Chapter 5
Map Amendments

5.1 Background

The accuracy of the flood zone boundary delineations shown on the National Flood Insurance Program (NFIP) maps depends, in part, on the scales at which the maps are prepared and by the accuracy of available topographic data. Map users may find it difficult to determine whether a specific structure or parcel of land is within the Special Flood Hazard Area (SFHA). Also, small areas of high ground may be included in the SFHA) because they are too small to be shown as elevated on the best available topographic data. When this happens, structures or parcels of land may be inadvertently included in the SFHA when the NFIP map is prepared. The SFHA is the area delineated on an NFIP map—Flood Hazard Boundary Map (FHBM), Flood Insurance Rate Map (FIRM), or Digital Flood Insurance Rate Map (DFIRM)—as being subject to inundation by the base (1-percent-annual-chance) flood.

Because the requirement for the purchase of flood insurance and the Federal and local regulations governing construction in the SFHA are important to persons who own or plan to build structures, FEMA has developed the map amendment process. Under this process, property owners may request that FEMA determine whether specific structures or legally described parcels of land are in the SFHA and, if appropriate, issue a Letter of Map Amendment (LOMA) determination in accordance with Part 70 of the NFIP regulations.

The standard process for LOMAs has been in place for more than 30 years. More recently, however, FEMA created a Web-based application within the FEMA Mapping Information Platform (MIP) that can be used by Licensed Professionals to submit simple LOMA requests to FEMA. Information on this application is provided in the section titled "Electronic Letters of Map Amendment," which appears at the end of this chapter.

FEMA does not issue LOMAs for structures/lots in alluvial fan flood hazard areas (areas labeled as Zone AO, with both base flood depths and velocities shown in feet per second on the effective NFIP map). FEMA also does not issue LOMAs for structures/lots in coastal high hazard areas (areas labeled as Zones V, VE, or V1-30 on the effective NFIP map) that are located seaward of the landward toe of the primary frontal dune.

Additional information regarding the processing of standard and electronic LOMAs is provided in Volume 2 of FEMA's *Guidelines and Specifications for Flood Hazard Mapping Partners* and in Section 3 of FEMA's *Document Control Procedures Manual*. Both documents are posted in the FEMA Library (http://www.fema.gov/library/index.jsp) and are accessible through the "Guidance Documents and Other Published Resources" page on the FEMA Website (http://www.fema.gov/plan/prevent/fhm/frm_docs.shtm).

5.2 Application Forms for Standard Letters of Map Amendment

FEMA developed the MT-EZ and MT-1 application forms and instructions for the submittal of standard LOMA requests. These forms and instructions, accessible through the links below, are discussed in more detail later in this chapter.

- MT-EZ http://www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm
- MT-1 http://www.fema.gov/plan/prevent/fhm/dl_mt-1.shtm

The MT-EZ and MT-1 forms provide step-by-step instructions for requesters to follow and are comprehensive, ensuring that the requesters' submissions are complete and more logically structured. This allows FEMA staff to complete their review quicker and at lower cost to the NFIP. While completing the forms may seem burdensome, experience has shown that the advantages to the requesters outweigh any inconvenience.

The MT-EZ form is not to be used for LOMA requests submitted by developers, for requests involving multiple structures or lots, for structures or lots in alluvial fan areas or coastal high hazard areas, for requests involving the placement of fill, or for requests for conditional determinations (i.e., Conditional Letters of Map Amendment [CLOMAs], Conditional Letters of Map Revision Based on Fill [CLOMR-Fs]). Thus, only individual property owners are to use the MT-EZ form, and then only for a standard LOMA request involving a single structure or single lot.

The MT-1 forms are to be used for multiple-structure/multiple-lot LOMA requests, as discussed later in this chapter; requests involving the placement of fill (see Chapter 4 of this *Guide*); and CLOMA and CLOMR-F requests (see Chapter 6 of this *Guide*).

For additional assistance in completing the MT-EZ and MT-1 forms, LOMA requesters should consult the LOMA tutorial, which is accessible through the following page on the FEMA Website: http://www.fema.gov/plan/prevent/fhm/ot_lmreq.shtm.

5.3 North American Vertical Datum of 1988

Since the National Geodetic Survey determined that the national vertical control network needed to be readjusted, FEMA has been gradually converting NFIP maps from the National Geodetic Vertical Datum of 1929 (NGVD29) to the North American Vertical Datum of 1988 (NAVD88) in the contiguous United States. Therefore, when submitting a LOMA request, requesters should use the reference datum shown on the applicable, effective FIRM/DFIRM panel.

For more information on the conversion from NGVD29 to NAVD88, requesters should refer to FIA-20, *Converting the National Flood Insurance Program to the North American Vertical Datum of 1988, Guidelines for Community Officials, Engineers, and Surveyors*, and to Appendix B, "Guidance for Converting to the North American Vertical Datum of

1988," of FEMA's *Guidelines and Specifications for Flood Hazard Mapping Partners*. These guidance documents are available from the FEMA Library (http://www.fema.gov/library/index.jsp). Information on how to obtain copies of these and other useful guidance documents is provided in Appendix B of this *Guide*.

5.4 How To Request a Standard Letter of Map Amendment

Any owner or lessee of property may request that FEMA make a determination concerning a structure or parcel of land and that, if appropriate, FEMA issue LOMA determination documents. Because such requests concern structures and parcels of land that were inadvertently included in the SFHA and do not involve recent alterations of topography or result in significant changes to the flooding information depicted on the NFIP map, they may be submitted directly to FEMA and are not subject to community review.

However, if the structure or land was also included in a regulatory floodway, removal of the structure or land from the regulatory floodway must be with community concurrence and is accomplished in accordance with the map revision procedures discussed in Chapters 4 and 7 of this *Guide*.

To request a LOMA for a single structure or legally recorded parcel of land or portion thereof, an individual property owner can complete the MT-EZ application form.

To request a LOMA for multiple structures or multiple lots, the requester should use the MT-1 application forms package. The MT-1 forms may also be used for single-structure and single-lot requests. The MT-EZ and MT-1 packages provide detailed instructions for filling out the forms. No fees are charged by FEMA for evaluating LOMA requests.

Requesters may obtain paper copies of these forms and the step-by-step instructions from the Map Specialists in the FEMA Map Assistance Center (FMAC). Requesters may contact the FMAC by telephone, toll free, at 1-877-FEMA MAP (1-877-336-2627), or send an e-mail message to a Map Specialist at FEMAMapSpecialist@riskmapcds.com. For hours of operation and to learn more about FMAC services, interested parties should visit the FMAC page on the FEMA Website: http://www.fema.gov/plan/prevent/fhm/fmc_main.shtm.

Requesters also may download Word, PDF, and TXT versions of the MT-EZ and MT-1 application forms and instructions from the FEMA Library (http://www.fema.gov/library/index.jsp). As indicated in the section titled "Application Forms for Standard Map Amendments," the forms and instructions also are accessible through the FEMA Website.

Completed application forms and supporting data and documentation for standard LOMA requests are to be submitted to:

LOMC Clearinghouse
6730 Santa Barbara Court
Elkridge, MD 21075

In accordance with Section 72.5 of the NFIP regulations, no review and

processing fee is required for single-lot, single-structure, multiple-lot, or multiple-structure LOMA requests.

5.5 Supporting Data and Documentation Required for Standard Letters of Map Amendment

Under the map amendment process, FEMA will make determinations for single or multiple structures on one or more lots and for parcels of land that can be legally described. The supporting data and documentation summarized below are to be submitted in support of a LOMA request.

- Property description documentation must be enclosed for every request and can consist of either the Plat Map or Deed (containing the recorder's stamp and recordation date) accompanied by a tax assessor's map or other suitable map showing the surveyed location of the property. Note: The recordation data (e.g., Book, Volume, Page, Reel, Document Number, Date) must appear on all documents submitted so that FEMA may use the legal description of the property in making its determination, and FEMA must be able to identify the property exactly.
- If the property is not recorded on a Plat Map, a copy of the tax assessor's map must be submitted to help FEMA located the property.
- A copy of the effective FIRM/DFIRM panel, annotated to show where the property is located, must be submitted for every request. If FEMA has produced a separate Flood Boundary and Floodway Map (FBFM) for the area in which the structure(s) or parcel(s) of land may be located, a photocopy of the FBFM panel also should be included. The panel number and effective date of the FIRM/DFIRM and FBFM must appear on the copy submitted. The original paper copy of the map panel(s) or a photocopy of the map panels must be used. A reproduction from a photocopy is unacceptable due to possible distortion.
- Elevation data must be submitted for all requests, except requests for determinations in which the effective FIRM/DFIRM already shows the property to be clearly outside the SFHA. As discussed below, the type and source of the elevation data will vary.
  a. For riverine flood hazard areas, the BFE can be established by interpolation along the Flood Profile for the flooding source that appears in the FIS report. If, for some reason, no Flood Profile exists, the BFE should be taken from the effective FIRM/DFIRM.
  b. For lacustrine flood hazard areas, the BFE can be taken from the Summary of Stillwater Elevations in the FIS report. If the flooding source is not

included in the table, the BFE should be taken from the effective FIRM/DFIRM.

c. For coastal flood hazard areas, the BFE should be taken from the effective FIRM/DFIRM and then compared with the elevation in the Summary of Stillwater Elevations table. If the stillwater elevation listed in the table is less than or equal to the whole-foot BFE shown on the map minus 0.5 foot, a wave height, wave runup, and/or wave setup component exists; therefore, the whole-foot BFE shown on the map should be used. If the stillwater elevation listed in the table is greater than the whole-foot BFE shown on the map minus 0.4 foot, the stillwater elevation shown in the table should be used as the BFE.

d. For approximate flood hazard areas (designated Zone A on the map), FEMA has not determined BFEs. If a BFE for the area has not been developed by a Federal, State, or local government agency, the requester should refer to FEMA-265, *Managing Floodplain Development in Approximate Zone A Areas: A Guide for Obtaining and Developing Base (100-Year) Flood Elevations*, accessible through the FEMA Website (http://www.fema.gov/plan/prevent/fhm/frm_docs.shtm).

e. For shallow flooding areas designated Zone AH on the map, the BFE shown on the effective FIRM/DFIRM (rounded to a whole-foot elevation) should be used unless a more precise elevation is available in the FIS report.

f. For shallow/sheet flooding areas designated Zone AO on the map, the characteristics of the area will determine the appropriate methodology, and the requester should refer to the guidance in the MT-EZ and MT-1 instructions.

g. In addition to the BFE, the elevation data required for a structure is the Lowest Adjacent Grade (LAG) to the structure (i.e., the elevation of the lowest ground touching the structure, including attached decks or garage).

h. The elevation data required for a legally defined parcel of land, or portion thereof, is the elevation of the lowest ground on the parcel or within the portion of land that is to be removed from the SFHA.

- For single-lot/single-structure requests, the elevation data may be provided in Section 5 of the MT-EZ form. For all other requests except requests for determinations in which the effective FIRM/DFIRM already shows the property to be clearly outside the SFHA, the "Elevation Form" (Form 2) from the MT-1 package must be included unless an NFIP

Elevation Certificate has been completed. The elevation data must be certified by a Licensed Land Surveyor or Registered Professional Engineer.

- If an NFIP Elevation Certificate has been completed for a structure, it may be submitted in lieu of Form 2. The Elevation Certificate also must be certified by a Licensed Land Surveyor or Registered Professional Engineer. The Elevation Certificate is available through the FEMA Library and can be accessed through http://www.fema.gov/plan/prevent/fhm/frm_form.shtm. Paper copies of the Elevation Certificate also may be acquired by contacting the Map Specialists in the FMAC.

Printed paper copies of the effective FIRM, DFIRM, and/or FBFM panel(s) and Flood Insurance Study (FIS) report materials are kept on file in the Community Map Repository of each affected community. (Digital versions may also be available in some communities.) The Community Map Repository is the community office responsible for floodplain management activities in the community. Interested citizens who are having trouble locating the Community Map Repository may call a Map Specialist in the previously referenced FMAC, toll free, at 1-877-FEMA MAP (1-877-336-2627), or send an e-mail to FEMAMapSpecialist@riskmapcds.com.

To obtain their own copy of the effective NFIP map(s) or selected panel(s) and the FIS report, LOMA requesters should contact the FEMA Map Service Center (MSC). The effective NFIP maps may be viewed online through the MSC Website: http://www.msc.fema.gov/. Effective NFIP maps, FIS reports, and related products also may be downloaded from the MSC Website. (Note: Effective October 1, 2009, the MSC distributes only digital versions of the Flood Maps and FIS reports.) A screen shot of the MSC Home Page is provided in Appendix B of this *Guide*.

Individuals who do not have Internet access or who require additional assistance also may contact the MSC staff by calling them, toll free, at 1-800-358-9616; by facsimile transmission, toll free, at 1-800-358-9620.

For many LOMA requests, map amendment requesters may also choose to create another product available from the MSC Website. This product is called a FIRMette. A FIRMette is a full-sized section of particular map panel that a user creates by selecting a desired area from the online image of that map panel. In addition to the area of interest, the FIRMette includes the map title block, north arrow, and scale bar. There is no cost for producing a FIRMette. A FIRMette tutorial is available on the MSC Website to assist first-time users.

Certifications, where referenced in the requirements for supporting data and documentation, are defined as follows:

- Certification of data is a statement that the data are accurate to the best of the certifier's knowledge.
- Certification of analyses is a statement that the analyses have been performed correctly and in

accordance with sound engineering practices.

- Certification of structural works is a statement that the works are designed in accordance with sound engineering practices to provide protection from the base flood.
- Certification of as-built conditions is a statement that a structure has been built according to the plans being certified, is in place, and is fully functional

The LOMA requester should ensure that certifications include the certifier's name, signature, registration number, and the registration date of the certifier.

5.6 Standard Letter of Map Amendment Processing Procedures

After the request has been received, FEMA will acknowledge receipt of the request by letter to the requester, usually within 10 days, but not later than 60 days. This letter will identify any basic data that the requester may have neglected to submit. If sufficient data have been provided with the request, FEMA will review the request and the supporting data. If any questions or problems arise during this review, FEMA will work with the requester to resolve them. If these required data are not provided within 90 days, FEMA will generally suspend the processing of the request

As provided for in the NFIP regulations, FEMA must complete the processing of LOMA requests within 60 days of the date that all required supporting data and documentation are received. However, FEMA generally issues determinations for LOMAs within 4 weeks of the date that all required supporting data and documentation are received. Once all necessary data and documentation, including application forms, are provided, FEMA will complete its review and issue the appropriate determination:

- Out of the SFHA as shown on the effective FEMA map. No amendment to the map is necessary.
- Out of the SFHA because the structure or parcel of land is above the BFE (inadvertent inclusion). FEMA will issue a LOMA to exclude the existing structure or the parcel of land from the SFHA.
- In the SFHA because the structure or parcel of land is below the BFE. If necessary, FEMA will issue a LOMA to include the structure in the SFHA.
- A LOMA for the structure only. This determination means that the structure has been found to be above the BFE and therefore out of the SFHA. However, the rest of the parcel of land is subject to flooding and is still in the SFHA.

Samples of the LOMA determination documents are provided in Appendix C of FEMA's *Document Control Procedures Manual*. The Manual is available for review/ download from the FEMA Library (http://www.fema.gov/library/index.jsp) and can be accessed from the following page on the FEMA Website: http://www.fema.gov/plan/prevent/fhm/gs_dcpm.shtm.

When an effective NFIP map is amended by a LOMA, the amendment is usually effective as of the date of the LOMA. Copies of LOMAs that amend an effective map are sent to the individual requester, Community Map Repository, State coordinating agency, and appropriate FEMA Regional Office.

It should be noted that, should FEMA republish the affected map panel using the results of a contracted restudy or information from the community, the LOMA will no longer be valid. If the amendment is of sufficient size to be shown on the revised map, it will be included.

However, if the map scale does not allow the amendment to be shown, the requester must request that FEMA re-issue the LOMA. The procedures that are followed in processing requests for LOMAs are presented in Figure 7-1.

5.7 Requirements for Electronic Letters of Map Amendment

Electronic Letter of Map Amendment (eLOMA) is a Web-based application within the FEMA MIP that provides Licensed Professionals, or "LPs", with a system to submit simple LOMA requests to FEMA. LPs are Licensed Land Surveyors and Registered Professional Engineers. This tool is designed to make a determination based on the information submitted by the Licensed LPs and allow them to generate a determination from FEMA in minutes.

The current release of eLOMA enables LPs to make requests for existing single residential structures or entire legally recorded parcels of land, provided that no earthen fill has been placed to raise the elevations of the subject structure or property. Almost one-half of the LOMAs processed annually meet the requirements for the use of eLOMA. Through the use of eLOMA, LPs can receive a determination in the time that it takes to enter the required information online, as opposed to the 30-60 day processing time for a standard LOMA submitted to FEMA, as discussed earlier in this section.

An eLOMA document serves the same functions as a standard LOMA. The only difference between the two is that the online determination is made automatically with standard checks instead of the lengthier manual review used in standard LOMA processing. After registering on the MIP, LPs will be able to enter property-specific information that they have certified as accurate, as well as data taken from the FIRMs, DFIRMs, and FIS reports, in order to receive an eLOMA.

For quality purposes, the eLOMA tool ensures that all required information is entered by the LP and it also selects some eLOMA applications to be audited by FEMA. When an eLOMA is selected to be audited, the LP receives instructions for submitting their application materials to FEMA. If the audit is approved, the LP receives notification that they can login and print their final determination. If the application is rejected, a LOMA is completed by FEMA using the standard MT-1 process and the LP will be audited again upon their next submittal. After a successful audit, the LP is able to generate eLOMA determinations online, but they are still subject to random audits.

Approximately 10 percent of eLOMA submittals will be selected by the MIP for audit, and all new LPs will be audited on their very first eLOMA submittal. Audit frequency will be determined by LP performance on previously audited submittals. Access can be denied to individual LPs after five consecutive audit rejections that result for any reason. The audit process is as follows:

- If an eLOMA project is selected for audit, the LP will receive a notification screen in the MIP and an automated notification e-mail from the MIP. The notification will provide instructions for submitting the supporting data to FEMA.
- When FEMA receives the supporting data and/or documentation for the eLOMA audit from the LP, FEMA will create a case file and write the Tracking Number on the label. The FEMA reviewer will add the case number and community information to the label when the final letter is added to the case file. The FEMA reviewer then places the draft eLOMA determination letter, with the Tracking Number written on it, in the case file.
- The FEMA reviewer will process the audit in the MIP within 5 business days of receiving all required supporting data and/or documentation.
- If the LP does not submit all required data and/or documentation, the FEMA reviewer will request the necessary data and/or documentation from the LP via e-mail. The FEMA reviewer will blind carbon copy the FMAC on the e-mail to the LP.
- Supporting data submitted by LPs will be kept on file by FEMA in accordance with the current archival procedures for MT-1 requests. The case file for each eLOMA audited will include all submitted supporting data and/or documentation and the final eLOMA determination letter and cover letter.
- If the audit is approved, the LP will receive an automated e-mail from the MIP stating that the audit was approved and is available for distribution.
- If the audit is rejected, the FEMA reviewer will e-mail the LP and explain the reasons why the audit had to be rejected. The LP will also receive an automated e-mail from the MIP stating that the audit was rejected.
- For rejected audits the FEMA reviewer will create a new LOMA to replace the rejected eLOMA.

Samples of the eLOMA determination documents are provided in Appendix C of FEMA's *Document Control Procedures Manual*. As mentioned earlier in this chapter, the Manual is available for review/download from the FEMA Library and accessible from the FEMA Website.

5.8 Summary of Map Actions Processing

When a revised FIRM/DFIRM panel becomes effective, all previous LOMAs for the area covered by that panel are superseded. Therefore, each time a panel is physically revised and republished, the panel must be updated to include the changes in the flood hazard information made via the issuance of a LOMA.

Frequently, the results of a LOMA cannot be shown on the revised FIRM/DFIRM panel for the following reasons:

- Map data limitations;
- Results indicated a particular property or structure was outside the SFHA as shown on the effective FIRM/DFIRM;
- Information on which the determination in the LOMA was based has been superseded by new information.

To assist a community in maintaining the FIRM/DFIRM, FEMA prepares a document called a Summary of Map Actions (SOMA), which is a summary of the LOMAs and other LOMCs that will be incorporated, revalidated, or superseded when the revised FIRM/DFIRM panels become effective. FEMA provides the SOMA to the communities at four significant stages during the processing of a study/mapping project or PMR. The SOMA informs the communities about the effect that the revised FIRM/DFIRM panels will have on previously issued LOMR-Fs.

At each of the four processing stages, the LOMR-Fs are sorted into the following categories:

- **Category 1** includes those LOMAs for which results have been shown on the revised FIRM/DFIRM panel(s).
- **Category 2** includes those LOMAs for which results could not be mapped and shown on the revised FIRM/DFIRM panel(s) because of map data limitations or because the affected areas was determined to be outside the SFHA as shown on the effective FIRM/DFIRM. These LOMAs are revalidated by a single letter after the revised FIRM/DFIRM panels become effective.
- **Category 3** includes those LOMAs for which results have not been, and will not be, reflected on the revised FIRM/DFIRM panels because the data on which the determinations in the LOMA documents were based are being superseded by new detailed data.
- **Category 4** includes those LOMAs which were previously issued for multiple lots or structures where the determination for one or more of the lots or structures has changed and cannot be revalidated through the administrative process used for Category 2 LOMAs.

For the Category 4 LOMAs, FEMA reviews the data submitted in support of the original LOMA request and issues a new determination for the subject properties after the revised FIRM/DFIRM panel becomes effective.

To learn more about the detailed procedures followed in preparing the SOMA, interested parties should refer to Subsections 1.5 and 1.11 of the FEMA *Document Control Procedures Manual* (http://www.fema.gov/plan/prevent/fhm/gs_dcpm.shtm).

5.9 Revalidation Letter Processing

As discussed in the previous section on SOMAs, LOMAs affecting particular map panels are superseded when revised versions of those map panels become effective. Therefore, approximately 4 weeks before the effective date of new FIRM/DFIRM panel(s), FEMA prepares and distributes a revalidation, or "LOMC-VALID," letter for the LOMAs and other LOMCs that would be superseded. FEMA mails the LOMC-VALID letter(s) to the community CEO(s), community FPA(s), and other community official(s) identified by the CEO.

During the processing of a revised FIS report and FIRM/DFIRM, FEMA may issue LOMA determination documents to revise the effective FIRM/DFIRM. In these determination documents, FEMA includes a notification that the affected map panel is scheduled to be republished and the determination made in the LOMA determination documents will be superseded on the date the new panel became effective.

FEMA also notifies the community and individual property owner if the LOMA will be revalidated after the effective date of the revised map panel(s).

The LOMC-VALID letter typically becomes effective 1 day after the effective date of the newly effective FIRM/DFIRM panels. The LOMC-VALID letter is considered legally binding, in the same manner as an original LOMA or other LOMC, provided a copy of the original LOMA or other LOMC accompanies the LOMC-VALID letter.

If requested, FEMA will provide a copy of the original LOMC determination documents and enclosures, if any, with the LOMC-VALID letter. FEMA will assess a review and processing fee for such requests.

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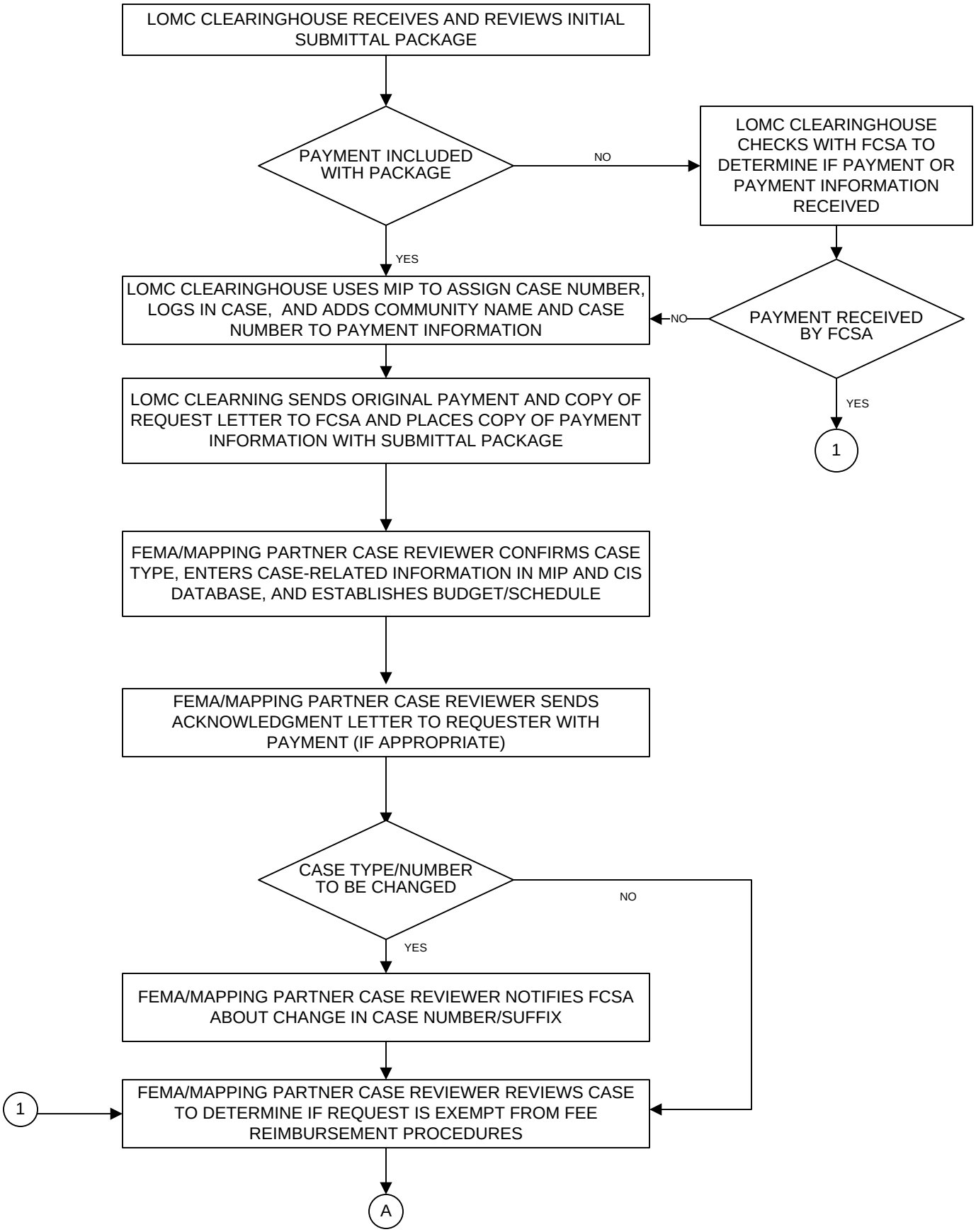

Figure 5-1. Processing Procedures for LOMAs

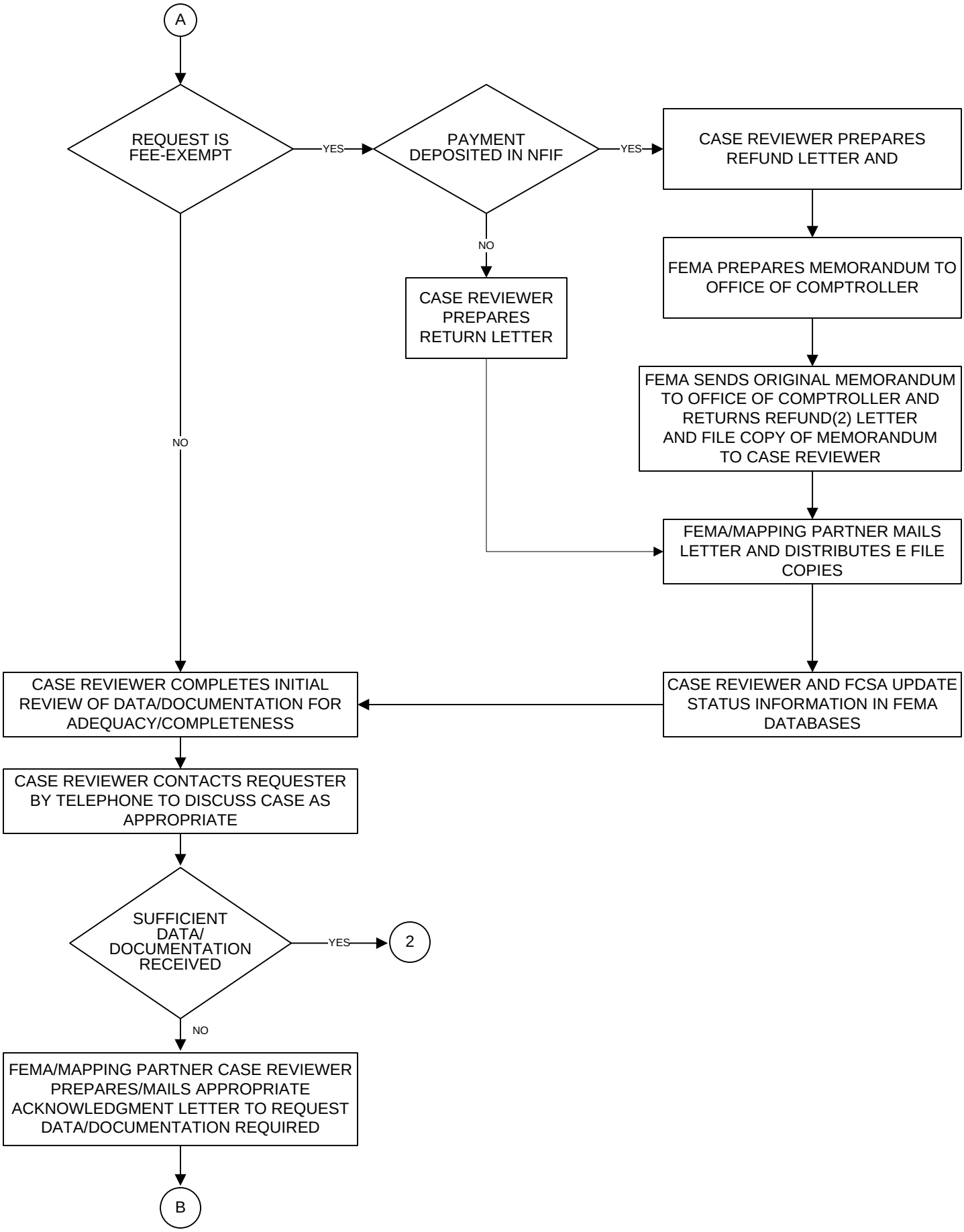

Figure 5-1. Processing Procedures for LOMAs (Cont'd)

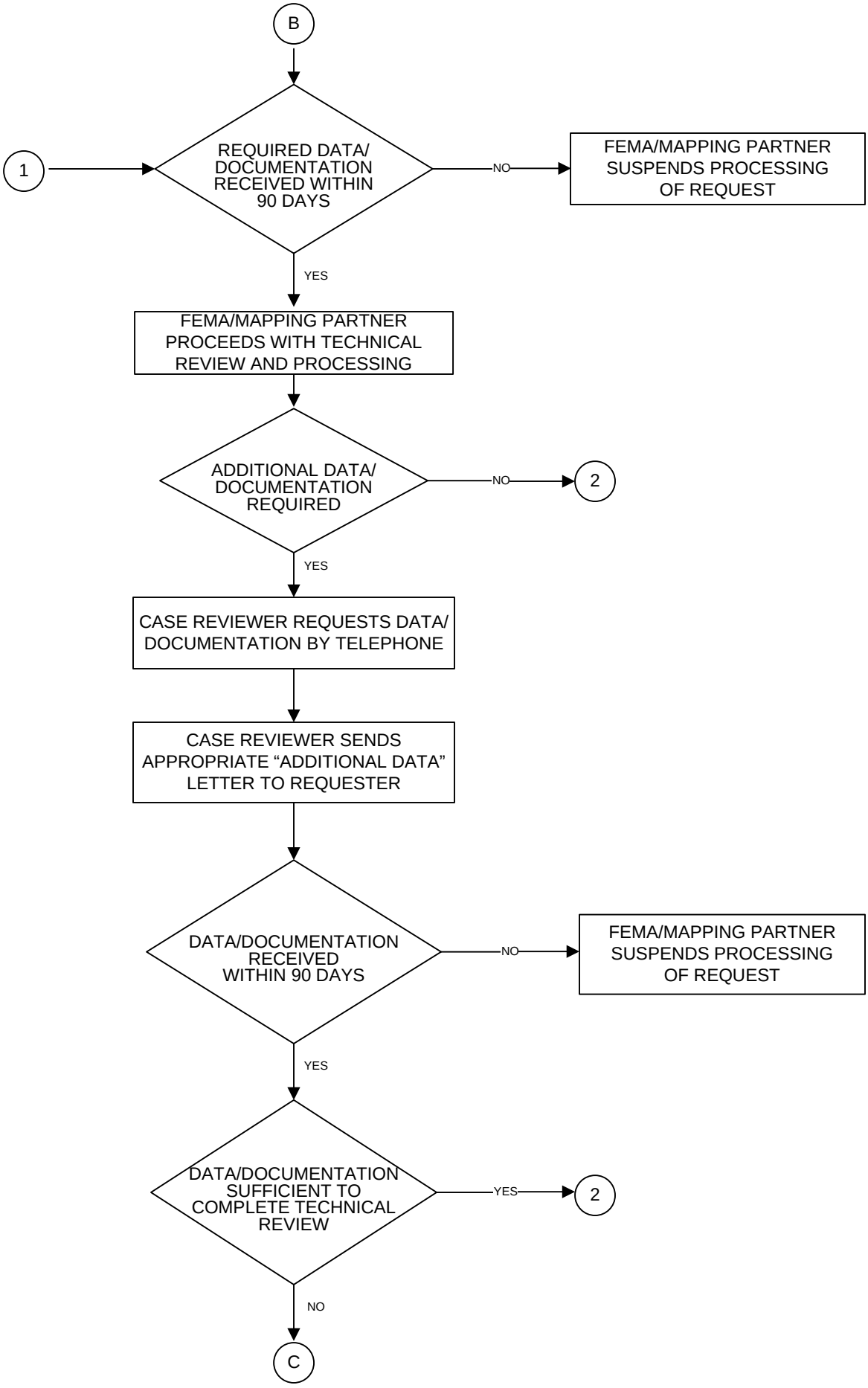

Figure 5-1. Processing Procedures for LOMAs (Cont'd)

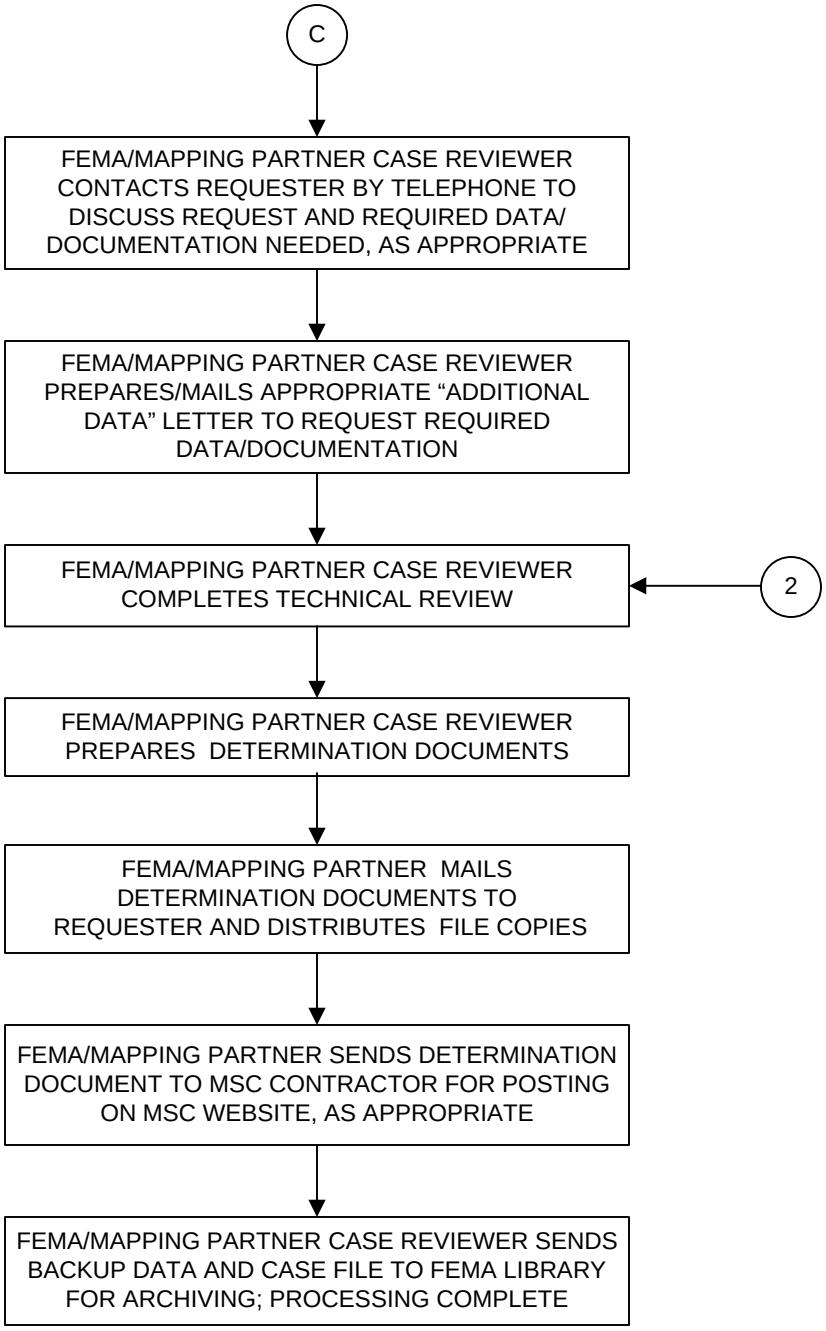

Figure 5-1. Processing Procedures for LOMAs (Cont’d)