

Task 3A & 3B Pre-Meeting Materials - August 2025 RFPG Meeting

As a precursor to discussions on Task 3A (Floodplain Management Practices) and 3B (Flood Mitigation Needs Analysis) planned for the RFPG meeting on August 14th, the Technical Consultant team would like to provide the following information for consideration to facilitate productive discussion.

Recap of May RFPG meeting: Task 3A (Floodplain Management Practices) was discussed during the May RFPG meeting, the scope of which is summarized below:

1. General description and summary of floodplain management practices.
2. Summary of key floodplain management practices by the respective regulatory entities.
3. Summary of recommendations and/or adopted minimum standards for floodplain management practices. *[If the RFPG adopts minimum standards, then entities must also adopt the same standards prior to the RFPG including any FMEs, FMSs, or FMPs sponsored by the entity in the plan – effectively limiting eligibility for FIF funding.]*

Discussion concluded that standards should continue to be recommended this cycle to avoid excluding sponsors from applying for FIF funding especially considering funding from the last FIF competition has not yet been awarded.

Recap of July Technical Committee meeting: Subsequently, in the July Technical Committee meeting, five standards were proposed for adoption by the RFPG.

Recommendation: Anticipating the need to deliberate path forward, the Technical Consultant team would like to propose the following approach:

- **Continue to Recommend minimum standards in the 2028 San Jacinto RFP**
 - Adoption of standards could restrict access to the FIF that could help fund necessary updates to drainage criteria and regulations.
 - Certain restrictions are already accounted for in the [FIF Intended Use Plan](#) including that sponsors that do not participate in the NFIP cannot access funds unless they are being used to develop floodplain management standards or to fulfill additional requirements for participation in the NFIP.
- **Leverage Task 3B (Flood Mitigation Needs Analysis) to recommend FMSs for communities that do not meet minimum standards recommended by the RFPG**
 - Last cycle, the RFPG recommended FMEs where there were gaps in flood risk information.
 - This cycle, the RFPG has an opportunity to recommend FMSs to fill in perceived gaps in flood management criteria and regulation.
 - The RFPG can also consider expanding considerations in Task 3B to inform recommendation of other FMSs such as flood early warning systems, emergency communications systems, and emergency management planning following the recent floods in the Hill Country.

A summary table detailing the approach for Task 3A and 3B is shown below.

Minimum Standard	Technical Committee Discussed Change	Suggested Task 3A/3B Plan
Participation in the National Flood Insurance Program (NFIP)	<p style="text-align: center;">ADOPT</p> <ul style="list-style-type: none"> • All regulatory entities to implement ordinances that meet minimum requirements per the NFIP • All regulatory entities to remain active NFIP participants in good standing • All regulatory entities are encouraged to participate in the Community Rating System (CRS) Program to reduce flood insurance rate premiums across the region. 	<p>Continue to RECOMMEND standards</p> <ul style="list-style-type: none"> • FMS for every community not participating in the NFIP. • FMS for every community not participating in the CRS Program.
Development of No Adverse Impact Policies	<p style="text-align: center;">ADOPT</p> <ul style="list-style-type: none"> • All regulatory entities are encouraged to define a no adverse impact policy. • The no adverse impact policy should be focused on preventing negative impacts. Evaluation of impacts should be completed using best available hydrologic and hydraulic modeling, where appropriate. 	<p>Continue to RECOMMEND standards</p> <ul style="list-style-type: none"> • FMS to update criteria for every regulatory entity without a no adverse impact policy.

Minimum Standard	Technical Committee Discussed Change	Suggested Task 3A/3B Plan
<p>Establish Minimum Finished Floor Elevations</p>	<p style="text-align: center;">ADOPT</p> <ul style="list-style-type: none"> • All new habitable structures shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 0.2% ACE flood elevation as shown on effective FIRMs except in areas designated as coastal flood zones. • Where regulatory mapping has been updated using Atlas 14 rainfall data, all new habitable structures shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 1.0% ACE flood elevation as shown on effective FIRMs except in areas designated as coastal flood zones. • In areas designated as coastal flood zones, all new habitable structures shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 1.0% ACE flood elevation as shown on effective FIRMS plus 1 foot of freeboard. • All new critical facilities shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 0.2% ACE flood elevation as shown on effective FIRMS plus 2 feet of freeboard except in areas designated as coastal flood zones. • Where regulatory mapping has been updated using Atlas 14 rainfall data, all new critical facilities shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 1.0% ACE flood elevation as shown on effective FIRMS plus 2 feet of freeboard except in areas designated as coastal flood zones. • In areas designated as coastal flood zones, all critical facilities shall have a finished floor elevation established at or above or waterproofed to the FEMA effective 1.0% ACE flood elevation as shown on effective FIRMS plus 2 feet of freeboard. 	<p>Continue to RECOMMEND standards</p> <ul style="list-style-type: none"> • FMS to update criteria for every regulatory entity without FFE policy.
<p>Encourage Use of Best Available Data</p>	<p style="text-align: center;">ADOPT</p> <ul style="list-style-type: none"> • Utilize the latest rainfall data, NOAA Atlas 14 rainfall data, when conducting new analyses, designing drainage infrastructure, or developing regulations and criteria. 	<p>Continue to RECOMMEND standards</p> <ul style="list-style-type: none"> • FMS to update criteria for every regulatory entity without latest rainfall data reflected in criteria.

The table below shows additional minimum standards that are suggested by the Technical Committee to **recommend** this cycle. New standards as of the 2028 planning cycle are highlighted in green.

Additional Minimum Standard to Recommend	Definition
Compensatory Storage Requirements in the 1.0% ACE Floodplain	<ul style="list-style-type: none"> Any reduction in floodplain storage or conveyance capacity within the 1.0% ACE regulatory floodplain must be offset with a hydraulically equivalent (one-to-one) volume of mitigation sufficient to offset the reduction, except in areas identified as coastal flood zones. A full hydrologic and hydraulic analysis should be performed to demonstrate that floodplain fill mitigation provided is sufficient.
Compensatory Storage Requirements in the 0.2% ACE Floodplain	<ul style="list-style-type: none"> Any reduction in floodplain storage or conveyance capacity within the 0.2% ACE regulatory floodplain must be offset with a hydraulically equivalent (one-to-one) volume of mitigation sufficient to offset the reduction, except in areas identified as coastal flood zones. A full hydrologic and hydraulic analysis should be performed to demonstrate that floodplain fill mitigation provided is sufficient.
Development of Detailed Hydrologic and Hydraulic Analysis Criteria/Requirements	<ul style="list-style-type: none"> All regulatory entities to develop hydrologic and hydraulic modeling criteria or requirements. All regulatory entities to identify features of a proposed development that would warrant a full hydrologic and hydraulic analysis.
Incentivizing the Preservation of the Floodplain	<ul style="list-style-type: none"> All regulatory entities are encouraged to explore and develop systems for incentivizing the preservation of the floodplain directly within the regulatory floodplain or within 100 feet of the banks of unstudied streams.
Nature-Based Solutions	<ul style="list-style-type: none"> Entities should encourage new construction to consider nature-based solutions.
Operations & Maintenance	<ul style="list-style-type: none"> To prevent replacement expenses, regulatory entities are encouraged to create a maintenance plan for drainage infrastructure.
Property Acquisition Program	<ul style="list-style-type: none"> Encourage regulatory entities to develop property acquisition program for repetitive loss structures.
Flood Warning System	<ul style="list-style-type: none"> Regulatory entities recommended to develop flood warning system for public awareness.
Hazard Mitigation Plan	<ul style="list-style-type: none"> Encourage regulatory entities to develop a Hazard Mitigation Plan to help prepare for, respond to, and recover from flood events.