

# Fall 2020 Guidance and Standards Summary of Policy Changes

FEMA maintains guidelines and standards to support the Risk Mapping, Assessment and Planning (Risk MAP) program. These specifically define how to apply the statutory and regulatory requirements for the National Flood Insurance Program (NFIP). These standards also outline how to use Flood Risk Projects, how to process Letters of Map Change (LOMCs), and related Risk MAP activities. More information is available on [FEMA.gov](https://www.fema.gov).

FEMA has a maintenance plan for these guidelines and standards and is updated annually. This summary relates to the 2020 update, which FEMA will release in November 2020.

A summary of the planned changes was published in June 2020. Those changes are:

## Significant Changes

Topic	Description
<b>2D Floodways</b>	Revise the standards and guidance on modeling and mapping the regulatory floodway using a two-dimensional (2D) model. Update standards (Standard Identification Number or SID #) associated with floodway analyses and technical approaches and outputs. Also update multiple technical references, guidance documents, and templates.
<b>Coastal Zone Management Act (CZMA) Compliance</b>	Create SIDs and guidance to clarify how to issue consistency determinations for the CZMA.
<b>Automated Map Production (AMP)</b>	Revise associated SIDs, technical references, guidance documents, and templates to allow flexibility in Flood Insurance Rate Map (FIRM) panel layout as the AMP tool is introduced into the Risk MAP workflow per SID 630.
<b>Changes Since Last FIRM (CSLF)</b>	Revise associated SIDs and this guidance document to integrate FEMA's automated CSLF utility.
<b>Key Decision Point (KDP)</b>	Revise this guidance and associated SIDs to allow more ownership by the FEMA Regional Offices.
<b>FEMA IT Security/Privacy</b>	Create SID to increase the Risk MAP program's safe handling and security of Personally Identifiable Information (PII).
<b>MT-2 Guidance</b>	Create guidance document with more direction and clarity on developing and submitting Letters of Map Revisions and other MT-2 documents.



The standards changes are as follows:

<b>Standard IDs (SIDs)</b>	<b>Standards Change Description</b>
SIDs 66, 69, 73, 75, 77, 78, 79, 128, 248, 335	Updating to include edits and refinements associated with the 2D Floodway Significant Update.
SIDs 89, 96	Updating to clarify the use of regulatory products and the applicability of this standard.
SID 99	Rescinding standard in association with edits and refinements associated with the 2D Floodway Significant Update.
SIDs 101, 103, 229, 232, 256, 265, 274, 507	Updating to clarify standard, and align to current standard operating procedures (SOPs).
SID 230	Rescinding standard because this is covered by other standards and guidance.
SID 235	Updating to comply with current style guide specifications.
SIDs 264, 272, 279, 280	Updating to incorporate clarifications or corrections in the wording of the standard.
SID 415	Updated to removed confusing language and emphasize the focus on quality.
SID 417	Align the Standard to current standard operating procedures regarding automated creation of CSLF.
SID 424	Rescinding standard because the tiling structure is no longer applicable.
*SID 443	Updating to make the requirement easier to understand, and clarify the table is optional.

<p><b>SID 628</b></p>	<p>Updating to reflect the automated creation of CSLF through Customer and Data Services (CDS) tools and removes it from the list of products required to align with model information.</p>
<p><b>SID 630</b></p>	<p>Updating to establish understanding that AMP output products will look different than current requirements, but that is ok. Quality control (QC) will still be required for the engineering and flood hazard information.</p>
<p><b>SID 640</b></p>	<p>To keep Risk MAP IT systems secure and appropriately protect the privacy of individuals who are referenced in Risk MAP data, a User Account Management Plan is being established so that all Risk MAP Providers understand the protocols that must be followed and managed.</p>
<p><b>SID 641</b></p>	<p>Updating as expired Provisionally Accredited Levee (PALs) are emerging issues and FEMA Headquarters is requiring more oversight on the use of an expired PAL on an updated regulatory product.</p>
<p><b>SID 642</b></p>	<p>Updating because seclusion should no longer be used for a Risk MAP study unless a specific case or set of circumstances dictates its use.</p>
<p><b>SID 643</b></p>	<p>New standard developed to address CZMA consistency determination requirements</p>

## Standards

The table below lists proposed new standards and updates to existing standards. FEMA will [publish](#) these standards in November 2020 during the annual update to the Policy for Flood Risk Analysis and Mapping. These draft updates are available for the public to review and comment on before they are included in the policy.

The proposed updates and revisions are listed in the table below, with their Standard Identification Number (SID #), primary key words, implementation, and current version of the standard (if applicable). The approach for updating these standards has been chosen to avoid any cost impacts on work underway.

The current standards and a list of acronyms are on the [FEMA website](#).

SID #	Implementation	Primary Keyword	Original Standard	Revised Standard
66	Effective Immediately	Flood Profiles	Each modeled split or diverted flow path must be plotted with individual Flood Profiles.	Each significant split or diverted flow path modeled in 1D and mapped as Zone AE or AH must be plotted with individual Flood Profiles.
69	Effective Immediately	Floodway	Floodway surcharge values must be between zero and 1.0 ft. If the State (or other jurisdiction) has established more stringent regulations, these regulations take precedence over the NFIP regulatory standard. Further reduction of maximum allowable surcharge limits can be used if required or requested and approved by the communities impacted.	Floodway surcharge values must be less than or equal to 1.0 ft. If the State (or other jurisdiction) has established more stringent regulations, these regulations take precedence over the NFIP regulatory standard. Further reduction of maximum allowable surcharge limits can be used if required or requested and approved by the communities impacted.
73	Effective immediately	Floodway	An equal conveyance reduction method must be used to establish the minimal regulatory floodway, except where an initial equal conveyance floodway is adjusted in coordination with FEMA and the impacted communities.	A methodology based on equitable consideration of both overbanks must be used to establish the minimal regulatory floodway. Variations to this approach must be made in coordination with FEMA and the impacted communities.

SID #	Implementation	Primary Keyword	Original Standard	Revised Standard
75	Effective immediately	FIS Tables	<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>	<p>For each stream where a floodway was determined under the scope of work, a Floodway Data Table (FDT) compliant with the FIS Report Technical Reference must be prepared as part of the hydraulic analysis. The FDT must contain an entry for each lettered, mapped cross section or evaluation line and must include the information outlined in the FIS Report Technical Reference.</p>
77	Effective Immediately	Floodway	<p>Unless the coincident peak situation is assumed floodway computations for tributaries must be developed without consideration of backwater from confluences.</p>	<p>Floodway computations for tributaries must be developed without consideration of backwater from confluences unless a coincident frequency analysis or detailed historical observations prove otherwise. If either of these exceptions is used, it must be done in coordination with FEMA.</p>

SID #	Implementation	Primary Keyword	Original Standard	Revised Standard
78	Effective immediately	Flood Profiles	The water-surface profiles of different flood frequencies must not cross one another.	The water-surface profiles of different flood frequencies modeled in 1D must not cross one another, unless technical justification is provided in coordination with FEMA.
79	Effective immediately	Flood Profiles	Water-surface elevations shown on the Flood Profiles shall not rise from an upstream to downstream direction.	Water-surface elevations shown on the Flood Profiles for 1D models shall not rise from an upstream to downstream direction, unless technical justification is provided in coordination with FEMA.
89	Effective Immediately	Coastal - Analysis	For coastal Flood Risk Projects, non-levee coastal structures must be evaluated and the profile adjusted as necessary to reflect expected storm impacts on the structure for the purpose of establishing appropriate risk zone determinations for NFIP maps.	For coastal Flood Risk Projects, non-levee coastal structures must be evaluated and the profile adjusted as necessary to reflect expected storm impacts on the structure for the purpose of establishing appropriate risk zones for regulatory products.
96	Effective immediately	Coastal - Analysis	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.	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 in establishing appropriate flood hazard zones for regulatory products.
99	Effective immediately	Shallow Flooding	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.	<b>Proposed to rescind</b>
101	Effective immediately	Shallow Flooding	Sheet runoff areas shall be delineated as Zone AO with average flooding depths above the ground surface, rounded to the nearest whole foot, indicated on the work map or digital GIS data.	Sheet runoff areas shall be delineated as Zone AO with average flooding depths above the ground surface, rounded to the nearest whole foot.

SID #	Implementation	Primary Keyword	Original Standard	Revised Standard
103	Effective immediately	PMR	For areas where new regulatory maps are being issued, flood hazard information on the effective NFIP map (i.e., FIRM, FBFM, FHBM) that is not being updated through a separate flood hazard analysis or floodplain boundary redelineation shall be “carried over” to the new or updated FIRM.	For areas where new or updated regulatory maps are being developed, effective flood hazard information on NFIP maps (i.e., FIRM, FBFM, FHBM) not being updated through a separate flood hazard analysis or floodplain boundary redelineation shall be maintained, either by digitally transforming information from existing NFIP paper maps and / or transferring existing digital data, on the new or updated FIRM.
128	Effective immediately	2D Models	For floodplains mapped from 2-D models, separate Flood Profiles for significant flow paths must be created.	For floodplains mapped from 2D models, BFE lines on the FIRM must match modeled water surface elevations and must be plotted at intervals sufficient to interpolate accurate BFEs in between BFE lines. If this is not possible, separate Flood Profiles for significant flow paths and/or FIS Report inserts must also be created.
229	Effective immediately	Flood Profiles	<p>Profiles shall be plotted as the projection of the stream invert and the flood surface(s) onto the flow path. The plots should show the locations of and clearly label:</p> <ul style="list-style-type: none"> <li>• Each lettered mapped cross section;</li> <li>• Splits and diversions;</li> <li>• Confluences with tributaries, splits, and diversions;</li> <li>• Each stream crossing with symbology depicting the top of road and low chord elevations of modeled bridges and culverts along with the name of the bridge/culvert (e.g., Pine Street);</li> <li>• Extents of modeled hydraulic structures adjacent to the flooding source;</li> <li>• Upstream and downstream study limits of the flooding source;</li> <li>• Extent of backwater or flooding controlling the receiving stream and depiction of the backwater elevation along the Profile.</li> </ul>	<p>Flood Profiles shall be plotted as the projection of the stream invert and the flood surface(s) onto the flow path. The plots should show the locations of and clearly label:</p> <ul style="list-style-type: none"> <li>• Each lettered mapped cross section;</li> <li>• Separately modeled splits and diversions;</li> <li>• Confluences of modeled tributaries, splits, and diversions;</li> <li>• Each stream crossing with symbology depicting the top of road and low chord elevations of modeled bridges and culverts along with the name of the bridge/culvert (e.g., Pine Street);</li> <li>• Extents of modeled hydraulic structures adjacent to the flooding source;</li> <li>• Upstream and downstream study limits of the flooding source; Extent of backwater or flooding controlling the receiving stream and depiction of the backwater elevation along the Profile.</li> </ul>
230	Effective immediately	FIS/FIRM	The FIRM panels must be derived directly from the FIRM database and must be in agreement with the	<b>Proposed to rescind</b>

SID #	Implementation	Primary Keyword	Original Standard	Revised Standard
			information shown in the FIS Report.	
232	Effective immediately	Flood Profiles	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.	Unless it can be demonstrated that the vertical and horizontal scale of the effective Flood Profiles are inadequate, re-analyzed or redelineated streams must be produced using the same horizontal and vertical scales that were used in the effective Flood Profiles.
235	Effective immediately	FIS Report	If an FIS Report is published in 2 or more volumes, no volume shall exceed 100 pages.	If an FIS Report is published in two or more volumes, no volume shall exceed 100 pages.
248	Effective immediately	FIS Tables	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 FDT. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.	All lettered or numbered cross sections or evaluation lines must be shown on the Flood Profiles and, if a floodway was computed, must also be shown in the FDT. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.
256	Effective immediately	Flood Profiles	Flood Profiles for Zone AE must show data for each of the 5 standard (10-, 4-, 2-, 1-, and 0.2-percent-annual-chance) flood events if they were calculated as part of the Flood Risk Project.	Flood Profiles for Zone AE must show data for each of the six standard (10-, 4-, 2-, 1-, 1-percent-plus-, and 0.2-percent-annual-chance) flood events if they were calculated as part of the Flood Risk Project.
264	Effective immediately	FIS Tables	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	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

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			Effects,” or “Storm Surge Effects,” as needed, to reference the appropriate flooding situation.	Surge Effects,” as needed, to reference the appropriate flooding situation.
265	Effective immediately	FIS Tables	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.	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 unless the stream forms the boundary between two States with differing surcharge requirements.
272	Effective immediately	Flood Profiles	A vertical elevation scale of 1 inch equals 1, 2, 5, 10, or 20 feet is to be used for the Flood Profiles. Elevations shall be shown on the left side of the grid at 1-inch intervals within the profile elevation range.	A vertical elevation scale of 1 inch equals 1, 2, 5, 10, or 20 feet is to be used for the Flood Profiles. Elevations shall be labeled on the left side of the grid at 1-inch intervals within the profile elevation range.
274	Effective immediately	Flood Profiles	The horizontal and vertical scales of the Flood Profiles shall be chosen so that that Flood Profile slopes are reasonable and can be easily interpreted by the user.	The horizontal and vertical scales of the Flood Profiles for newly studied streams shall be chosen so that that Flood Profile slopes are reasonable and can be easily interpreted by the user.
279	Effective immediately	Flood Profiles	Downstream flood elevations are to begin on the left edge of the Flood Profile.	Downstream flood elevations are to be oriented towards the left edge of the Flood Profile.
280	Effective immediately	Flood Profiles	Stream distances reported in the FDTs, Profiles, and FIRM database must be measured along the profile baseline.	Stream distances reported in the FDTs , Flood Profiles, and FIRM database must be measured along the profile baseline.
335	Effective immediately	Floodway	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.	Regulatory floodways shall be shown on the FIRM panel within the SFHA and, at lettered or numbered cross-section and evaluation line 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.

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415	Effective immediately	Flood Risk Datasets	Water-surface elevation (WSEL) grids produced as part of a Flood Risk Project must be of such a quality that they could be used for regulatory and other official purposes as the digital source from which to retrieve flood elevations. Additionally, for each mapped flood frequency (e.g. 1-percent, 0.2-percent, etc.), there must be agreement in extent and coverage between the WSEL grid and its associated flood hazard area polygon.	Water-surface elevation (WSEL) grids produced as part of a Flood Risk Project must be of such a quality that they can be used for regulatory and other official purposes, and blended into a seamless dataset. For each mapped flood frequency (e.g. 1-percent, 0.2-percent, etc.), there must be agreement in extent and coverage between the WSEL grid and its associated flood hazard area polygon.																																																												
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424	Effective immediately	Flood Risk Database	As an outcome of Discovery, a tiling structure must be defined for products.	<b>Proposed to rescind</b>
*443	Effective immediately	Flood Risk Database	In order to maintain privacy, the L_Claims table, if there are less than five claims, five repetitive loss claims, or five severe repetitive loss claims in a community, then the relevant value field shall be set to null.	In order to maintain privacy, if the optional L_Claims table is created, the relevant value field shall be set to null if there are less than five claims, five repetitive loss claims, or five severe repetitive loss claims in a community.
507	Effective Immediately	FIS/FIRM	The FIRM, FIRM database, NFHL, Flood Profiles and Floodway Data Tables must all be in agreement with each other, including decimal point precision, as it relates to the depiction of flood hazards and hydraulic structures.	The FIRM, FIRM database, NFHL, Flood Profiles and Floodway Data Tables must all be in agreement with each other, including decimal point precision, as it relates to the depiction of flood hazards and hydraulic structures.
628	Effective immediately	Flood Risk Datasets	All Flood Risk Products will be deemed of acceptable quality if they meet the following conditions: - All Flood Risk Products pass the MIP Validation step - All raster datasets and the Changes Since Last FIRM dataset align with the underlying model information used to develop the associated regulatory products - All other database elements align with regulatory products as of the time they are contracted, if they are developed from regulatory products	All Flood Risk Products will be deemed of acceptable quality if they meet the following conditions: - All Flood Risk Products pass the MIP Validation step - All raster datasets align with the underlying model information used to develop the associated regulatory products - All other database elements align with regulatory products as of the time they are contracted, if they are developed from regulatory products
630	Implemented with all new flood risk projects initiated in FY20 and MT-2s received after the automated mapping tool is implemented.	Map Format and Layout	All preliminary and final FIRM panels, including FIRM attachments delivered with MT-2s, must be developed using the FEMA FIRM panel creation tool.	All preliminary and final FIRM panels, including FIRM attachments delivered with MT-2s, must be developed using the FEMA FIRM panel creation tool. The output panel layout and cartographic design from the FEMA FIRM panel creation tool are considered FEMA compliant with no edits, however the output products, including the FIRM database, must be quality controlled by the producer to confirm the engineering and flood hazard data align with the related regulatory products. Quality control must be performed, documented and completed prior to the issuance of preliminary and final regulatory products.

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640	Effective immediately	Project Management	New	All organizations and users that access FEMA RAM applications must comply with applicable RAM policies and SOPs.
641	Implemented with all new Flood Risk Projects initiated in FY21	Levee	New	Justification to use an expired PAL agreement date on the FIRM panel must be approved by the FEMA Region and FEMA Headquarters.
642	Implemented with all new Flood Risk Projects initiated in FY21	Levee	New	Justification to use Seclusion mapping on the FIRM panel must be approved by the FEMA Region and FEMA Headquarters.
643	Effective Immediately	CZMA	New	Prior to preliminary issuance of FIRMs affecting tidally influenced floodplains within the coastal zone, as defined by the Coastal Zone Management Act of 1972 (16 U.S.C. § 1451-1464), the FEMA Region will submit to the coastal management program for the State or territory in which the project takes place a Federal consistency determination that the project is consistent to the maximum extent practicable with the enforceable policies of the coastal management program.

## Responses to Public Comments Received in July 2020

Several comments were received during the comment period. The comments and FEMA’s response are listed by their SIDs below:

### Revised SID 73

- ASFPM Comment:
  - The term “equitable consideration” can be interpreted to include property and land value in the consideration of the floodway. It is important that any consideration of “equitable” is defined by hydraulics exclusively.
- Response:
  - No further changes are planned to the proposed revisions for SID 73; however the topic of equitable hydraulic consideration will adequately be addressed in the Floodway Guidance where this concept is discussed.

### Revised SID 103

- Dewberry Comment:

- For the existing language of SID 103, the effective study is typically carried over “as is” on any revised mapping products (or as it was previously published). We believe the existing language for SID 103 conflicts with other FEMA standards, including SIDs 551, 308, and 507, which indicate that updates should be applied, even when a study is not scoped for revision. The proposed language (“digitally converted”) is also unclear, as many of these unrevised studies are already in a digital form and considered valid in CNMS. In such a case, it is unclear to what degree unrevised studies should be modernized and updated to meeting newer spec requirements.
- Response
  - The root of this question is that SID 308 requires hydraulic structures to be shown as part of the FIRM base map, which according to SID 507 must agree with the profiles. Additionally, SID 551 requires these (i.e. hydraulic structures) be shown / captured for portions of a PMR panel that are not part of the study area. Therefore, does the combination of these four standards require producers to create (i.e. digitally convert) hydraulic structures that have not been previously captured or in the NFHL? Yes, hydraulic structures must be captured as part of the digital conversion process to create a 1:1 match between the effective profiles and FIRM database for digitally captured areas.
  - For any hydraulic structure digitally converted (e.g. placing a bridge that no longer appears on the aerial imagery and determining its location from the profile baseline), the data must be stored in the S\_Gen\_Struct layer and given the same metadata source citation as the digitally converted flood hazards areas. The metadata will indicate the source of the features as the effective FIRM panel (e.g. dated 1980) and therefore will indicate to future users not to leverage the data for detailed survey work.
  - The question also asks if the digitally captured structures do not align with base map features (e.g. newer imagery, updated transportation networks, etc.) will it be misleading for future CNMS assessments to see these digitally captured hydraulic structures? The mismatch of a hydraulic feature (e.g. a bridge) in the database as compared to the aerial imagery is an important component for CNMS assessments as this demonstrates a change to the hydraulic network impacting the stream. Therefore, it is more important to show these features as opposed to leaving them off.
  - The question also further asks if old hydraulic structures are digitally captured, what other components from older studies need to be captured for digitally converted streams. The FIRM DB Technical Reference provides the specifications for each table / feature; however, it is important to note the requirements do not ask for the creation of new engineering information on digitally converted studies, but to digitally capture any data that was part of the original study.
    - For example, the L\_Summary\_Discharges is only required if the FIS report has a Summary of Discharges Table. The L\_ManningsN is required for all new studies or if data is available in existing FIS Reports.
  - Finally, the question asks about the FIRM DB version ID, specifically if an unrevised study is attributed as 1.1.1.0, would it need to be advanced to a higher version ID (e.g. 1.6.1.0) if the hydraulic structures are digitally converted. No as the digitally captured information is not considered new as it was in the original engineering model.

## Revised SID 229

- PennDOT Comment:
  - Flood Profile, fourth bullet.
    - Each stream crossing with symbology depicting the top of road and low chord elevations of modeled bridges and culverts along with the name of the bridge/culvert (e.g., Pine Street).

- PennDOT Recommends the following change to this bullet:
  - Each stream crossing with symbology depicting the top of road and low chord elevations of modeled bridges and culverts along with the name and the owner's structure identification information of the bridge/culvert (e.g., Name, Bridge ID Number(s) latitude and longitude).
- Response:
  - The fourth bullet is not part of the proposed revisions for this cycle; revisions to this bullet may be considered for future maintenance cycles.

#### Revised SID 230

- Compass Comment:
  - Wanted to note that while standard 230 is being rescinded and combined with standard 507, the language for standard 507 has not been changed. It would be worth revising the language for SID 507 to more broadly State the need for agreement with the FIS, instead of the specific FIS components (FDTs, Profiles, etc.). This will help to maintain the full intent of both standards without them being duplicative.
- Response:
  - SID 507 covers the need for agreement between all components, and is not planned for revision.

#### Revised SID 256

- ASFPM/Atkins/Angela Parker/BEM Systems/University of Illinois Comment:
  - There are now 6 standard flood events, not 5.
- Response:
  - Addressed.

#### Revised SID 264

- Angela Parker Comment:
  - Doesn't seem to be any difference between old/new language.
- Response:
  - There are minor grammatical and stylistic changes to the revised SID, to maintain maximum clarity of the standard.

#### Revised SID 415

- ASFPM Comment:
  - There is no program for updating gridded data products for LOMR's, no defined way to process legacy data for gridded data products, overall maintenance of gridded data products has not been considered in this program.
- Response:
  - FEMA is working to improve the Flood Risk Products (FRPs) through a series of sequential updates. These updates are focused on improving the quality and usability of the FRPs. This Fall 2020 update to the FRP G&S was a next step in that process. Future FRP updates will include more guidance regarding quality and processes for updating FRPs during the Risk MAP study lifecycle or through the MT-2 workflow process.

### Revised SID 507

- Oswego County Department of Community Development, Tourism & Planning Comment:
  - What is the process for an individual or a community to provide FEMA with the exact measurements of hydraulic structures within a stream in order to update the FIRM database?
- Response:
  - *No response was provided. This individual should have received the guidance public review announcement.*

### Revised SID 628

- ASFPM Comment:
  - The lack of updates to the DVT result in numerous “bypasses”, which negates the intent of this standard, and causes needless work. FEMA needs to commit to timely updates to the DVT. This will be especially critical as the automatic mapping applications come to fruition.
- Response:
  - FEMA is making updates to DVT as shown in the planned updates that will be applied in the near future (ordinally scheduled to be applied over the weekend of 09/11/20 – 09/12/20). This update will eliminate a common bypass related to flood source names when the dataset is in compliance. FEMA is working closely with the CDS Team to track potential DVT items that might arise from AMP and developing solutions for those as part of our Inspect and Adapt agile planning process.

### Revised SID 640

- University of Illinois Comment:
  - Please define the RAM acronym in Appendix A of the FEMA Policy Standards for Flood Risk Analysis and Mapping.
- Response:
  - The RAM acronym, which stands for Risk Analysis Management, will be added to the Policy list.

### Revised SID 641

- STARR II Comment:
  - Implementation Description to "Effective Immediately".
  - Justification to use an expired PAL agreement date on the FIRM panel must be approved by the FEMA Region and FEMA Headquarters.
- Response:
  - The implementation description has been changed to "effective immediately" and the other wording changes to the standard have been made per the comment.

### Revised SID 642

- STARR II Comment:
  - Implementation Description to "Effective Immediately".
  - Justification to use Seclusion mapping on the FIRM panel must be approved by the FEMA Region and FEMA Headquarters.
- Response:

- The implementation description has been changed to "effective immediately" and the other wording changes to the standard have been made per the comment.

### Revised SID 643

- ASFPM Comment:
  - The Great Lakes are non-tidal, but States in that Region have CZM programs. We assume that you meant to include those States in this standard. Consider using another term.
- Response:
  - The reference to "tidally influenced" floodplains has been removed and reworded to account for all floodplains in the coastal zone.
- Rhode Island Resources Management Council Comment:
  - Noted that the public review announcement indicates a "significant change" to CZMA compliance and clarification on "how to issue consistency determinations for the CZMA." Further, the document States that "[t]hese draft updates are available for the public to review and comment on before they are included in the policy." Can you direct me please to where I can find the proposed draft CZMA consistency determination preparation guidance?
- Response:
  - Comment does not affect the language of SID 643.
- FEMA Region IX Comment:
  - Rewrite:
    - Prior to issuance of a preliminary FIRM panel covering a tidally influenced floodplain within the coastal zone, as defined by the Coastal Zone Management Act of 1972 (16 U.S.C. § 1451-1464), documentation that the FEMA project is consistent with the Coastal Zone Management Act Plan of the State in which the project takes place shall be issued by the FEMA Region.
- Response:
  - The comment was addressed, however subsequent comments were adjudicated and changed the language of the SID further. The language suggested in this comment was incorporated, and has been expanded upon according to other comments.
- New Hampshire Coastal Program Comment:
  - 1) To be consistent with the Federal consistency regulations at 15 CFR Part 930 Subpart C (Consistency for Federal Agency Activities) the NHCP recommends revising the standard to read as follows: "Prior to preliminary issuance of FIRMS affecting tidally influenced floodplains within the coastal zone, as defined by the Coastal Zone Management Act of 1972 (16 U.S.C. § 1451-164), FEMA shall submit a Federal consistency determination to the State coastal management program that the project is consistent to the maximum extent practicable with the enforceable policies of the State coastal management program.
  - 2) The proposed standard calls for the issuance of a consistency determination only where a FIRM affects a tidally influenced floodplain within the coastal zone. However, the statutory obligation to issue a consistency determination extends to all Federal agency actions affecting any uses or resources of a State or territory's coastal zone. New Hampshire's coastal zone encompasses the jurisdictional boundaries of the seventeen municipalities subject to tidal influence. As such, it

includes both tidally influenced and non-tidally influenced floodplains. The NHCP recommends that the standard be revised to call for the issuance of a consistency determination for any FIRM mapping a floodplain in a coastal zone.

- Response:
  - 1) Comment has been adjudicated and the language of SID 643 has been adjusted to concur with the comments.
  - 2) The reference to "tidally influenced" floodplains has been removed and reworded to account for all floodplains in the coastal zone.
  
- Coastal States Organization Comment:
  - 1) The proposed policy calls for FEMA to issue a consistency determination only where a FIRM affects a tidally influenced floodplain within the coastal zone. However, the statutory obligation to issue a consistency determination extends to all Federal agency activities affecting any uses or resources of a State or territory's coastal zone (referred to as the effects test).<sup>5</sup> By limiting the policy to only FIRMs in tidally-influenced floodplains, FIRMs in coastal zones may be issued without a necessary consistency determination – in particular, as the Great Lakes are not tidally influenced, the policy as written would not reach the coastal zones of the seven Great Lakes States. We suggest that the policy instead call for a consistency determination for any FIRM mapping a floodplain in a coastal zone.
  - 2) In order to clarify the statutory and regulatory requirements for the consistency determination,<sup>6</sup> CSO suggests that FEMA change the language “documentation that the project is consistent with the Coastal Zone Management Act Plan of the State in which the project takes place shall be issued by the FEMA Region” to read “the FEMA Region shall submit to the coastal management program for the State or territory in which the project takes place a Federal consistency determination that the project is consistent to the maximum extent practicable with the enforceable policies of the coastal management program.
  - 3) The consistency determination is required to be submitted to the coastal State at the earliest practical time, but in no case later than 90 days before final approval of the Federal agency activity.<sup>8</sup> The proposed policy does not establish when in the FIRM development process the consistency determination would be submitted. CSO encourages FEMA Regions to reach out to coastal management programs early in the map revision process and share a clear timeline, so that the coastal management program can know what documents to expect when, and provide any feedback in a timely and constructive manner.
  
- Response:
  - 1) The reference to "tidally influenced" floodplains has been removed and reworded to account for all floodplains in the coastal zone.
  - 2) Comment has been adjudicated and the language of SID 643 has been adjusted to concur with the comments.
  - 3) The comment is acknowledged, but does not require a change to the SID language. Guidance is being developed to clarify the question posed.