



# Federal Emergency Management Agency

Washington, D.C. 20472

July 9, 1999

MEMORANDUM FOR: Doug Bellomo, Acting Project Officer  
Eastern Studies Team

Mike Grimm, Project Officer  
Western Studies Team

**[Original Signed]**

FROM: Mathew B. Miller, Chief  
Hazards Study Branch

SUBJECT: Procedure Memorandum No. 6  
As-Built and Topographic Data Certification

**Background:** When submitting a map revision request based on physical changes for which a conditional Letter of Map Revision (LOMR) was previously issued, the revision requester is required to submit certified as-built plans or certification that the project was built as proposed as part of the supporting data. Subparagraph 65.2(b) states that "certification of as-built conditions is a statement that the structure(s) has been built according to the plans being certified, is in place, and is fully functional." **For Reference Only.**

**Issue:** At least one instance has occurred where a LOMR follow up to a previously issued conditional LOMR was processed and no as-built plans were submitted or available. All that could be provided was a vaguely worded letter from the community certifying the project. Subsequently, under an appeal to the follow up LOMR, concerns were raised by the appellant regarding the as-built plans and certification used to prepare the LOMR. The basis of the appeal was that the project was not built as proposed and the LOMR did not reflect existing conditions.

**Final Procedure:** All map revisions based on completed projects must be accompanied by as-built plans certified by a registered professional engineer or licensed land surveyor. In lieu of as-built plans, a registered professional engineer or licensed land surveyor may submit a written statement specifically stating that the project was built as proposed. If it is unclear that the certification also applies to the topographic data, follow up written confirmation/certification is necessary. Any cases deviating from the above must be brought up to the FEMA project engineer for approval.

cc: see distribution list

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