



# Federal Emergency Management Agency

Washington, D.C. 20472

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MEMORANDUM FOR: Mary Jean Pajak, Project Officer  
Eastern Studies Team

Mike Grimm, Project Officer  
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**[Original Signed]**

FROM: Matthew B. Miller, Chief  
Hazards Study Branch

SUBJECT: TEC Procedures Memorandum No. 2 – Revalidation of Letters of  
Map Change (LOMCs)

**Background:** When a preliminary Study, Restudy, LMMP, or PMR is issued, a Summary of Map Actions (SOMA) is prepared to make communities aware of the effect the revised FIRM panels will have on previously issued LOMCs. The SOMA sorts the LOMCs into the following three categories:

- Category 1** includes those LOMAs, LOMRs, and LOMR-Fs whose results have been shown on the revised FIRM panel(s).
- Category 2** includes those LOMCs whose results could not be mapped and shown on the revised FIRM panel(s) because of map scale limitations or because the affected areas were determined to be outside the SFHA as shown on the effective FIRM. These LOMCs are automatically revalidated after the revised FIRM panel(s) become(s) effective by the LOMC-Valid letter.
- Category 3** includes those LOMCs whose results have not been, and will not be, reflected on the revised FIRM panel(s) because the flood hazard data on which the determinations are based are being superseded by new detailed flood hazard data.

When the current procedures for preparing SOMAs and revalidating LOMCs were developed, the TECs were directed to supersede LOMCs that are located along newly studied or restudied flooding sources. This decision was made because of the expense involved in reviewing case files to locate elevation data and due to the difficulty in obtaining case files from the Regional Offices.

**Issue:** During recent TEC Policy meetings we have discussed changing our policy to include the review of LOMCs affected by new detailed flood hazard data.

**Final Procedure:** Effective immediately, please direct the TECs to review LOMCs affected by new detailed flood hazard data to determine if they can be automatically revalidated by the LOMC-Valid letter. In addition, as discussed during the TEC policy meetings, the SOMAs should be revised to include standardized notes indicating why each LOMC in Category 3 of the SOMA has been superseded. Furthermore, I would like the TECs to automatically issue new determination letters for multiple structures or lots which cannot be revalidated by the LOMC-Valid letter because the determinations given for the individual structures or lots in the original LOMC have changed.

cc: FEMA Regional Offices I-X, Mitigation Division Directors  
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