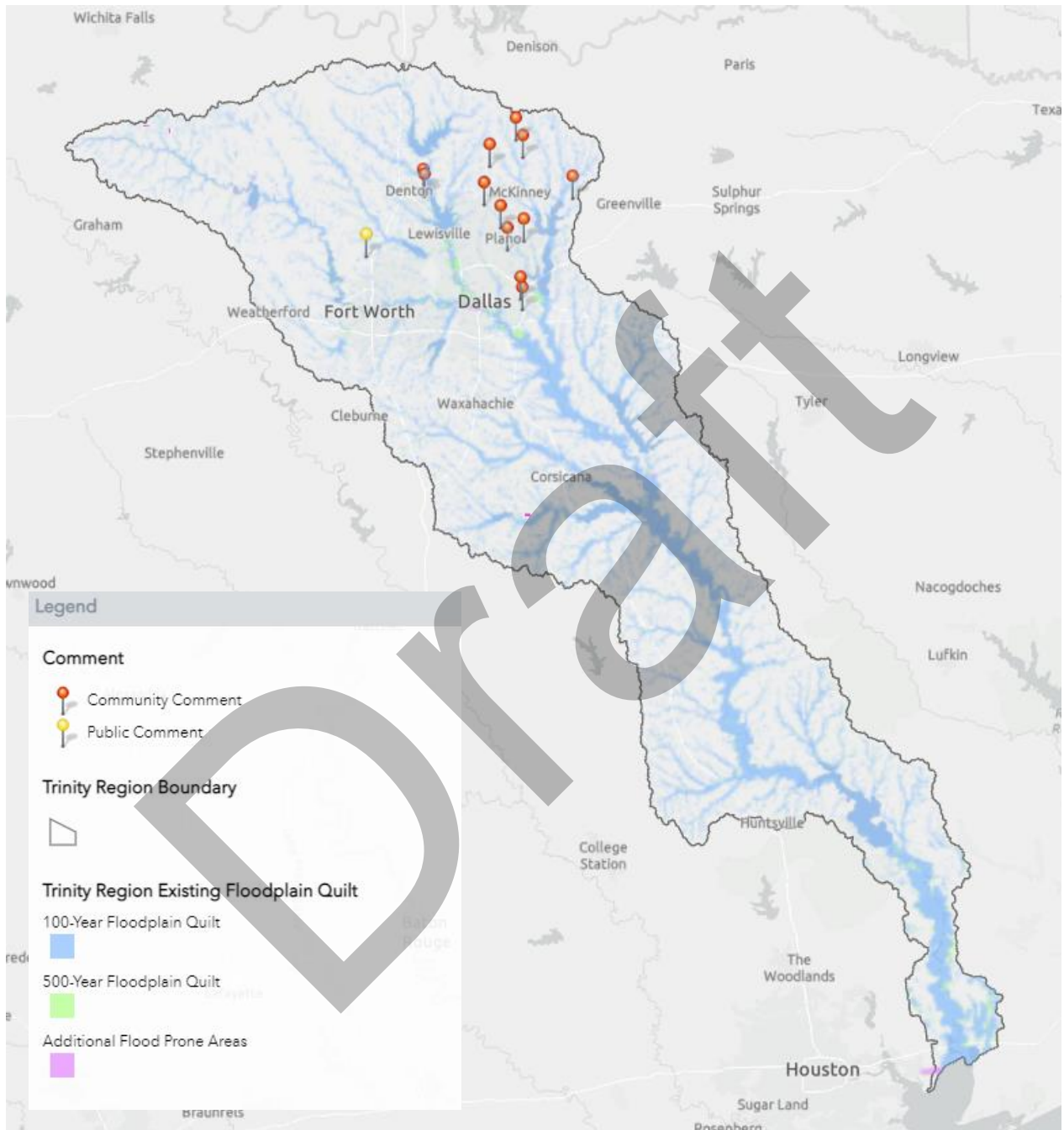


Figure 10.7: Image of the Survey Distributed to Sponsors of Potential Flood Mitigation Actions

Hello Sponsor,

We are reaching out to you because there are one or more actions for your community that will be listed in the Trinity regional flood plan, and we need your help to identify how much state or federal funding you may need to implement these projects.

Please reply to this email and fill out the drop-down menu in the table below for each of your entities' Flood Mitigation Actions by June 28, 2022. Please note the percent funding financed by sponsor and other funding needed **must equal 100%**. For more information regarding your Flood Mitigation Actions, visit the following link: [RFP Region 3 - FMX Summaries by Sponsor](#). If we do not receive a response, we will assume that 90% of the cost for that action will need other funding (including state, federal and/or other funding).

The Texas Water Development Board (TWDB) designated 15 regional flood planning areas each of which began with a designated regional flood planning group that will develop a regional flood plan for their region by January 2023. TWDB will bring the regional flood plans together to produce the first State Flood Plan by September 1, 2024. Entities must have their project listed in the State Flood Plan to receive state funding for a proposed flood project. As part of the regional flood planning process, RFPGs must indicate how sponsors will propose to finance recommended Flood Mitigation Actions included in the Flood Plan¹. Flood Mitigation Actions include Flood Management Evaluation (FME), Flood Mitigation Strategy (FMS), and Flood Mitigation Project (FMP)².

There is no commitment associated with being a sponsor for an action in the plan, this is just a planning level study.

Flood Mitigation Action ID	Flood Mitigation Action Type ²	Flood Mitigation Action Name	Flood Mitigation Action Description	Flood Mitigation Action Total Estimated Cost [*]	Sponsor Funding		Other Funding Needed** (including state, federal and/or other funding)
					Anticipated Source of Sponsor Funding	Percent Funding to be Financed by Sponsor**	
032000095	FMS	Floodplain Regulatory Awareness Public Information Campaign	Rewrite, improve, and implement new local floodplain regulations, to include a public information campaign on regulatory awareness	\$50,000	General Revenue	90%	10%
032000058	FMS	Acquisition of Repetitive Loss Properties	Acquire repetitive flood loss properties and properties prone to flooding in the Deep River Plantation Subdivision	\$5,000,000	Choose an item.	Choose an item.	Choose an item.
032000070	FMS	Voluntary Buyout Program	The county and partnering jurisdictions will begin a voluntary buyout program for insured severe repetitive loss properties that are in the floodplain	\$5,000,000	Choose an item.	Choose an item.	Choose an item.
031000033	FME	FEMA Mapping	Create FEMA mapping in previously unmapped areas and update existing FEMA maps as needed.	\$1,276,000	Choose an item.	Choose an item.	Choose an item.

^{*}Costs are based on high level engineering estimates and assumptions.

^{**}Percent funding financed by sponsor and other funding needed **MUST equal 100%**.

Immediately after the Trinity RFPG voted to approve the 2023 Region 3 Trinity Regional Flood Plan in November 2022, its consultant team began the process of soliciting and reviewing further input as part of their preparations to amend the Plan in 2023. Emails sent to regional stakeholders between November 17, 2022, and January 27, 2023 requested sponsors from across the Trinity River Basin to submit data for potential FMEs, FMSs, and FMPs to be considered for inclusion in the Amended Regional Flood Plan. Multiple meetings were held during this period with potential project sponsors to discuss their proposed FMEs, FMSs, and FMPs. The consultant team also developed a methodology for grouping all proposed project submissions into tiers, based on certain RFPG-approved criteria, and presented this methodology to the Trinity RFPG for approval. The goal of this effort was to get more FMEs, FMSs, and FMPs qualified for inclusion in the Amended Plan as recommended solutions. As a result of this purposeful outreach, additional data for 165 new FMEs, two new FMSs, and 69 new FMPs was received and had the potential to be added to the Amended Regional Flood Plan.

For the second Amended Regional Flood Plan, solicitations for additional flood mitigation actions were distributed on the RFPG’s website and via email to the Trinity RFPG’s distribution list. As a result, eight new FMEs, six new FMSs, and 31 new FMPs were received and recommended to be included in the second Amended Regional Flood Plan.

Meetings with Local Political Subdivisions with Flood-Related Authority

During this initial planning round, the Trinity RFPG's team met with 16 local political subdivisions with flood-related authority who were identified as potential sponsors of flood mitigation actions. The purpose of these meetings was to specifically identify the locations of potential FMEs, FMSs, and FMPs and to gather other necessary details for planning purposes. These entity meetings were held in a virtual format and included cities, counties, river authorities, and others.

Meetings with Other Entities and Interested Parties

The Trinity RFPG team also met with a variety of other regional entities and interested parties during the initial planning round to gain input on potential flood mitigation actions and to collect any relevant data these entities wished to be considered in the planning process. These entities included eight state and federal agencies, COGs, and environmental advocacy groups. Much like the Trinity RFPG meetings with political subdivisions with flood-related authority throughout the region, these meetings were held in a virtual format.

Outreach to the Public

In addition to the regional entity outreach described above, members of the general public were informed about planning activities through the development and/or distribution of a variety of communications vehicles. More information on public meetings, hearings, and open houses is included in later in this chapter.

Digital Media: Website and Twitter

In May 2021, the Trinity RFPG created a Twitter account and began using it to regularly to update the public about meetings and planning activities, as well as to share flood-related data and stories from other sources.

In accordance with regional flood planning guidelines and public engagement best practices, the Trinity RFPG team developed and launched a website (www.trinityrfpg.org) in June 2021. In accordance with the Texas Open Meetings Act and Senate Bill 8/TWDB guidelines, the website was also used for timely postings of all meeting agendas/notices, meeting materials, meeting minutes, and recordings. The homepage features a form where interested parties can sign up to receive electronic notifications for meeting-related document postings, along with key planning milestones.

The site also includes a dedicated Public Comment page, where members of the public can submit questions or concerns. Other avenues for the public to contact the Trinity RFPG team

are also provided, including the identification of a dedicated email address, info@trinityrfpg.org. The site also uses Google Analytics, which allows the Trinity RFPG team to determine how many visits the site receives overall, as well as which pages receive the most traffic.

All key planning documents are uploaded to the site for public review through a searchable/sortable document library page.

In February 2022, the Trinity RFPG website was recognized with a Gold Award in the 2022 AVA Digital Awards, an international marketing communications competition, in the Web-Based Production/Government category. This annual, global awards program, administered and judged by the Association of Marketing and Communication Professionals, honors outstanding work by creative professionals involved in the concept, direction, design, and production of media that are part of the evolution of digital communication. Out of the thousands of entries submitted from creative agencies and organizations worldwide, around 19 percent receive Gold-level recognition.

The Draft Trinity Regional Flood Plan was made available on the website at the same time that it was submitted to the TWDB in late July 2022. Both the Final Trinity Regional Flood Plan and the Trinity RFPG's request for project sponsors across the region to submit additional FME, FMS, and FMP data were posted to the website in January 2023.

Informational Handouts

To support the initial data collection effort and educate regional stakeholders about the new regional flood planning process, the Trinity RFPG developed two informational, one-page flyers in the spring of 2021. One was designed for the general public or landowners of flood-prone areas. The other was designed specifically for political entities with flood-related authority or responsibility. Each flyer described the origins of the regional flood planning process and the basic timeline for development of the first regional flood plan.

The public version of the flyer encouraged members of the public or landowners to use the Interactive Web Map tool to mark known flood-prone areas in their community or neighborhood. It also encouraged them to stay informed and participate throughout the regional flood planning process.

The political entity-focused version of the flyer showcased the electronic data collection tool and Interactive Web Map and described the types of information that should be gathered by the political entity before receiving the Trinity RFPG's June 2021 survey. (see previous Data Collection and Tools section) The flyer also described ways that political entities could upload relevant reports, maps, and models to the Trinity RFPG website's data collection tool, or how those materials could be mailed directly to the Trinity RFPG. Finally, the flyer reinforced that

participation in the planning process was important because projects included in the regional and State Flood Plans would be better positioned in the future to potentially receive funding.

The RFPG team developed two additional flyers with the release of the draft plan. A two-page flyer provided a brief overview of the Trinity Regional Flood Plan, identified the RFPG members and representative categories, and highlighted the RFPG's accomplishments through July 2021. The RFPG members shared this flyer with interested parties. A separate one-page flyer encouraged public participation in the open houses scheduled in August 2022 and the Public Hearing in September 2022. This flyer provided information on where the draft plan could be viewed and the available methods for public comments to be submitted to the RFPG. See **Appendix H** for copies of these flyers.

PowerPoint Slideshow Presentation

The Trinity RFPG developed an educational PowerPoint presentation for Trinity RFPG members to use when speaking to various organizations about the regional flood plan. The presentation included an overview of the regional flood planning process and its history, as well as a comparison to the regional water planning process that was already well-known to many in the region due to the regional water planning groups' nearly 25-year history of planning activities.

The Trinity RFPG Chair used the created presentation at the 2021 North Texas Infrastructure Summit (organized by the North Texas Commission), a meeting with the NCTCOG Flood Management Task Force, and a meeting of local elected officials convened by NCTCOG, among others. The presentation was also used by the RFPG Chair and several RFPG members for presentations at several 2022 opportunities, including the North Texas Infrastructure Summit, the Texas Floodplain Management Association (TFMA) Region 4/10 Educational Luncheon Forum, and the Society of American Military Engineers (SAME) 22nd Annual Infrastructure Forum.

Press Releases and Media Advisories

Press releases and/or media advisories were developed and issued to regional media prior to every meeting of the Trinity RFPG during this first round of regional flood planning. These notices alerted the media of the opportunity to attend and cover these public meetings (or to observe them online), as well as requested the media to include meeting information in their publications and event calendars to enhance overall public awareness and public participation opportunities.

The Trinity RFPG team also worked directly with numerous editors and reporters to promote Trinity RFPG meetings and to encourage them to write stories about the importance of the flood planning process. Media outreach avenues included:

- ABC News Radio Network
- Anahuac Progress
- Archer County News
- Athens Daily Review
- Bowie News
- Bluebonnet News
- Cleburne Times-Review
- Collin County Business Press
- Community Impact Newspaper: DFW and other local editions
- Corsicana Daily Sun
- The Community News
- Cross Timbers Gazette
- Dallas Business Journal
- The Dallas Morning News
- Dallas Observer
- Denton Record-Chronicle
- The Fairfield Recorder
- The Ennis News
- Fort Worth Report
- Fort Worth Star-Telegram
- Freestone County Times
- Gainesville Daily Register
- Good Morning Parker County
- The Graham Leader
- Grand Saline Sun
- The Grapeland Messenger
- The Herald-Banner
- The Hometown Press
- Hood County News
- Houston County Courier
- Hubbard City News
- Huntsville Item
- Intown Magazine
- Irving Rambler
- Jacksboro Herald-Gazette
- KAND-AM
- Kaufman Herald
- KBOC-FM
- KDAF-TV
- KDFW-TV
- KGAF-AM
- KGVL-AM
- KIVY-AM
- KLIF-AM
- KMVL-AM
- KPIR-AM
- KPYK-AM
- KRVF-FM
- KTVT-TV
- KWBC-AM
- KWWJ-AM
- KXAS-TV
- KXII-TV
- KXTX-TV
- KZHN-AM
- The Lakelander
- Lone Star Politics (KXAS-TV)
- Madisonville Meteor
- Mansfield Magazine
- The Mexia News
- Messenger News
- Muenster Enterprise
- Nocona News
- Normangee Star
- North Texas e-News
- Ozona Stockman
- Palestine Herald-Press
- Polk County Enterprise
- The Reporter (Hillsboro)
- The Seabreeze Beacon
- Sherman Herald Democrat
- Star Local Media (various publications – Allen, Carrollton, Celina, The Colony, Coppell, Flower Mound, Frisco, Lake Cities, Lewisville, Little Elm, McKinney, Mesquite, Plano, Rowlett)
- The Teague Chronicle
- Terrell Tribune
- Texas Forest Country Living

- Van Zandt News
- Waxahachie Daily Light
- WBAP-AM
- Weatherford Democrat
- WFAA-TV
- Wise County Messenger

Public Hearings, Public Meetings, and Open House Roadshow

Numerous public hearings and public meetings were held as part of the first round of regional flood planning for the Trinity Region to provide ample opportunities for public engagement, feedback, and suggestions for the first Trinity Regional Flood Plan. Additionally, the Trinity RFPG held a series of open house roadshow events at various locations in the late summer of 2022 to provide an overview of the Draft Trinity Regional Flood Plan and take questions prior to collecting formal input on the draft plan. More details about these meetings and events are provided in the following sections.

Public Hearings

As required by TWDB rules, the Trinity RFPG held two pre-planning meetings on April 22, 2021, and August 19, 2021, to receive public input on the development of the regional flood plan. During these meetings, a TWDB representative presented background information on the formation of RFPGs and the regional flood planning process. The Trinity RFPG encouraged the public to provide feedback and general suggestions to issues, provisions, projects, and strategies that should be considered in the development of the regional flood plan. No written or oral comments were provided during either pre-planning meeting. Two written comments of a general nature were submitted through the Trinity RFPG website in between the pre-planning meetings and were shared with the Trinity RFPG for consideration in the planning process.

The Trinity RFPG held a public hearing on September 8, 2022, to present an overview of the Draft Trinity Regional Flood Plan and to receive formal public input on the draft plan. No public comments were received at that hearing.

Public Meetings

The Trinity RFPG has held many regular public meetings during the development of the Draft Trinity Regional Flood Plan. These meetings were open to the public, proper notice was made following Senate Bill (SB) 8 guidelines, and meetings met all requirements of the Texas Open Meetings Act. Additionally, detailed minutes and recordings of all meetings were kept and subsequently posted to the Trinity RFPG website.

Most Trinity RFPG meetings were held in a hybrid (virtual and in-person) format to facilitate greater, more convenient participation opportunities for planning group members, regional entities, and individual members of the public. Additionally, the Trinity RFPG used a variety of locations for the in-person component of its meetings, including meetings in Arlington

(NCTCOG), Dallas (Dallas City Hall), Corsicana (Navarro College), Crockett (Houston County Electric Cooperative), Huntsville (Sam Houston Statue Visitor Center and TRA’s Southern Region Office), and Streetman (TRWD Richland Chambers Lake Office).

The Trinity RFPG met regularly, approximately once every one to two months, to verify that flood planning topics were given due consideration and that the draft plan was developed on schedule. **Table 10.3** shows the dates of the Trinity RFPG public meetings, including meetings of its committees and subcommittees, held during this round of planning:

Table 10.3: Trinity Regional Flood Planning Group Public Meetings

Full Regional Flood Planning Group	Technical Subcommittee	Goals Subcommittee	Nominating Subcommittee
October 27, 2020	February 10, 2022	August 31, 2021	March 12, 2021
December 17, 2020	March 15, 2022		June 23, 2021
March 16, 2021	April 13, 2022		April 21, 2022
April 22, 2021	October 20, 2022		
May 27, 2021			
June 24, 2021			
August 19, 2021			
September 23, 2021			
November 18, 2021			
December 16, 2021			
February 17, 2022			
April 21, 2022			
June 2, 2022			
July 21, 2022			
November 17, 2022			
February 16, 2023			
April 6, 2023			
June 29, 2023			

Open House Roadshow

The Trinity RFPG team planned and conducted a roadshow series of open house meetings in late August 2022 at locations across the Trinity Region – including in the Lower, Middle and Upper portions of the basin – to present an overview of the initial draft plan that was submitted to the TWDB in late July 2022, and to address regional entities’ and individuals’ questions.

Those meeting dates and locations were as follows:

- Lower Basin: Monday, August 29, 2022, 5:00 – 7:00 p.m., Dayton Community Center, Ballroom 300B, 801 S. Cleveland St., Dayton, Texas 77535
- Mid Basin: Tuesday, August 30, 2022, 5:00 – 7:00 p.m., Houston County Electric Cooperative Community Room, 1701 Loop 304, Crockett, Texas 75835

- Upper Basin: Wednesday, August 31, 2022, 6:00 – 8:00 p.m., North Central Texas Council of Governments, William Pitstick Conference Room, Centerpoint II Building, 616 Six Flags Drive, Arlington, Texas 76011

The purpose of these events was to provide entities and individuals in each area of the region – including entities with flood-related authority or responsibility, and any interested members of the public – with a chance to ask questions and gain a solid understanding of the Draft Trinity Regional Flood Plan’s recommendations, as well as the process the Trinity RFPG used to develop the recommendations. These open house sessions enabled entities and the public to be more meaningfully engaged and better informed, so they could provide vital input on the draft plan during the 60-day comment period surrounding the Trinity RFPG’s September 2022 Public Hearing for the draft plan. These open house sessions were publicized in a variety of ways, including through:

- Prominent posting on the Trinity RFPG website and social media
- Emails sent to the regional entities and interested parties email list (distributed via MailChimp)
- Postcards sent via United States mail to each regional entity with a known mailing address
- Press releases distributed to media across the region, resulting in numerous news article placements in the relevant portion of the Trinity Region where a particular open house session was held
- Encouraging Trinity RFPG members to notify their contacts about the open house session in their local area and encourage entity and individual attendance

Public Input

The Trinity RFPG encouraged the public to participate in the planning process by providing an opportunity for the public to speak to the planning group at each public meeting during the planning cycle. Since the majority of Trinity RFPG meetings were conducted in a hybrid (in-person and via videoconference or teleconference) format, members of the public could provide comment during meetings either in-person, by phone, or by videoconference as they so desired. The public was invited to provide comments of a general nature, or to address the planning group on particular agenda items. Written comments were also accepted on specific agenda topics or materials for 14 days prior to certain public meetings or pre-planning meetings as required by the TWDB and/or statute.

Members of the public also had the opportunity to provide written public comments at any time using the Public Comment form on the Trinity RFPG website, via email to info@trinityrfg.org, or by contacting any of the Trinity RFPG contacts listed on the website’s Contact page (via email or phone).

Prior to submission of the Draft Trinity Regional Flood Plan to the TWDB in late July 2022, written comments by regional entities or members of the public were also provided throughout the development of the draft plan. Those are included in **Appendix I** along with a notation indicating any response made or resulting action taken. **Appendix I** also includes general comments and questions received between June 2022 and June 2023.

Various questions of an informational or technical nature were also raised by regional entities throughout the planning process, including requests for clarifications about upcoming meeting dates or materials presented at past meetings, requests to update contact information in the regional entity database, requests for assistance locating information on the website, and requests for assistance with login issues pertaining to the password-protected data collection survey. In such cases, the Trinity RFPG team responded directly to the inquiring party and provided direct assistance.

After the submittal of the Draft Trinity Regional Flood Plan to the TWDB, the Trinity RFPG distributed copies of the draft plan to several locations around the region (Dallas Public Library, Fairfield Library and the Sam Houston Regional Library & Research Center) and also posted the full, draft plan to the Trinity RFPG website for review. These postings were made available to the public at least 30 days prior to the September 8, 2022, Public Hearing at which the Trinity RFPG received formal public input on the draft plan and were kept available at these locations for at least 30 days after the Public Hearing. The Trinity RFPG also posted a notice on its website making the public aware of where and how to access the draft plan. Members of the public were given the opportunity to comment on the draft plan at the Public Hearing and/or to submit written comments up to 30 days after the Public Hearing. The RFPG team also created an interactive web map that was posted to the RFPG website and made available to the public throughout the public comment period on the Draft Trinity Flood Plan for the public to provide additional comments on known flood-prone locations. No oral or written comments were received at the Public Hearing, but a transcript of the Public Hearing is included in **Appendix J** of this report. Written comments on the draft plan were also accepted by the planning group and are included in **Appendix K** along with a notation indicating where changes to the plan were made in response to those written comments, as appropriate. In addition to the written public comments, the Texas Water Development Board provided comments in a letter that is included in **Appendix K** along with a spreadsheet indicating responses and/or resulting actions taken.

Plan Adoption and Approval Process

The initial voting members of the 15 RFPGs were designated by the TWDB during its October 1, 2020, Board meeting. The Trinity RFPG held its first public meeting on October 27, 2020, and as noted previously, the planning group met roughly every 1-2 months since then to continue its work in developing the first Region 3 Trinity Regional Flood Plan.

In early 2021, the Trinity RFPG solicited proposals for a technical consultant to assist the group with its initial planning cycle, and a consultant team led by Halff Associates was formally engaged by the Trinity RFPG in March 2021. The consultant team also includes Freese and Nichols, Inc., H2O Partners, Cooksey Communications, and Dr. Nick Fang of the University of Texas at Arlington.

Since being engaged by the Trinity RFPG, the team has presented regular progress updates on key elements of the plan development process, giving the planning group, regional entities, and the general public as much time as possible to see the draft plan in development and to shape its final draft form.

A critical milestone for the regional flood planning process occurred with the development and submission to the TWDB of the Technical Memorandum in January 2022, which described the significant progress achieved up to that point on Tasks 1-4 of the TWDB's initial scope of work for all RFPGs. Among its included elements was a list of potential FMEs, potentially feasible FMSs, and potentially feasible FMPs identified to date by the Trinity RFPG. The Technical Memorandum also included the Trinity RFPG's specific and measurable goals for the plan, which the Trinity RFPG spent considerable time defining and refining. A supplement to the Technical Memorandum, called the Technical Memorandum Addendum, was developed and submitted to the TWDB in March 2022, and included more information on Tasks 2 and 4.

Throughout 2021 and the first half of 2022, the Trinity RFPG team completed and presented preliminary draft chapters of the Draft Trinity Regional Flood Plan at public meetings. The team accepted input from the planning group and the public on those preliminary draft chapters in preparation for completion and approval of the complete Draft Trinity Regional Flood Plan in July 2022. As noted above, these meetings have taken place in a hybrid format to allow for convenient participation by planning group members and members of the public. The in-person components of these hybrid meetings have been held in a variety of locations throughout the Trinity Region to help generate local interest in participating in the plan development. The full draft plan was presented to the Trinity RFPG for formal approval at its July 21, 2022, public meeting and approved by the RFPG.

Upon submission of the Draft Trinity Regional Flood Plan to the TWDB, the Trinity RFPG published the draft plan to the planning group's website, posted hard copies of the draft plan in at least three publicly accessible locations around the region – the Dallas Public Library (Dallas), Fairfield Library (Fairfield), and Sam Houston Regional Library and Research Center (Liberty) – and officially opened the minimum 60-day public comment period on the draft plan beginning August 1, 2022. As described above, the RFPG team planned and executed a series of open house events at locations around the region. During these meetings:

- A planning group member provided welcome remarks

- Team members presented an overview of the draft plan
- Team members received and answered general questions from the public
- During breakout sessions and one-on-ones, team members:
 - Provided interactive web maps for the public to mark-up and identify flood-prone areas in need of further analysis
 - Shared the draft list of recommended flood mitigation actions (FMEs, FMSs, and FMPs) for the local area in the draft plan, and fielded questions regarding recommendations
 - Encouraged the public to submit written comments on the draft plan by October 10, 2022, and/or provide written or oral comments at the September 8, 2022, Public Hearing.

Subsequently, the Trinity RFPG consultant team collected and reviewed all comments received from the public and the TWDB during the comment period and developed proposed responses or proposed revisions to the draft plan taking those comments into account, before presenting the proposed responses and revisions to the RFPG at its November 17, 2022, public meeting.

Comments, responses, and all input shared, collected, and considered by the Trinity RFPG were also collected throughout the process of amending the Regional Flood Plan in early 2023.

Public Comments on Draft Flood Plan and RFPG Responses

The Trinity RFPG accepted written comments on the draft plan through multiple formats, including email, postal, public comment web form, interactive web map and at the Public Hearing. Oral comments were also accepted at the Public Hearing, but none were provided. In all, the Trinity RFPG received 17 public comments on the draft plan during the public comment period. **Table 10.4** provides a summary of the public comments received. **Figure 10.8** shows the locations of the flood-prone areas submitted through the interactive web map. Detailed responses to these comments are included in **Appendix K**.

TWDB Comments on Draft Flood Plan

TWDB provided comments on the Draft Trinity Regional Flood Plan on October 18, 2022. TWDB’s comments included:

- 43 Level 1 comments directly linked to specific statute, rule, or contract requirements that had to be addressed in the Final Trinity Regional Flood Plan
- 38 Level 2 comments that were provided as suggested changes to improve the plan

The RFPG team developed preliminary draft responses to TWDB’s comments prior to meeting with TWDB staff on November 3. During the conference call, the TWDB provided clarification on its comments and confirmation of acceptable RFPG responses. The TWDB comments focused on Chapters 1 through 5 and confirmed that the comments provided were the agency’s

complete set of comments for the Draft Trinity Region Flood Plan. TWDB confirmed that the maps initially thought to be missing were actually provided in the electronic “Appendix B” folder.

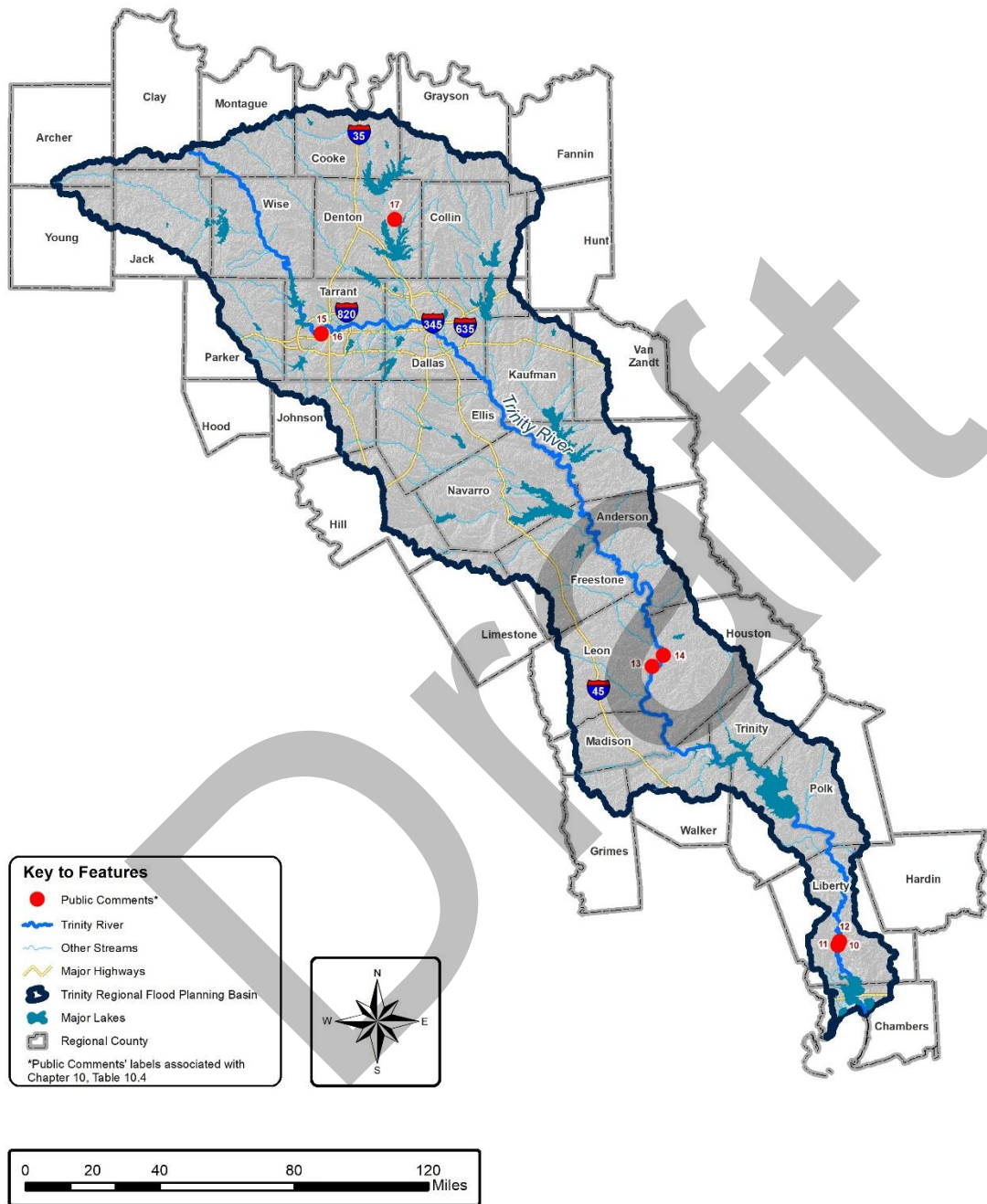
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Table 10.4: List of Public Comments Received

Comment #	Date	Submission Platform	Comment Topic	Response
1	July 18, 2022	email to sAmoako-Atta@halff.com	Editorial and proposed revisions to Chapters 1, 2 and 3	Revisions were made where appropriate
2	August 28, 2022	Public Comment Web Form	Flooding in Fort Worth neighborhood	Forwarded email to city. Recommended FMP in draft plan addressed this area. No changes made.
3	August 28, 2022	Public Comment Web Form	Flooding in Fort Worth neighborhood	Forwarded email to city. Recommended FMP in draft plan addressed this area. No changes made.
4	August 29, 2022 and October 7, 2022 (duplicate comment except the latter included a new sentence referring to the potential Floodwater Detention Basin and an extra description of the affected area as a high-end neighborhood)	Public Comment Web Form and email (same comment)	Flooding in Fort Worth neighborhood	Forwarded email to city. Recommended FMP in draft plan addressed this area. No changes made.
5	September 1, 2022	Email to David.Rivera@freese.com	Request for new FME for retention pond in Liberty County	Requested FMP was located in Region 6 and submitted to Region 6 RFPG. No changes made.
6	September 8, 2022	Email to info@trinityrfg.org	Recommendations for inclusion in Chapter 8 Legislative, Regulatory & Administrative and State Flood Planning Recommendations	RFPG considered many of these ideas in its meetings. The RFPG did not have adequate time to investigate these ideas and potential unintended consequences or liabilities in this cycle of planning. The RFPG may establish a subcommittee in a future cycle of regional flood planning. No changes made.
7	September 22, 2022	Email to info@trinityrfg.org	Creek crossing floods and prevents access to residence in City of Cross Roads	RFPG initially recommended resident coordinate with City for potential FME. After receiving interactive web map location (Comment #17), the RFPG determined that the area is located outside the city limits. RFPG submitted information to Grimes County.
8	October 10, 2022	Email to info@trinityrfg.org	Support for nature-based solutions. Concerns with no negative impact determinations and Alligator Gar. Preferred TPWD design criteria.	RFPG supports nature-based solutions. RFPG used engineering judgement on no negative impact determination and included additional explanation in final report. RFPG welcomes input on Alligator Gar. RFPG recommended TPWD contact specific sponsors regarding preferred design criteria.

Comment #	Date	Submission Platform	Comment Topic	Response
9	October 10, 2022	Email to info@trinityrfpg.org	Suggested additional goals. Concerned about no negative impacts. Requested minimum floodplain standards be required. Questioned future conditions flood risk determination. Supports nature-based solutions. Questioned critical facilities.	RFPG spent considerable time developing goals. RFPG recommended but did not require minimum floodplain standards for this planning cycle. Goals and minimum floodplain standards may be reconsidered in a future cycle of regional flood planning. RFPG included additional information on no negative impacts in final report. RFPG supports nature-based solutions. Other comments should be directed to TWDB.
10	August 29, 2022	Interactive Web Map	Illegal Coffe Dam blocking floodwater flow	RFPG does not have regulatory or enforcement authority. RFPG recommended resident reported this to Liberty County. RFPG submitted information to Liberty County. No changes made.
11	August 29, 2022	Interactive Web Map	Abandoned pipeline. Public safety and navigation hazard.	RFPG does not have regulatory or enforcement authority. RFPG recommended resident reported this to Liberty County. RFPG submitted information to Liberty County. No changes made.
12	August 29, 2022	Interactive Web Map	Second abandoned pipeline since 1940s.	RFPG does not have regulatory or enforcement authority. RFPG recommended resident reported this to Liberty County. RFPG submitted information to Liberty County. No changes made.
13	August 30, 2022	Interactive Web Map	Major Agricultural Flooding in this area when water gets released from reservoirs	RFPG recognizes flooding impacts agricultural activities. Property is located within the 100-year floodplain as shown in the draft plan flood quilt. RFPG forwarded comment to appropriate counties. No changes made.
14	August 30, 2022	Interactive Web Map	Major Flooding in this area. Also flooding from water releases from reservoirs upstream. Costing major damages to crops and ranchland	RFPG recognizes flooding impacts agricultural activities. Property is located within the 100-year floodplain as shown in the draft plan flood quilt. RFPG forwarded comment to appropriate counties. No changes made.
15	September 1, 2022	Interactive Web Map	Major Flooding in this whole area both upstream and downstream. Pluvial and Fluvial flooding. extensive flooding. Potential backflow issues in this whole area (Flooding in Fort Worth neighborhood)	Forwarded email to city. Recommended FMP in draft plan addressed this area. No changes made.
16	September 1, 2022	Interactive Web Map	Massive storm drain Backflow flooding in this area (Flooding in Fort Worth neighborhood)	Forwarded email to city. Recommended FMP in draft plan addressed this area. No changes made.
17	September 23, 2022	Interactive Web Map	At this pin there is a low water crossing over Cantrell Slough. This crossing floods several times annually and poses dire emergency risk to both residents and wildlife. This risk has been amplified by the recent housing subdivision development,	Roadway is located within 100-year floodplain. RFPG added location to low water crossing layer. RFPG recommended resident contact the county. RFPG forwarded to the Grimes County. (Related to Comment #7)

Figure 10.8: Flood-Prone Areas Identified via Interactive Web Map



Other results from the meeting included noted areas of inconsistencies between GIS and summary tables and assumed benefit-cost ratios of 0 for potentially feasible FMPs that were not identified as recommended FMPs.

The RFPG addressed all of the Level 1 comments and most of the Level 2 comments. Time constraints limited the RFPG’s ability to respond to some Level 2 comments. A copy of the TWDB’s comment letter and the RFPG’s responses to each comment is included in **Appendix K**.

Adoption of Amended Plans

The RFPG held a regularly scheduled public meeting on June 29, 2023. At which time, the RFPG approved the addition of the new recommended FMEs, FMPs, and FMSs for inclusion in this amended plan. The RFPG approved the adoption of the amended plan for submittal to the TWDB. **Appendix L** includes an index listing the revisions made in this amended plan since the January 2023 final plan.

A second amendment was performed and approved during the regularly scheduled public RFPG meeting on March 12, 2025. Action was taken by the RFPG during this meeting to recommend new FMEs, FMPs, and FMSs. The RFPG further approved the adoption of the second amendment to the 2023 regional flood plan and approved subsequent submittal to TWDB. **Appendix L** includes this summary document of changes made during the second amendment.

Conformance with Title 31 TAC §362.3 Guidance Principles

In accordance with Title 31 TAC §361.20, the Draft and Final Trinity Regional Flood Plans conformed with the guidance principles established in Title 31 TAC §362.3. The Trinity RFPG performed a No Negative Impact assessment for each potentially feasible FMP and FMS. Those that had, or appeared to have, a potential negative impact were removed from further consideration and were not included as recommended FMPs or FMSs in the draft or final plans. **Table 10.5** includes a list of the 39 regional flood planning principles and where they are addressed in this plan.

Table 10.5: Title 31 TAC §362.3 Guidance Principles and Regional Flood Planning Group Response Satisfying Said Principles

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
1	shall be a guide to state, regional, and local flood risk management policy	Incorporated throughout the regional flood planning process

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
2	shall be based on the best available science, data, models, and flood risk mapping	Included in Chapters 2, 4, 5, 6, and 9
3	shall focus on identifying both current and future flood risks, including hazard, exposure, vulnerability and residual risks; selecting achievable flood mitigation goals, as determined by each RFPG for their region; and incorporating strategies and projects to reduce the identified risks accordingly	Included in Chapters 2, 3, 4, and 5
4	shall, at a minimum, evaluate flood hazard exposure to life and property associated with 0.2% annual chance storm event (the 500-year flood) and, in these efforts, shall not be limited to consideration of historic flood events	Included in Chapter 2
5	shall, when possible and at a minimum, evaluate flood risk to life and property associated with 1% annual chance storm event (the 100-year flood) and address, through recommended strategies and projects, the flood mitigation goals of the RFPG (per item 2 above) to address flood events associated with a 1% annual chance storm event (the 100-year flood); and, in these efforts, shall not be limited to consideration of historic flood events	Included in Chapters 2, 3, and 5; TWDB-Required Tables 15, 16, and 17
6	shall consider the extent to which current floodplain management, land use regulations, and economic development practices increase future flood risks to life and property and consider recommending adoption of floodplain management, land use regulations, and economic development practices to reduce future flood risk	Included in Chapter 3
7	shall consider future development within the planning region and its potential to impact the benefits of flood management strategies (and associated projects) recommended in the plan	Included in Chapters 2, 3, 4, and 5

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
8	shall consider various types of flooding risks that pose a threat to life and property, including, but not limited to, riverine flooding, urban flooding, engineered structure failures, slow rise flooding, ponding, flash flooding, and coastal flooding, including relative sea level change and storm surge	Included in Chapters 2, 4, 5, and 7
9	shall focus primarily on flood management strategies and projects with a contributing drainage area greater than or equal to 1.0 (one) square miles except in instances of flooding of critical facilities or transportation routes or for other reasons, including levels of risk or project size, determined by the RFPG	Included in Chapter 5 and TWDB-Required Tables 15, 16, and 17
10	shall consider the potential upstream and downstream effects, including environmental, of potential flood management strategies (and associated projects) on neighboring areas. In recommending strategies, RFPGs shall ensure that no neighboring area is negatively affected by the regional flood plan	Included in Chapters 4, 5, and 6
11	shall include an assessment of existing, major flood mitigation infrastructure and will recommend both new strategies and projects that will further reduce risk, beyond what existing flood strategies and projects were designed to provide, and make recommendations regarding required expenditures to address deferred maintenance on or repairs to existing flood infrastructure	Included in Chapters 2 and 5 and TWDB-Required Tables 1, 16, and 17
12	shall include the estimate of costs and benefits at a level of detail sufficient for RFPGs and sponsors of flood mitigation projects to understand project benefits and, when applicable, compare the relative benefits and costs, including environmental and social benefits and costs, between feasible options	Included in Chapters 4 and 5 and TWDB-Required Tables 12, 13, 14, 15, 16, and 17
13	shall provide for the orderly preparation for and response to flood conditions to protect against the loss of life and property and reduce injuries and other flood-related human suffering	Included in Chapter 7

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
14	shall provide for an achievable reduction in flood risk at a reasonable cost to protect against the loss of life and property from flooding	Included in Chapters 5 and 9 and TWDB-Required Tables 15, 16, 17, and 19
15	shall be supported by state agencies, including the TWDB, General Land Office, Texas Commission on Environmental Quality, Texas State Soil and Water Conservation Board, Texas Parks and Wildlife Department, and the Texas Department of Agriculture, working cooperatively to avoid duplication of effort and to make the best and most efficient use of state and federal resources	Held conference calls as appropriate and shared data and files with these agencies and others upon request.
16	shall include recommended strategies and projects that minimize residual flood risk and provide effective and economical management of flood risk to people, properties, and communities, and associated environmental benefits	Included in Chapters 5 and 6
17	shall include strategies and projects that provide for a balance of structural and nonstructural flood mitigation measures, including projects that use nature-based features, that lead to long-term mitigation of flood risk	Included in Chapters 4 and 5 and TWDB-Required Tables 13, 14, 16, and 17
18	shall contribute to water supply development where possible	Discussed in Chapter 6
19	shall also follow all regional and state water planning guidance principles (31 TAC 358.3) in instances where recommended flood projects also include a water supply component	Discussed in Chapter 6
20	shall be based on decision-making that is open to, understandable for, and accountable to the public with full dissemination of planning results except for those matters made confidential by law	Included in Chapter 10
21	shall be based on established terms of participation that shall be equitable and shall not unduly hinder participation	Included in Chapter 10 ; bylaws are available on the RFPG website

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
22	shall include flood management strategies and projects recommended by the RFPGs that are based upon identification, analysis, and comparison of all flood management strategies the RFPGs determine to be potentially feasible to meet flood mitigation and floodplain management goals	Included in Chapter 5 and TWDB-Required Tables 16 and 17
23	shall consider land-use and floodplain management policies and approaches that support short- and long-term flood mitigation and floodplain management goals	Included in Chapter 3 and TWDB-Required Tables 6 and 10
24	shall consider natural systems and beneficial functions of floodplains, including flood peak attenuation and ecosystem services	Included in Chapters 1, 3, 4, and 5
25	shall be consistent with the National Flood Insurance Program (NFIP) and shall not undermine participation in nor the incentives or benefits associated with the NFIP	Included in Chapter 3 and TWDB-Required Table 6
26	shall emphasize the fundamental importance of floodplain management policies that reduce flood risk	Included in Chapter 3 and TWDB-Required Table 6
27	shall encourage flood mitigation design approaches that work with, rather than against, natural patterns and conditions of floodplains	Included in Chapter 5 and TWDB-Required Table 16
28	shall not cause long-term impairment to the designated water quality as shown in the state water quality management plan as a result of a recommended flood management strategy or project	Included in Chapter 6
29	shall be based on identifying common needs, issues, and challenges; achieving efficiencies; fostering cooperative planning with local, state, and federal partners; and resolving conflicts in a fair, equitable, and efficient manner	Included in Chapters 3, 8, and 10

Principle #	Principle Description	Explanation of How Plan Satisfies Principle
30	shall include recommended strategies and projects that are described in sufficient detail to allow a state agency making a financial or regulatory decision to determine if a proposed action before the state agency is consistent with an approved regional flood plan	Included in <i>Chapters 5 and 9</i> and <i>TWDB-Required Tables 15, 16, 17, and 19</i>
31	shall include ongoing flood projects that are in the planning stage, have been permitted, or are under construction	Included in <i>Chapter 1</i> and <i>TWDB-Required Table 2</i>
32	shall include legislative recommendations that are considered necessary and desirable to facilitate flood management planning and implementation to protect life and property	Included in <i>Chapter 8</i>
33	shall be based on coordination of flood management planning, strategies, and mitigation projects with local, regional, state, and federal agencies projects and goals	Included in <i>Chapters 1, 3, 5, 9, and 10</i> and <i>TWDB-Required Tables 16 and 17</i>
34	shall be in accordance with all existing water rights laws, including but not limited to, Texas statutes and rules, federal statutes and rules, interstate compacts, and international treaties	Included in <i>Chapter 6</i>
35	shall consider protection of vulnerable populations	Included in <i>Chapters 1 and 5</i> and <i>TWDB-Required Tables 3, 13, and 16</i>
36	shall consider benefits of flood management strategies to water quality, fish and wildlife, ecosystem function, and recreation, as appropriate	Included in <i>Chapter 6</i>
37	shall minimize adverse environmental impacts and be in accordance with adopted environmental flow standards	Discussed in <i>Chapter 6</i>
38	shall consider how long-term maintenance and operation of flood strategies will be conducted and funded	Discussed in <i>Chapters 4 and 6</i>
39	shall consider multi-use opportunities such as green space, parks, water quality, or recreation, portions of which could be funded, constructed, and or maintained by additional, third-party project participants	Included in <i>Chapters 5, 6, 8, and 9</i>

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