

Chapter 8: Administrative, Regulatory, and Legislative Recommendations



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Appendices

Appendix 8A Subcommittee 4 June 16, 2022, Meeting #1 Presentation Slides

Appendix 8B Subcommittee 4 June 16, 2022, Meeting #2 Presentation Slides

8. Administrative, Regulatory, and Legislative Recommendations

This chapter outlines recommendations developed by the Regional Flood Planning Group (RFPG) for the following items required for Task 8:

1. Legislative recommendations that the RFPG considers necessary to facilitate floodplain management and flood mitigation planning and implementation.
2. Other regulatory or administrative recommendations that the RFPG considers necessary to facilitate floodplain management and flood mitigation planning and implementation.
3. Any other recommendations that the RFPG believes are needed and desirable to achieve its regional flood mitigation and floodplain management goals. F
4. Recommendations regarding potential, new revenue-raising opportunities, including potential new municipal drainage utilities or regional flood authorities, that could fund the development, operation, and maintenance of floodplain management or flood mitigation activities in the region.

In this regard, the Upper Rio Grande Regional Flood Planning Group (URGRFPG) established Subcommittee 4 to develop recommendations for consideration by the URGRFPG.

The following recommendations are offered by the URGRFPG for consideration by the Texas Legislature, TWDB, TCEQ, other water planning regions and all stakeholders and participants in Texas' regional and state flood planning efforts. Each policy includes background information, policy statement(s), and action(s) the URGRFPG recommends.

8.1 Development of Recommendations

8.1.1 Regional Flood Risk

Per the risk analysis results presented in Chapter 2 and 4, by far the largest risks of flood impact in the Upper Rio Grande Flood Planning Region (URGFPR) are located in El Paso County. Map 15 (“Greatest Flood Risk”) in Chapter 4 depicts the location of the 31 cities/ CDPs in the URGFPR with the highest numbers of buildings estimated to be at risk of inundation in the 1% AC flood. Eight of these 31 (City of El Paso, City of Socorro, Fort Bliss CDP, Canutillo CDP, City of San Elizario, Homestead Meadows North CDP, Fabens CDP, and Prado Verde CDP) are located within El Paso County and have in aggregate approximately 18,000 buildings estimated to be at risk of inundation in the 1% AC flood. The remaining 23 cities/ CDPs in the URGFPR have in aggregate approximately 11,000 buildings estimated to be at risk of inundation in the 1% AC flood. El Paso County also is differentiated from the broader region by a unique combination of issues described in Section 8.2.1 and 8.2.2.

8.1.2 Formation of Subcommittee 4

The Upper Rio Grande Regional Flood Planning Group (URGRFPG) established Subcommittee 4 to develop recommendations for this chapter for consideration by the URGRFPG. Subcommittee 4 includes these members of the RFPG:

- Gilbert Saldana, Voting Member, Counties
- Anita Keese, Non-Voting Member, Texas Commission on Environmental Quality
- Omar Martinez, Voting Member, Water Districts, Chairman
- Gisela Dagnino, Voting Member, Water Utilities
- Levi Bryand, Voting Member, Water Utilities

8.1.3 Subcommittee 4 Activities

Initial Development

The initial engagement with the RFPG on Task 8 occurred during the identification of FMEs and FMSs during execution of Task 4B(a-b). During the third meeting of Subcommittee 3 on November 10, 2021, a series of presentations were made by regional stakeholders (El Paso Water Utility/ City of El Paso, EPCWID1, USIBWC1) that related experience in recent major floods, occurring in 2006 and 2021 in El Paso County, and occurring in 2008 in Presidio. Hudspeth County also related the needs of that county. The meeting developed a consensus list of needs arising from the related experiences, to include needs associated with agency coordination, regulatory shortfalls, and jurisdiction-specific floodplain management resource (staffing, regulatory) shortfalls. The FMEs and FMSs developed to meet these needs provided the starting inputs to these Task 8 recommendations. Input from the broader URGFPR (beyond Hudspeth County and City of Presidio) was notably absent from this initial list of identified needs and associated recommended FMEs/FMS.

Preparation for Subcommittee 4 Meetings

In order to improve input from stakeholders across the broader region, there were several parallel efforts on the part of the RFPG.

Individual Meetings with Stakeholders. Direct approaches were made to the cities/ CDPs with over 400 buildings-at-risk in the 1% AC flood (see Map 15, Chapter 4). Meetings were held with smaller cities/ CDPs absent from the Subcommittee 3 meetings (Socorro, Pecos, Alpine, Kermit, Sonora, San Elizario, Presidio). These meetings provided context and prompts for effective participation in the regional Subcommittee 4 meetings.

Data Collection Meeting with Large Stakeholder. A meeting with held with Milton Rahman, Harris County Engineer on March 29, 2022, to solicit general input on regulatory strategies used by the County and their legal basis. This information was relayed to Gilbert Saldana, El Paso County in Subcommittee 4.

Data Collection meetings with Small Stakeholders. Prior to the Subcommittee 4 meetings, interviews were conducted with state-wide entities of similar population size to those invited to attend from the URGRFPG to get their feedback on Task 8. A summary of those entities interviewed along with their 2020 Census population noted in parentheses for comparison purposes is provided below:

- City of Marlin (5,551)
- Falls County (16,968)
- Nueces County (353,178)
- City of Alvin (27,140)
- Bordon County (631)
- Martin County (5,676)
- Mitchell County (8,685)

Although the population of Nueces County and City of Alvin, respectively, is greater than the entities targeted for this meeting, they provided an interesting perspective and additional feedback for the subcommittee to consider.

8.1.4 Subcommittee 4 Meetings (June 16, 2022)

Two Subcommittee 4 meetings were held on June 16, 2022; one for stakeholders located within El Paso County, and one for stakeholders representing the broader region. The agenda specified discussion for four Task 8 areas for recommendation: (1) legislative action, (2) administrative/regulatory action, (3) other related actions, and (4) procedural funding actions/ ideas. During the discussion with the meeting attendees, each of the three categories for action (floodplain

management, flood mitigation planning, and flood mitigation implementation) were addressed within each of the four Task 8 areas.

Subcommittee 4: El Paso County-Focused Meeting

Stakeholder attendees at the first meeting (including Subcommittee 4 members) are noted below.

- Annette Gutierrez, Rio Grande Council of Governments, Executive Director
- Omar Martinez, Water Districts, Chair RFPG Subcommittee 4
- Gilbert Saldana, Counties, Voting Member
- Gisela Dagnino, Water utilities, Voting Member
- Anita Keese, Texas Commission on Environmental Quality, Non-Voting Member
- Peggy O'Brien, Rio Grande Council of Governments, Local Governments Manager
- Levi Bryand, Water utilities, Voting Member
- Richard Bagans, Texas Water Development Board, Planner

These attendees include representatives from these El Paso County jurisdictions: El Paso Water, El Paso County, Rio Grande COG, and EPCWID1. Reference **Appendix 8A** for a copy of the presentation slides from the first meeting of Subcommittee 4.

Subcommittee 4: Broader Planning Region (outside El Paso County)-Focused Meeting

In order to obtain feedback from the broader planning region, a number of rural counties (Hudspeth, Presidio, Reeves, Brewster, and Winkler) and cities (Pecos, Kermit, Sonora, Alpine, Marfa, Fort Stockton, and Presidio) were invited to attend the second meeting; individual emails were sent out in advance by the COG along with follow up phone calls prior to the meeting. Stakeholder attendees to the meeting (including Subcommittee 4 members) are noted below.

- Annette Gutierrez, Rio Grande Council of Governments, Executive Director
- Omar Martinez, Water Districts, Chair RFPG Subcommittee 4
- Jeff Bennett, Environmental Interests, Voting Member
- Richard Bagans, Texas Water Development Board, Planner
- Taylor Nordstrom, AECOM Engineering Consultant,
- Anita Kreese, Texas Commission on Environmental Quality, Non-voting member
- Leo Hung (Guest), Reeves County, Judge
- Jerry D. Bullard (Guest), Reeves County, Emergency Management Coordinator
- Arturo Fuentes (Guest), City of Sonora, City Manager
- Elijah Casas, Texas General Land Office, Community Outreach Coordinator
- Judy Lucio, Texas Division of Emergency Management, Chief for Disaster Finance
- Peggy O'Brien, Rio Grande Council of Governments, Local Governments Manager
- Cinderela Guevara, Presidio County, Judge
- Joanna Mackenzie, Hudspeth County, County Administrator
- Marci Tuck, City of Alpine, Grant Writer

Reference **Appendix 8B** for a copy of the presentation slides from the second meeting of Subcommittee 4.

8.2 Recommendations

As noted above, the administrative, regulatory, and legislative issues within the Upper Rio Grande Flood Planning Region (URGFPR) can be best understood by separating the jurisdictions geographically: those within El Paso County, and those outside El Paso County. Regional Flood Planning Group (RFPG) recommendations to address administrative, regulatory, and legislative issues are therefore provided separately for these two geographic regions.

8.2.1 Recommendations from Stakeholders Within El Paso County

Those jurisdictions located within El Paso County have a unique combination of these flood-related issues:

- Large dense urban area with a large associated population-at-risk.
- A wide range of property values.
- Risk from flooding of the Rio Grande. This risk is jointly managed: from the riverine side by the US International Boundary Water Commission (IBWC); and from the interior drainage side (i.e., the side of river levee intercepting drainage into the river).
- Risks uniquely associated with drainage from steep mountainous terrain (sediment/debris transport).
- Risks uniquely associated with federal management of the US Army at Fort Bliss (i.e., unexploded ordinance on firing ranges), which includes a large portion of the tributary watershed of the city/ county.
- Risks uniquely associated with “mesa” terrain: large, very flat, sparsely vegetated watersheds that drain to steep arroyos that drop into the Rio Grande terrace.
- Risks uniquely associated with an historically (and currently) irrigated riverine terrace. This terrace is traversed by feeder canals that interrupt and divert stormwater, and irrigation drains designed for irrigation return flows but also intercept and convey stormwater. Addressing flood risks associated with these structures involves close coordination between the El Paso County Water Improvement District No. 1 (EPCWID1) and the cities in El Paso County, and El Paso County itself.
- Risks associated with continuous new development.

In this area, the variety of terrain creates challenges to floodplain management and setting appropriate drainage standards, and the unique combination of involved agencies (the usual range of permit agencies, plus USIBWC, US Army and EPCWID1) creates challenges to providing the necessary multi-agency planning, permitting, and implementation. The recommendations provided in **Table 8.1** through **Table 8.4** below are primarily focused on addressing the above unique challenges. These recommendations are largely in the form of recommendations for future, more detailed action by the RFPG, involving the collective actions of stakeholders to develop specific language to address the identified issue.

Table 8.1 Legislative Recommendations (El Paso County Area Stakeholders)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	-	Burden on sponsors for levee certification is excessive	Communicate with the federal government about lessening the burden for levee certification
Floodplain Management	-	Counties perceive lack of ability to regulate drainage outside of FEMA floodplains	Counties to consider adoption of drainage requirements beyond areas that are in flood zone (e.g., within County Road ROWs outside floodplains)
Flood Mitigation Implementation	-	Revolving state funds are not self-sustaining	Create specific revolving state funds to provide matching to federal dollars for FMPs

Table 8.2 Regulatory/Administrative Recommendations (El Paso County Area Stakeholders)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	FMS15	Identified potential design standard improvements	Develop recommendations for inlets, curb cuts, on-site storage, sediment controls at inlets, discharges into irrigation drains, 2D modeling (include freeboard requirements)
Floodplain Management	FMS16	Erosion in natural channels	Develop recommendations for design guidelines for erosion mitigation in arroyos
Floodplain Management	FMS17	Issues with outfalls into Rio Grande	Develop guidelines for design of outfalls
Floodplain Management	-	EPCWID1 is concerned with the risk of loss of Clean Water Act exemptions associated with stormwater accumulated in irrigation drains	Recommend that USACE develop clear guidance relevant to situation in El Paso County to ensure exemption is retained
Floodplain Management	-	There are uncertainties in El Paso County associated with the capture of stormwater with the potential for reuse	Investigate permitting issues and develop clear guidance to ensure compliance and optimize opportunities for capture/blend
Floodplain Management	-	Improve coordination with other jurisdictions to facilitate floodplain management (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate floodplain management involving multiple jurisdictions. (e.g., create consensus requiring no adverse impact)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	-	Codify use of most restrictive standard where conflicts exist	Revise local standards to codify this requirement and address adverse impact
Floodplain Management	-	Drainage component is not part of certificate of compliance (In Ector County there is no review of any building or development permit, no component for flood mitigation)	Counties should have the option to be empowered to enforce drainage requirements within the requirements for a certificate of compliance
Flood Mitigation Planning	FMS9	ATV-induced erosion on state lands	Review existing regulatory/admin controls and effectiveness. Recommend changes
Flood Mitigation Planning	-	Improve coordination with other jurisdictions to facilitate (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate flood mitigation planning involving multiple jurisdictions.
Flood Mitigation Implementation	-	Improve coordination with other jurisdictions to facilitate (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate flood mitigation implementation involving multiple jurisdictions.
Flood Mitigation Implementation	-	Coordinate with State Historic Preservation Office to develop acceptable mitigation practices for the El Paso region	Develop county-wide procedures for accelerating compliance, reducing delays in projects due to interaction with the historic preservation office.
Flood Mitigation Implementation	-	Shortfalls with use of existing El Paso area MOUs with State Historic Preservation Office	Negotiate with the State Historic Preservation Office to address shortfalls

Table 8.3 Fundraising Recommendations (El Paso County Area Stakeholders)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Flood Mitigation Implementation	FMS1	Certification of Levees in El Paso County	Establish formal involvement of relevant El Paso County Stakeholders
Floodplain Management	-	Lack of fees for County Drainage	Provide regional support to interested counties to investigate feasibility of forming a county stormwater utility

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	-	Federal grants have a monetary-based threshold requirement that puts areas such as El Paso (with comparatively low property values in flood-prone areas) at a disadvantage to compete with federal flood mitigation funds.	Develop regional recommendation to FEMA to reconsider monetary-based damage threshold requirements to compete for federal flood mitigation grants.
Flood Mitigation Planning	-	Collect appropriate data to present a complete plan to obtain HUD funds for flood planning. Prepare documentation for post-disasters	Increase coordination between City-County-and HUD to develop procedures and databases which meet HUDs requirements
Flood Mitigation Implementation	-	Lack of regional assistance to available resources to apply for funds identifying funding sources	TWDB should create an online resource so that regions have assistance to apply for funds and identifying funding sources

Table 8.4 Other Recommendations (El Paso County Area Stakeholders)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	FME1	Maintenance of Rio Grande Channel in El Paso County	Formal involvement of El Paso County Stakeholders
Floodplain Management	-	Coordinate with TxDOT to get clarity on maintenance at specific locations within jurisdictions	Create an MOU to clarify maintenance responsibilities at specified crossings
Floodplain Management	--	Coordinate grading plan/other permit approvals with consideration of flood risk	No permits shall be issued unless grading plans have been approved
Flood Mitigation Planning	FME6, FMS4	Control of sediment from Franklin Mtns in areas with UXO	Control of sediment from Franklin Mountains from Eastern El Paso County
Flood Mitigation Planning	-	No systematic data collection post-flood event	State should create a repository for post flood data (e.g., high water marks, photos)

8.2.2 Recommendations from Stakeholders Outside El Paso County

Those jurisdictions representing the broader planning region outside of El Paso County have a few similar flood-related issues; however, they also have unique flood-related issues associated with their rural classification:

- Large rural region comprised of communities having lower populated areas.
- Lack of resources and services available to support floodplain management and flood mitigation planning for rural areas located outside of El Paso County.
- Need for improving coordination with other jurisdictions and organizations (i.e., TxDOT, IBWC, TPW, Private Entities) to facilitate floodplain management and flood mitigation planning.
- Need for updated maps, resources to join/maintain NFIP, and support for securing funding to update master drainage plans.
- Risks uniquely associated with drainage from steep mountainous terrain (sediment/debris transport).
- Risks uniquely associated with “mesa” terrain: large, very flat, sparsely vegetated watersheds that drain to steep arroyos that drop into the Rio Grande terrace.
- Risk from flooding of the Rio Conchos in Presidio County, including binational planning needed to address this issue.
- Risks associated with unregulated and/or minimally regulated new development, especially in Hudspeth County.

The primary theme of the feedback received from the stakeholders located outside of El Paso County focused on the general lack of resources, technical staff, training, funding, etc. for small communities and low populated counties to address floodplain management and flood mitigation planning. The recommendations provided in **Table 8.5** through **Table 8.8** below are primarily focused on addressing the above unique challenges. These recommendations are largely in the form of recommendations for future, more detailed action by the RFPG, involving the collective actions of stakeholders to develop specific language to address the identified issue.

Table 8.5 Legislative Recommendations (Flood Planning Area Outside of El Paso County)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Flood Mitigation Implementation	-	New federal requirements addressing historic preservation	Develop a set of regional comments on new requirements to be provided to the federal agency
Floodplain Management	-	Counties perceive lack of ability to regulate drainage outside of FEMA floodplains	Counties to consider adoption of drainage requirements beyond areas that are in flood zone (e.g., within County Road ROWs outside floodplains)

Table 8.6 Regulatory/Administrative Recommendations (Flood Planning Area Outside of El Paso County)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	FME14	Unregulated/ minimally regulated development in Hudspeth County	Develop program to regulate drainage from development in Hudspeth County and similar counties that elect to participate
Floodplain Management	-	No technical personnel on staff nor funds to develop drainage criteria/standards	Provide regional coordination for technical assistance and/or funding to update drainage criteria and development standards
Floodplain Management	-	Improve coordination with other jurisdictions to facilitate floodplain management (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate floodplain management involving multiple jurisdictions. (e.g., create consensus requiring no adverse impact)
Floodplain Management	-	Codify use of most restrictive standard where conflicts exist	Revise local standards to codify this requirement and address adverse impact
Floodplain Management	-	Drainage component is not part of certificate of compliance (In Ector County there is no review of any building or development permit, no component for flood mitigation)	Counties should have the option to be empowered to enforce drainage requirements within the requirements for a certificate of compliance
Flood Mitigation Planning	-	Improve flood mitigation planning coordination with other jurisdictions to facilitate (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate flood mitigation planning involving multiple jurisdictions.
Flood Mitigation Implementation	-	Improve flood mitigation implementation coordination with other jurisdictions to facilitate (TxDOT, IBWC, TPW, RRC, TCEQ, Private Entities)	Coordinate regional protocols to facilitate flood mitigation implementation involving multiple jurisdictions.
Flood Mitigation Implementation	-	Coordinate with State Historic Preservation Office to develop acceptable mitigation practices for the Upper Rio Grande Flood Planning region outside of El Paso County	Develop regional procedures for accelerating compliance, reducing delays in projects due to interaction with the historic preservation office.

Table 8.7 Fundraising Recommendations (Flood Planning Area Outside of El Paso County)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Flood Mitigation Planning	-	Collect appropriate data to present a complete plan to obtain HUD funds for flood planning. Prepare documentation for post-disasters	Increase coordination between City-County-and HUD to develop procedures and databases which meet HUDs requirements
Floodplain Management	-	Lack of fees for County Drainage	Provide regional support to interested counties to investigate feasibility of forming a county stormwater utility
Flood Mitigation Implementation	-	Small community/ low population counties have a disadvantage in obtaining FEMA post-disaster flood mitigation funding due to \$3M damage threshold. Low property values and limited infrastructure at risk disqualify small communities/ low population counties from grant eligibility.	RFPG to convey recommendation to FEMA to change thresholds to address small city disadvantage in grant funding
Flood Mitigation Implementation	-	HUD CDBG grant application success for small communities/ low population counties is inhibited by a lack of local resources	Convey recommendation to HUD to set aside a fixed percentage of grant funding to address small community/ low population county needs; or by adding ranking points favoring small communities/ low population counties
Flood Mitigation Implementation	-	TWDB Flood Infrastructure Fund grant application success is limited by the lack of local resources and technical expertise within small communities to assemble technical requirements of the application	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for grant preparation
Flood Mitigation Implementation	-	Lack of regional assistance to available resources to apply for funds identifying funding sources	Create an online resource so that regions have assistance to apply for funds and identifying funding sources

Table 8.8 Other Recommendations (Flood Planning Area Outside of El Paso County)

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Floodplain Management	FMS13	Need for resources to join/maintain NFIP	Plan solution for lack of staff resources within areas with small populations, but with significant risk.
Floodplain Management	FMS8	Certification of Cibolo Creek Levees in Presidio County	Support certification of this levee by City of Presidio
Floodplain Management	-	Small communities lack resources for these services/resources needed for floodplain management: funding for badly needed new floodplain maps, training of staff in NFIP requirements, development and technical oversight of local drainage design criteria for new development, education of local populace in importance of floodplain management.	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for these issues; staff position could be potentially funded by additional TWDB RFP allocations; RFPG to request TWDB support in development of web portals to facilitate communication, relevant data collection/ tracking of queries, and document network of available support.
Floodplain Management	-	Low population counties lack resources for these services/resources needed for floodplain management: funding for badly needed new floodplain maps, training of staff in NFIP requirements, education of local populace in importance of floodplain management, support in developing a stormwater utility.	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for these issues; staff position could be potentially funded by additional TWDB RFP allocations; RFPG to request TWDB support in development of web portals to facilitate communication, relevant data collection/ tracking of queries, and document network of available support.
Floodplain Management	-	Coordinate with TxDOT to get clarity on maintenance at specific locations within jurisdictions	Create an MOU to clarify maintenance responsibilities at specified crossings
Flood Mitigation Planning	FMS6	Flooding in Presidio County	Binational Planning to Address Rio Conchos flooding

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Flood Mitigation Planning	-	Small communities lack resources for these services/ resources needed for flood mitigation planning: funding for strategic growth plan essential for planning future drainage infrastructure, training of staff in FEMA disaster programs (e.g., post-disaster Public Assistance), funding for storm water master planning, education of local populace in importance of storm water master planning.	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for these issues; staff position could be potentially funded by additional TWDB RFP allocations; RFPG to request TWDB support in development of web portals to facilitate communication, relevant data collection/ tracking of queries, and document network of available support.
Flood Mitigation Planning	-	Need updated maps and funding to have updated master drainage plans	Funding needed to provide updated floodplain maps.
Flood Mitigation Planning	-	No systematic data collection post-flood event (high water marks, damages)	Initiate and maintain a State-created repository for post flood data needed to refine local flood risk assessments
Flood Mitigation Implementation	-	Low population counties lack resources for these services/ resources needed for flood mitigation implementation: training in USACE Section 404 permitting of channel maintenance, training in selection of grant opportunities across the full spectrum of available grants, technical support for the associated grant application data requirements and processes, education of local populace in importance of implementation of priority flood mitigation actions.	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for these issues; staff position could be potentially funded by additional TWDB RFP allocations; RFPG to request TWDB support in development of web portals to facilitate communication, relevant data collection/ tracking of queries, and document network of available support.

Flood Mitigation Category	Related FME/FMS	Need to address	Recommendation
Flood Mitigation Implementation	-	Small communities lack resources for these services/ resources needed for flood mitigation implementation: training in USACE Section 404 permitting of channel maintenance, training in selection of grant opportunities across the full spectrum of available grants, technical support for the associated grant application data requirements and processes, education of local populace in importance of implementation of priority flood mitigation actions.	Region to take action to create a partial staff position to provide a regional resource within the RFPG to assist small communities/ low population counties in seeking support for these issues; staff position could be potentially funded by additional TWDB RFP allocations; RFPG to request TWDB support in development of web portals to facilitate communication, relevant data collection/ tracking of queries, and document network of available support.
Floodplain Management	-	Coordinate phasing of grading plan/other permit approvals with flood risk	Provide guidance on order of permit approvals to ensure continuity of drainage protection