

Review of Changes to the Policy for Flood Risk Analysis and Mapping

The Federal Emergency Management Agency (FEMA) maintains guidelines and standards to support the Risk Mapping, Assessment and Planning (Risk MAP) Program. These guidelines and standards define the specific implementation of the statutory and regulatory requirements for the National Flood Insurance Program (NFIP). They also outline the performance of Flood Risk Projects, processing of Letters of Map Change (LOMCs), and related Risk MAP activities. More information is available at: www.fema.gov/guidelines-and-standards-flood-risk-analysis-and-mapping.

FEMA has a maintenance plan for the Risk MAP guidelines and standards and issues updates on an annual basis. This notice provides information about the 2019 annual update which is expected to be released in November 2019.

A summary of the planned changes was published in June 2019. Those changes are:

Significant changes

- **New strategies for modernizing legacy maps:** It is a priority for the mapping program to fully modernize the map inventory. However, there are unique challenges with many of these remaining areas. FEMA is exploring changes for Fiscal Year 2020 that reduce the cost, staff time, or lifecycle time for modernizing legacy maps without significant negative impacts on the communities.
- **Automate map products:** FEMA has systems in place that can automatically produce high quality Flood Insurance Rate Map (FIRM) images from the National Flood Hazard Layer (NFHL). However, legacy processes still result in significant time and money spent on manual cartography to create the FIRM deliverables. This activity will mandate that future FIRM images be produced using an automated tool to reduce cost.
- **Removing floodways during a map update:** FEMA is looking at Standard Identification Number (SID) 5 to evaluate if there are circumstances where an area with a floodway might receive an updated map without a floodway.
- **Financial Tracking Improvements:** FEMA is improving processes for tracking regional cost allocations and status of funds for flood map projects including studies and other investments. FEMA plans to formalize these new processes in policy.

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

Simple changes

Item #	Doc. Type	Document Title/SID #	Description
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Item #	Doc. Type	Document Title/SID #	Description
1	Standard	SIDs 113, 114	Updating to clarify standards and align to current standard operating procedures.
2	Standard	SIDs 71, 72, 73 & 77	Updating to clarify standards and align floodway analysis and mapping to current standard operating procedures.

Minor changes

There are some additional minor updates to various standards that do not change the intent of the existing content but rather provide additional clarification to reduce confusion and clarify the application. The following minor changes that FEMA plans to make include:

- SIDs: 215, 217, 218, 220, 226, 367

Standards

The table below lists proposed updates to existing standards and drafts of new standards. A list of acronyms and the current standards may be found on the FEMA website here <https://www.fema.gov/media-library/assets/documents/35313>.

FEMA intends to publish these standards as a part of the annual update to the Policy for Flood Risk Analysis and Mapping in November 2019. The draft updates are being made available for public review to provide an opportunity for comment prior to incorporation into the policy. The reasons for the changes are summarized above.

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

SID #	Primary Keyword	Implementation	Original Standard	Revised/New Standard
5	Project Planning	Effective immediately	No flooding source will receive a lower level of regulatory flood map product than what currently exists on effective maps.	<i>Note: No change is proposed for the SID wording; the proposed change is from a Working standard to a Program standard.</i>

SID #	Primary Keyword	Implementation	Original Standard	Revised/New Standard
17	Project Planning	Effective immediately	Discovery is a mandatory element of all Flood Risk Projects, and must be conducted on the same scale at which the Flood Risk Project is initiated. All watershed-based Discovery must be initiated at a geographic footprint that encompasses the hydrologic characteristics of the area of interest.	Discovery is a mandatory element of all Flood Risk Projects. All watershed-based Discovery must be initiated at a geographic footprint that encompasses the hydrologic characteristics of the area of interest. At the start of discovery, the delivery may be scaled to engage the appropriate level of project stakeholders based on community need and risk. <i>Note: includes a proposed change from a Program standard to a Working standard.</i>
20	Stakeholder Engagement	Effective immediately	Discovery must engage all communities and stakeholder organizations within the project area and must engage practitioners across relevant disciplines.	Discovery must engage all communities and the appropriate level of project stakeholders identified within the project area and must engage practitioners across relevant disciplines.
23	Discovery	Effective immediately	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.	Discovery-related data 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.
24	Discovery	Effective immediately	A post-meeting Discovery Map and Report will be provided to the communities and tribes after the Discovery Meeting.	A Discovery Report and associated data will be provided to the communities and tribes after the Discovery Meeting.
26	Discovery	Effective immediately	A Discovery Report must include a section listing the data and information collected, when they were received, data sources, and an analysis of the data and information. The Post-Meeting Report must include the outcomes and decisions made at the Discovery Meeting.	A Discovery Report must include a section listing the data and information collected, when they were received, data sources, and an analysis of the data and information. It must also include the outcomes and decisions made at the Discovery Meeting.

SID #	Primary Keyword	Implementation	Original Standard	Revised/New Standard
71	Floodway	For all projects where the engineering work has not yet begun.	Revised floodway data must match any effective floodways at the limits of the Flood Risk Project.	New or revised floodway data must match any effective floodways at the limits of the Flood Risk Project.
72	Floodway	Effective immediately	An equal conveyance reduction method must be used to establish the minimal regulatory floodway.	Rescinding as it is proposed to be combined with SID #73 for clarity.
73	Floodway	For all projects where the engineering work has not yet begun.	To calculate floodways using methodologies other than steady-state, one-dimensional models, pre-approval must be received from the FEMA Project Officer and impacted communities and states with floodway authorities.	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.
77	Floodway	For all projects where the engineering work has not yet begun.	Floodway computations for tributaries must be developed without consideration of backwater from confluences.	Unless the coincident peak situation is assumed, floodway computations for tributaries must be developed without consideration of backwater from confluences.
113	FBS	Existing standard. Already implemented.	The flood risk class must be determined for each flooding source to identify what Floodplain Boundary Standard must be met and what level of analysis is required.	The flood risk class must be determined for each flooding source to identify what Floodplain Boundary Standard flood risk class must be met and what level of analysis is required.

Risk Class	Characteristics	Delineation Reliability of the floodplain boundary per study methodology ¹	
		Zone A	All Other Zones
A	High population and densities within the floodplain and/or high anticipated growth	+/- 1/2 contour 95%	+/- 1.0 foot / 95%
B	Medium population and densities within the floodplain and/or modest anticipated growth	+/- 1/2 contour 90%	+/- 1.0 foot / 90%
C	Low population and densities within the floodplain, small or no anticipated growth	+/- 1/2 contour 85%	+/- 1.0 foot / 85%
D	Undetermined Risk, likely subject to flooding	N/A	N/A
E	Minimal risk of flooding; area not studied	N/A	N/A

¹ The difference between the ground elevation (defined from topographic data) and the computed flood elevation

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SID #	Primary Keyword	Implementation	Original Standard	Revised/New Standard
114	FBS	Existing standard. Already implemented.	A horizontal tolerance of +/- 38 feet will be used to determine the compliance with the vertical tolerances defined for each risk class. This horizontal tolerance will address varying floodplain delineation techniques (automated versus non-automated) and map scale limitations.	A horizontal tolerance of +/- 38 feet will be used to determine the compliance with the vertical tolerances defined for each risk class, in order to address varying floodplain delineation techniques.
215	Letter of Map Change (LOMC)	Effective immediately	<p>Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except:</p> <ul style="list-style-type: none"> • Because Conditional LOMCs are based on proposed construction, as-built information is not required. • The Conditional Comment Documents that are issued by FEMA do not amend the effective FHBM or FIRM. • Conditional LOMRs and CLOMR-Fs must demonstrate compliance with the Endangered Species Act. 	<p>Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except:</p> <ul style="list-style-type: none"> • Because Conditional LOMCs are based on proposed construction, as-built information is not required. • The Conditional Comment Documents that are issued by FEMA do not amend or revise the effective FHBM or FIRM. • Conditional LOMRs and CLOMR-Fs must demonstrate compliance with the Endangered Species Act.
217	Letter of Map Change (LOMC)	Effective immediately	If all information is not received within 90-days from the date of the request for additional data, the processing of the LOMC shall be suspended.	If all information is not received within 90 days from the date of the request for additional data, the processing of the LOMC shall be suspended.

SID #	Primary Keyword	Implementation	Original Standard	Revised/New Standard
218	Letter of Map Change (LOMC)	Effective immediately	LOMA, CLOMA, LOMR-F, CLOMR-F, LOMR and CLOMR determinations must be issued based on the effective FIRM and FIS for a community and may not be issued based on preliminary data for a FEMA-contracted Flood Risk Project or community-initiated map revision. Except, a 1-percent water surface elevation may be calculated during an LOMA, CLOMA, LOMR-F, or CLOMR-F review using data from these sources if the effective SFHA does not have BFEs or flood depths established and the preliminary data is the best available.	LOMA, CLOMA, LOMR-F, CLOMR-F, LOMR and CLOMR determinations must be issued based on the effective FIRM and FIS for a community and may not be issued based on preliminary data for a FEMA-contracted Flood Risk Project or community-initiated map revision. However, if the effective SFHA does not have BFEs or flood depths established and the preliminary data is the best available, a one-percent-annual chance flood hazard water surface elevation may be calculated during LOMA, CLOMA, LOMR-F, or CLOMR-F reviews using data from these sources.
220	Letter of Map Change (LOMC)	Existing standard. Already implemented.	The reviews of LOMC requests shall be processed in accordance with Parts 65, 67, 70, and 72 of the NFIP regulations.	The reviews of LOMC requests shall be processed in accordance with 44 C.F.R. § 65, 67, 70, and 72.
226	Letter of Map Change (LOMC)	Effective immediately	LOMC requests involving below-grade crawlspaces constructed within the SFHA shall follow guidance provided in FEMA Technical Bulletin 11-01.	LOMC requests involving below-grade crawlspaces constructed within the SFHA shall follow guidance provided in FEMA Technical Bulletin 11.
367	FIRM Database	Existing standard. Already implemented.	In the FIRM Database, all final revised FIRM panels shall get new FIRM panel Map Number suffixes and effective dates in the S_FIRM_Pan feature class.	All final revised FIRM panels in the FIRM database, both printed and non-printed, shall get new FIRM panel Map Number suffixes and effective dates in the S_FIRM_Pan feature class.
630	Map Format and Layout	For all studies funded in FY20 and beyond.	New proposed standard.	All preliminary and final FIRM panels, including FIRM attachments submitted with MT-2s, must be developed using the FEMA FIRM panel creation tool.

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631	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	The Budget Matrix Tool will serve as the standard financial management system for Risk MAP studies.
632	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	Program Offices will prepare their spend with plans and confirm they do not exceed budget targets, contravene Congressional intent, and are in accordance with applicable laws, policies and regulations.
633	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	FEMA Regional Offices must annually update the P4 tool based on Risk Map projected planning guidance, financial targets list in the Budget Matrix tool, and the FY Risk MAP Regional Allocations and Performance Metrics Memo.
634	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	FEMA Regional Offices must align the MIP to reflect the all Risk MAP projects and services reported in the P4 tool.
635	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	The Regional financial allocation amounts must align between the P4 tool, MIP and Budget Matrix tool.
636	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	Integrated Financial Management Information System (IFMIS) must be the system of record for obligation expenditures and balances.

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637	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	The Budget Matrix tool must comprise the Risk MAP master spend plan report.
638	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	Earned Value reporting in the MIP must be updated monthly, and account for active and on-hold projects.
639	Financial Management	For all studies funded in FY20 and beyond.	New proposed standard.	Monthly provider and partner invoices must match information in the MIP and Integrated Financial Management Information System (IFMIS).

How to Submit Comments to FEMA

You may provide comments via email at: FEMA.GS@riskmapcds.com. Comments received prior to August 15th, 2019, will be reviewed and addressed as appropriate before the standards are finalized.