

**Comment Received From:**

Gus Patell - Comment 2 (FEMA-2022-0012-0002)

Caroline Schnell - Comment 3 (FEMA-2022-0012-0003)

Pam Weishuhn CFM, Tom Green County - Comment 4 (FEMA-2022-0012-0004)

Pam Weishuhn CFM, Tom Green County - Comment 4 (FEMA-2022-0012-0004)

Costello, Inc. - Comment 5 (FEMA-2022-0012-0005)

State Farm Agent - Comment 6 (FEMA-2022-0012-0006)

City of Benton - Comment 7 (FEMA-2022-0012-0007)

Anonymous - Comment 8 (FEMA-2022-0012-0008)

City of Manville - Comment 9 (FEMA-2022-0012-0009)

City of Manville - Comment 9 (FEMA-2022-0012-0009)

Leon County - Comment 10 (FEMA-2022-0012-0010)

Randy Noel - Comment 11 (FEMA-2022-0012-0011)

City of North Port Stormwater Manager CRS Coordinator - Comment 12  
(FEMA-2022-0012-0012)

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City of North Port Stormwater Manager CRS Coordinator - Comment 12  
(FEMA-2022-0012-0012)

City of Longmont - Comment 13 (FEMA-2022-0012-0013)

Wendy Lathrop - Comment 14 (FEMA-2022-0012-0014)

Scott Fraser - Comment 15 (FEMA-2022-0012-0015)

Riverside County - Comment 16 (FEMA-2022-0012-0016)

Association of State Floodplain Managers - Comment 17 (FEMA-2022-0012-0017)

Association of State Floodplain Managers - Comment 17 (FEMA-2022-0012-0017)

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Rebecca Quinn - Comment 18 (FEMA-2022-0012-0018)

**Document/Section:**

N/A

Elevation Certificate/Section D

Elevation Certificate/Section C

Floodproofing Certificate

Elevation Certificate/Section H

Elevation Certificate and Floodproofing Certificate

Elevation Certificate and Floodproofing Certificate

N/A

Elevation Certificate/Section C

Elevation Certificate/Section E

Elevation Certificate/Sections H and I

N/A

Elevation Certificate/Section A

Elevation Certificate/Section B

Elevation Certificate/Section A

Elevation Certificate/Section B

Elevation Certificate/Section C

Elevation Certificate/Section B

N/A

Elevation Certificate/Section A

EC Section B

Elevation Certificate/Section C

Elevation Certificate/Section D

Elevation Certificate/Section F

Elevation Certificate/Building Diagrams

Elevation Certificate/Instructions

Elevation Certificate/Section A

Elevation Certificate/Section C

Elevation Certificate/Section D

Elevation Certificate/Section E

Elevation Certificate/Section G

Elevation Certificate/Instructions Section A

Elevation Certificate/Instructions Section B

Floodproofing Certificate - Overall

Floodproofing Certificate/Purpose

Floodproofing Certificate/Property/Information

Floodproofing Certificate/Required Documentation

Floodproofing Certificate/Required Documentation

Floodproofing Certificate/Required Documentation

Floodproofing Certificate/Required Documentation

Floodproofing Certificate?Instructions - Property Information

Elevation Certificate/Title Area

Elevation Certificate/Pages 3-8 of 19

Elevation Certificate/Section D/Section F

Elevation Certificate/ Section E

Elevation Certificate/Section E

Elevation Certificate/Section H

Elevation Certificate/Section I

Elevation Certificate/Instructions

Elevation Certificate/Privacy Act Statement and throughout

Elevation Certificate/Purpose

Elevation Certificate Form/Section A

Elevation Certificate Form/Section B

Elevation Certificate Form/Section E

Elevation Certificate/Form Section G

Elevation Certificate/Instructions

Elevation Certificate/Instructions Section A

Elevation Certificate/Instructions Section B

Elevation Certificate/Instructions Section C

Elevation Certificate/Instructions Section E

Elevation Certificate/Instructions Section F

Elevation Certificate/Instructions Section G

Elevation Certificate/Instructions Section H

Elevation Certificate/Instructions Section I

Elevation Certificate/Instructions Building Diagrams

Elevation Certificate - general comment

Elevation Certificate - general comment

Elevation Certificate/Section A

Elevation Certificate/Section C and Section G

Elevation Certificate/Required Documentation

Floodproofing Certificate - general comment

Floodproofing Certificate - general comment

Floodproofing Certificate/Sections II and III

Floodproofing Certificate/Sections II and III

Floodproofing Certificate/Required Documentation

Floodproofing Certificate/Required Documentation

Current Language:	Comment/Question:
N/A	I support sticking with the Mariana Trench National Marine Monument, but No to the proposal to add a Sanctuary to the MTNMM.
N/A	<p>It would be beneficial to use a larger comment box in Section D for surveyors to provide additional information that is not able to be included in the current form fields.</p> <p>The Elevation Certificate does not clearly indicate to surveyors that the lowest adjacent grade elevation should be based on natural grade and not on fill, and there is no diagram for this type of development.</p>
N/A	<p>The current floodproofing certificate is useless for certain buildings since it is not feasible to build a non-residential structure completely water tight below the BFE and have entry to the structure.</p> <p>Is the intent of the elevation requirements to get a mitigation discount for elevation of machinery and equipment above the first floor to make all single-story homes with contents coverage ineligible for the discount?</p> <p>The drafts look very good. Very clear on what's needed. Thanks.</p> <p>The edits are appropriate and allow for more applicable and useful documentation to be completed and satisfy the multitude of interests involved</p>
N/A	<p>Whom ever changed the flood rating in the greater New Orleans area needs to pay these premium increases.</p> <p>If there is any way to move C1 to the first page, that would make it so much easier to reference and file the 3 ECs required for new construction. Also add an "Existing Construction" category.</p> <p>For E1, can you just remove "below" the HAG? Instead, it could say "above the Natural HAG." If for some bizarre reason the elevation were "below" the Natural HAG, they could just use a negative number.</p>

Section H and Section I should be revised to include the same references to ownership, representatives, and floodplain management official

Multiple comments about providing discounted amounts for mitigation, approving additional flood mitigation, rating in jurisdictions with flood control structures, and delaying the new rating methodology.

The current EC form has the requirement to select the vertical datum in three different locations. This should be consolidated into one. At a minimum, the two vertical datum requirements under C2 can be consolidated into one.

Suggest standardizing the language for B8 to require flood zone, or flood zones for the entire property rather than where the structure is located

Box A3 - Many surveyors forget to enter the Tax Parcel ID because the box is lumped with other lot, block legal descriptions. Tax Parcel ID is very useful for municipalities to track the building EC.

Suggest autopopulating certain fields related to the community and FIRM

In the digital EC, if the elevation for C2f LAG is higher than C2g HAG, then an error message should appear.

Please include the watercourse name on the new EC. Some communities have multiple watercourses and the newest versions of the EC don't include a spot for the watercourse name anymore.

As a general comment, in the wake of Risk Rating 2.0, FEMA needs to rename the FIRM and the FIS report (an action long overdue due to use of these documents beyond insurance).

N/A

- Revise A5 to indicate source of Latitude and Longitude
- Revise A6 to remove the words “if the Certificate is being used to obtain flood insurance”
- Revise A8 and A9 first line to report number of crawlspaces/enclosures, so “0” (zero) could be entered
- Revise A8d and A9d to add space to identify “unique design” or “manufactured” and to report “rated opening” (instead of physical opening)
- Revise instructions for A8 and A9 regarding certification for manufactured engineered openings and refer to ICC-ES site (remove “if you have it”)

Revise B1 to allow comment in instances where communities have changed governmental form (such as from Town to Township), or have merged but are not yet mapped as such, or have gained or lost mapped areas due to annexations.

- Add ability to indicate if information in B8 and B9 is based on a LOMC and to report applicable LOMC(s), including date, Case Number, type of LOMC. Related to this but outside of this particular comment request by the agency, FEMA should go back to reporting new BFE for sites on approved LOMCs, not just those that have been denied.

- Add boxes to B10 to indicate LOMC, Transect, and FIS Stillwater data table

- Add a line to Section B to indicate if the site is subject to Limit of Moderate Wave Action. Related to this but outside of this particular comment request by the agency, FEMA should make a distinction in zone labels for AE zones that are subject to coastal wave action (could be AEC or AC or other distinct zone identification).

Revise C2 to say “control utilized” instead of “benchmark utilized”

- Revise C2 to provide space to identify datum conversion (to be used only when applicable)
- Revise C2a-c to accommodate multiple levels below the main floor, or multi-level enclosures, or mid-level floors, with space to identify what the reported elevation(s) represent
- Revise instructions to address below grade window wells, basement entries, and loading docks.

Add a line to “Check here if attachments” to read “This form is void without the referenced attachments”. Add language to instructions to require identification in Section D of what those attachments are

Add a line to “Check here if attachments” to read “This form is void without the referenced attachments”. Add language to instructions to require identification in Section F of what those attachments are.

Make referenced dimensions defining a crawlspace in Diagram 9 consistent with Technical Bulletin 11.

Update Floodplain Management Bulletin 467-1 (“Elevation Certificate”) and reference it in the Elevation Certificate instructions

Overall: (1) The commenter expressed that the revisions to Lines A8.a-f and A9.a-f will help clarify several flood ventilation scenarios not easily documented in the past. Property Information: (1) Change Line A3 to clarify the data points needed. (2) Increase the field length in Line A5 for the latitude/longitude entries on the MS Word version. (3) Line A6 - making photographs a requirement for all uses of this form is a much-needed improvement. (4) Line A8 – consider adding checkboxes for adjacent or interior grade and update instructions. (5) Line A9: Consider revising to clarify that an attached garage is not under a building. (6) Lines A9 (a-f): Very helpful to breakout engineered vs. non-engineered vents and into square-inches and square-feet of coverage.

Line C2.d: Consider revising to clarify that an attached garage is not under a building.

Telephone: (underscore line missing where entry would go).

Line E3: Consider revising to clarify that an attached garage is not under a building.

Line G9.a. Suggest adding checkboxes for lowest floor and next higher floor.

Items A1-A4: Clarify data points needed by inserting the word “either” to better clarify not all these data points are necessary in this one field.

Item B8: Suggested including LOMC data.

The commenter noted that the new design closes a gap in determining if the certificate was intended for design or as-built and may be completed by different professionals. The commenter suggested that adding the Property Information and FIRM information to each Section would confirm that the design and as-built certifications are associated with the same property, though they may be completed at different times.

o The following sentence within the last paragraph appears to contain typographic errors and miswording: § *“The dry floodproofing of non-residential buildings to elevating to or above the Base Flood Elevation (, and the non-residential portions of mixed-use buildings may be permitted as an alternative BFE); however, a dry floodproofing design certification is required. This form is to be used for that certification.”* • 1st underscored words appear out of place. • 2nd underscored punctuation typographic error • 3rd underscored words are confusing, regarding how a building is permitted to an “alternative” BFE.

The line: “Property Description (Lot and Block Numbers, Tax Parcel Number, Legal Description, etc.)” leads some to believe all these data points are necessary in this one field. Recommend revising to include the word “or” as follows: “Property Description (Lot and Block Numbers, or Tax Parcel Number, Legal Description, etc.):” (2) Recommend numbering the lines for easier reference.

Section 1, Line b: Recommend include “backflow (non-return) valves or shutoff valves” as these can often be the most difficult-to-locate components upon non-residential sites with many other utility connections. Section 1, Line c: Recommend deleting the section requiring additional photographs of openings without flood barriers installed.

Section 2, Line h: Recommend deleting this line: “Repair procedures and component maintenance procedures that may be necessary during a flooding event”; and adding new line “Flood barriers labeled to identify opening they protect and order of component installation.” and adding examples.

Section 3, Lines d and e: Recommend deleting line “e” as these lines appear to include the same items.

Section 4: Recommend deleting the Building Owner acknowledgment. Such an acknowledgement might be better suited to the policy documentation which would usually reflect the most current associations with a building.

Property Information: Recommend revising the instruction to include the word “or” before the Tax Parcel Number to better clarify not all these datapoints are necessary in this one field.

Page 2 of 19: Include verbiage in the title area to indicate that only Section C or Section E (not both) needs to be filled out to gain FEMA and community compliance.

Reincorporate the “IMPORTANT: In these spaces, copy the corresponding information from Section A.” verbiage that was in the previous edition to appear on each page of the form.

Section D/Section F - Underline is missing under the telephone section.

Item E1.b: This section should read "below the LAG" instead of "below the HAG"

Clarify whether or not Section E is intended to allow individuals to gain regulatory compliance without the use of surveyed elevations.

Clarify the use of Section H. Is H to be used as a replacement to Section C when the property owner cannot hire an engineer to certify elevations for insurance purposes? Can Section H be filled out to get approval for insurance purposes after an EC for the same structure has already been completed using Section C or Section E?

Please include a sentence that states "If Section H is filled out by local official, please complete Section G instead" to clarify that Section G must be filled in, in lieu of I if a government official fills out the measurements in Section H.

Add a verbiage to Page 1 of the instruction stating: "Note that an EC does not have to have both Sections C and E filled out for compliance, but instead only one of those two."

Change references from LOMC to LOMA or LOMR-F

Remove the LOMC definition, remove the word “insurance” from description of flood zones, reorder the zones throughout, and add Zone AO. Specify throughout that surveyor must be a land surveyor; add “as authorized by state law”.

Item A9.c Remove” (if applicable)” after Engineered flood openings

Add new Item B13 with Yes/No checkboxes and accompanying instructions. “Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)?”

(1) Add an asterisk both after Construction Drawings and Building Under Construction, and add new line under Building Measurements “\*A new Elevation Certificate will be required when construction of the building is complete.” (2) Item E1.b: Correct HAG to LAG.

Add periods between numbers and letters and at the end for Items G9a, G9b, G10a, and G10b.

In second paragraph, remove “state” in reference to authorization of community officials, as the “state” qualifier is not applicable.

(1) Item A5: Correct the latitude/longitude conversions. (2) Item A6: In line 3, remove period between A and 7. (3) Item A7: Delete “of these instructions” in line 1. (4) Item A8.b: Remove “Yes”; change “if the openings are not” to “none of the openings are”; change reference to Item A8.d to A8.c-f. (5) Item A8.c: Remove “If A8.b is Yes” and change location of the word “permanent.” (6) Item A8.d: Change “estimated” to “measured” net open area. Revise reference to comments to direct users to use “the Comments area of the appropriate section” because a surveyor, a local floodplain management official, or a property owner can complete Sections A and B. (7) Item A8.e: Second sentence, add “for a specific building” after Certification, and “of the appropriate section” after Comments. Update reference in last line from A8.c to A8.d. (8) Items A9.a - A9.e: Make corresponding changes suggested above for Items A8.a - A8.e. For A9.e, add the manufacturer’s name. (9) Item A9.f: Add “net” in front of “open area.”

(1) Third paragraph: Change six-digit “number” to six-digit “Community Identification Number.” (2) Item B1.a-b. Add new second sentence: “For an unincorporated area of a county, enter the county name and “unincorporated area”, and the six-digit number of the county.” (3) Item B2. Delete “and unincorporated area.” (4) Item B9: Update to clarify zones with base flood depths instead of base flood elevations. (5) Item B10: Should be an entirely separate paragraph beginning on a new line. (6) (new) Item B.13. Indicate whether the building is located seaward of the Limit of Moderate Wave Action (LiMWA). If the LiMWA is not shown on the FIRM, check the “No” box. Information about the LiMWA and other coastal flood zones may be obtained on the FEMA website at [www.fema.gov/flood-maps/coastal/insurance-rate-maps](http://www.fema.gov/flood-maps/coastal/insurance-rate-maps).

(1) C2.c Remove “Building Diagrams 5 and 6” because this elevation is required for all buildings in V and coastal zones. (2) Item C2.e. Second line, change “machinery” to “M&E.” Last sentence, delete “on top of the roof.” (3) Item C2.f. Use acronym for lowest adjacent grade. (4) Item C2.g. The text contradicts the requirements, as “natural” in C2.g only applies to Zone AO, for LOMA/LOMR-F purposes. (5) Item C2.h. Update for consistency with C2.f-g. (6) Update caption for figure to remove Building Diagrams 5 and 6.

(1) Add “or AR/AO” after Zone A in first line of first paragraph. (2) Line 3: Replace LOMC with: LOMA, CLOMA, LOMR-F, or CLOMR-F. (3) Items E1.a and b.: Line 3, add “natural” in front of LAG; change depth number to “base flood depth”; delete last sentence “Buildings in Zone A (without BFE) may qualify for a lower insurance rate if an engineered BFE is developed at the site” as this statement no longer applies under the new rating methodology.

The commenter made several minor edits for consistency.

(1) Delete “state” in front of “law” because the state qualifier is not applicable. (2) Revise format of Items G1-G4 to be consistent with other instructions. (3) G1. Add “land” in front of “surveyor in first sentence. (4) G2.a. Remove “FEMA issued or community”. (5) G9.b Remove “Building Diagrams 5 and 6” because this elevation is required for all buildings in V and coastal zones. (6) G10.b: Delete “if higher than the BFE”.

(1) First paragraph: delete last sentence “A local floodplain management official who completes Section H may certify in Section G instead.” (2) Items H1a and H1.b. For consistency, in the parenthesis delete “applicable diagram” and replace with “selected Building Diagram, Item A7”. (3) Item H2: Move the placement of the M&E to improve readability. (4) Foundation Type Diagrams for Use in Section H: Correct the introductory paragraph to reference eleven Building Diagrams instead of nine. Also move the Foundation Type Diagrams to the next page to increase their size.

Update to clarify who can certify Section H and where to certify on the form.

In the second paragraph, change the reference from “drawing” to “figure” for consistency.

This version of the form represents significant progress by improving the Elevation Certificate as a compliance tool.

Remove the date from the FEMA form number. This is problematic for those communities that explicitly require use of the FEMA certificate because citing the form number in their regulations will lock them into a specific version of the form and thus would require those communities to amend their regulations every time FEMA updates the form.

In A8.d, .e., and f – and A9.d. e., and f – modify so there aren't mixed units (both square inches and square feet) which is complicated when the summation of both nonengineered and engineered is needed. Alternatively, eliminate Item A8.f and A9.f so there is no need to combine the measurements.

In Items C.2.c and G9.b, clarify the intent of the phrase “regulated areas.”

Photographs. One benefit of having photos of all sides and aspects of the building is to document as-built conditions. If any unpermitted construction or alterations occur, having a full set of photographs documenting the as-built conditions will be beneficial for the community.

Distinguishing Design from As-Built. This version of the form represents significant progress by recognizing and clearly distinguishing the certification of design from certification of the “as-built” condition.

Remove the date from the FEMA Form Number.

Commented on the need for surveyed elevations of machinery and equipment whether inside or outside of the building.

Questioned the rationale for the elevation of the lowest protected floor to be surveyed to a tenth of a foot.

Recognized the benefit of requiring more photographs.

Suggested having a section for the building owner to acknowledge the Emergency Operations Plan and the Inspection and Maintenance Plans.

**Recommendation:****Adjudication**

n/a

Not germane.

Provide a larger comment box in Section D This field will be made expandable to fit the entry, within reason. Users can also provide attachments with additional information/comments.

N/A

Partially accepted.

Provide a certificate for Wet Floodproofing. Not germane.

Yes, as these buildings would not be eligible for the M&E discount as the flood risk is higher on the first floor of a single-story building.

N/A

N/A

N/A

N/A

Not germane.

Move C1 to the first page and add Existing Construction checkbox. No changes.--will keep C1 as is. There are other ways of determining whether finished construction is new construction.

Change "below" the HAG to "above the natural HAG."

No change.

Partially accepted.

Not germane.

Consolidate the vertical datum requirements into a single location.

All datum entries are necessary as they don't refer to the same item and cannot be consolidated.

All flood zones in which the building is located should be listed.

Suggest a separate box for Tax Parcel ID to focus attention that this is required data. Partially accepted.

Consideration for future iteration

Consideration for future iteration

No change. The name of the water source is not necessary; the flooding may result from multiple different sources.

Not germane.

The commenter may have been viewing a previous version of the form; the suggestions for changes no longer apply and are already addressed in the proposed form.

The commenter may have been viewing a previous version of the form; most suggested changes no longer apply or are already addressed in the proposed form. Added LimWa.

No changes; already addressed.

Partially accepted. Added language to instructions to identify attachments.

Partially accepted. Added language to instructions to identify attachments.

No change. The language in TB11 may be different, but the meaning is essentially the same in practice.

The document Floodplain Management Bulletin 467-1 will remain referenced under Purpose for the Elevation Certificate; updates are being considered for the future.

Partially accepted.

No change.

The form provides a fillable field for the telephone number.

No changes.

No change. FEMA will keep the numbering as is, as the next higher floor measurement is not needed.

Partially accepted.

Partially accepted.

Accepted

Partially accepted.

Partially accepted.

Partially accepted.

Accepted

No changes.

Partially accepted.

The first page of the Instructions  
already provides detailed  
information on who can or should  
complete which sections of the EC.

Accepted

The line display may vary based on  
the version of the viewing software.  
However this is a fillable field, so  
the underline is not needed  
Accepted

Please see Instructions for clarifications on the use of Section E for compliance. The intent of Section E is not changing; it is used for compliance for Zones AO and A only, and Section C is used for compliance for other zones.

Section H was provided to give property owners an option for determining the new First Floor Height rating element without a licensed surveyor. The surveyed elevations in Section C take precedence. FEMA will add “(SURVEY NOT REQUIRED)” to the Section H heading for additional clarification.

FEMA will add the following Note after the first paragraph in Section I on the form and as a note at the end of the Section I instructions: “Note: If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.”

Accepted. Added a note to the general instructions clarifying compliance information.

Partially accepted. FEMA is revising the first reference to LOMC to reflect Letter of Map Amendment (LOMA), Conditional LOMA (CLOMA), Letter of Map Revision Based on Fill (LOMR-F), or Conditional LOMR-F (CLOMR-F). Hereafter, FEMA will replace all references to LOMC with these acronyms: LOMA, CLOMA, LOMR-F, or CLOMR-F.

Partially accepted; will maintain  
order of the zones.

Accepted

Accepted

Accepted

Accepted

Accepted

Accepted

Accepted

Partially accepted

Accepted

Accepted

Accepted

Accepted

Accepted

Accepted

N/A

FEMA will keep the format of the form number with the date, as this is the new standard for all FEMA forms.

FEMA will keep the instructions provided as the most effective solution, and the items will remain as currently proposed.

Accepted. FEMA updated the instructions for C2.c and G9.b to clarify the information needed.

N/A

N/A

FEMA will keep the format of the form number with the date, as this is the new standard for all FEMA forms.

FEMA is removing B. Elevation of machinery and equipment from Sections II and III of the form as these elevations are not needed.

FEMA is removing C. Elevation of the lowest protected floor from Sections II and III of the form as these elevations are not needed.

N/A

The instructions already require that the plans be submitted with the certificate, and Part 4 of the Required Documentation addresses the building owner acknowledgment.

