



Hello CTP Community of Practice:

The official comment period is now open for the “standards” portion of the Guidance and Standards updates for this November. Please take a look at the information below and be sure that you respond as directed with any **comments by JULY 31, 2020**.

*Please note, the Guidance portion of the review will take place in August and you will receive another reminder when that timeframe is open for public review and comment.

Thank you,

Laura J Algeo, PE

National CTP Program Coordinator

FEMA PUBLIC REVIEW ANNOUNCEMENT

Fall 2020 Guidance and Standards Review 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
2D Floodways	Revise the standards and guidance on modeling and mapping the regulatory floodway using a two-dimensional (2D) model. Update standards (SIDs) associated with floodway analyses and technical approaches and outputs. Also update multiple technical references, guidance documents, and templates.
Coastal Zone Management Act (CZMA) Compliance	Create SIDs and guidance to clarify how to issue consistency determinations for the CZMA.
Automated Map Production (AMP)	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.
Changes Since Last FIRM (CSLF)	Revise associated SIDs and the CSLF guidance document to integrate FEMA’s automated CSLF utility.
Key Decision Point (KDP)	Revise the KDP guidance and associated SIDs to allow more ownership by the FEMA Regional Offices.
FEMA IT Security/Privacy	Create SID to increase the Risk MAP program’s safe handling and security of Personally Identifiable Information (PII).
MT-2 Guidance	Create guidance document with more direction and clarity on developing and submitting Letters of Map Revisions and other MT-2 documents.

Simple Changes

Listed below is a table that describes the other simple maintenance items with a short summary of proposed changes to standards.

Item #	Doc. Type	Document Title/SID #	Description
1	Standard	SIDs 89, 96	Update to clarify the use of regulatory products and how these standards apply.
2	Standard	SIDs 101, 229, 230, 256, 265, 274, 279, 507	Update to clarify standard and/or guidance information, and to align to current standard operating procedures.
8	Standard	New Standard	New standards to incorporate Privacy and FEMA IT Security requirements.

Minor Changes

Minor changes to standards identified below do not have any impact to current intent, nor do they have any Regional or stakeholder impact. These changes are only intended to improve consistency or clarity in language, and / or correct minor errors (e.g. typos).

SIDs with Minor Changes
103, 232, 235, 264, 272, 280, 414, 415, 417, 424, 443, 628

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 reasons for the changes are summarized above.

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](https://www.fema.gov).

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.
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"> • Cross-section identification shown in a georeferenced spatial file; • Stream or profile baseline station of the cross section; • Width of the floodway at the cross section; • Wetted area of the cross section under encroached conditions; • Average velocity of the floodwaters at the cross section under encroached conditions; • The greater of BFEs from all flooding sources, including from backwater, affecting the cross section (regulatory elevation); • The BFE from the existing conditions model (without-floodway elevation); • The BFE from the encroached existing conditions model (with-floodway elevation); and • Difference between with- and without-floodway elevations (surcharge). 	For each stream 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 or evaluation line and must include the information outlined in the FIS Report Technical Reference
77	Effective Immediately	Floodway	Unless the coincident peak situation is assumed floodway computations for tributaries must be developed without consideration of backwater from confluences.	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.
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.	Proposed to rescind
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.
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 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 digitally converted to 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 2-D models, printed BFE lines on the FIRM must match modeled water surface elevations and must be plotted at intervals sufficient to interpolate accurate BFEs in between printed 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"> • Each lettered mapped cross section; • Splits and diversions; • Confluences with tributaries, splits, and diversions; • 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); • Extents of modeled hydraulic structures adjacent to the flooding source; • 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. 	<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"> • Each lettered mapped cross section; • Separately modeled splits and diversions; • Confluences of modeled tributaries, splits, and diversions; • 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); • Extents of modeled hydraulic structures adjacent to the flooding source; • 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.
230	Effective immediately	FIS/FIRM	The FIRM panels must be derived directly from the FIRM database and must be in agreement with the information shown in the FIS Report.	Proposed to rescind
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 Floodway Data Table. 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 Floodway Data Table. Unlettered cross sections shown on the FIRM are not to be included on the Floodway Data Table or Flood Profiles.
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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 5 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 Effects," or "Storm Surge Effects," as needed, to reference the appropriate flooding situation.	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.
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 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 Floodway Data Tables, Profiles, and FIRM database must be measured along the profile baseline.	Stream distances reported in the Floodway Data Tables, 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.																																																												
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.																																																												
417	Effective immediately	Flood Risk Datasets	<table border="1"> <thead> <tr> <th>Flood Risk Product/Output</th> <th>New Flood Hazard Analysis/Contour</th> <th>No New Flood Hazard Analysis/Contour</th> </tr> </thead> <tbody> <tr> <td>Flood Risk Database</td> <td>Required</td> <td>Required</td> </tr> <tr> <td>Changes Since Last FIRM (CSLF)</td> <td>Required¹</td> <td>N/A</td> </tr> <tr> <td>Water Surface Elevation Grids</td> <td>Required²</td> <td>Optional³</td> </tr> <tr> <td>Flood Depth Grids</td> <td>Required⁴</td> <td>Optional⁵</td> </tr> <tr> <td>Percent Annual Chance & Percent 50 year Chance Grids</td> <td>Required⁶</td> <td>Optional⁷</td> </tr> <tr> <td>Flood Risk Assessment</td> <td>Required⁸</td> <td>Required⁹</td> </tr> <tr> <td>Area of Mitigation Interest (AMI)</td> <td>Required</td> <td>Required</td> </tr> <tr> <td>Flood Risk Map</td> <td>Optional</td> <td>Optional</td> </tr> <tr> <td>Flood Risk Report</td> <td>Optional</td> <td>Optional</td> </tr> </tbody> </table> <p>The minimum datasets associated with the Flood Risk Project are defined as follows:</p>	Flood Risk Product/Output	New Flood Hazard Analysis/Contour	No New Flood Hazard Analysis/Contour	Flood Risk Database	Required	Required	Changes Since Last FIRM (CSLF)	Required ¹	N/A	Water Surface Elevation Grids	Required ²	Optional ³	Flood Depth Grids	Required ⁴	Optional ⁵	Percent Annual Chance & Percent 50 year Chance Grids	Required ⁶	Optional ⁷	Flood Risk Assessment	Required ⁸	Required ⁹	Area of Mitigation Interest (AMI)	Required	Required	Flood Risk Map	Optional	Optional	Flood Risk Report	Optional	Optional	<p>Add the following products within the ""Flood Risk Dataset"" section of the table: Floodway Water Surface Elevation and Depth Grids. These will be Optional for New Analysis and Optional for non-New Analysis.</p> <table border="1"> <thead> <tr> <th>Flood Risk Product/Output</th> <th>New Flood Hazard Analysis/Contour</th> <th>No New Flood Hazard Analysis/Contour</th> </tr> </thead> <tbody> <tr> <td>Flood Risk Database</td> <td>Required</td> <td>Required</td> </tr> <tr> <td>Changes Since Last FIRM (CSLF)</td> <td>Required¹</td> <td>N/A</td> </tr> <tr> <td>Water Surface Elevation Grids</td> <td>Required²</td> <td>Optional³</td> </tr> <tr> <td>Flood Depth Grids</td> <td>Required⁴</td> <td>Optional⁵</td> </tr> <tr> <td>Percent Annual Chance & Percent 50 year Chance Grids</td> <td>Required⁶</td> <td>Optional⁷</td> </tr> <tr> <td>Flood Risk Assessment</td> <td>Required⁸</td> <td>Required⁹</td> </tr> <tr> <td>Area of Mitigation Interest (AMI)</td> <td>Required</td> <td>Required</td> </tr> <tr> <td>Flood Risk Map</td> <td>Optional</td> <td>Optional</td> </tr> <tr> <td>Flood Risk Report</td> <td>Optional</td> <td>Optional</td> </tr> </tbody> </table> <p>The minimum datasets associated with the Flood Risk Project are defined as follows:</p>	Flood Risk Product/Output	New Flood Hazard Analysis/Contour	No New Flood Hazard Analysis/Contour	Flood Risk Database	Required	Required	Changes Since Last FIRM (CSLF)	Required ¹	N/A	Water Surface Elevation Grids	Required ²	Optional ³	Flood Depth Grids	Required ⁴	Optional ⁵	Percent Annual Chance & Percent 50 year Chance Grids	Required ⁶	Optional ⁷	Flood Risk Assessment	Required ⁸	Required ⁹	Area of Mitigation Interest (AMI)	Required	Required	Flood Risk Map	Optional	Optional	Flood Risk Report	Optional	Optional
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424	Effective immediately	Flood Risk Database	As an outcome of Discovery, a tiling structure must be defined for products.	Proposed to rescind																																																												
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, and FIS information must all be in agreement with each other, including decimal point precision, as it relates to the depiction of flood hazards and hydraulic structures. All regulatory products should be derived from the FIRM database.																																																												
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.																																																												
640	Effective immediately	Project Management	New	All organizations and users that access FEMA RAM applications must comply with the RAM System Non-Privileged User Account Management Plan.																																																												
641	Implemented with all new Flood Risk Projects initiated in FY21	Levee	New	A determination to use an expired PAL agreement date on the FIRM panel must be coordinated with and approved by the FEMA Region and FEMA Headquarters.																																																												
642	Implemented with all new Flood Risk Projects initiated in FY21	Levee	New	A determination to use Seclusion mapping on the FIRM panel must be coordinated with and 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), 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																																																												

How to Submit Comments to FEMA

You may provide comments via email at: FEMA-GS@fema.dhs.gov. Comments received prior to July 31, 2020, will be reviewed and addressed as appropriate before the standards are finalized.