

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	1	All Flood Risk Projects and map revisions / amendments must be tracked in the MIP.	This does not seem to make sense as a Discovery Workflow category. You need to update the MIP if non-regularly products are really going to tracked. SAM	Guidance will be developed to better support this standard. Discovery is the most likely workflow, but it could apply to multiple categories.	All Flood Risk Projects and LOMCs must be tracked in the MIP.
3/8/2013	4	All newly initiated Flood Risk Projects must be watershed-based, with the exception of small-scale Flood Risk Projects related to Provisionally Accredited Levee (PAL) status, and flooding sources related to issue resolution for litigation or Federal legislative or executive inquiries.	It is a concern that FEMA uses the term "watershed" when referring to a HUC8, which by USGS definition is a sub-basin. SAM	This comment was discussed but it was determined the term "watershed" will be kept for now. Recognizing that the formal NHD / WBD terminology assigns the term watershed to catchments of a different size, FEMA believes that the term 'watershed' make more sense to non-technical users and will use care to utilize the technical terminology where appropriate.	All newly initiated Flood Risk Projects must be watershed-based, with the exception of coastal and small-scale Flood Risk Projects related to levee accreditation status.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	5	No stream segment or sub watershed will receive a lower level of regulatory flood map product than what currently exists on effective maps.	This does not seem to make sense as a Discovery Workflow category. SAM	This standard was re-tagged to Project Planning instead of Discovery. Standard verbiage was also updated.	No flooding source will receive a lower level of regulatory flood map product than what currently exists on effective maps.
3/8/2013	7	Community-specific requests to update the FIRM outside of the NVUE validation process must be documented in the CNMS database as mapping requests for FEMA Regional review and consideration.	ID 7: How will individual communities be able to directly get data into the queue for future consideration without an ongoing FEMA project.	They will need to contact the FEMA Regional office	Community-specific requests to update the FIRM outside of the NVUE validation process and LOMR process must be documented in the CNMS database as mapping requests for FEMA Regional review and consideration.
3/8/2013	7	Community-specific requests to update the FIRM outside of the NVUE validation process must be documented in the CNMS database as mapping requests for FEMA Regional review and consideration.	Does this include LOMRs?	The CNMS database should not be used for LOMR requests. There is a different standard protocol for how LOMRs are requested	Community-specific requests to update the FIRM outside of the NVUE validation process and LOMR process must be documented in the CNMS database as mapping requests for FEMA Regional review and consideration.
3/8/2013	9	The CNMS database shall be the sole source for reporting	Discovery Reports have more detail, this seems limiting. SAM	"Reporting" in this context means for Risk MAP program	The CNMS database shall be the sole authority for reporting flood map update needs.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		flood map update needs.		measures related to NVUE. The Discovery reports will still be utilized to support project development and implementation.	
3/8/2013	13	NVUE status must be reported to FEMA HQ at least quarterly.	Would seem to work for the PTS contractors, but could slip by CTPs maintaining CNMS database. SAM	Regional offices via the PTSs are responsible for collecting data from the CTPs during the quarterly update	NVUE status must be reported by each FEMA Region to FEMA HQ at least quarterly.
3/8/2013	20	At least one representative from every community and area of influence must be engaged during Discovery.	Is there a definition of engaged? This seems ill defined for a standard. SAM	Guidance will be developed to better support this standard. Engagement and coordination are not well suited to rigid definition.	Discovery must engage all communities and stakeholder organizations within the project area and must engage practitioners across relevant disciplines

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	21	<p>At a minimum, the following list of data and information must be collected during Discovery if available:</p> <ul style="list-style-type: none"> <li>• The community or Tribe’s planning capabilities, and the timing and level of any needed technical assistance for mitigation planning;</li> <li>Tribal lands and community boundaries</li> <li>• The status of a local or Tribal Hazard Mitigation Plan;</li> <li>• Current stormwater activities such as culvert or ditch cleaning;</li> <li>• Current outreach programs to residents about stormwater issues;</li> <li>• Stormwater Best Management Practices, programs for reducing flows,</li> </ul>	Where is this noted as a standard and is it really up to date? SAM	This standard was extracted from Appendix I (July 2011). It was updated to be more general. Guidance will provide examples of data that meets the standard.	The types of data and information obtained during Discovery must demonstrate a holistic picture of flooding issues, flood risk, and flood mitigation priorities, opportunities, efforts and capabilities.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		etc.; <ul style="list-style-type: none"> <li>• Risk and Flood Risk Project needs;</li> <li>• Flooding issues, historical flooding, and declared flood disasters;</li> <li>• Information regarding participation in the Community Rating System (CRS);</li> <li>• Actionable projects identified in the Hazard Mitigation Plan;</li> <li>• Community development plans and comprehensive plans;</li> <li>• Prior proactive mitigation actions and planning efforts resulting in reduced losses;</li> <li>• Interest in providing elevation data or pursuing partnership opportunities;</li> <li>• Information about</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>community priorities in order to focus mitigation discussions through knowledge of what is important to the public;</p> <ul style="list-style-type: none"> <li>• Community-identified mitigation opportunities;</li> <li>• Regional or state information about communities and flooding within a watershed, such as information from Community Assistance Visits (CAVs);</li> <li>• Community correspondence, and other data that the FEMA Regional Office, State NFIP Coordinator, or SHMO possesses;</li> <li>• Information from OFAs, NGOs, and other watershed stakeholders; and</li> <li>• Data from the Mapping Information</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		Platform (MIP), the FEMA library, etc.			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	22	Discovery must be completed prior to final purchases being made for a complete Flood Risk Project.	Does this mean that all Flood Risk Projects must be multi-year funding? SAM	Multi-year funding may will be the way this occurs for new Flood Risk Projects, but there may be exceptions based on Regional discretion.	Decisions to perform additional analyses, data development activities, and/or community engagement within the Flood Risk Project area must be supported by the outcomes from Discovery. These decisions shall be communicated to project stakeholders prior to executing those activities.
3/8/2013	23	A pre-meeting Discovery Map and Report will be provided to the communities and Tribes prior to the Discovery Meeting and presented at the Discovery Meeting to facilitate discussions	To my knowledge this is not happening, this is the first time I saw this requirement. I do not believe this has been specified in the MAS. This qualifies as a Standard?? Really? SAM	This standard makes the requirement mandatory	A pre-meeting Discovery Map and Report that incorporates appropriate background research must be provided to the communities and Tribes prior to the Discovery Meeting and presented at the Discovery Meeting to facilitate discussions
3/8/2013	24	A post-meeting Discovery Map and Report will be provided to the communities and Tribes after the Discovery Meeting	I do not believe this has been specified in the MAS. SAM	This standard makes the requirement mandatory	A post-meeting Discovery Map and Report will be provided to the communities and Tribes after the Discovery Meeting

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	25	Mandatory elements of the Discovery Map (if available) include: <ul style="list-style-type: none"> <li>• Base data reflecting watershed boundaries, jurisdictional boundaries, Tribal land boundaries, State lands, Federal lands, major roads, and stream lines;</li> <li>Illustration of Discovery Meeting Outcomes and decisions;</li> <li>• Coastal Barrier Resource Areas and Otherwise Protected Areas from U.S. Fish and Wildlife Service (USFWS);</li> <li>• Mapping needs from Coordinated Needs Management System (CNMS) or Community Information System (CIS);</li> <li>• Topographic and Bathymetry data</li> </ul>	Status of Hazard Mitigation plans / cycle does not belong on a Map, it is in the Discovery Report. Availability of orthophotography, bathymetry and topography are report elements, not map elements. SAM	While the Discovery report may also be a good place to provide narrative on these elements, having them also be represented on the Discovery Map may also be worthwhile. However, in the review, this was determined to be too prescriptive and will be adapted to guidance instead.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		status and availability, locations of future topographic and/or bathymetric data acquisition; <ul style="list-style-type: none"> <li>• Hazus-based annualized loss estimates from the Average Annualized Loss analysis;</li> <li>• The coverage areas of known community or Tribal risk assessment data;</li> <li>• Status of local, state, and Tribal Hazard Mitigation Plans (status of plan in mitigation cycle);</li> <li>• Flood control structure location data from national or regional inventories (e.g., the National Inventory of Dams, levee inventories, etc.) and accreditation status information, including information from dam Emergency</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		Action Plans, if available; <ul style="list-style-type: none"> <li>• Locations of stream gages;</li> <li>• Location of past flood claims and repetitive loss properties;</li> <li>• Location of clusters of Letters of Map Change;</li> <li>• Known flooding issues not represented on effective FIRMs or listed in CNMS;</li> <li>• Areas of ongoing or planned development and areas of high growth or other natural land changes (e.g., wildfires, landslides, or subsidence);</li> <li>• Locations of other ongoing Flood Risk Projects and stream reaches that have been modified since the effective map and</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		require an updated Flood Risk Project (e.g., highway improvements); <ul style="list-style-type: none"> <li>• For coastal areas, the locations of wave and tide gages;</li> <li>• For coastal areas, the locations of wind stations;</li> <li>• For coastal areas, the proposed inland limit of the Primary Frontal Dune, if present;</li> <li>• For coastal areas, the location of any beach nourishment or dune restoration projects;</li> <li>• For coastal areas, a comparison of preliminary stillwater elevations with effective stillwater elevations;</li> <li>• Available effective Flood Risk Project data;</li> <li>• Available</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		orthophotography; and • Proposed discussion areas, problem areas, areas of proposed mitigation projects, and other areas of interest to discuss based on regional knowledge and analysis of the data collected during Discovery.			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	27	A Discovery Meeting must be conducted with project stakeholders.	There is no context for this standard. SAM	Guidance will be developed to better support this standard. The new format for the standards, separate from the old guides and specs documents, creates some challenge for looking at the standards together to get the complete picture. The KSS system for internal users is intended to partially address this issue.	A Discovery Meeting with project stakeholders is a required activity of Discovery.
3/8/2013	29	During Discovery, data must be identified that illustrates potential changes in flood elevation and mapping that may result from the proposed project scope. If available data does not clearly illustrate the likely changes, an analysis is	It was my understanding that this was never a standard. It is ill defined, and as I recall was based on an erroneous assumption that a "rough" assessment could indicate if a full study would in fact show discernable differences. This came from an early PM. SAM	This standard was originally part of Appendix I to the FEMA G&S. It requires that a rough early assessment be conducted to determine the likely changes to the FIS and FIRM arising from new or revised flood hazard	During Discovery, data must be identified that illustrates potential changes in flood elevation and mapping that may result from the proposed project scope. If available data does not clearly illustrate the likely changes, an analysis is required that estimates the likely changes. This data and any associated analyses must be shared and results must be discussed with stakeholders.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		required that does estimate the likely changes. Share and discuss results with stakeholders.		analyses.	
3/8/2013	40	New elevation data purchased by FEMA must comply with the current USGS National Geospatial Program Base LiDAR Specification Version 1.0, except where specifically noted in other FEMA standards	SID 40: Who will certify the elevation data complies?	For data purchased by FEMA, the provider collecting the data must provide certifications as specified in the USGS specification	New elevation data purchased by FEMA must comply with the current USGS National Geospatial Program Base LiDAR Specification Version 1.0, except where specifically noted in other FEMA standards
3/8/2013	41	For areas within the Continental United States field surveys and aerial data acquisition must be referenced to the North American Vertical Datum of 1988 (NAVD88) and the North American Datum 1983 (NAD83)	SID 41: Who will certify the elevation data complies?	For data purchased by FEMA, the provider collecting the data must provide certifications	For areas within the Continental United States field surveys and aerial data acquisition must be referenced to the North American Vertical Datum of 1988 (NAVD88) and the North American Datum 1983 (NAD83) and connected to the NSRS.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		and connected to the NSRS.			
3/8/2013	42	All land surveys must be certified by a licensed professional.	SID 42: Define 'land surveys'. Does it include all field data capture and terrain data? Is the licensed professional a Professional Surveyor?	Reworded: All ground and structure surveys must be certified by a licensed professional. State law determines which licensed professionals are able to certify survey data.	All ground and structure surveys must be certified by a registered professional engineer or a licensed land surveyor.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	43	<p>Existing topographic data leveraged by FEMA must have documentation that it meets vertical accuracy requirements in Table 2.2.</p> <p>Table 2.2. Vertical Accuracy Requirements based on Flood Risk and Terrain Slope within the Floodplain being mapped Level of Flood Risk ; Typical Slopes ; Specification Level ; "Vertical Accuracy, 95% Confidence Level FVA/CVA "; Lidar Nominal Pulse Spacing (NPS)</p> <p>High (Deciles 1,2,3) ; Flattest ; Highest ; 24.5 cm/36.3 cm ; ≤2 meter High (Deciles 1,2,3) ;</p>	<p>SID 43: Does documentation include an accuracy certificate? Certified by a licensed professional?</p>	<p>Documentation does not necessarily mean certified by a license professional. It is the responsibility of the engineer using the elevation data for specific products to determine what documentation is suitable.</p>	<p>Existing topographic data leveraged by FEMA must have documentation that it meets the following vertical accuracy requirements:</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		Rolling or Hilly ; High ; 49.0 cm/72.6 cm ; ≤2 meters High (Deciles 2,3,4,5) ; Hilly ; Medium ; 98.0 cm/145 cm ; ≤3.5 meters Medium (Deciles 3,4,5,6,7) ; Flattest ; High ; 49.0 cm/72.6 cm ; ≤2 meters Medium (Deciles 3,4,5,6,7) ; Rolling ; Medium ; 98.0 cm/145 cm ; ≤3.5 meters			
3/8/2013	44	FEMA requires all elevation data to be processed to the bare earth terrain in the vicinity of floodplains that will require hydraulic modeling.	SID 44: Does this require an independent QA/QC (field verification) certified by a licensed professional?	See SID #46 and SID #49	FEMA requires all elevation data to be processed to the bare earth terrain in the vicinity of floodplains that will require hydraulic modeling.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	46	When bare earth post-processing is included in the project the SVA for up to three significant land cover categories, in terms of percentage of the project area covered, shall be tested in addition to the open/bare ground areas already tested for FVA Land cover categories making up 10% or more of the project area should be included in the SVA testing	SID 46: Will testing need accuracy certified by a licensed professional?	Yes, please see SID #49	When bare earth post-processing is included in the project the SVA for up to three significant land cover categories shall be tested in addition to the open/bare ground areas already tested for FVA. Up to three land cover categories making up 10% or more of the project area should be included in the SVA testing.
3/8/2013	48	Checkpoints used for testing SVA of the bare earth elevation product must be located in the areas where bare earth post-processing was performed, distributed to avoid clustering, and support vertical accuracy reporting	SID 48: Will checkpoint accuracy need to be certified by a licensed professional?	Yes, this is required by the USGS specification (SID #40)	Checkpoints used for testing SVA of the bare earth elevation product must be located in the areas where bare earth post-processing was performed, distributed to avoid clustering, and support vertical accuracy reporting that is representative of the post processed areas.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		that is representative of the post processed areas.			
3/8/2013	54	<p>For Flood Risk Projects with published flood elevations, survey data must be used to determine the geometry for the portions of cross sections that are underwater during normal flow conditions.</p> <p>The means and data used to calculate losses through hydraulic structures must be provided.</p>	SID 54: Assume this still allows for the interpolation of cross section channel information between two existing surveyed sections??	Standard was substantially revised based on internal review.	Where flood elevations are produced from a hydraulic model, they can be published as BFEs unless the responsible engineer documents why they should not be issued.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	54	<p>For Flood Risk Projects with published flood elevations, survey data must be used to determine the geometry for the portions of cross sections that are underwater during normal flow conditions.</p> <p>The means and data used to calculate losses through hydraulic structures must be provided.</p>	<p>SID 54: Assume this will not be required if using a FEMA approved hydraulic model (e.g. HEC-RAS).</p>	<p>Standard was substantially revised based on internal review.</p>	<p>Where flood elevations are produced from a hydraulic model, they can be published as BFEs unless the responsible engineer documents why they should not be issued.</p>
3/8/2013	54	<p>For Flood Risk Projects with published flood elevations, survey data must be used to determine the geometry for the portions of cross sections that are underwater during normal flow conditions.</p> <p>The means and data</p>	<p>SID 54: What are the vertical and horizontal accuracy requirements for said survey data. Will an accuracy certificate be required?</p>	<p>Standard was substantially revised based on internal review.</p>	<p>Where flood elevations are produced from a hydraulic model, they can be published as BFEs unless the responsible engineer documents why they should not be issued.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		used to calculate losses through hydraulic structures must be provided.			
3/8/2013	55	For all areas scoped for alluvial fan analyses, adequate field inspections with regard to geomorphology must be conducted. The level of field inspection may vary based on details of project scope.	Shouldn't the project scope state how much and the type of field inspections required?	This standard was removed and will be addressed with guidance.	Deleted/Demoted
3/8/2013	55	For all areas scoped for alluvial fan analyses, adequate field inspections with regard to geomorphology must be conducted. The level of field inspection may vary based on details of project scope.	what would the minimum level of adequate field inspection be?It is recommended that the language also be revised to discuss level of field inspections and its related documentation. What is the definition of adequate inspection/documentation?	This standard was removed and will be addressed with guidance.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	56	The Mapping Partner who undertakes alluvial fan analyses must obtain written approval of the methodology from the FEMA Regional Risk Analysis Branch Chief before the commencement of the Flood Risk Project production. To inform this decision, the Mapping Partner shall provide sufficient field data and analysis, where to apply it and records of community engagement relative to the scope and methodology.	What if this doesn't happen? Who is checking for this? It seems like the Mapping Partner might have to do some work before the before the Branch Chief gives their approval on the methodology. Does this apply to LOMRs? Does this apply to floodplain delineation studies done without FEMA money?	Coordination should occur prior to initiation of the analysis. This standard is applicable to LOMRs. Guidance will be developed to better support this standard.	Written approval from the FEMA Regional Risk Analysis Branch Chief regarding the alluvial fan methodology must be obtained before the commencement of full analysis. To inform this decision, sufficient field data and analysis and records of community engagement relative to the scope and methodology must be provided.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	56	<p>The Mapping Partner who undertakes alluvial fan analyses must obtain written approval of the methodology from the FEMA Regional Risk Analysis Branch Chief before the commencement of the Flood Risk Project production. To inform this decision, the Mapping Partner shall provide sufficient field data and analysis, where to apply it and records of community engagement relative to the scope and methodology.</p>	<p>FEMA already has multiple approved methodologies for analyzing Alluvial Fans. Getting Branch Chief's approval for these methodologies will introduce subjectivity to this process. Recommend this issue to be revisited. The text states that approval of a methodology is necessary prior to the commencement of a study. However, it then states that field data and analysis and how it is being used needs to be submitted for approval. The collection of field data and its analysis would most likely be the alluvial fan analysis methodology. Essentially the study still has to be conducted using the "unapproved" methodology in order to provide enough information for the RRABC to make an informed decision regarding the use of any specific methodology.</p>	<p>Guidance will be developed to better support this standard and will explain the sequence of events (what to collect and when).</p>	<p>Written approval from the FEMA Regional Risk Analysis Branch Chief regarding the alluvial fan methodology must be obtained before the commencement of full analysis. To inform this decision, sufficient field data and analysis and records of community engagement relative to the scope and methodology must be provided.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	58	The hydrologic and hydraulic models must be calibrated and the results must be validated.	<p>Does this apply to LOMRs that restudy hydrology? We almost never see it done. - CRH</p> <p>I think this is lacking "when data for calibration and verification is available"-GJB</p>	This standard was removed and will be addressed with guidance.	Deleted/Demoted
3/8/2013	59	Hydrologic and hydraulic analyses and calibration shall must include data from well-documented flood events (if available) representative of a modeled flood frequency.	SID 58: The hydrologic and hydraulic models must be calibrated and the results must be validated. <i>This will be a tough items to enforce with minimal amounts of gage data available. This is also assuming that the study stream has gage data available. Suggest adding an "if possible" line to the standard.</i>	To clarify, "if available" was added to the standard.	Hydrologic and hydraulic analyses must be calibrated using data from well-documented flood events, if available.
3/8/2013	59	Hydrologic and hydraulic analyses and calibration shall must include data from well-documented flood events (if available) representative of a modeled flood frequency.	We make some attempt to make sure that our hydrology results are reasonable. We don't really do this for hydraulic models. Although I've heard that there has been some attempts to do this FLO-2D for some areas.	Calibration is expected (if information is available) for hydrology using gages and hydraulics using high water marks. If gage records or high water marks from	Hydrologic and hydraulic analyses must be calibrated using data from well-documented flood events, if available.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				known storms do not exist, then calibration is not possible and not expected. Guidance will be developed to better support this standard.	
3/8/2013	59	Hydrologic and hydraulic analyses and calibration shall must include data from well-documented flood events (if available) representative of a modeled flood frequency.	Please consider using original Appendix C language.	Guidance will be developed to better support this standard. All existing appendices (including C) will be leveraged for existing language.	Hydrologic and hydraulic analyses must be calibrated using data from well-documented flood events, if available.
3/8/2013	59	Hydrologic and hydraulic analyses and calibration shall must include data from well-documented flood events (if available) representative of a modeled flood frequency.	Typo "shall must" -GJB	This typo was corrected.	Hydrologic and hydraulic analyses must be calibrated using data from well-documented flood events, if available.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	63	<p>A flood risk watershed project will be considered complete when the HUC-8 has been evaluated, the watersheds or subwatersheds chosen for new or updated flood risk projects are analyzed, and:</p> <ul style="list-style-type: none"> <li>• All watersheds or subwatersheds requiring new or updated hydrologic or hydraulic analysis have been analyzed and mapped.</li> <li>• Hydraulics will be performed for an entire stream segment when that stream is selected for a flood risk project. This means that unanalyzed areas (or gaps) between analyzed stream</li> </ul>	<p>"All hydrology is consistent" could prove problematic for watersheds that have gage records only on certain tributaries. -GJB</p>	<p>This standard was removed and will be addressed with guidance.</p>	<p>Deleted/Demoted</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		<p>segments must be analyzed unless those gaps consist of a valid flood risk project that ties into the new flood risk project. However, there can be different levels of analyses for the different stream segments, as long as all the models tie-in.</p> <ul style="list-style-type: none"> <li>• All other subwatersheds have been evaluated and do not require a new or updated flood risk project based on risk and need.</li> <li>• All Hydrology within the watershed is consistent. In watersheds where the hydrology is not consistent, additional analysis is required to create consistency.</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	65	BFEs must agree with those of other contiguous Flood Risk Projects of the same flooding source within 0.5 foot, unless it is demonstrated that it would not be appropriate. Please see 44 CFR 65.6a(2).	Are there any examples of situations when the 0.5 ft tie-in would not be appropriate? And if a situation is deemed appropriate, are we expected to carry the discontinuity in the map and profile, or smooth it over? - CRH	Guidance will be developed to better support this standard.	BFEs must agree with those of other contiguous studies of the same flooding source within 0.5 foot, unless it is demonstrated that it would not be appropriate. Please see 44 CFR 65.6a(2).
3/8/2013	66	Each modeled split or diverted flow path must be plotted with individual profiles.	minimum length of diversion, or a minimum elevation difference could require options for exceptions.	Guidance will be developed to better support this standard and explain exceptions.	Each modeled split or diverted flow path must be plotted with individual Flood Profiles.
3/8/2013	72	Use an equal conveyance reduction method to establish the minimal regulatory floodway.	Typically this is the "starting point" for floodway modeling after which manual edits are made as necessary. Is there a target percent difference that will be considered "equal conveyance reduction"?-GJB	Guidance will be developed to better support this standard.	An equal conveyance reduction method must be used to establish the minimal regulatory floodway.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
2/25/2013	74	A registered professional engineer must certify the hydrologic and hydraulic analyses. All supporting data, including as-builts and structural works must also be certified by the appropriate entity. Please see 44 CFR 65.2.	On page 47 of 76 under item number 74 of the scanned pdf with title of "Review of New Standards for Flood Hazard Mapping" it states that "A registered professional engineer must certify the hydrologic and hydraulic analyses. All supporting data, including as-builts and structural works must also be certified by the appropriate entity. Please see 44 CFR 65.2." Recent and past countywide DFIRM and Flood Insurance Studies do not have a section in the FIS book nor in a CD of hydrology or hydraulic analyses showing a registered professional engineering seal and signature of the engineering calculations that went into preparing the hydrology and hydraulics studies and subsequent floodplain boundary mapping. A page within new FIS books should contain a professional engineer's seal with	FEMA will not mandate that engineers can only certify models in states where they are licensed. Certifications are to be part of the submittals to FEMA and have been historically. The certification is not repeated in the FIS published.	The hydrologic, hydraulic, and coastal analyses and the final regulatory products must be certified by a registered professional engineer.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>appropriate signature and date of the engineering calculations for all users of the FIS to see. That professional engineer should also be a qualified professional engineer licensed to practice engineering in the state which the flood study is located. Out-of-state professional engineers should not certify calculations on a study in a state where they are not registered to practice. The engineers preparing calculations for use in FEMA floodplain studies should not be allowed to remain in anonymity on critical engineering and floodplain mapping projects that affect thousands of land owners. Please clarify these issues within the revised guidelines to allow for more accountability by FEMA and their contracted engineers once DFIRMS and Flood Insurance Studies are completed.</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	75	<p>For each floodway determined under the scope of work, the Mapping Partner must create a Floodway Data Table (FDT) as part of the hydraulic analysis. There must be an entry for each cross section in the model that includes the following information:</p> <ul style="list-style-type: none"> <li>• Cross-section identification shown in a georeferenced spatial file;</li> <li>• Stream or profile baseline station of the cross section;</li> <li>• Width of the floodway at the cross section;</li> <li>• Wetted area of the cross section under encroached conditions;</li> <li>• Average velocity of the floodwaters at the cross section under</li> </ul>	<p>SID 75: For each floodway determined under the scope of work, the Mapping Partner must create a Floodway Data Table (FDT) as part of the analysis. <u>There must be an entry for each cross section in the model</u> that includes ... <i>We read this to mean that all cross sections included in a model is required to be in the FWDT now rather than just lettered cross sections. However, this directly conflicts with SID 248's guidance of "All lettered or numbered cross sections must be shown in the FDT and flood profiles. Unlettered cross sections shown on the FIRM are not to be included in the FDT or flood profiles". Please revise wording of one or the other to match.</i></p>	<p>Only lettered mapped cross-sections are to be included in the FDT; there is no requirement for all cross-sections in the model to be included.</p>	<p>For each stream with cross sections where a floodway was determined under the scope of work, a Floodway Data Table compliant with the FIS Report Technical Reference must be prepared as part of the hydraulic analysis. The Floodway Data Table must contain an entry for each lettered, mapped cross section that includes the following information:</p> <ul style="list-style-type: none"> <li>• Cross-section identification shown in a georeferenced spatial file;</li> <li>• Stream or profile baseline station of the cross section;</li> <li>• Width of the floodway at the cross section;</li> <li>• Wetted area of the cross section under encroached conditions;</li> <li>• Average velocity of the floodwaters at the cross section under encroached conditions;</li> <li>• The greater of BFEs from all flooding sources, including from backwater, affecting the cross section (regulatory elevation);</li> <li>• The BFE from the existing conditions model (without-floodway elevation);</li> <li>• The BFE from the encroached existing conditions model (with-floodway elevation); and</li> <li>• Difference between with- and without-floodway elevations (surcharge).</li> </ul>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>encroached conditions;</p> <ul style="list-style-type: none"> <li>• The greater of BFEs from all flooding sources, including from backwater, affecting the cross section (regulatory elevation);</li> <li>• The BFE from the existing conditions model (without-floodway elevation);</li> <li>• The BFE from the encroached existing conditions model (with-floodway elevation); and</li> <li>• Difference between with- and without-floodway elevations (surcharge).</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		<p>encroached conditions;</p> <ul style="list-style-type: none"> <li>• The greater of BFEs from all flooding sources, including from backwater, affecting the cross section (regulatory elevation);</li> <li>• The BFE from the existing conditions model (without-floodway elevation);</li> <li>• The BFE from the encroached existing conditions model (with-floodway elevation); and</li> <li>• Difference between with- and without-floodway elevations (surcharge).</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		<p>encroached conditions;</p> <ul style="list-style-type: none"> <li>• The greater of BFEs from all flooding sources, including from backwater, affecting the cross section (regulatory elevation);</li> <li>• The BFE from the existing conditions model (without-floodway elevation);</li> <li>• The BFE from the encroached existing conditions model (with-floodway elevation); and</li> <li>• Difference between with- and without-floodway elevations (surcharge).</li> </ul>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	76	Storage considerations in hydrologic and hydraulic modeling of the unencroached condition should be revised to reflect any encroachment into storage areas indicated by the floodway configuration. If designated storage areas behind structures are accounted for in the flood discharge computations by routing the base flood hydrograph, no encroachment is to be allowed.	SID 76 Encroachment is not to be allowed if hydrologic discharges computed are based on storage-routing. The statement should be modified to include: "except where analysis indicates no change to discharges.", or a similar provision.	Guidance will be developed to better support this standard.	If previously-modeled storage areas are removed or filled, the models must be updated to reflect the loss in storage.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	76	Storage considerations in hydrologic and hydraulic modeling of the unencroached condition should be revised to reflect any encroachment into storage areas indicated by the floodway configuration. If designated storage areas behind structures are accounted for in the flood discharge computations by routing the base flood hydrograph, no encroachment is to be allowed.	<p>I assume this applies only where a floodway is currently designated and isn't required where floodway has been computed. If the upstream limit of floodway ends just downstream of a storage controlling structure, should the storage be designated as floodway? -CRH</p> <p>This item appears in conflict with hydrology item SID#57 which states "The multiple profile and floodway runs must have the same physical characteristics in common for existing ground conditions. "-GJB</p>	Guidance will be developed to better support this standard. The standard was adjusted to be in agreement with #57.	If previously-modeled storage areas are removed or filled, the models must be updated to reflect the loss in storage.
3/8/2013	77	Floodway computations for tributaries must be developed without consideration of backwater from confluences.	How does this work when you are using HEC-RAS with junctions? This sounds like it could end up taking more effort and drive up costs.	Junctions should not be used when modeling floodways.	Floodway computations for tributaries must be developed without consideration of backwater from confluences.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	77	Floodway computations for tributaries must be developed without consideration of backwater from confluences.	Please consider situations where we have coincidental peaks, where use of junction is a more appropriate methodology.	Junctions should not be used when modeling floodways.	Floodway computations for tributaries must be developed without consideration of backwater from confluences.
3/8/2013	80	If the floodplain centerline crosses the floodplain to form a more direct flow path than the water line, the case must be documented and the flow path shown on the FIRM and labeled "Profile Baseline." Flow distances in one-dimensional models must be referenced to the profile baseline.	Please Clarify !	Guidance will be developed to better support this standard.	If a flow path other than the stream centerline is more representative of the direction of flow, the case must be documented and the flow path shown and labeled on the FIRM as the "Profile Baseline". Flow distances in one-dimensional models must be referenced to the profile baseline.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	84	<p>All riverine engineering Flood Risk Projects shall consist of a hydraulic model with multiple frequencies: 0.2 percent, 1-percent, 2-percent, 4-percent, and 10-percent-annual-chance exceedance events.</p> <p>In addition, the “1-percent plus” flood elevation shall be modeled for all Flood Risk Projects. The 1% plus flood elevation is defined as a flood elevation derived by using discharges that include the average predictive error for the regression equation discharge calculation for the Flood Risk Project. This error is then added to the 1% annual chance</p>	<p>SID 84 This concept of relating the uncertainty of the flood elevation is a good idea; but practically speaking, only some community users (floodplain administrators) and a few technical users will see the "1-% plus" elevations on the profiles. The 2-% and 1-% profiles are often too close together to show, this will add a 3rd line in a small space and likely contribute to more clutter. Please consider adding a note to profiles relating the uncertainty instead.</p>	<p>FEMA sees value in adding the 1% plus to the profile. Guidance will be developed to better support this standard and help reduce potential clutter.</p>	<p>All riverine engineering Flood Risk Projects shall consist of a hydraulic model with multiple frequencies: 0.2 percent, 1-percent, 2-percent, 4-percent, and 10-percent-annual-chance exceedance events.</p> <p>In addition, the “1-percent plus” flood elevation shall be modeled for all riverine analyses. The 1% plus flood elevation is defined as a flood elevation derived by using discharges that include the average predictive error for the regression equation discharge calculation for the Flood Risk Project. This error is then added to the 1% annual chance discharge to calculate the new 1% plus discharge. The upper 84-percent confidence limit is calculated for Gage and rainfall-runoff models for the 1% annual chance event.</p> <p>The “1-percent plus” flood elevation must be shown on the Flood Profile in the FIS Report to best understand and communicate the uncertainty of the flood elevation.</p> <p>The mapping of the “1-percent plus” floodplain is optional and will only be produced when it is determined to be appropriate.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		<p>discharge to calculate the new 1% plus discharge. The upper 84-percent confidence limit is calculated for Gage and rainfall-runoff models for the 1% annual chance event.</p> <p>The “1-percent plus” flood elevation must be shown on the Flood Profile in the FIS Report to best understand and communicate the uncertainty of the flood elevation.</p> <p>The mapping of the “1-percent +” floodplain is optional and will only be produced when it is determined to be appropriate.</p>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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		<p>discharge to calculate the new 1% plus discharge. The upper 84-percent confidence limit is calculated for Gage and rainfall-runoff models for the 1% annual chance event.</p> <p>The “1-percent plus” flood elevation must be shown on the Flood Profile in the FIS Report to best understand and communicate the uncertainty of the flood elevation.</p> <p>The mapping of the “1-percent +” floodplain is optional and will only be produced when it is determined to be appropriate.</p>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

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3/8/2013	84	<p>All riverine engineering Flood Risk Projects shall consist of a hydraulic model with multiple frequencies: 0.2 percent, 1-percent, 2-percent, 4-percent, and 10-percent-annual-chance exceedance events.</p> <p>In addition, the “1-percent plus” flood elevation shall be modeled for all Flood Risk Projects. The 1% plus flood elevation is defined as a flood elevation derived by using discharges that include the average predictive error for the regression equation discharge calculation for the Flood Risk Project. This error is then added to the 1% annual chance</p>	<p>This is new...will "1% +" discharges and profiles will be required for LOMR applicants performing new H&amp;H on streams? If so, it will add extra hours needed to complete MT-2 reviews - CRH</p> <p>There is no exception to this requirment listed for model based Zone A's-GJB</p>	<p>The 1% plus will only be required for LOMRs if it is on the effective study. Guidance will be developed to better support this standard, including potential exceptions.</p>	<p>All riverine engineering Flood Risk Projects shall consist of a hydraulic model with multiple frequencies: 0.2 percent, 1-percent, 2-percent, 4-percent, and 10-percent-annual-chance exceedance events.</p> <p>In addition, the “1-percent plus” flood elevation shall be modeled for all riverine analyses. The 1% plus flood elevation is defined as a flood elevation derived by using discharges that include the average predictive error for the regression equation discharge calculation for the Flood Risk Project. This error is then added to the 1% annual chance discharge to calculate the new 1% plus discharge. The upper 84-percent confidence limit is calculated for Gage and rainfall-runoff models for the 1% annual chance event.</p> <p>The “1-percent plus” flood elevation must be shown on the Flood Profile in the FIS Report to best understand and communicate the uncertainty of the flood elevation.</p> <p>The mapping of the “1-percent plus” floodplain is optional and will only be produced when it is determined to be appropriate.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>discharge to calculate the new 1% plus discharge. The upper 84-percent confidence limit is calculated for Gage and rainfall-runoff models for the 1% annual chance event.</p> <p>The “1-percent plus” flood elevation must be shown on the Flood Profile in the FIS Report to best understand and communicate the uncertainty of the flood elevation.</p> <p>The mapping of the “1-percent +” floodplain is optional and will only be produced when it is determined to be appropriate.</p>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/7/2013	96	Coastal analyses should not account for long term erosion. Episodic, storm-induced erosion should be included in the flood hazard analysis.	<p>Comment #2 - The FEMA Region III Technical Storm Surge Meeting held in Ocean City, MD on December 2, 2011 identified a potential concern about the coastal hazard analysis model which may not evaluate the positive benefit of our sand dunes (both natural and managed) or other coastal protection measures.</p> <p>The Town of Chincoteague is concerned that a change in Federal management of coastal beach profiles, to encourage overwash in favor of select shorebird habitat, will have the potential to increase the BFE on Chincoteague Island by up to four (4) feet. Is there a bias in the coastal flood model and the proposed 'partner standards' that assumes there will be no benefit of storm damage mitigation measures in the ground profile? We object to a new or continued</p>	<p>Our standards for consideration of storm induced erosion are based on the best science and existing statutes and regulations for mapping current conditions.</p> <p>The comment mainly pertains to the treatment of beach nourishment / dune construction. Consideration of these activities is addressed in SID 139.</p>	Coastal analyses shall not account for future impacts due to long term erosion. Episodic, storm-induced erosion must be included in the flood hazard analysis.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>policy that requires modeling an eroded ground surface without also requiring analysis of hazard mitigation measures and programs, such as maintenance of a primary frontal dune system. [Standard 89, 91, 95, 96, 98, 139]</p> <p>Suggestion: Add a standard to #96 that requires analysis of regular management practices and maintenance of storm damage protection plan measures including dunes, beach re-nourishment, beach profile restoration, sea walls, etc. as a positive force in the analysis instead of only requiring the negative force of 'episodic storm-induced erosion'</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	99	Areas of shallow flooding shall not have modeled/computed floodways due to the inherent uncertainties associated with their flow patterns. However, communities can choose to have administrative floodways for such areas.	What defines "shallow flooding" in this context?-GJB  This could be in conflict with the Illinois requirement for preservation of cross sectional area.-GJB	Shallow flooding is between 1 and 3 feet. Exceptions can be granted by Regional Branch Chief where necessary.	Areas of shallow flooding shall not have modeled/computed floodways due to the inherent uncertainties associated with their flow patterns. However, communities can choose to have administrative floodways for such areas.
3/8/2013	104	Redelineation shall only be used when the terrain source data is better than effective and the stream reach is classified as valid in the CNMS database.	Should this say invalid or unverified?	No, the intent is that the engineering is valid, but better terrain is available. If the engineering is unverified, redelineation shall not be used.	Redelineation shall only be used when the terrain source data is better than effective and the stream reach is classified as VALID in the CNMS database.
3/8/2013	107	1% annual chance flood elevations must be shown within 1% annual chance floodplains; the exception shall be for Zone A, Zone V, Zone AO and Zone A99.	What about those times when floodplain is fairly narrow and you can't fit the BFE within floodplain limits? Why are only some zones except?	Guidance will be developed to better support this standard. BFEs are not applicable to certain zones by definition therefore some are excepted.	BFEs must be shown within 1% annual chance floodplains; the exception shall be for Zone A, Zone V, Zone AO and Zone A99.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				This is not a labeling standard. It is a content standards. The BFE must be provided, it can be labeled using call-outs or other cartographic methods if there are space restrictions.	
3/12/2013	118	<p>For areas within the continental United States, all new flood maps and updates must be referenced to NAVD88, with specific exceptions.</p> <p>Waivers should be approved by the Regional Mitigation Division Director and coordinated with the Headquarters Regional Engineer.</p>	NAVD 88 conflicts with Countywide Datum. Unclear	Updated to clarify standard.	For areas within the continental United States, all new flood maps and updates must be referenced to NAVD88.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/12/2013	119	If the final average countywide or flooding source-based datum conversion value is less than +/- 0.1 foot, the Mapping Partner shall consider the datum conversion to be executed and shall not adjust flood elevations for those flooding sources on the FIRM, Flood Profiles, or in the FIS Report tables.	"Datum Conversion" not defined - The main comment is related to SID#119. The standards for vertical procedures may conflict with the methodologies for establishing vertical positions from (Appendix A).	Datum conversions apply to existing data that is valid but referenced to a prior datum. To use these data in a map update, the elevations generally need to be converted to NAVD88 to be compatible with other data. New data, should be referenced to NAVD88 with no datum conversion per Appendix A.	If the final average countywide or flooding source-based datum conversion value is less than +/- 0.1 foot, the datum conversion shall be considered to be executed and the flood elevations for those flooding sources on the FIRM, Flood Profiles, and in the FIS Report tables shall not be adjusted.
3/12/2013	122	Mapping Partners must use either a single countywide vertical datum conversion factor or an average flooding source-based conversion factor for a grouping of flooding sources, for individual flooding sources, or for flooding source segments.	Is countywide datum different than NSRS?	There is no countywide datum in the standards. There is a countywide datum conversion factor. NSRS is a Federal system for geodetic control managed by the National Geodetic Survey. The NAVD88 vertical datum and NAD83 horizontal	Either a single countywide vertical datum conversion factor or an average flooding source-based conversion factor must be used for a grouping of flooding sources, for individual flooding sources, or for flooding source segments.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				datum are defined by elements of the NSRS.	
3/12/2013	123	The Mapping Partner performing the datum conversion shall apply a single countywide vertical datum conversion factor when the maximum offset from the average conversion factor does not exceed 0.25 foot.	Accuracy conflicts with methodology	This standard has been in place for many years.	A single countywide vertical datum conversion factor shall be applied when the maximum offset from the average conversion factor does not exceed 0.25 foot.
3/8/2013	124	When calculating a single countywide vertical datum conversion, USGS topographic Quadrangle corners falling within the land area of the county must be used to calculate the vertical	SID 124: Falling WITHIN? Do we also include the quadrangle corners falling outside but 'near' the borders of the county? How far is near?	Only the corners within the county must be used.	When calculating a single countywide vertical datum conversion, USGS topographic Quadrangle corners falling within the land area of the county must be used to calculate the vertical datum conversion factor.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		datum conversion factor.			
3/8/2013	126	All flood elevations must be tied in when performing datum conversions.	SID 126: Ambiguous. Define 'tied in'.	This can be clarified with additional guidance, but the term "tie-in" has historically be used frequently in FEMA's standards without a specific definition.	All flood elevations must be tied in when performing datum conversions.
3/8/2013	128	For floodplains mapped from 2-D models, the Mapping Partner should create separate Flood Profiles for significant flow paths.	How is the mapping partner supposed to determine what is a significant flow path? Do we still need profiles when 2D models are used? We work with and use the results for the individual cells from the FLO-2D models that we have, we don't use profiles where we have 2D models. For us creating profiles is a waste of time and effort.	Guidance will be developed to better support this standard; however, professional engineers should be able to determine a flow path. Profiles are a necessary part of the regulatory products and are critical to end users.	For floodplains mapped from 2-D models, separate Flood Profiles for significant flow paths must be created.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	131	All non-conveyance areas considered in the model must be mapped.	Clarify the condition for a non-conveyance area. Is this referring to obstructions such as buildings?	Areas where water is standing (not moving). Guidance will be developed to better support this standard.	All non-conveyance areas considered in the model must be mapped.
3/8/2013	140	Shallow flooding areas shall not contain non-SFHA islands based on small scale-scale topographic variations.	The FIRMs for Maricopa County have some small scale islands in the Zone AO area.	This is not a standard practice, however, exceptions can be granted by the Regional Branch Chief. Variations such as these can be further explained with guidance.	Shallow flooding areas shall not contain non-SFHA islands based on small scale topographic variations.
3/8/2013	144	Mapping Partner and FEMA must discuss data and methodology used for ice jam analysis.	Why is discussion only needed for ice jam analysis, while for alluvial fans the Branch Chief needs to approve the proposed methodology in writing? What is meant by FEMA, is that the Region, the Branch Chief, someone at Headquarters?	This standard was removed and will be addressed with guidance.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	146	The FEMA Regional Office must be notified of any potential floodplain management violations identified through the submittal of new or revised flood hazard data.	SID 146: While this is good in theory, this could lead to big problems, as you may be asking someone to turn in a client or a community that they may live in and risk penalties on both sides.	Guidance will be developed to better support this standard, including information that explains why the LOMR reviewer or study contractor should be the one that notifies FEMA of the potential violation.	FEMA must be notified of any potential floodplain management violations identified through the submittal of new or revised flood hazard data.
3/8/2013	146	The FEMA Regional Office must be notified of any potential floodplain management violations identified through the submittal of new or revised flood hazard data.	SID 146: Ambiguous. Please explain. Is this for mapping partners or any professional who submits new data?	Guidance will be developed to better support this standard, including information that explains why the LOMR reviewer or study contractor should be the one that notifies FEMA of the potential violation.	FEMA must be notified of any potential floodplain management violations identified through the submittal of new or revised flood hazard data.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	147	The minimum resolution requirement for raster data files (ortho-imagery) is 1-meter ground distance.	SID 147: Is there a minimum currency or limits to the age of photography.	No, please see SID #149. Changes over time have the potential to make existing imagery unusable because too many features in the imagery have been changed to allow unambiguous interpretation of location on the base map.	The minimum resolution requirement for raster data files (ortho-imagery) is 1-meter ground distance.
3/8/2013	149	The base map used for the Flood Insurance Rate Map must enable unambiguous interpretation of the flood hazard data.	SID 149: Ambiguous: Please explain.	There is existing guidance that will be updated over the next year. This means the basemap must show roads, buildings, etc. in the correct locations to allow users to interpret the map. A few changes (new buildings, roads not shown) are OK if it doesn't get too confusing.	The base map used for the Flood Insurance Rate Map must clearly show sufficient current ground features to enable clear interpretation of the flood hazard data displayed on the base map.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	149	The base map used for the Flood Insurance Rate Map must enable unambiguous interpretation of the flood hazard data.	Not sure what this means. This is ambiguous... LMG	There is existing guidance that will be updated over the next year. This means the basemap must show roads, buildings, etc. in the correct locations to allow users to interpret the map. A few changes (new buildings, roads not shown) are OK if it doesn't get too confusing.	The base map used for the Flood Insurance Rate Map must clearly show sufficient current ground features to enable unambiguous interpretation of the flood hazard data displayed on the base map.
3/8/2013	154	Mapping Partners must avoid all unnecessary duplication of Federal, State or local mapping efforts.	So a local mapping partner is supposed to make sure that federal agencies don't duplicate their efforts	This standard requires the mapping partner to avoid duplicating work that has already been accomplished regardless of whether that work was done by a local, state or Federal agency.	All unnecessary duplication of Federal, State or local mapping efforts must be avoided.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	156	It is the Mapping Partner's responsibility to certify that the elevation data used for the project complies with the G&S and industry best practices.	SID 156: Is the certifying Mapping Partner required to be a licensed professional?	Standard removed. Professional certification requirements are in SID #s 42, 49, and 74.	Deleted/Demoted
3/8/2013	157	FEMA will not provide funding for new base map data collection as part of a specific Flood Risk Project.	SID 157: Does this include terrain data?	No, "base map data" does not include terrain data. Conditions of topo data purchase is covered by SID #158	FEMA will not provide funding for new base map data collection as part of a specific Flood Risk Project.
3/8/2013	160	<p>In addition to the spatial data specified in the FIRM Database Submittal Table of the FIRM Database Technical Reference, Mapping Partners must submit the following Alluvial Fan data:</p> <ul style="list-style-type: none"> <li>• A technical report that describes the</li> </ul>	Is the Brach Chie supposed to approve the results?	This standard was removed and will be addressed with guidance.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		processes for identifying the alluvial fan, the areas of active and inactive alluvial fan flooding, and the procedures for determining the aerial extent and/or elevation of the base flood.			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	163	The Preliminary digital FIRM Database shall be distributed for review with the hardcopy FIRM and FIS Report.	<p>Due to the cost of printing the FIS Report, especially multi-volume FIS Reports; dsitributing the Preliminary FIS, Preliminary SOMA and Preliminary digital FIRM Database on disk accompanied by a hardcopy of the Preliminary Transmittal Letter and hardcopies of the Preliminary FIRM panels should be given consideration.</p> <p>This CTP delivered all multi-volume Preliminary FIS Reports on disk during Map Mod without issue, and has moved forward with all Preliminary FIS Reports and Preliminary SOMAs delivered on disk for Risk Map.</p> <p>Much thought was given to the text and content listed on the disk lables and to the disk subfolder names and folder structure. In addition ReadMe files were included in each subfolder to explain that</p>	Removed the word "hardcopy" from the final standard language. Where it is acceptable to communities, hardcopy distribution may be replaced with digital.	The Preliminary digital FIRM Database shall be distributed for review with the Preliminary FIRM and FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>particular component of the Preliminary Transmittal.</p> <p>Please do not overlook the importance of these details in the presentation and delivery of the Preliminary digital FIRM Database on disk. - DMD</p>		
3/8/2013	166	Following issuance of the Preliminary copies of the FIRM and FIS Report, FEMA shall provide a period (usually 30 days) for community officials, community residents, and other interested	<p>Does this mean that there should be a minimum of 30 days between release of the Preliminary products (mailing) and the Open House meeting (which typically initiates the 30-day comment period)?</p> <p>This is reasonable for a countywide project, but may</p>	This standard is only about the review period. It does not specify the time period within which the CCO meeting should occur; the release of the preliminary maps	Following issuance of the Preliminary copies of the FIRM and FIS Report, FEMA shall provide a period (usually 30 days) for community officials, community residents, and other interested parties / stakeholders to review the Preliminary copies of the FIRM and FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		Mapping Partners to review the Preliminary copies of the FIRM and FIS Report before proceeding with processing.	not be necessary for smaller PMR projects. - DMD	actually initiates the 30-day period	
3/8/2013	167	FEMA will provide communities with a Summary of Map Actions (SOMA) when the revised FIRM panels are issued Preliminary and at LFD	Typically, the P-SOMA is prepared and released (mailed) by the PPP partner and the F-SOMA is prepared by the PPP partner but released by FEMA or the PTS contractor. - DMD	This standard was deleted due to redundancy and/or being merged with another standard.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	168	<p>Mapping Partners shall review and categorize all effective LOMCs:</p> <ol style="list-style-type: none"> <li>1. through a draft SOMA before the Preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment;</li> <li>2. through a revised draft SOMA before Revised Preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment;</li> <li>3. through a Final SOMA before the Letter of Final Determination (LFD) letter is sent to the community; and</li> </ol>	<p>All may apply for the review but all does not apply to categorizing LOMC on the SOMA.</p> <p>For the SOMA, All LOMC associated with the mapping project panels.</p> <p>For the Revalidation letter all may not apply, as there is more than one type of Revalidation Letter:</p> <p>A Revalidation 2 Letter is only used when a previous a Revalidation Letter was in effect for a community and that letter is superseded as part of the map revision administrative process. A Revalidation 2 Letter is not used when every FIRM panel in a given county is revised as part of the mapping project.</p> <p>A Revalidation 2 letter may not be a comprehensive list of all valid LOMC for a community. LOMC</p>	<p>Updated standard language with "on affected FIRM panels" to clarify.</p>	<p>All effective LOMCs located on affected FIRM panel(s) shall be reviewed and categorized:</p> <ol style="list-style-type: none"> <li>1. through a draft SOMA before the Preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment;</li> <li>2. through a revised draft SOMA before Revised Preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment;</li> <li>3. through a Final SOMA before the LFD letter is sent to the community; and</li> <li>4. through a revalidation letter before the effective date of the new or revised FIRM panels.</li> </ol>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		4. through a revalidation letter before the effective date of the new or revised FIRM panels.	determined after the date of the superseded letter and located on non-revised panels are not affected by the map revision or the administrative process and are therefore not listed on the Revalidation 2 Letter. - DMD		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	169	The processing Mapping Partner shall ensure that currently effective LOMRs are incorporated into the new FIS Report and FIRM unless new or revised flood hazard information is superseded by the LOMR.	is this phrased correctly?	Standard was reworded to address concern and/or add clarification.	All LOMRs issued during post-preliminary prior to the LOMC cutoff date (which is 60 days before the project's LFD date) must be incorporated into the new FIS Report and FIRM. LOMRs that are issued after this time must be re-issued after the revised FIRM date.
3/8/2013	169	The processing Mapping Partner shall ensure that currently effective LOMRs are incorporated into the new FIS Report and FIRM unless new or revised flood hazard information is superseded by the LOMR.	The processing Mapping Partner shall ensure that currently effective LOMRs associated with revised panels are incorporated into the new FIS report and FIRM unless new or revised flood hazard information is superseded by the LOMR.	Standard was reworded to address concern and/or add clarification.	All LOMRs issued during post-preliminary prior to the LOMC cutoff date (which is 60 days before the project's LFD date) must be incorporated into the new FIS Report and FIRM. LOMRs that are issued after this time must be re-issued after the revised FIRM date.
3/8/2013	171	For coastal flood risk projects, all community requests to have the LiMWA removed from the FIRM must be received prior to the issuance of the Letter	Most likely should be prior to the QR5-7 submittal date which is 2 months prior to LFD. - DMD	This standard was deleted due to redundancy and/or being merged with another standard. Now addressed in SID #352	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		of Final Determination.			
3/8/2013	174	Mapping Partners must submit certification of completeness of submitted data for FEMA-funded Flood Risk Projects when their work on a project is complete (via the certification forms provided in (add document library link here). This form must cover the Mapping Partner's scope of work for the project and be signed and dated by the manager responsible for the work.	SID 174: Certification of completeness? Does this imply completed to the accuracy required?	No, certification of technical sufficiency and completeness have been separated in this version of the standards. See SID #74.	Certification of completeness of all submitted data for FEMA-funded Flood Risk Projects must be provided when work on a project is complete (via the certification forms provided in <a href="http://www.fema.gov/library/viewRecord.do?id=7577">http://www.fema.gov/library/viewRecord.do?id=7577</a> )

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	175	<p>In addition to the spatial data specified in the FIRM Database Submittal Table of the FIRM Database Technical Reference, Mapping Partners responsible for Floodplain Mapping must submit the following data:</p> <ul style="list-style-type: none"> <li>• The preliminary FIS Report</li> <li>• Topographic data files (if not submitted under “Develop Topographic Data”)</li> <li>• Base map data files (if not submitted under “Acquire Base Map”)</li> </ul>	<p>Please specify the appropriate file location available to the mapping partner and the timeframe for submittal of these items.</p> <p>Please specify if topographic data is required only if redelineation is performed by the mapping partner or if the topographic data used by the study originator to produce the delineation is required. This data would have to be provided to the mapping partner by the MT-2 review partner. The information provided for the data set may not comply with DCS. If the Region accepts leveraged studies, topographic data and metadata should be requested. - DMD</p>	<p>Removed the references to topographic data and base map. They are addressed elsewhere.</p> <p>Location and timing for submittals is addressed in MIP guidance and the Data Capture Standards Technical Reference.</p>	<p>The preliminary FIS Report must be submitted with the other required submittals at the completion of the Floodplain Mapping task.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	176	All DCS spatial data must be georeferenced, have a standard coordinate system and projection defined and documented, and specify the horizontal and vertical datums used.	SID 176: What are the vertical and horizontal accuracy requirements for said DCS spatial data. Will an accuracy certificate be required?	The DCS data do not have explicit accuracy requirements separate from the requirements for the engineering analysis and floodplain mapping overall.	All spatial data must be georeferenced, have a standard coordinate system and projection defined and documented, and specify the horizontal and vertical datums used.
3/8/2013	179	If a Project Charter is signed, it must be submitted to the TSDN folder on the MIP.	A Project Charter is signed at the Discovery phase and the TSDN is submitted about 6 months prior to a Regulatory mapping project going effective. This can easily span 5 years and involve separate contractors. Since the MIP requires completion of certain tasks before other tasks are made available, will the TSDN folder be available at this early phase in the project? - DMD	Yes, the TSDN folder is populated as the project proceeds from cradle to grave	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	188	FEMA must be able to distribute the base map data and floodplain information (hardcopy and digital) freely to the public.	SID 188: Does this apply to topographic data constraints?	No, this applies to base map data. Base map definition will be added outside the standards that make clear elevation data is not included. SID #158 provides requirements for elevation data.	FEMA must be able to distribute the base map data and floodplain information freely to the public in hardcopy and digital formats.
3/8/2013	188	FEMA must be able to distribute the base map data and floodplain information (hardcopy and digital) freely to the public.	SID 188: Will mapping partner be immune from copyright infringement?	No, the intent of the standard is to make is clear that parties selecting / providing the base map data must use care to insure there is no copyright infringement.	FEMA must be able to distribute the base map data and floodplain information freely to the public in hardcopy and digital formats.
3/8/2013	191	The designated Mapping Partner shall follow the required procedures for preparing and distributing new and revised FIS Reports and FIRMs, standard correspondence, and enclosures as documented in	This assumes the Document Control Procedures Manual (FEMA, 2000) reflects the most current versions of letters and forms. - DMD  Document Control Procedures Manual (FEMA, 2000) is out of date. The Expanded Appeal Process necessitated revisions for nearly all post processing	The reference to the DCPM was removed.	All standard correspondence, letters, and enclosures distributed during the life of a Flood Risk Project must be prepared in accordance with the templates located at <a href="http://www.fema.gov/library/viewRecord.do?id=7577">http://www.fema.gov/library/viewRecord.do?id=7577</a>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		Section 1 and Appendix A of the Document Control Procedures Manual (FEMA, 2000).	correspondence. - SLF		
3/8/2013	192	Unique FEMA Case Numbers (e.g., 01-05-1234R) shall be assigned.	<p>Out of context, not sure of intent.</p> <p>Please give consideration to the fact that multiple FEMA projects may be released as one mapping project in a County. Example: a PMR project consist of multiple H &amp;H studies with 316-PMR designations, multiple effective LOMRs, leves note changes, as well as leveraged H&amp;H studies. - DMD</p>	Guidance will be developed to better support this standard.	Unique FEMA Case Numbers (e.g., 01-05-1234R) shall be assigned for all initiated LOMCs and Flood Risk Projects

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/7/2013	194	<p>Regulatory flood map updates (FIRM updates) are required wherever Base Flood Elevations (BFEs) change by more than one foot in either direction.</p> <p>Regulatory flood map updates (FIRM updates) are required wherever floodplain widths increase or decrease by more than 10% percent on average across the stream segment</p>	<p>To Whom it May Concern:</p> <p>The following comments are submitted on behalf of the Town of Chincoteague, Virginia regarding the New Standards for Flood Hazard Mapping Partners under the National Flood Insurance Program (NFIP). We are a certified CRS community and have recently updated our Hazard Mitigation Plan to address our unique barrier island position that is sheltered by Assateague Island National Seashore and the federal management practices of the USFWS at Chincoteague National Wildlife Refuge.</p> <p>Comment #1 - The FEMA Region III Coastal Flood Study will model storm surge, wave height, wave setup and runup based on field run cross sections and will create a 'high bar' for anyone to meet for the preparation of a LOMR</p>	<p>This standard is used by FEMA to determine when natural or man-made changes are great enough to warrant a flood study in a particular community. FEMA uses the best science and data available when making flood map updates. The expectation is that LOMRs to incorporate better data would not be needed immediately after a new map is published. As new topographic data, methodologies, and information is available to incorporate into the flood maps, LOMRs can be used for maintenance. When this information is provided to FEMA,</p>	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>in the future. These standards will make it impractical and unaffordable for any individual or small community to participate in future evaluation or modification of the Flood Insurance Rate Maps. [Standard 194]</p> <p>Suggestion: Define and adopt standards for an early petition or scoping process that would allow FEMA to complete a preliminary 'test run' of the coastal hazard model and to complete a preliminary review to determine if a proposed change would warrant the expense of tens of thousands of dollars to prepare a full LOMR in the coastal zone.</p>	<p>we have the expectation that the LOMR will meet FEMA's and the industry's engineering standards in order to be incorporated into the maps. It is not FEMA's intent to determine when a community should submit a LOMR. FEMA makes strategic decisions about when flood studies will be completed by the agency and this standard is helpful in that decision making process.</p> <p>Guidance will be developed to better support the standard.</p>	

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	194	<p>Regulatory flood map updates (FIRM updates) are required wherever Base Flood Elevations (BFEs) change by more than one foot in either direction.</p> <p>Regulatory flood map updates (FIRM updates) are required wherever floodplain widths increase or decrease by more than 10% percent on average across the stream segment</p>	<p>Please clarify, are the newer studies that do not generate FIRM updates considered effective studies? I assume not. How are these studies classified and where is the data stored? In the digital environment (Model = Database= FIRM) - DMD</p>	<p>Correct, there is no new effective if a regulatory product update is not conducted.</p> <p>Information developed during a Flood Risk Project that does not warrant a revision to the FIRM could be made available by FEMA as Best Available Data for use by local stakeholders. This information will be stored in FEMA's central mapping repository known as the Mapping Information Platform (MIP).</p>	Deleted/Demoted
3/8/2013	196	<p>If required by state law, the Mapping Partner shall require State concurrence with the LOMR or CLOMR.</p>	<p>When required, State approval for a study should be obtained by the study originator before the MT-2 submittal. - DMD</p>	<p>Guidance will clarify timing of this concurrence</p>	<p>If required by state law, State concurrence with the LOMR or CLOMR shall be required.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	199	LOMC submittals must include certifications by a licensed professional authorized to certify the data under state law.	Provide clarification whether licensee must be registered in State where LOMC is being applied for. My experience is that certain Mapping Partners have different requirements.	Standard does not seek to mandate this since different states may have different requirements. FEMA's expectations of certification are outlined on the MT-2 form.	LOMC submittals must include certifications by a licensed professional authorized to certify the data under state law.
3/8/2013	200	A LOMR or CLOMR must be supported by a topographic map that includes all relevant information required by FEMA.	SID 200: Do the topographic maps need to be certified by a licensed professional?	The regulations under part 65 specify topographic data certification requirements	A LOMR or CLOMR must be supported by a topographic map or digital data that includes all relevant information required by FEMA.
3/8/2013	200	A LOMR or CLOMR must be supported by a topographic map that includes all relevant information required by FEMA.	Currently the MT-2 submittal requirements do not meet DCS requirements. - DMD	While this may be changed in the future, for now, FEMA allows variations to this to accommodate those with little to no DCS knowledge.	A LOMR or CLOMR must be supported by a topographic map or digital data that includes all relevant information required by FEMA.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	201	A LOMR or CLOMR must include proposed floodplain and/or floodway boundary delineations shown on an annotated FIRM.	SID 201: Does a certificate by a professional surveyor meet this requirement?	Comment does not appear to be applicable to this standard.	A LOMR or CLOMR must include proposed floodplain and/or floodway boundary delineations shown on an annotated FIRM.
3/8/2013	202	All LOMRs including new grading or structures must include certified as-built construction or grading plans	SID 202: Assume that if As-Built plans are not available, surveyed information will suffice.	Standard was reworded to address concern.	All LOMRs including new grading or structures must include certified as-built construction plans, grading plans, or survey data.
3/8/2013	204	A LOMR or CLOMR in riverine areas must submit a model duplicating effective hydraulic model (multiple profile and floodway if appropriate).	This could be a complete waste of time if the revision wipes out the previous model, new topographic mapping, new hydrology, along with a new hydraulic model.	Exceptions to standards may be sought in certain circumstances. Guidance will help outline some of these scenarios where exceptions may be valid.	A LOMR or CLOMR in riverine areas must submit a model duplicating the effective hydraulic model (multiple profile and floodway if appropriate). The revision requester shall use it to establish the baseline condition unless an existing conditions hydraulic model is required.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	204	A LOMR or CLOMR in riverine areas must submit a model duplicating effective hydraulic model (multiple profile and floodway if appropriate).	It is recommended that it be considered that if a local community is performing their own floodplain mapping update, not associated with a "project" that will revise the entire limits of the watercourse, that a duplicate effective model is not necessary.	Exceptions to standards may be sought in certain circumstances. Guidance will help outline some of these scenarios where exceptions may be valid.	A LOMR or CLOMR in riverine areas must submit a model duplicating the effective hydraulic model (multiple profile and floodway if appropriate). The revision requester shall use it to establish the baseline condition unless an existing conditions hydraulic model is required.
3/8/2013	205	For a LOMR or CLOMR, an existing conditions hydraulic model with the same flooding events as the effective analyses, and, if in the effective riverine analysis, a floodway is required if the duplicate effective model does not reflect the floodplain conditions prior to the start of the project.	It is recommended that if a CLOMR/LOMR is submitted that wholly contains the flood hazard within a constructed channel, the requirement of providing an updated existing condition model is not needed. This becomes an additional cost for regional agencies attempting to reduce hazards across multiple jurisdictions .	Exceptions to standards may be sought in certain circumstances. Guidance will help outline some of these scenarios where exceptions may be valid.	For a LOMR or CLOMR, an existing conditions hydraulic model is required if the duplicate effective model does not reflect the floodplain conditions prior to the start of the project.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	206	If the revision is submitted as the result of a project, a post-project, revised hydraulic model must be submitted with the same flooding events as the effective analysis, and, if in the effective riverine analysis, a floodway.	Is a duplicate effective, corrected effective, and existing or pre-project required? This seems like a waste of time when we use new topographic data, new hydrology, and a new hydraulic analysis.	This standard only addresses the post-project model.	If the revision is submitted as the result of a project, a post-project revised hydraulic model reflecting as-built conditions must be submitted.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
2/21/2013	211	<p>If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>	<p>My comments specifically address the following RISK Map change:</p> <ul style="list-style-type: none"> <li>· Created a standard to limit the maximum size of map changes process under the Letter of Map Revision process to one effective flood map panel.</li> </ul> <p>This particular size limitation places an unfair burden on property owners who are mapped into a SFHA using very conservative approximate methods. Approximate methods amounts to nothing more than aerial photo interpretation. In the case of the Fairbanks North Star Borough, no new hydrology or topography is brought to bear on “updates” occurring in approximate A zones.</p> <p>The FNSB has been engaged with FEMA since 2006 in a restudy effort within the old</p>	<p>This has been removed as a standard and will be addressed in guidance.</p>	<p>For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>Map Modernization platform. To date, the revised preliminary dFIRMS have yet to be effective. My concerns stem from the fact that the revised preliminary dFIRMS were created without benefit of LIDAR data which is now readily available within the study area. I am told by Region 10 staff, that to go back and redo the maps using current LIDAR data is not possible and that the focus should be on getting the Map Panels adopted and into digital formats, so that LOMRs can then be pursued to correctly map the floodplain using relevant topography.</p> <p>According to the quoted bullet above, our community is limited to one (1) map panel in future LOMR applications? Once our Legacy Map Mod restudy is effective, I fully intend to submit multiple LOMR applications to revise multiple</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>map panels in order to take advantage of LIDAR topography and develop a more accurate assessment of our flood risk.</p> <p>Thank you.</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
2/28/2013	211	If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.	I am concerned that the limitation of LOMCs to one effective map panel. The vast majority of my studies cover two to three panels in urban areas. Making this process more difficult and more expensive does not serve the public well where much of our mapping is defective (produced by the Corps of Engineers in the 1970s based on 1960s topographic mapping). Allowing the private sector to process larger map changes reduces the exigency for FEMA to address them and potentially reduces FEMA's cost by having non-government sources pay for the work.	This has been removed as a standard and will be addressed in guidance.	For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/6/2013	211	<p>If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>	<p>Where and how do I search for the keywords provided in the PDF table?</p> <p>I also have a question regarding PDF page number 56, SID# 211, Primary Keyword PMR. We have processed several cases as LOMRs where we had one full panel and up to three additional 11x17 partial panel exhibits in order to show the revised floodplain footprint. The description here implies anything more than one full panel footprint will automatically be moved to PMR status. Is that correct or can we continue to use additional partial panel exhibits for a LOMR?</p>	<p>This has been removed as a standard and will be addressed in guidance.</p>	<p>For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/7/2013	211	<p>If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>	<p>I was recently notified of the proposed updates to the Guidelines and Specifications for Flood Hazard Mapping Partners . I've noted one item in particular that has given me pause and I would request clarification and/or additional information.</p> <p>Regarding the following:</p> <ul style="list-style-type: none"> <li>- Created a standard to limit the maximum size of map changes process under the Letter of Map</li> </ul> <p>Revision process to one effective flood map panel.</p> <p>Our Community recently completed a LOMR (12-10-0728P) following the retrofit of a small private dam which lowered the BFE by 3.8' on the lake behind the dam. This revision affected four map panels within our Community. Furthermore, there are many properties within the SFHA in</p>	<p>This has been removed as a standard and will be addressed in guidance.</p>	<p>For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>our Community which span two panels.</p> <p>It seems apparent that if this proposed standard should become approved, it would cause undue hardship for those Communities and individuals seeking LOMR's which might span more than one panel.</p> <p>Should this update become the new standard, could you please explain how one should go about revising a SFHA which spans more than one panel? Finally, one premise of converting to DFIRM's was to seamlessly blend the panels. This proposed standard disregards that philosophy and appears to be a step backwards.</p> <p>Please consider these comments and provide additional information regarding how Communities and individuals will be expected to navigate this</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			change should it become approved.		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	211	If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.	Will be funding PMRs? This could be a real issue with large projects or study updates. How often will be issuing PMRs in a community? What happens if you just clip another panel? We think that FEMA should be allowing for larger size LOMRs.	This has been removed as a standard and will be addressed in guidance.	For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.
3/8/2013	211	If the footprint of the revised floodplains in a LOMR is larger than one effective panel, the processing Mapping Partner will review the technical data and then shall prepare a letter, referred to as a 316-	Stronger language is needed in the 316-PMR letter related to requests for additional information since there may be a long time between the 316-PMR determination and the mapping project.	Suggestion is under advisement.	For each individual LOMR submitted within the community, if the footprint of the revised floodplains in the LOMR is larger than a size equivalent to one effective panel, the technical data shall be reviewed and a letter prepared, referred to as a 316-PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		PMR letter, to inform the community CEO and floodplain administrator that a PMR will be prepared and request that the community submit any information to be incorporated into the PMR.			
3/8/2013	215	<p>Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except:</p> <ul style="list-style-type: none"> <li>• Because Conditional LOMCs are based on proposed construction, as-built information is not required.</li> <li>• The Conditional Comment Documents that are issued by FEMA do not amend the effective Flood Hazard Boundary Map (FHBM) or FIRM.</li> <li>• Conditional LOMCs must demonstrate</li> </ul>	<p>The onus to provide Endangered Species Act compliance currently falls on the applicant. However, the commenting agencies (FWS &amp; NMFS) have indicated that this is the incorrect protocol and FEMA/Mapping Partner should initiate the commenting, not the applicant, based on submittal. Clarification of this section should be expanded/ revised.</p>	<p>Guidance can help provide some of this clarification.</p>	<p>Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except:</p> <ul style="list-style-type: none"> <li>• Because Conditional LOMCs are based on proposed construction, as-built information is not required.</li> <li>• The Conditional Comment Documents that are issued by FEMA do not amend the effective FHBM or FIRM.</li> <li>• Conditional LOMRs and CLOMR-Fs must demonstrate compliance with the Endangered Species Act.</li> </ul>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		compliance with the Endangered Species Act.			
3/8/2013	216	Within 3 days of receipt of the LOMC request, the LOMC Clearinghouse shall prepare and mail a letter to the requester acknowledging receipt of the request.	Is this working days?	Yes	A letter shall be mailed to the requester acknowledging receipt of the LOMC request within business three days of receiving the data.
3/8/2013	218	A LOMA, CLOMA, LOMR-F, or CLOMR-F may not be issued or based on preliminary data for a FEMA-contracted Flood Map Project or community-initiated map revision; however, BFE data may be used from these sources if the effective SFHA does	What if the preliminary BFE is higher? Sometimes we wait years for preliminary data to be effective.	This is a regulatory requirement since insurance is tied to effective maps. Although a community could choose to deal with this through floodplain management efforts (higher standard).	A LOMA, CLOMA, LOMR-F, or CLOMR-F may not be issued or based on preliminary data for a FEMA-contracted Flood Risk Project or community-initiated map revision; however, BFE data may be used from these sources if the effective SFHA does not have BFEs established and the preliminary data is the best available.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		not have BFEs established and the preliminary data is the best available.			
3/8/2013	218	A LOMA, CLOMA, LOMR-F, or CLOMR-F may not be issued or based on preliminary data for a FEMA-contracted Flood Map Project or community-initiated map revision; however, BFE data may be used from these sources if the effective SFHA does not have BFEs established and the preliminary data is the best available.	This standard has some concerns. Within our community, we have several studies that have gained FEMA acceptance, revising BFEs (316-PMR letter-issued) but are not shown on the maps. If property owners seek to revise the floodplain on a FEMA-approved but not yet mapped detailed study, they should be allowed to submit using both the effective and the 316-PMR data so that the most up-to-date information can ultimately be reflected on the FIRM panel. CLOMRs and LOMRs should not be stopped just due to FEMA current schedule of map production. Our community has waited 5 to 7 years from issuance of	This is not a new standard; it is in the regulations. FEMA cannot issue LOMRs off of preliminary data, since the preliminary data may change through appeals, and has not gone through due process.	A LOMA, CLOMA, LOMR-F, or CLOMR-F may not be issued or based on preliminary data for a FEMA-contracted Flood Risk Project or community-initiated map revision; however, BFE data may be used from these sources if the effective SFHA does not have BFEs established and the preliminary data is the best available.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			Best Available Data and 316-PMR letters to FIRMs revisions.		
3/8/2013	221	When processing a LOMC, the processing Mapping Partner shall prepare all letters in accordance with the requirements provided in the most recent version of the FEMA Document Control Procedures Manual .	This assumes the Document Control Procedures Manual (FEMA, 2000) reflects the most current versions of letters and forms. - DMD	This standard was deleted due to redundancy and/or being merged with another standard.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	222	When processing a LOMR, the Mapping Partner shall prepare the map (FIRM and/or FBFM panels), Flood Profile, and data tables (i.e., Floodway Data and Summary of Discharges) enclosures in accordance with the standards used for the effective map and attachments.	Once the NFHL Database is migrated to 2012 specs (by mid 2013) this LOMR delegation Partner inquired and was instructed to issue the newest map format regardless of the effective format. - DMD	Standard was updated to clarify. If the effective format is not "modernized", the option exists as outlined in the standard. If the effective format is "modernized", it must follow the Technical References, which is the newest format.	When processing a LOMR for a FIRM that has been modernized (i.e., has a FIRM database), the map (FIRM and/or FBFM panels), Flood Profile, and data tables (i.e., Floodway Data and Summary of Discharges) enclosures shall be prepared in accordance with the FIRM Panel Technical Reference and the FIS Report Technical Reference. If the FIRM that is having a LOMR issued for it has not been modernized, either the current standards may be used (as indicated in the FIRM panel and FIS Report Technical References), or the standards in effect when the effective map and attachments were created.
3/8/2013	223	If a LOMR changes flood elevations, discharges, or floodway information the supporting information in the FIS shall be revised as necessary.	This will need to be expanded to all items reflected in the database for the FIS in order for the FIS to be generated from the database. Currently, the LOMR documents do not provide for the tables already in the FIS such as n-values and limits of study. Also, consideration should be given to text in the FIS that is superseded by the LOMR.- DMD	Guidance will help clarify that "supporting information" covers all aspects of the FIS associated with that flooding source that is revised (tables, descriptions, methodologies, etc.)	If a LOMR changes stillwater elevations, transect data, flood elevations, discharges, and/or floodway information, the supporting information in the FIS Report and FIRM Database shall be revised as necessary.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	224	For all Special Conversion procedures, the processing Mapping Partner shall perform the coordination and documentation activities required to convert the community to the Regular Phase of the NFIP, in accordance with the detailed procedures documented in FEMA's Document Control Procedures Manual.	This assumes the Document Control Procedures Manual (FEMA, 2000) is up to date - DMD  I am not familiar with the process, I assume close coordination is required with the State NFIP coordinator - DMD	References to DCPM have been removed	For all Special Conversions, coordination and documentation activities shall be performed to convert the community to the Regular Phase of the NFIP.
3/8/2013	225	For Special Conversions the assigned Mapping Partner shall ensure FEMA management system databases are maintained	Which databases? In this State, CIS is typically maintained by the State NFIP coordinator. - DMD	Standard reworded so as not to dictate who will perform this.	FEMA management system databases shall be maintained for Special Conversions.
3/8/2013	226	LOMC requests involving below-grade crawlspaces constructed within the SFHA shall follow	Confirm TB number, not sure it is correct-DMD	This is the correct TB number.	LOMC requests involving below-grade crawlspaces constructed within the SFHA shall follow guidance provided in FEMA Technical Bulletin 11-01.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		guidance provided in Technical Bulletin 11-01.			
3/8/2013	227	The Notice-to-Users revision only shall be used to correct errors or omissions in the FIS or on the FIRM that do not affect due process. A Notice-to-Users revision shall not change the effective date.	Is this applicable to the database environment? Will the NFHL databse include the most current data? - DMD	In most cases, yes, NFHL will be updated (depending on the type of change completed thru the Notice-to-User revision)	The Notice-to-Users revision only shall be used to correct errors or omissions in the FIS Report or on the FIRM that do not affect due process. A Notice-to-Users revision shall not change the effective date.
3/8/2013	232	New Flood Profiles for re-analyzed streams must be produced using the same horizontal and vertical scales that were used in the effective FIS Report.	Generally OK, but should not prohibit improved profiles (Ex.. stationing in feet instead of miles) - DMD	Agreed, guidance can help clarify	Unless it can be demonstrated that the vertical and horizontal scale of the effective Flood Profiles are inadequate, re-analyzed streams must be produced using the same horizontal and vertical scales that were used in the effective Flood Profiles
3/8/2013	239	FIS Reports and FIRM panel Indexes must be prepared using the FIS Report Technical Reference	Please clarify, is this something other than Appendix J and PM66? - DMD	Yes; the FIS Report Technical Reference is now the definitive source for the new FIS report format"current format" and supercedes Appendix J and PM	Table columns and names in the FIS Report must comply with the most current FIS Report Technical Reference unless FEMA Regional approval has been given to retain the prior FIS Report format.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				66.	
3/8/2013	240	FIS Reports revised in the new format must use the new FIS Report template.	<p>All documentation related to updates to the FIS Report (including LOMC determinations) should be written in terms of the new FIS Report and new Tables along with the corresponding entries required in the database. - DMD</p> <p>The guidance is confusing regarding the Citation column in the topographic table of the new FIS. When citing the "Source" of the topographic data, should one list the provider of the information, the contracting agency(ies), the flight contractor, or all of the above?</p> <p>This question was posed and this answer was provided. I would list the agency or group that would be the repository of the information. If the</p>	Guidance will help address these questions.	When revising the FIS Report in compliance with the current FIS Report Technical Reference (as opposed to appending information to the former FIS report format), the FIS Report template at <a href="http://www.fema.gov/library/viewRecord.do?id=7577">http://www.fema.gov/library/viewRecord.do?id=7577</a> must be used.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>contractor flew the LiDAR for the USGS, then the USGS would be the citation. I believe the purpose of this column is to be able to trace the data back to the source if it needs to be reproduced. Normally, the contractor would not be this source as once they have completed the job, they would turn it over to the client.</p> <p>Perhaps the guidance should be clarified. - DMD</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	241	References in the FIS Report text must match the citation listed in the Bibliography and References table.	<p>The guidance is confusing regarding the Bibliography and References Table. Should this table list only information cited in other areas of the FIS as suggested by the column heading, "Citation in this FIS" or should additional references not mentioned previously within the FIS be cited here as well? Annex A (p.33) states that "Other Studies" previously included in Section 7.0 of the old FIS should be included in the Bibliography and References. Also, the standard text for Section 9.0 of the new FIS states, "Table 33 includes sources used in the preparation of and cited in this FIS Report as well as additional studies that have been conducted in the study area."</p> <p>This question was posed and this answer was provided. If there's a need to add other material to the Bibliography</p>	<p>This standard simply says that if you refer to another publication from within the FIS text, then the citation you use in the text must match the citation in the B&amp;R table. Although it is good writing practice to include actual references within the text for citations that have been included in the B&amp;R table, this standard doesn't prevent you from listing additional publications (such as previous studies) in the B&amp;R table, even if you don't include an equivalent reference in the text.</p>	References used within the FIS Report text must match the citation listed in the Bibliography and References table.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>that isn't cited in the report, the "Citation in this FIS" should probably say something like "Not Cited", although it's generally better writing practice to cite/mention all sources in the text.</p> <p>Perhaps the guidance should be clarified. - DMD</p>		
3/8/2013	243	If a future conditions analysis is incorporated into the Flood Risk Project, the results shall be included in the FIRM database, FIRM, and FIS Report.	Not familiar, I assume the new FIS documentation and database have a designated Section and Fields for this data and that clear documentation is provided related to this topic. This is a change from past guidance indicating that only current conditions could be mapped.-	Multiple communities across the nation have been modeling and mapping future conditions analyses for several years. The FIS Report and FIRM Database do allow for this	If a future conditions analysis is incorporated into the Flood Risk Project, the results shall be included in the FIRM database, FIRM, and FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			DMD	<p>information to be stored/reported in certain tables if a future conditions analysis is performed.</p> <p>There have been studies published with future conditions information (Mecklenburg, NC, for example).</p>	
3/8/2013	244	For watershed projects, affected FIS Reports shall be produced at a countywide level and in the latest format.	Generally OK, but should be dependent on the extent of the impact to be cost effective - DMD	This standard was deleted due to redundancy and/or being merged with another standard.	Deleted/Demoted
3/8/2013	246	Communities that have no Special Flood Hazard Areas identified shall be noted in the "Listing of NFIP Jurisdictions" and "Community Map History" tables with a footnote.	Please provide specific direction related to Multi-County communities. It should be clear if the footnote applies to a community as a whole or the portion of the community within a specified county. - DMD	<p>This will be covered with guidance.</p> <p>Multi-county community designations of this sort would have to apply to the entire community, regardless of</p>	Communities that have no Special Flood Hazard Areas identified shall be noted in the "Listing of NFIP Jurisdictions" and "Community Map History" FIS Report tables with a footnote.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				<p>whether it is shown on more than one countywide FIRM. If the community is all Zone X in County A, but has flood hazards in County B, then the County A study would NOT call the community NSFHA ... it just wouldn't show any flood hazards.</p>	
3/8/2013	247	<p>All accredited levees, PALs, and non-accredited levees must be included in the "Levees" table of the FIS Report.</p>	<p>Please provide direction or reference to the documentation for levees that do not have a determination? It would be unfortunate to reach the mapping phase of a project and encounter this situation.</p>	<p>Guidance for this specific FIS Report tables will address this comment.</p>	<p>For FIS Reports produced in compliance with the FIS Report Technical Reference, all accredited levees, PALs, and non-accredited levees must be included in the "Levees" table of the FIS Report.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	248	All lettered or numbered cross sections must be shown on the Floodway Data Table and Flood Profiles. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.	See SID 347, there seems to be little bit of conflict between SID 248 and SID 347.	<p>While these two standards are really not in conflict, there clearly is a need for some guidance to support them.</p> <p>What this means is that normally you can determine the exact BFE / reproduce the profile using the WSEL data shown at XS shown on the FIRM (lettered and unlettered). The only exception to this is where it is too crowded. In this case, you need to look at the profile to read the BFE (rather than calculate the BFE directly using the FIRM only).</p> <p>248 means the horizontal position of unlettered XS are</p>	All lettered or numbered cross sections must be shown on the Flood Profiles and, if a floodway was computed, must also be shown in the Floodway Data Table. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				not shown on the profile the way that lettered XS and hydraulic structures are. However, WSELs computed at the unlettered XS are reflected in the water surface shown on the profile as they have always been.	
3/8/2013	248	All lettered or numbered cross sections must be shown on the Floodway Data Table and Flood Profiles. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.	I was unaware that unlettered cross section could be or should be shown on the FIRM. - DMD	Guidance will be provided for this; unlettered cross-sections may be shown on the FIRM.	All lettered or numbered cross sections must be shown on the Flood Profiles and, if a floodway was computed, must also be shown in the Floodway Data Table. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	249	<p>In the "Community Map History" table, the "FIRM Revisions Date(s)" column shall include all FHBM and FIRM revisions, and must be updated during each revision to reflect the new PMR effective date. All PMR effective dates must be included for the communities that received updated FIRM panels, even if the PMR did not revise all the panels within that community.</p>	<p>The name of this Table should be changed. Once a Countywide FIRM is in place, all revisions are to the Countywide map not a Community Based Map. If the intent is to trace the map history for each community please be specific with footnotes for Multi-County communities. If a community is in three counties then it should be clear whether entries to this table are for the community as a whole or for the portion of the community in a specified county. - DMD</p> <p>Side Note: Documentation of a communities Level of Regulation is also confusing for Multi-County Communities. The Level of Regulation definitely applies to the community as a whole, however, forms and database limitations do not make this clear. This is most liklely how the Map Service Center</p>	<p>Because many of the updates to FIRM panels in the future will be conducted as PMRs there is a need to keep this table separated by communities, as certain communities will receive updates at different dates even once in countywide format. This table is not called the "Community-Based Map History" – it's the map history of the communities included in the county's FIS Report. If a full countywide update is performed, all communities would include the updated date in the last column of the table. Unique circumstances with multi-county</p>	<p>In the "Community Map History" table for FIS Reports produced in compliance with the FIS Report Technical Reference, the "FIRM Revisions Date(s)" column shall include all FHBM and FIRM revisions, and must be updated during each revision to reflect the new PMR effective date. All PMR effective dates must be included for the communities that received updated FIRM panels, even if the PMR did not revise all the panels within that community.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>became out of sync during Map Mod as to which panels should be superseded for a community as each Countywide Map became effective. - DMD</p>	<p>communities will be addressed in guidance.</p>	
3/8/2013	250	<p>The FIRM panel Index shall be produced at a size of 11" x 17"</p>	<p>SID 250: Seems small considering you will now be required to add HUC boundaries and labels and CID numbers. I gather the push is to use multiple 11" x 17" pages rather than a large single sheet??</p>	<p>Agreed, guidance will provide info on using multiple 11 x 17 FIRM Indexes.</p>	<p>The FIRM Index shall be included in the FIS Report at a size of 11" x 17" for FIS Reports produced in compliance with the FIS Report Technical Reference.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	250	The FIRM panel Index shall be produced at a size of 11" x 17"	Hopefully the 11"x17" is only for the FIS Report	The old format Z-fold Indexes will be discontinued; the only FIRM Index will now be in the FIS report. There will be contingencies for multi-page 11 x 17 FIRM Indexes as needed.	The FIRM Index shall be included in the FIS Report at a size of 11" x 17" for FIS Reports produced in compliance with the FIS Report Technical Reference.
3/8/2013	250	The FIRM panel Index shall be produced at a size of 11" x 17"	<p>Guidelines regarding the FIRM Panel Index state that the Panel Index should be prepared in an 11" x 17" format to "facilitate inclusion in the FIS report." Should this page be prepared in horizontal orientation for a fold-out presentation as is done with the profiles?</p> <p>This questions was posed and this answer was provided. Horizontal fold-out will be easier for the user. However, you can adapt the layout to the general shape of the project area – north does not always have to point up on the page. Use the layout that</p>	Please see other comments for SID #250. Guidance will also be written to support this standard.	The FIRM Index shall be included in the FIS Report at a size of 11" x 17" for FIS Reports produced in compliance with the FIS Report Technical Reference.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>works best to fit on a horizontal fold-out.</p> <p>Perhaps the guidance should be clarified. - DMD</p>		
3/8/2013	252	<p>Required base map features that must be shown and labeled on the latest format of the FIRM panel Index are HUC-8 watersheds and political jurisdictions. Community labels must also include the CID.</p>	<p>Are all community boundaries updated on the index map for each PMR or only the portions on the revised panels? There are complications if updated in part and complications if updated as a whole. - DMD</p> <p>Note: The HUC-8 watershed boundaries are not static. As better information is made available to the USGS these boundaries change. The most current boundaries are available on the USGS website. - DMD</p>	<p>If updated community boundaries are made available outside the PMR footprint, the FIRM Index will reflect the more current boundaries. The HUC boundaries are only provided for reference.</p>	<p>For FIRM Indexes produced in compliance with the FIS Report Technical Reference, base map features that must be shown and labeled on the FIRM Index are HUC-8 watersheds and political jurisdictions. Community labels must also include the CID.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	254	The FIRM panel Index shall identify unprinted panels with asterisks and footnotes that define the reason(s) for the panel(s) not being printed.	<p>It does not make sense in the Risk MAP digital environment to have a few unprinted panels in a countywide set. Giving consideration to future multi-hazard mapping and future studies, unless a very large area is not being considered, it seems like tracking unprinted panels is more work than including the panels.</p> <p>It is interesting that a panel that is entirely Zone AE with a single elevation is not printed. Why would one not want to see their flood risk?</p> <p>I noticed many comments from the public on-line asking what does panel not printed mean as they searched for their address. - DMD</p>	<p>Panels without identified flood hazards have never been printed and this is not envisioned to change. Also, this is not an entirely digital environment; hard copy maps are still widely in use.</p> <p>If the entire FIRM panel is all one zone and all one elevation, the FIRM Index gives the user enough information to rate a policy and know the flood hazard. The panel boundaries are also in the NFHL which would provide the information if a stakeholder wants to see relationships (roads to flood hazards etc).</p> <p>Panel not printed</p>	The FIRM Index shall identify unprinted panels with asterisks and footnotes that define the reason(s) for the panel(s) not being printed.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				seems intuitive enough for users to understand that it means the panel is not printed	
3/8/2013	257	The FIS Report deliverable to the MSC must be an unsecured PDF file, with a resolution of 400 dpi.	OK as long as this is the standard asked for at the QR5-7 checks	Yes, there are checks in place that are intended to validate compliance with this standard	The FIS Report deliverable to the MSC must be an unsecured PDF file, with as much searchable text as possible, and must be bookmarked in accordance with the direction outlined in the FIS Report Technical Reference. Embedded graphics, where necessary, must have a resolution of 400 dpi.
3/8/2013	259	A description of all dams affecting the communities in the project area, including those dams that lie outside the project area, shall be included in the FIS.	SID 259: Where is the stopping point on this? Is it considered to be major dams or any dam that contributes to that area of study? The wording of "all dams" may want to be tweaked to omit small watershed dams, include only large hydroelectric or navigational	The standard specifies dams and levees that provide flood protection.	A description of all dams and other non-levee flood protection measures affecting the communities represented in the project area shall be included in the FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			dams, etc.		
3/8/2013	259	A description of all dams affecting the communities in the project area, including those dams that lie outside the project area, shall be included in the FIS.	This could be useful for CRS Activity 630. How do you determine which dams affect a community?	The standard specifies dams and levees that provide flood protection, which seems fairly specific.	A description of all dams and other non-levee flood protection measures affecting the communities represented in the project area shall be included in the FIS Report.
3/8/2013	259	A description of all dams affecting the communities in the project area, including those dams that lie outside the project area, shall be included in the FIS.	Is the information that this statement refers to accounted for within the table headings for Non levee Flood Protection Measures in the new FIS?  Information concerning Dams may be filtered at the State level. If a hazard classification level is provided it must be clearly explained. - DMD	Yes, the headings for Table 8 include: Flooding Source, Structure Name, Type of Measure, Location, and Description of Measure. The "Description of Measure" column can be used to provide the information felt to be relevant to the	A description of all dams and other non-levee flood protection measures affecting the communities represented in the project area shall be included in the FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				reader.	
3/8/2013	263	A community's information shall be contained in only one FIS report.	SID 263: What about communities that span multiple counties, parishes, and/or watersheds? Placing them in only one FIS Report would require the data located outside the study area to be placed in the study area report.	This standard was deleted for this very reason; multi-county communities may be shown in more than one FIS report	Deleted/Demoted
3/8/2013	263	A community's information shall be contained in only one FIS report.	Except for Multi-County communities. - DMD	This standard was deleted for this very reason; multi-county communities may be shown in more than one FIS report	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	264	<p>For cross-sections shown in areas of backwater flooding, elevations in the "Without Floodway" column of the Floodway Data Table shall not include backwater effects. These "Without Floodway" vales must include a footnote stating, "Elevation Computed Without Consideration of Backwater Effects From (Source of Flooding)". The words "Backwater Effects" are to be replaced with "Tidal Effects," "Overflow Effects," "Ice Jam Effects," or "Storm Surge Effects," as needed, to reference the appropriate flooding situation.</p>	<p>Yes, unless the MT-2 reviewer has agreed that it was appropriate for the study submitter to include the backwater elevation in the downstream boundary condition, in which case it would already be included in the profile and there would be no need to manually apply the backwater at the mapping phase. In this case it would not be meaningful in the FDT. Perhaps clarification is necessary. - DMD</p>	<p>For the scenario referenced by this comment, it's not really a backwater situation that has been modeled/mapped. It's more of a coincident peak scenario, and this standard wouldn't apply. The use of the "Without Floodway" column is for the scenarios where the modeled elevations are not the same as the mapped elevations (i.e. backwater has been applied to the mapping).</p>	<p>For cross-sections shown in areas of backwater flooding, elevations in the "Without Floodway" column of the Floodway Data Table shall not include backwater effects. The "Without Floodway" values must include a footnote stating, "Elevation Computed Without Consideration of Backwater Effects From (Source of Flooding)". The words "Backwater Effects" are to be replaced with "Tidal Effects," "Overflow Effects," "Ice Jam Effects," or "Storm Surge Effects," as needed, to reference the appropriate flooding situation.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	265	When a part of a regulatory floodway lies outside the Flood Risk Project jurisdiction, both the total floodway width, and the width within the Flood Risk Project jurisdiction, shall be listed in the FIRM database and Floodway Data Table.	OK-DMD On a countywide map this should only happen across county boundaries and state boundaries.	Correct	When a part of a regulatory floodway lies outside the jurisdiction, both the total floodway width, and the width within the jurisdiction, shall be listed in the FIRM database and Floodway Data Table.
3/8/2013	268	All communities within a Flood Risk Project jurisdiction whose FIS Report format is being updated shall receive a copy of the new FIS Report, regardless of whether they are affected by the new Flood Risk Project or are outside the project watershed.	SID 268: It seems to be excessive work to include communities within a county or parish that simply touches the watershed, especially if they have no real connection to the watershed. Plus it will be extra paperwork for a community to keep up with, assuming that they do.	The reason for this is to ensure that all stakeholders get a copy of the new FIS report format when it has been converted to the new format.	All communities whose FIS Report is being updated to comply with the FIS Report Technical Reference must receive a copy of the new FIS Report, regardless of whether they are affected by the new Flood Risk Project or are outside the project area.
3/8/2013	268	All communities within a Flood Risk Project jurisdiction whose FIS Report format is being	OK if this translates to every community in a county will receive an updated FIS if the countywide FIS format is being updated. - DMD	Correct; the reason for this is to ensure that all stakeholders get a copy of the new FIS report	All communities whose FIS Report is being updated to comply with the FIS Report Technical Reference must receive a copy of the new FIS Report, regardless of whether they are affected by the new Flood Risk Project or are outside the project area.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		updated shall receive a copy of the new FIS Report, regardless of whether they are affected by the new Flood Risk Project or are outside the project watershed.		format when it has been converted to the new format.	
3/8/2013	269	Flood Profiles are required for those watercourse segments that may not lie within the community, but do contribute to the flood inundation within the project area. Profile extents will include areas where the stream has left the community, but flood inundation within the project area continues. For these situations, the those limits that are located outside the project area shall be labeled on the profile as "Limit of Flooding Affecting	Generally OK. The intent is to provide a continuous profile for the reach. The length of floodplain segments outside of the boundary and the number of times the stream and/or floodplain winds in and out will drive the profile presentation.- DMD	Standard deleted	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>Community."</p> <p>The above standard was reworded and demoted to guidance using the verbiage below:</p> <p>Flood Profiles are required for those watercourse segments that may not lie within the community, but do contribute to the flood inundation within the project area. Profile extents will include areas where the stream has left the community, but flood inundation within the project area continues. For these situations, the limits that are located outside the project area shall be labeled on the profile as "Limit of Flooding Affecting</p>			

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		Community."			
3/8/2013	271	Any well-documented high-water marks of past major floods, including but not limited to those shown in the S_HWM table of the FIRM database, shall be shown and referenced on the Flood Profiles.	Not familiar with high water marks displayed on flood profiles - DMD	Standard deleted	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	277	For FIS Reports being revised in the latest format, any information that was included in Section 10 of a previous FIS using an approach known as "Revisions by Addendum" shall be incorporated into the relevant sections and tables.	Being a community that has had a lot updates there have been many times that we have found the current setup useful. It sounds like in the future it will be much harder to determine when certain information and study were incorporated into the FIS.	While we recognize that there were some benefits to the old format addendum approach, it was considered better to have seamless data within the FIS report rather than chunking up data for streams (for example) using addendums thereby making it harder to see the whole picture and to know which pieces and parts were the most current.	For FIS Reports prepared in compliance with the FIS Report Technical Reference, any information that was included in Section 10 of a previous FIS Report using an approach known as "Revisions by Addendum" shall be incorporated into the relevant sections and tables of the current FIS Report.
3/8/2013	278	River stationing is to be referenced from a physical location such as a confluence or structure.	OK-DMD Does the MT-2 review include this check? - DMD	Yes. During MT-2 reviews, the river stationings are verified to be referenced from a physical location.	River stationing is to be referenced from a physical location such as a confluence or structure.
3/8/2013	280	Stream distances reported in the Floodway Data Tables, Profiles, and FIRM database must be	OK-DMD Does the MT-2 review include this check? - DMD	Yes. During MT-2 reviews, the stream distances are verified by comparison to the mapped profile	Stream distances reported in the Floodway Data Tables, Profiles, and FIRM database must be measured along the profile baseline.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		measured along the profile baseline.		baseline.	
3/8/2013	287	When each new edition of a FIRM panel is prepared, the suffix for each revised FIRM panel is changed to the next alphabetical letter, with the letters "I" and "O" being skipped. For first-time countywide FIRMs, the suffix will be the next letter following the highest suffix letter of any FIRM panel that maps land within the extents of countywide mapping. Likewise, any FIRM panel being revised to reflect a completely new panel layout will have suffixes one letter higher than the highest of any previously published panel.	OK - Perhaps specific guidance should be added for cutting a new panel into an established countywide layout, including when this is required to be done. Also direction should be included for the associated FIS and database changes. - DMD	This standard is only intended to specify how to handle advancing the map suffix; it has no relationship to cutting a new panel into an existing layout other than to provide direction on how to update the map suffix.	<p>When each new edition of a FIRM panel is prepared, the suffix for each revised FIRM panel shall be changed to the next alphabetical letter while skipping the letters "I" and "O".</p> <p>For first time countywide or partial countywide FIRMs, the map suffix should be one letter higher than the highest suffix of all jurisdictions included.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	296	If partial countywide FIRM panel mapping is pursued and existing FIRM panels are reissued with "This Area Shown" notes, the panels in Standard Format must be converted to Map Initiatives Format.	Not familiar - DMD	Back in the 80s, there were two maps made; a Flood Boundary and Floodway Map, which contained floodplain and floodway delineation and showed cross-sections, and the FIRM which showed floodplain delineation (no floodway) and BFEs. When the Map Initiatives format was created in the late 80's, the two maps were combined and flood zones were also changed. This standard simply says that when you encounter some of these legacy dual format maps, they are to be combined into the new format FIRM which has all	If a FIRM revision is being processed when there is a separate FBFM, the two maps should be combined into the new format FIRM using the new flood zone designations and the FBFM shall no longer exist as a separate map.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				elements of the formerly separate maps.	
3/8/2013	297	On FIRM panels, levee and other hydraulic structure symbolization must be standardized as shown in the FIRM Panel Technical Reference.	Symbolizing - OK, identification and clasification concerns remain - DMD	Unclear what the concern is here; the requirement is to follow the FIRM Panel Technical Reference. Comment is not specific enough to address.	On FIRM panels, symbolization and labeling of all base map, hydraulic, and flood theme features must be standardized as shown in the FIRM Panel Technical Reference.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/4/2013	299	The assigned Mapping Partner shall prepare FIRM panels that are derived directly from the FIRM database.	<p>The Pima County Regional Flood Control District (District), Pima County, Arizona, has reviewed the Draft Standards for Flood Hazard Mapping Partners for Risk Mapping for the National Flood Insurance Program and offers the following comments:</p> <ul style="list-style-type: none"> <li>· SID # 299 requires mapping partners to prepare FIRM panels derived from the FIRM data base. We have some questions regarding the data base and the data the District provides to engineers preparing LOMRs and CLOMRs.</li> <li>o Does the data base include LOMR data? We recently had a PMR for the Agua Caliente Wash and the first three volumes of the reprinted FIS had several mistakes (see attached Excel file). The database needs to be kept current to avoid future</li> </ul>	<p>When the FIRM database is revised for an ongoing PMR, all outstanding LOMRs within the PMR footprint will be included.</p> <p>The NFHL contains the most current data, including all issued LOMRs; the FIRM database will not contain LOMR data issued <u>after</u> the FIRM database was revised.</p>	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>mistakes.</p> <ul style="list-style-type: none"> <li>o The District provides FEMA FIRM GIS data to engineers preparing LOMRs and CLOMRs. All our data is from Baker. It is maintained on a County-Wide basis. Data is issued by panel number after a request\disclaimer form is signed. Will engineers preparing LOMRs and CLOMRs be at risk of not having their application not accepted because the data does not come from the FEMA data base? We also supply the data to the general public via a MapGuide website that allows individuals to search for flood risks with simple address or property tax code search. The MapGuide site also includes PDF links to official LOMR and LOMC data. Here is a link to the website we created.</li> </ul>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	299	The assigned Mapping Partner shall prepare FIRM panels that are derived directly from the FIRM database.	OK- DMD Does the MT-2 review and deliverables enforce this standard?	The FIRM database and the FIRM panels must be in 100% agreement; however, when MT-2s are issued after the FIRM database is revised, the FIRM database will not include those LOMRs until such time as the FIRM database is revised in the future. MT-2s must be issued against the most current FIRM data and will normally be included in the National Flood Hazard Layer in advance of being included in the FIRM database.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	304	All raster base maps used for FIRM panel preparation must be accurately georeferenced and orthorectified.	SID 304: Define 'accurately'.	See SID #148 for base map accuracy. Removed the word "accurately" from this standard to avoid the perception this standard was referencing a different standard.	All raster base maps used for FIRM panel preparation must be georeferenced and orthorectified.
3/8/2013	308	<p>The assigned Mapping Partner shall depict the following types of base map features on the FIRM panel if they occur within the community:</p> <ul style="list-style-type: none"> <li>• transportation features, including roads and railroads, hydrographic features, hydraulic structures</li> <li>• boundaries that identify county and State boundaries, corporate limits, extraterritorial jurisdiction (ETJ)</li> </ul>	SID 308: Is the minimum horizontal positional accuracy for PLSS features, county and state boundaries, and corporate limits the NSSDA radial accuracy of 38 feet. Will an accuracy certificate be required?	No, SID #148 specifically references transportation and hydrographic features	<p>The FIRM base map is the horizontal reference data shown on the FIRM to assist in interpreting the areas impacted by the flood risk information shown. The term base map does not include topographic or elevation data.</p> <p>The following types of base map features must be depicted on the FIRM panel if they occur within the community:</p> <ul style="list-style-type: none"> <li>• transportation features, including roads and railroads, hydrographic features, hydraulic structures</li> <li>• boundaries that identify county and State boundaries, corporate limits, ETJ areas, military lands, and tribal lands, and</li> <li>• U.S. PLSS features.</li> </ul>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>areas, military lands, and tribal lands, and</p> <ul style="list-style-type: none"> <li>• U.S. Public Land Survey System (PLSS) features.</li> </ul>			
3/8/2013	311	<p>On FIRM panels, all hydrographic features (streams, lakes, ponds, bays, and oceans) that have an identified flood hazard associated with them shall be labeled and contained completely within the SFHA.</p>	<p>OK-DMD Does the MT-2 review include this check? - DMD</p>	<p>Yes; when preparing a LOMR, the same standards apply as also apply to the FIRM and this will be checked.</p>	<p>On FIRM panels, all hydrographic features (streams, lakes, ponds, bays, and oceans) that have an identified flood hazard associated with them shall be labeled.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	312	A profile baseline must be shown on FIRM panels for all Flood Risk Projects with profiles or otherwise established riverine BFE (static elevations excluded), and for modeled riverine Zone A areas.	OK-If a stream name should be shown on the FIRM and in the FIS and database for the model based Zone A reaches, please specify in standarts.-DMD	Standard #312 does not discuss stream labeling. Please utilize the FIRM database, FIRM Panel, and FIS Technical References for further guidance.	A profile baseline must be shown on FIRM panels for all flooding sources with profiles or otherwise established riverine BFEs (static elevations excluded), and for modeled riverine Zone A areas.
3/4/2013	313	In areas where no profile baseline is available but a flood hazard has been identified, the bank or centerline representation of the hydrographic feature must be shown on vector-based FIRM panels.	SID 313...Generating a hydrographic feature in an AO alluvial fan when flows are very uniform and there is no clear channel could be difficult and miss-leading due to the active nature of fans.	The standard has been reworded to clarify that drainage vectors are expected to be added only riverine flooding.	In areas of riverine flooding where no profile baseline is available but a flood hazard has been identified, the bank or centerline representation of the hydrographic feature must be shown on vector-based FIRM panels.
3/8/2013	315	All levees stored in the FIRM Database shall be symbolized and labeled on the FIRM panel with the appropriate accreditation status noted.	OK-perhaps provide direction if a levee is seen on the orthophoto but it is not in the NFHL database-DMD	Guidance will be developed to better support this standard.	All levees stored in the FIRM Database shall be labeled and symbolized on the FIRM panel as outlined in the FIRM Panel Technical Reference, with the appropriate accreditation status noted.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	316	Hydraulic structures other than levees shall be labeled on the FIRM panel only if shown on the Flood Profile of the FIS Report. The label name must match what is shown on the Flood Profile. If 1%, 0.2%-annual-chance-flood discharge, and/or floodway are contained in the structure, a note must be placed on the FIRM panel to refer to the highest contained discharge.	OK- DMD Does the MT-2 review and deliverables enforce this standard?	Yes; when preparing a LOMR, the same standards apply as also apply to the FIRM and this will be checked.	Hydraulic structures other than levees shall be labeled on the FIRM panel only if shown on the Flood Profile of the FIS Report. The label name must match what is shown on the Flood Profile. If 1%, 0.2%-annual-chance-flood discharge, and/or floodway are contained in the structure, a note must be placed on the FIRM panel near the future to refer to the highest contained discharge.
3/8/2013	318	Extra-Territorial Jurisdiction areas shall be shown on the FIRM panel.	OK if provided-DMD	Extraterritorial jurisdiction boundaries are important for clear identification of the entity that has responsibility for compliance with subpart 60.3 of the NFIP regulations. For this reason, mapping	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				partners must make every effort to ensure that the most current political boundaries (including ETJ boundaries) are represented on the FIRM. Please consult the FIRM Panel Technical Reference.	
3/8/2013	328	U.S. PLSS features shall be shown on a FIRM panel if they are available in digital format and were shown on a previous FIRM.	SID 328: Is the minimum horizontal positional accuracy for PLSS features the NSSDA radial accuracy of 38 feet. Will an accuracy certificate be required?	No, SID #148 specifically references transportation and hydrographic features	Deleted/Demoted
3/8/2013	335	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables,	SID 335: Clarification – 1"=500' scale the maximum tolerance would be 25 feet. Is that 25 feet EITHER side of the true location?	No; the total width is what is being addressed with this standard without consideration of how much variance is allowed on either side. In the scenario provided with this comment, the variance allowed is a	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables, within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.		total of 25 feet.	
3/8/2013	335	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables, within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.	"5 percent of the distance" – does this mean 5% of the floodway width? Please clarify.	Yes; the standard should probably have said "width" instead of "distance". This can be clarified with guidance.	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables, within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	335	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables, within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.	<p>QR reviews have flagged errors if not exact, not allowing the for a tolerance. - DMD</p> <p>Study originators may or may not lock in the encroachments. They may or may not include ineffective flow areas. They may or may not distinguish the high ground seen by the model from that which would be represented in mapping. There are multiple mapping decisions to be made related to small islands along across section. There are multiple variables provided in HEC-RAS for a floodway width. If the model=database=FIS is to be a reality this interaction be between modeling, model data reporting, and mapping should be specifically addressed. - DMD</p>	<p>QR reviews should not be flagging floodway widths if they are within the stated tolerance.</p> <p>This standard does not address the modeling techniques, results and the decisions that determine the final floodway widths at different cross sections. This standard states that the widths as measured on the map must match the values in the FDT and the FIRM database within 5% of the map scale or 5 % of the total width if the floodway is wider than one inch at map scale. How the modeling results and ground conditions are</p>	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section locations, floodway widths must agree with the values shown on the FDT in the FIS Report and the FIRM Database tables, within a maximum tolerance of 5 percent of the map scale or 5 percent of the distance, whichever is greater.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				interpreted to determine the floodway boundary placement is something that can be addressed in guidance.	
3/8/2013	339	Zone X areas shall be labeled on a FIRM panel where they represent future conditions or areas protected by accredited levees.	Not familiar with future conditions on the FIRM - DMD Is there new symbology for the levee protected areas?- DMD	This standard is only requiring that shaded Zone X be labelled as opposed to non-shaded Zone X.	Zone X areas that represent future conditions or areas protected by accredited levees shall be labeled on the FIRM panel in accordance with the FIRM Panel Technical Reference.
3/8/2013	341	All BFE lines stored in the FIRM Database must be shown on FIRM panels.	Could there ever be a time that you can't show the BFE?	Yes, and this can be explained with guidance.	All BFE lines stored in the FIRM Database must be shown on FIRM panels.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	342	Cross sections stored in the FIRM Database must be shown on the FIRM panels if they are attributed as one of the following line types: LETTERED, MAPPED and NOT LETTERED, MAPPED.	OK, Not familiar with mapped unlettered cross sections-DMD	Explanation of MAPPED and UNLETTERED cross sections can be provided in guidance OR refer to FIRM Database Technical Reference or the Domain Tables Technical Reference	Cross sections stored in the FIRM Database must be shown on the FIRM panels if they are attributed as one of the following line types: LETTERED, MAPPED and NOT LETTERED, MAPPED.
3/8/2013	343	On FIRM panels and in FIRM Databases, lettered or numbered cross sections for each stream analyzed by detailed methods shall be labeled alphanumerically from the downstream to the upstream limits of the Flood Risk Project.	It seems like SID 343 and 344 could be combined.	Agreed - SID #344 was incorporated into SID #343, and then SID #344 was deleted	On FIRM panels and in FIRM Databases, lettered or numbered cross sections for each stream analyzed by detailed methods shall be labeled alphabetically or numerically from downstream to upstream.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	347	If unlettered cross sections and BFEs cannot be shown on the FIRM panel because of crowding due to steep terrain, a note shall be placed referring the user to the Flood Profiles in the FIS Report.	SID 248 states that the unlettered cross sections are not to be included on Flood Profiles, and here on SID 347 it says to place a note to refer users to the profile.	<p>While these two standards are really not in conflict, there clearly is a need for some guidance to support them.</p> <p>What this means is that normally you can determine the exact BFE / reproduce the profile using the WSEL data shown at XS shown on the FIRM (lettered and unlettered). The only exception to this is where it is too crowded. In this case, you need to look at the profile to read the BFE (rather than calculate the BFE directly using the FIRM only).</p> <p>248 means the horizontal position of unlettered XS are</p>	If unlettered cross sections and BFEs cannot be shown on the FIRM panel because of crowding due to steep terrain, a note shall be placed referring the user to the Flood Profiles in the FIS Report.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				not shown on the profile the way that lettered XS and hydraulic structures are. However, WSELs computed at the unlettered XS are reflected in the water surface shown on the profile as they have always been.	
3/8/2013	349	On the FIRM panels and in the FIRM Database, LIMIT LINES shall be placed at the beginning and at the end of flow in every area analyzed by detailed methods.	Does this include unstudied tributaries?	No; there is no need for limit lines when there is no study.	On the FIRM panels and in the FIRM Database, LIMIT LINES shall be placed at the beginning and at the end of flow in every area analyzed by detailed methods and shall be depicted as specified in the FIRM Panel Technical Reference.
3/8/2013	361	The mapping partner must submit the FIRM Database digital data in a series of thematic files that cover the	For PMRs direction has been back and forth related to submitting a countywide database or submitting a clipped database.-DMD	New standards now allow for databases to be limited to the PMR footprint (aka "clipped")	The FIRM Database digital data must be submitted in a series of layers that cover the entire geographic area being mapped and not in individual small tiles that cover limited geographic areas.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		entire geographic area being mapped and not in individual small tiles that cover limited geographic areas. For partial countywide updates, the data must be clipped to the nearest panel or county boundary.			
3/8/2013	363	The NFHL must be used as the source for effective digital FIRM Database data when starting FIRM updates, and used for mandatory edge matching at county/community boundaries.	The NFHL database has errors, it should be specified who will resolve these error. - DMD	The errors in the NFHL are more associated with mismatches between adjacent jurisdictions than internal errors. If there are internal errors, then those errors are also reflected in the FIRM database and will need to be addressed within the footprint of the PMR during execution of the PMR.	The NFHL must be used as the source for effective digital FIRM Database data when starting FIRM updates, and used for mandatory edge matching at county/community boundaries.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	366	For FIRM Databases, the horizontal projection shall be UTM (NAD83 meters or NAD83 HARN meters) or State Plane (NAD83 feet or NAD83 HARN feet) using Geodetic Reference System 1980 (GRS 80) ellipsoid or revisions thereof.	SID 366: Noted that the FIRM DB can be UTM or State Plane, yet SID 434 & 435 list Flood Risk Database data to be provided in GCS or UTM. It would seem that consistency would be a good thing.	Agreed. Projection and coordinate system is now consistent between the FIRM DB and the FRD.	FIRM Database tables must comply with the following database schema properties defined in the FIRM Database Technical Reference: <ul style="list-style-type: none"> <li>• Tables and Feature Classes</li> <li>• Spatial Reference Systems</li> <li>• Topology Rules</li> <li>• Domains</li> </ul>
3/4/2013	369	Lines in the FIRM Database must be generalized to no more than one vertex every 10 feet while still meeting FBS standards.	SID 369 requires vertexes to be not more than 10 feet apart. Some mapping products (such as HEC-GEORAS) can produce vertexes that are much closer. Must an engineer always thin the vertexes? For large products that could be time consuming.	Yes, to be compliant with the standard, those vertexes must be thinned. The reason for this is mostly to keep file sizes minimized.	Floodplain boundary lines in the FIRM Database must be generalized to no more than an average of one vertex every 10 feet while still meeting FBS standards.
3/8/2013	369	Lines in the FIRM Database must be generalized to no more than one vertex every 10 feet while still meeting FBS standards.	SID 369: Will there be an automated check or other tool to confirm this, or will it be up to the Mapping Partner to confirm?	It is up to the Mapping Partner to comply with the standard; it is not envisioned that an automated check tool will be created for this at this time.	Floodplain boundary lines in the FIRM Database must be generalized to no more than an average of one vertex every 10 feet while still meeting FBS standards.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	370	FIRM Database Flood Theme and Base Map features shall not have disconnects, jogs, or missing features during edge matching.	OK-errors exist in NFHL-DMD	Any disconnects will need to be addressed within the footprint of the PMR. Most of the NFHL errors are associated with mismatches between adjacent jurisdictions; any other errors are within individual FIRM databases and those errors must be corrected within the PMR footprint during execution of the PMR.	FIRM Database Flood Theme and Base Map features shall not have disconnects, jogs, or missing features during edge matching and at community boundaries.
3/8/2013	374	BFE lines must be placed in the FIRM Database S_BFE feature class for any area where the cross section maximum vertical rise requirement of one foot is not met. As mentioned in the description for S_XS, if there is not at least	There could be a lot of BFEs in some areas, especially steeper areas.	Agreed; guidance will be provided to address this potential issue.	BFE lines must be placed at their interpolated whole-foot location along the profile baseline only when there is not at least one cross section in S_XS in the FIRM Database for every 1-foot vertical rise in the 1-percent annual chance flood elevation,.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		<p>one cross section in S_XS for every 1-foot vertical rise in the 1-percent annual chance flood elevation, intervening BFE lines must be placed at their interpolated whole-foot location along the profile baseline only when there are not enough cross sections.</p>			
3/8/2013	375	<p>The S_Levee table is required for any Preliminary or Final FIRM Database that include levees, floodwalls, closure structures, berms, embankments, or dikes that have been designed for flood control, whether or not they have been demonstrated to meet the NFIP requirements in 44 CFR 65.10.</p>	<p>OK- DMD Does the MT-2 review and deliverables enforce this standard?</p>	<p>Yes; the same standards will apply to MT-2s</p>	<p>The S_Levee table is required for any Preliminary or Final FIRM Database that includes levees, floodwalls, closure structures, berms, embankments, or dikes that have been designed for flood control, whether or not they have been demonstrated to meet the NFIP requirements in 44 CFR 65.10.</p>

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	376	Mapping Partners must use the National Flood Hazard Layer (NFHL) as the initial digital flood hazard mapping source for all FIRM Database and FIRM panel updates.	SID 376: Coming for an area with lots of relief, this will occur for almost every mapped stream we encounter. Perhaps this label would be better to add as a standard note in the "Notes to Users" section of the FIRM. This way is it on every panel, after all the FIS profile is supposedly the governing source for determining the elevation at a location.	This standard was deleted due to redundancy and/or being merged with another standard. Comment doesn't seem to apply.	Deleted/Demoted
3/8/2013	376	Mapping Partners must use the National Flood Hazard Layer (NFHL) as the initial digital flood hazard mapping source for all FIRM Database and FIRM panel updates.	OK- DMD Does the MT-2 review and deliverables enforce this standard?	Yes, and although standard 376 was incorporated into 363, mapping partners are mandated to start map revisions using the data in the NFHL, because MT-2s issued after the FIRM database was created will not be included in the FIRM database.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	377	For Physical Map Revisions (PMR), once the NFHL for a community is converted to the latest FIRM Database schema, all database submissions will also be required to conform to this schema.	OK- DMD Does the MT-2 review and deliverables enforce this standard?	Yes; MT-2s will also need to comply with the new schema	For PMRs, once the NFHL for a community is converted to the latest FIRM Database schema, all database submissions will also be required to conform to this schema. For non-FEMA funded external data studies and for portions of a study where the engineering is unrevised, attribute data associated with the schema that is not needed for FIRM production may be excluded from the study submittal with permission from the FEMA Regional Office. Each exclusion should be documented in the FIRM Database metadata file that accompanies the FIRM Database.
3/8/2013	378	For Physical Map Revisions (PMR) where updated political boundaries are available for the entire extent of the FIRM database, the S_Pol_AR feature class shall be incorporated into the RFHL and shown on the FIRM panel Index.	Does this require additional changes if a community picks up or drops panels based on the index map depiction of the political areas?-DMD	This requirement is already required as a requisite for their participation in the NFIP; they must adopt all panels on which they fall.	For PMRs where updated political boundaries are available for the entire extent of the FIRM database, the S_Pol_AR feature class shall be incorporated into the RFHL and shown on the FIRM Index.
3/8/2013	379	For Physical Map Revisions (PMR), the revised FIRM database layers within the PMR panel footprint shall be incorporated into	OK, may want to address how errors noticed in NFHL outside of the PMR footprint would be reported and corrected. - DMD	Those outside-the-PMR-footprint issues noticed in the NFHL should be documented in CNMS	For PMRs, the revised FIRM database layers within the PMR panel footprint shall be incorporated into the RFHL. Certain layers such as watershed boundaries, nodes, and political areas may extend outside of the PMR footprint.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		the RFHL.			
3/8/2013	380	For Physical Map Revisions (PMR), panels must be prepared using FEMA's latest FIRM panel graphic specifications, regardless of the PMR scenario chosen.	Give consideration to how the legend is provided or not provided based on if the countywide FIS is provided or not provided to communities outside of the PMR footprint. -DMD	The FIRM legend will be added as an insert in the old FIS report format when the new FIS report format is not used. Although SID #380 was deleted, SID #501 covers this as follows:  For Flood Risk Projects that have at least one FIRM panel produced in compliance with the current FIRM Panel Technical Reference, but whose FIS Report is not produced in compliance with the current FIS Report Technical Reference (i.e., the FIS Report is retaining its legacy	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
				format) the FIRM Legend and Notes to Users must be included as an appendix to the FIS Report per the current FIS Report Technical Reference. There will be a standard that specifies this.	
3/8/2013	382	FEMA correspondence must be prepared in accordance with DHS / FEMA style guidance and processing procedures developed within the Federal Insurance and Mitigation Administration.	OK, assumes consistent and coordinated between the Regions.-DMD	This standard was removed and will be addressed with guidance.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	383	After preliminary issuance of the FIS and FIRM, any major changes must be coordinated with the FEMA Regional office.	How else what this be done?	Guidance will be developed to better support this standard. In the past, major changes to the maps have not always been documented and reported to FEMA. Examples of "major" changes will be listed in the guidance.	After preliminary issuance of the FIS Report and FIRM, any major changes must be coordinated with the FEMA Regional office.
3/8/2013	385	The designated Mapping Partner shall develop and ensure that the News Release and Federal Register Proposed Flood Hazard Determination Notice are correct and that they include all communities affected by new or modified flood hazard information. The designated Mapping Partner shall ensure the newspaper notice is published twice within the 10-days of	Please clarify that this is a PTS requirement, and not the CTP or local community.	Standards have been written so as not to assign scope that may be handled differently between different mapping partners.	Per 44 CFR 67.4, the News Release and Federal Register Proposed Flood Hazard Determination Notice shall include all communities affected by new or modified flood hazard information. The newspaper notice shall be published twice within the 10-days of notification of the community CEO, after publication of the Federal Register Proposed Flood Hazard Determination Notice.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		notification of the community CEO, after publication of the Federal Register Proposed Flood Hazard Determination Notice.			
3/8/2013	386	The designated Mapping Partner shall notify the community and other Mapping Partners involved in the Flood Map Project when corrections to the News Release or Federal Register are required.	Please clarify that this is a PTS requirement, and not the CTP or local community.	Standards have been written so as not to assign scope that may be handled differently between different mapping partners.	The community and other affected stakeholders must be notified when corrections to the News Release or Federal Register are required, including timelines for publishing corrections.
3/8/2013	398	The FEDD files must be PDFs that are separate for each community.	Mapping Partners submit FEDD File Checklists in Word format. Checklists are working documents completed and converted to pdf by the PTS. This should have been specified in PM 62 but was not.  All final documents are pdf by community.	Wording has been updated	The FEDD files must be separate for each community.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	405	2-4 weeks before the effective date of the revised map, the assigned Mapping Partner shall submit a revalidation package to FEMA for review and approval prior to issuing the revalidation letters.	Mapping Partner submits materials to the PTS for review. PTS then submits to FEMA HQ for review/approval.	Standard reworded so as not to dictate who will perform this.	2-4 weeks before the effective date of the revised map, the revalidation package shall be submitted to FEMA for review and approval prior to issuing the revalidation letters.
3/8/2013	406	The assigned Mapping Partner shall provide the LOMC-VALID letter to the community CEO and floodplain administrator and the LOMC Subscription Service Coordinator.	As of 11/1/2011 LOMC-VALID letters are also sent to the National Flood Determination Association (NFDA). Date stamped copies also go to the NFIP State Coordinator, the FEMA regional office and the PTS (for inclusion in the FEDD file per PM 62).	The letters can be sent to these other entities, but it's not a requirement.	The LOMC-VALID letter shall be provided to the community CEO and floodplain administrator and the LOMC Subscription Service Coordinator before the effective date of the revised FIRM(s).

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/7/2013	409	FEMA will distribute suspension notification letters to communities that have not yet adopted NFIP compliant ordinances within 90 and 30 days prior to the FIRM effective date.	<p>Comment #3 - The new policies and standards will be adopted before local communities have the opportunity to review and understand the implications and their effect on proposed FIRM updates. FIRM updates will require communities to adopt NFIP compliant ordinances without an opportunity to comment on the policies that generated them. The proposed semi-annual maintenance cycle to update the standards is unlikely to change an adopted policy other than to increase its scope. The terms 'standard' and 'policy' should not be used interchangeably [Standard 409]</p> <p>Suggestion: Adopt the new standards in draft form (if necessary) with an open comment period until the FIRMs are adopted and regulatory Ordinance changes are reviewed, agreed to and</p>	<p>As part of the maintenance process, there will be a public review period on updates before the changes are finalized.</p> <p>Updates to the standards that would impact the actual ordinance (i.e. changing how we define a V zone, etc.) would be more deliberate.</p>	Suspension notification letters shall be distributed to communities that have not yet adopted NFIP compliant ordinances within 90 and 30 days prior to the FIRM effective date.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>adopted by the communities that are impacted. Then adopt the standards as policy.</p> <p>Thank you for providing notice and a comment window prior to the adoption of these policies.</p>		
3/8/2013	413	Local building footprint and/or associated population data shall be the only acceptable data source to be used to populate structure and population attributes within the CSLF dataset.	SID 413: Ambiguous. Please explain.	Guidance will be developed to help support the standard. In the meantime, please refer to draft Appendix N for guidance.	Locally-provided, -sourced, or -validated building footprint, location, and/or population data shall be the only acceptable data sources to be used to populate structure and population count attributes within the CSLF dataset.

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	413	Local building footprint and/or associated population data shall be the only acceptable data source to be used to populate structure and population attributes within the CSLF dataset.	Do you really want or need building footprints? What if a local community uses a dot to represent the location of buildings instead of footprints or outlines?	Wording updated accordingly to allow for more than just footprints	Locally-provided, -sourced, or -validated building footprint, location, and/or population data shall be the only acceptable data sources to be used to populate structure and population count attributes within the CSLF dataset.
3/8/2013	419	The extent of water surface elevation change grids shall only reflect those areas that were both SFHA before and after the revision.	It seems to me that I would want to include areas that used to be outside SFHA in this analysis since they have had a water surface elevation change. As a local community I'm not sure that I would want to show an exhibit with water surface elevation changes to people newly mapped into the SFHA and the area where they are located displays no information on the change of the water surface elevation.	Wording updated accordingly to allow for more areas to be shown if desired.	The extent of water surface elevation change grids shall, at a minimum, reflect those areas that were both SFHA before and after the revision.
3/8/2013	430	All Flood Risk Product deliverable files must meet the standards set forth by the Map Service Center.	The MSC does not distribute Non-regulatory products. SAM	This is being implemented.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/8/2013	435	<p>Delivered FRD raster datasets shall have the following spatial standards:</p> <p>Projection: Universal Transverse Mercator (UTM)            Zone: Single zone which best covers the project area.            Horizontal Datum: NAD83 (NRS_2007?)            Horizontal Units: Meters            Vertical Vatu: NAVD88.</p>	SID 435: Correct spelling – Vertical Datum	The standard was deleted.	Deleted/Demoted
3/12/2013	435	<p>Delivered FRD raster datasets shall have the following spatial standards:</p> <p>Projection: Universal Transverse Mercator (UTM)            Zone: Single zone which best covers the project area.            Horizontal Datum: NAD83 (NRS_2007?)</p>	2011 is reported by the most recent NGS datasheets (NRS)	The standard was deleted.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		Horizontal Units: Meters Vertical Vatu: NAVD88.			
3/8/2013	435	Delivered FRD raster datasets shall have the following spatial standards:  Projection: Universal Transverse Mercator (UTM) Zone: Single zone which best covers the project area. Horizontal Datum: NAD83 (NRS_2007?) Horizontal Units: Meters Vertical Vatu: NAVD88.	Meters? Really? SAM	The standard was deleted.	Deleted/Demoted
3/8/2013	439	The Watershed Boundary Dataset (WBD) (dated xxxxxx) shall be the source for	How can this be a standard when th esource and date are not specified? SAM	The standard was deleted.	Deleted/Demoted

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
		hydrologic basins in the FRD.			
3/8/2013	51	The minimum data required for the terrain data submission are the source terrain and the output processed terrain data used in the flood risk project.	SID 51, 52, 53, 62: Do these submittals require certification by a licensed professional?	Standard removed. Professional certification requirements are in SID #s 42, 49, and 74.	Deleted/Demoted
2/19/2013			You submit to the public "new standards" that are a page of NOTHING. What are the NUMBERS? Bull dung is everywhere, I did not expect it from FEMA	No Response	

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
3/7/2013			<p>I have the following comments:</p> <p>Migrating the requirements from the narrative guidance to standards has left a large amount of guidance in the documents that appears to have been originally intended as being mandatory, as now being a recommendation that can be followed or not. It is understandable that FEMA would want to organize and stress the importance of the most significant requirements, but the way they are being proposed to be organized does more to diminish the importance of most of the guidance (that was not included in the standards).</p> <p>It also appears that the significance of these documents is being overlooked. While these are the guidance documents for mapping partners, they are</p>	<p>The remaining guidance will be reissued over the next year or so and will remain accessible until then.</p>	

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>also used on a regular basis by engineers, developers and community officials to interpret what is allowable with respect to analyses and mapping within the floodplain. Any reduction in significance of what was previously perceived as mandatory requirements to recommendations can have significant ramifications. Some examples of requirements (a full review was not performed) that were not included in the proposed list, but probably should be outlined below:</p> <p>Appendix C</p> <ul style="list-style-type: none"> <li>• There are a lot of requirements that include the word “must” that were not included as standards (examples below). It would be hard to conceive of the intent of such strong language as meaning anything other than that these items be mandatory. Unfortunately as</li> </ul>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>proposed, these will be recommendations, and will be easily avoided by anyone who wishes to do so.</p> <ul style="list-style-type: none"> <li>• Cross sections must be placed perpendicular to flood flow and extend beyond the 0.2-percent-annual-chance floodplain boundaries on either side of the stream.</li> <li>• The Mapping Partner must not consider the storage capability below Normal Pool Elevation of reservoirs operated primarily for purposes other than flood control unless all the exceptions provided in Section C.2.4.4 (subsection for Reservoir Storage) are met.</li> <li>• Unless it is demonstrated that the model should be revised for reasons other than encroachments into the floodplain, all subsequent revisions to the floodway are limited to the maximum allowable surcharge above the elevations determined in the</li> </ul>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013

Date received	SID #	Original Standard Verbiage	Comment	Response	Final Standard Verbiage
			<p>base model.</p> <p>Appendix G</p> <ul style="list-style-type: none"> <li>• Hydraulic analytical methods are not for use with active alluvial fan flooding.</li> </ul> <p>The information provided also discusses two sets of standards (program standards and working standards), but there is only one set of 450 standards provided for review, and no distinction between the two sets is provided.</p> <p>In the interest of sound floodplain management, safety, and reduction in flood losses, please re-review the entire text of the guidelines and ensure that all of the items that were intended to be required make it to the list of standards (otherwise they may never be followed).</p>		

Standards for Flood Risk Analysis and Mapping  
Public Review Comments  
March 2013