

# Guidance for Flood Risk Analysis and Mapping

## Summary of Map Actions and Revalidation Letters

February 2019



**FEMA**

Requirements for the Federal Emergency Management Agency (FEMA) Risk Mapping, Assessment, and Planning (Risk MAP) Program are specified separately by statute, regulation, or FEMA policy (primarily the Standards for Flood Risk Analysis and Mapping). This document provides guidance to support the requirements and recommends approaches for effective and efficient implementation. Alternate approaches that comply with all requirements are acceptable.

For more information, please visit the FEMA Guidelines and Standards for Flood Risk Analysis and Mapping webpage ([www.fema.gov/guidelines-and-standards-flood-risk-analysis-and-mapping](http://www.fema.gov/guidelines-and-standards-flood-risk-analysis-and-mapping)). Copies of the Standards for Flood Risk Analysis and Mapping policy, related guidance, technical references, and other information about the guidelines and standards development process are all available here. You can also search directly by document title at [www.fema.gov/library](http://www.fema.gov/library).

## Table of Revisions

The following summary of changes details revisions to this document subsequent to its most recent version in May 2017.

| Affected Section or Subsection | Date          | Description  |
|--------------------------------|---------------|--|
| Section 4.3                    | February 2019 | Slight modification to add a reference to Physical Map Revision (PMR) guidance document regarding how to address MT-2s if they are within and outside of the impacted study. |
| Section 4.4                    | February 2019 | Section was modified to add a consideration related to multi-county communities.   |
| Section 5.1                    | February 2019 | Updated guidance to reflect revisions to the distribution of the revalidation letter.  |

## Table of Contents

|     |  |    |
|-----|--|----|
| 1.0 | Introduction .....   | 1  |
| 2.0 | Post Preliminary Timeline .....                                  | 2  |
| 3.0 | Overview of MT-1 and MT-2 LOMC Determinations .....              | 4  |
| 4.0 | LOMC Assessment .....  | 6  |
| 4.1 | Downloading LOMCs .....  | 7  |
| 4.2 | LOMC Locations .....   | 8  |
| 4.3 | LOMC Categorization .....  | 9  |
| 4.4 | Special Considerations .....                                     | 11 |
| 5.0 | Creation and Distribution .....                                  | 12 |
| 5.1 | Preliminary SOMA, Final SOMA, and Revalidation MIP Export.....   | 12 |
| 5.2 | Preliminary SOMA, Final SOMA, and Revalidation Distribution..... | 13 |

## List of Figures

|           |   |    |
|-----------|---|----|
| Figure 1. | Post Preliminary Processing Timeline .....                        | 3  |
| Figure 2. | MT-1 and MT-2 LOMC Determination Overview .....                   | 4  |
| Figure 3. | Determination Document (Older Determination Document).....        | 7  |
| Figure 4. | Determination Document (Newer Style Determination Document) ..... | 8  |
| Figure 5. | Community LOMC List .....   | 9  |
| Figure 6. | Processing Timeline .....   | 11 |

## List of Tables

|          |                                     |   |
|----------|-------------------------------------|---|
| Table 1: | MT-1 LOMC Determination Types ..... | 5 |
| Table 2: | MT-2 LOMC Determination Types ..... | 6 |

## 1.0 Introduction

A National Flood Insurance Program Flood Insurance Rate Map (FIRM) panel may be revised by physically altering the mapped data or by other administrative means established by the Department of Homeland Security's Federal Emergency Management Agency (FEMA). When a revised FIRM panel becomes effective, all previous map actions for that panel are superseded and, therefore, all previously issued valid Letter of Map Change (LOMC) actions (i.e., Letters of Map Amendment [LOMA], Letters of Map Revision [LOMR] and Letter of Map Revision based on Fill [LOMR-F]) on a revised FIRM panel must be re-evaluated to identify the effect of the FIRM panel revisions on these LOMCs.

LOMCs are evaluated against the proposed new FIRM panel(s) to determine if they will remain valid once the new study goes effective. This occurs at certain stages of the Flood Risk Project lifecycle. These milestone stages include: preliminary map issuance, revised preliminary map issuance, Letter of Final Determination (LFD), and map effective date.

The mechanism for categorizing LOMCs against a revised FIRM during these milestone stages is done through the Summary of Map Actions (SOMAs) process, which includes the utilization of the SOMA workbench via FEMA's Mapping Information Platform (MIP). The SOMA workbench provides a way for the mapping partner to categorize all the previously issued valid LOMCs for all communities with revised FIRM panels. For preliminary and revised preliminary panel issuances, the SOMA workbench outputs a comprehensive and categorized list of all LOMCs in a document termed the "preliminary SOMA". A "final SOMA", if applicable, is provided along with the LFD sent to each community impacted by the Flood Risk Project. A "Revalidation Letter", if applicable, is provided to each community upon map effective date and lists only those LOMCs that will remain valid after the FIRM panel effective date.

In advance of the new panel(s) becoming effective, the preliminary and final SOMA assists community officials and property owners in determining the status of these LOMCs that may have changed due to the proposed revisions to the FIRM panel(s). These SOMAs identify LOMCs that are incorporated into a revised FIRM panel(s), LOMCs that are superseded by new information used to prepare a revised FIRM panel(s), LOMCs that are revalidated once a revised FIRM panel(s) becomes effective, or LOMCs for which a request should be sent to FEMA to re-determine the case. Section 4.3 will provide additional information related to the various categories within the SOMA.

The mechanism for revalidating LOMCs automatically when a revised FIRM becomes effective is through the Revalidation Letter so that LOMCs do not have to be reissued. When revised FIRM panel(s) become effective, the Revalidation Letter, which is effective one day after the FIRM effective date, identifies all LOMCs that are being revalidated within a community. While the preliminary and final SOMAs provide an assessment of how LOMCs are categorized against the revisions to the FIRM panel(s) at the preliminary and LFD issuance phases, the Revalidation Letter is the final legally binding letter that

links the newly effective FIRMs to the original determination documents. A revalidated LOMC's original determination will remain valid once the new FIRM panel(s) becomes effective.

The purpose of this guidance document is to provide an overview of the SOMA and Revalidation process, as well as production and distribution of the SOMA and Revalidation Letter.

## **2.0 Post Preliminary Timeline**

Figure 1 depicts the overall Post Preliminary Processing (PPP) timeline of Flood Risk Projects to demonstrate where the SOMA and Revalidation Letter are distributed as denoted by the purple boxes.

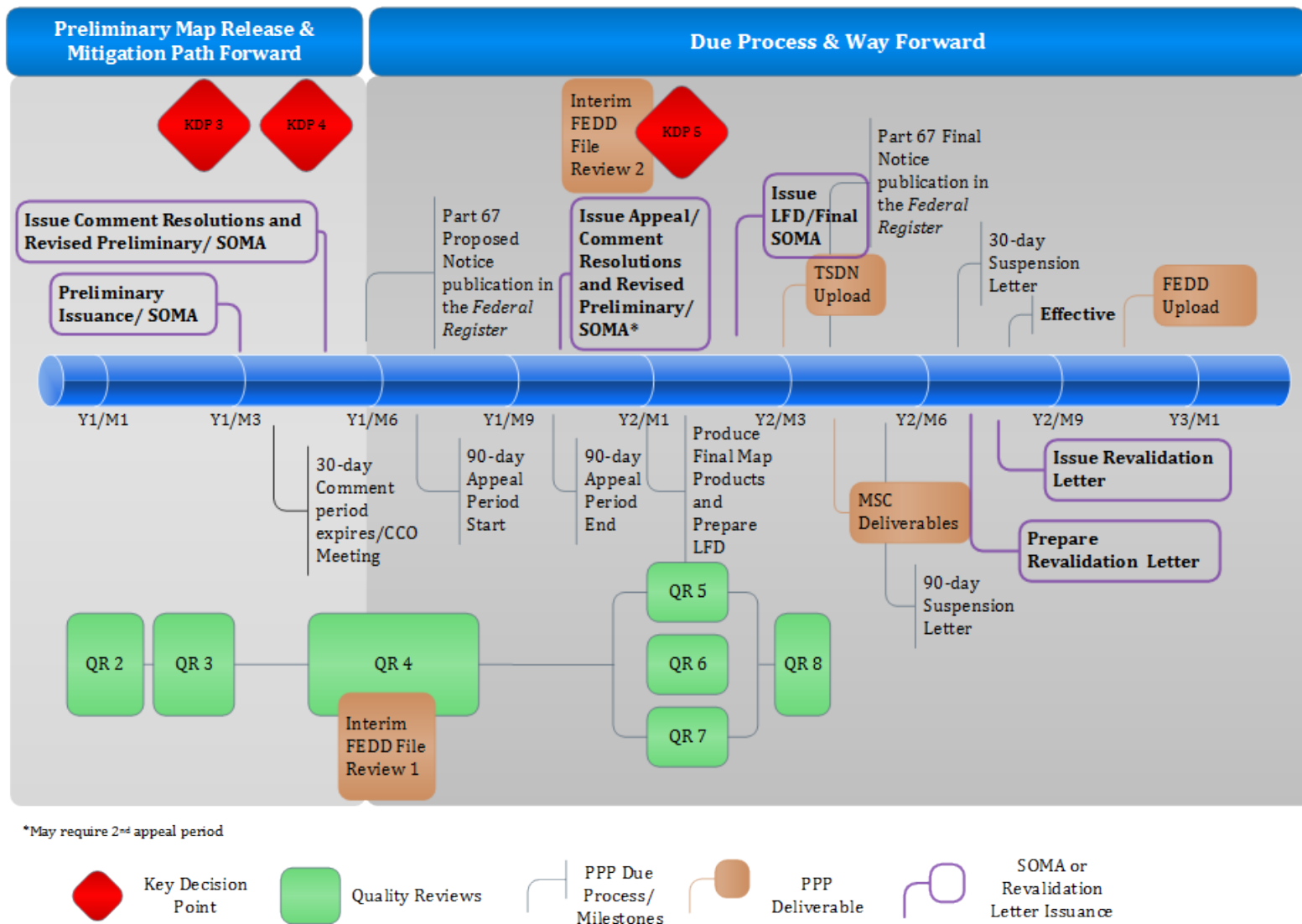


Figure 1. Post Preliminary Processing Timeline

### 3.0 Overview of MT-1 and MT-2 LOMC Determinations

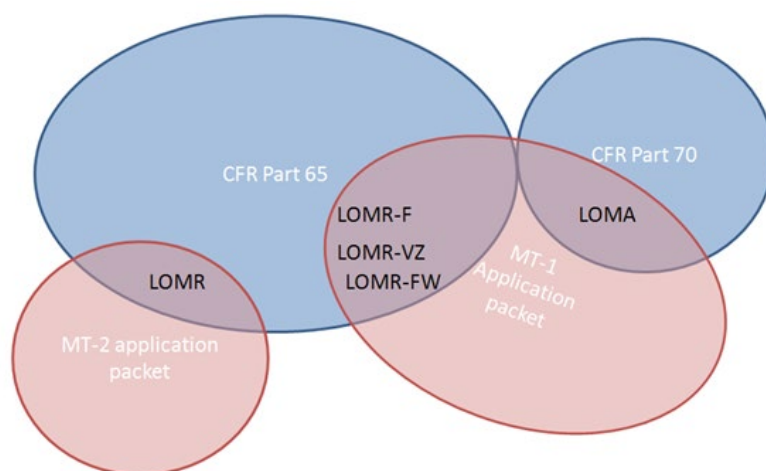
During a Flood Risk Project, the mapping partner is responsible for assessing all valid LOMCs and producing the following where applicable:

- Preliminary SOMA, and if applicable, a revised preliminary SOMA, during the issuance of the preliminary, and/or revised preliminary products;
- Final SOMA, which is distributed along with the LFD; and
- Revalidation Letter, effective one day after the FIRM effective date.

The SOMA workbench, utilized to produce the preliminary SOMA, final SOMA, and Revalidation Letter on a community-basis, categorizes the previously issued valid LOMCs based on the mapping partner's assessment of each LOMC determination in relation to the updated FIRM(s).

The LOMC determination process is independent of the Flood Risk Project. A property owner or authorized representative may request a property-specific determination or revision to the Special Flood Hazard Area (SFHA) at any time, even while there is an ongoing Flood Risk Project. LOMC determination documents are produced based on two types of processes, the MT-1 and MT-2 process. The MT-1 process utilizes a community's effective FIRM and Flood Insurance Study (FIS) Report yet does not result in physical changes to an effective FIRM. MT-1 determinations amend the community's FIRM by clarifying whether the subject is located within the SFHA. The MT-2 process also utilizes the community's effective FIRM and FIS Report, yet these types of determinations do result in physical changes to the effective FIRM(s), and updated SFHAs will be produced to identify these map revisions.

Further information on the various categories that these LOMCs will be issued under is provided in the sections below. Figure 2 identifies the MT-1 and MT-2 LOMC application type, relationship to the Code of Federal Regulations, and the various determination types.



**Figure 2. MT-1 and MT-2 LOMC Determination Overview**

Table 1 and Table 2 provide additional detail on the various MT-1 and MT-2 LOMC applications, determination types, and determination descriptions.



**Table 1: MT-1 LOMC Determination Types**

| <b>MT-1 – Letter of Map Amendment (a map amendment, by letter, to the effective FIRM)</b>   |  |
|---|--|
| <b>LOMC Types*</b>  | <b>Determination Description</b>   |
| <ul style="list-style-type: none"> <li>• LOMA</li> <li>• LOMR-F (based on fill)</li> <li>• LOMR-FW (based on floodway)</li> <li>• LOMR-VZ (coastal zone)</li> </ul> | <p>LOMCs whose determination identifies that the property, structure, or portion of property is outside of the SFHA and/or above the Base Flood Elevation (BFE):</p> <ul style="list-style-type: none"> <li>• P-REM: Property Removal</li> <li>• S-REM: Structure Removal</li> <li>• M-REM: Portion of Property described by a Meets and Bounds Removal</li> <li>• P-OAS: Property Out as Shown</li> <li>• S-OAS: Structure Out as Shown</li> <li>• M-OAS: Portion of Property described by a Meets and Bounds Out as Shown</li> </ul> |
| Suspended/Withdrawn   | MT-1 applications that have been submitted but were never completed or issued a final determination and thus are not valid LOMCs.  |
| Denials   | P-DEN, S-DEN, M-DEN – LOMCs whose determination identifies that they are below the BFE and/or within the SFHA.   |
| CLOMA/CLOMR-F (Conditional Letter LOMCs)  | FEMA's comment on a proposed structure, group of structures, or project that would, upon construction, be located partially or wholly on existing natural ground above the base (1-percent-annual-chance) flood elevation on a portion of a legally defined parcel of land that is partially inundated by the base flood or result in a modification of the SFHA through the placement of fill outside the existing regulatory floodway.   |
| eLOMA (web-based application that allows Licensed Professionals [LPs] and other FEMA Certified Professionals [CPs] to submit LOMA requests)                         | eLOMA applications do not include Conditional Letters of Map Amendment (CLOMA), Conditional Letters of Map Revision Based on Fill (CLOMR-F), Letters of Map Revision (LOMR), Letters of Map Revision Based on Fill (LOMR-F), or requests located within alluvial fan or Flood Zone V areas.  |

\* Please note there are other older determination types that will need to be further investigated.

**Table 2: MT-2 LOMC Determination Types**

| <b>MT-2 – Letter of Map Revision<br/>(FEMA’s modification to an effective FIRM or Flood Boundary and Floodway Map [FBFM])</b> |  |
|---|--|
| <b>LOMC Types*</b>  | <b>Description</b>   |
| LOMR – FEMA’s modification to an effective FIRM or FBFM   | The LOMR officially revises the FIRM or FBFM, and sometimes the FIS Report, and when appropriate, includes a description of the modifications. The LOMR is generally accompanied by an annotated copy of the affected portions of the FIRM, FBFM, or FIS Report. |
| Conditional Letter of Map Revision (CLOMR)  | FEMA’s comment on a proposed project that would, upon construction, affect the hydrology and hydraulic (H&H) characteristics of a flooding source. This letter does not revise the FIRM.   |

\* Please note there are other older determination types that will need to be further investigated.

## 4.0 LOMC Assessment

Since the MT-1 and MT-2 LOMC process is independent of a Flood Risk Project, MT-1 and MT-2 LOMC determinations are continuously issued throughout the lifecycle of a project. To ensure that all LOMCs issued throughout the lifecycle of the project are assessed based on the revised FIRM panel(s) and distributed to community officials as part of the SOMA and revalidation process, the assigned Mapping Partner should perform searches for determinations at four stages:

- 1) Before the preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment
- 2) When necessary, before revised preliminary copies of the affected FIRM panel(s) are prepared and sent to the community for review and comment
- 3) Before the LFD letter is sent to the community
- 4) Before the effective date of the revised FIRM panels

The mapping partner must:

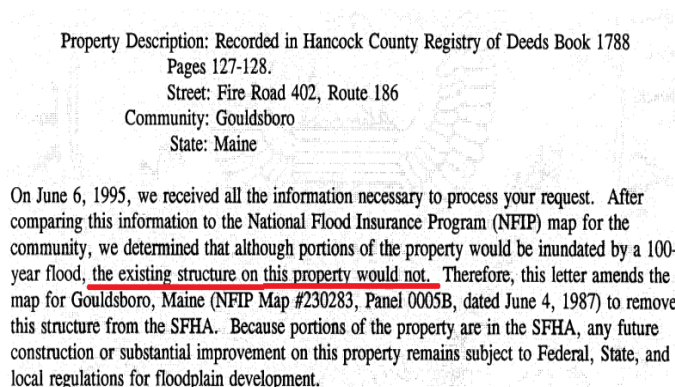
- Download LOMC determination documents
- Geospatially locate LOMCs
- Assess and categorize all LOMCs within a community
- Update the Mapping Information Platform (MIP) using the SOMA workbench based on the categorization assessment of all LOMCs within a community, and
- Produce the preliminary SOMA, revised preliminary SOMA, final SOMA, or Revalidation Letter for distribution at the appropriate stage.

The below subsections explain these steps in greater detail.

## 4.1 Downloading LOMCs


To download LOMC determination documents (MT-1s or MT-2s) the Mapping Partner can use the Map Service Center (MSC), the MIP, or request them through the FEMA Engineering Library. Determination documents may be downloaded for most LOMCs directly through the MSC. Please note that backup data are not available through this download. The Mapping Partner may also locate LOMC determination documents through the Flood Risk Study Engineering Library on the MIP where backup data are available for most of the LOMCs. Older issued LOMCs and backup data may not be available per the two noted locations, but they can be requested through the File Trail (<https://filetrail.msc.fema.gov/>), a web browser-based file tracking system used to track FEMA Engineering Library's inventory of information that was submitted to be archived. Additional LOMC determination documentation may also be requested through the FEMA region, state, or community throughout the Flood Risk Project.

It is important to download the LOMC determination documents and identify some key information within these documents to help with the assessment of these LOMCs. Figure 3 highlights some key elements within the determination document. For older determination documents, such as in Figure 3, it is important to read through the letter to identify the determination type as it is not clearly pointed out such as in the new documents that are generally issued after 2000. The underlined text in Figure 3 shows how this identifies if it is a removal or an out as shown and what is removed or not removed. The Lowest Adjacent Grade (LAG) or Low Lot Elevation (LLE), datum, flooding source, and other key information are generally not located in the letter, and backup data for these older LOMCs are usually necessary to properly assess them.



**Figure 3. Determination Document (Older Determination Document)**

Figure 4 is an example of a new determination document, generally issued after 2000, and the highlighted elements below are important to keep in mind when assessing LOMCs. The date issued, case number, and letter type are all identified at the top of the document. The effective panel number, flooding source, and project identifier are also available on the first page for a quick reference. The actual determination of what is removed or not removed is also highlighted on the first page, including the LAG/LLE and datum used and, in some instances, the BFE. Please note that the first page of the determination document will also highlight if this LOMC supersedes a previous determination and is critical when assessing LOMCs.

|  |  |   |                       |  |                                   |  |   |   |
|--|--|---|-----------------------|--|-----------------------------------|--|---|---|
| Page 1 of 2  |  | Date: May 15, 2014  | Case No.: 14-01-1632A | LOMA   |                                   |  |   |   |
|  <b>Federal Emergency Management Agency</b><br>Washington, D.C. 20472                             |  |   |                       |  |                                   |  |   |   |
| <b>LETTER OF MAP AMENDMENT</b><br><b>DETERMINATION DOCUMENT (REMOVAL)</b>  |  |   |                       |  |                                   |  |   |   |
| COMMUNITY AND MAP PANEL INFORMATION  |  | LEGAL PROPERTY DESCRIPTION  |                       |  |                                   |  |   |   |
| COMMUNITY  | TOWN OF GOULDSBORO,<br>HANCOCK COUNTY, MAINE | A parcel of land, as described in the Quit-Claim Deed with Covenant, recorded as Instrument No. 2007019952, in Book 4894, Pages 143, 144 and 145, in the Office of the Registry of Deeds, Hancock County, Maine |                       |  |                                   |  |   |   |
|  | COMMUNITY NO.: 230283                        |   |                       |  |                                   |  |   |   |
| AFFECTED MAP PANEL   | NUMBER: 23028300158                          |   |                       |  |                                   |  |   |   |
|  | DATE: 6/4/1987                               |   |                       |  |                                   |  |   |   |
| FLOODING SOURCE: JONES POND  |  | APPROXIMATE LATITUDE & LONGITUDE OF PROPERTY: 44.443, -68.082<br>SOURCE OF LAT & LONG: ARCGIS 10.1<br>DATUM: NAD 83   |                       |  |                                   |  |   |   |
| DETERMINATION  |  |   |                       |  |                                   |  |   |   |
| LOT  | BLOCK/SECTION                                | SUBDIVISION   | STREET                | OUTCOME<br>WHAT IS<br>REMOVED FROM<br>THE SFHA | FLOOD<br>ZONE                     | 1% ANNUAL<br>CHANCE<br>FLOOD<br>ELEVATION<br>(NGVD 29) | LOWEST<br>ADJACENT<br>GRADE<br>ELEVATION<br>(NGVD 29) | LOWEST<br>LOT<br>ELEVATION<br>(NGVD 29) |
| --   | --   | --  | 204 Rocky Road        | Structure<br>(Residence)                       | X<br>(unshaded)                   | --   | 54.8 feet   | --                                      |
| Special Flood Hazard Area (SFHA) - The SFHA is an area that would be inundated by the flood having a 1-percent chance of being equaled or exceeded in any given year (base flood). |  |   |                       |  |                                   |  |   |   |
| ADDITIONAL CONSIDERATIONS (Please refer to the appropriate section on Attachment 1 for the additional considerations listed below.)  |  |   |                       |  |                                   |  |   |   |
| DETERMINATION TABLE (CONTINUED)  |  |   |                       |  | STUDY UNDERWAY                    |  |   |   |
| PORTIONS REMAIN IN THE SFHA  |  |   |                       |  | SUPERSEDES PREVIOUS DETERMINATION |  |   |   |
| ZONE A   |  |   |                       |  |                                   |  |   |   |

**Figure 4. Determination Document (Newer Style Determination Document)**

Depending on the SFHA updates, backup data for these LOMCs may also be needed to properly assess the LOMCs. Backup data may include, but is not limited to: tax maps identifying the property, the elevation certificate, the legal description of the structure or portion of property, as well as information from the LOMA analyst that made the initial determination.

## 4.2 LOMC Locations

Once all LOMC determination documents are located, it is beneficial to also identify the geographical location of each LOMC on the new maps and store that point location within a Geographical Information System (GIS) shapefile to help assist in categorization. The National Flood Hazard Layer (NFHL) contains a LOMC GIS point shapefile that can be utilized when working on the SOMA. The shapefile can be downloaded from <https://hazards.fema.gov/filedownload/nfhlv2/output/LOMA/>. Please note that the locations of the points within this shapefile is based on the latitude and longitude found on the LOMC determination document and may have been placed at an approximate location; thus, rechecking the location for these LOMC shapefile points based on backup information is critical. Shapefile points may also be created manually by using geocoding software using the LOMC determination's latitude and longitude, address, manually locating them using the backup data from the LOMC, or utilizing other data sources such as countywide or community based parcel and rooftop geocoding data.

The Community LOMC List is a MIP Report that is helpful for identifying all LOMCs within a community. This report may be downloaded from the MIP in either Excel or PDF format and lists every LOMC, determination type, case number, final map date, and other categorization information. Please refer to MIP User Care for further information on downloading the Community LOMC List.

## COMMUNITY LOMC LIST

| Norfolk County                      |             | State:MA  |              |                   |               |                 |              |               |                |
|-------------------------------------|-------------|-----------|--------------|-------------------|---------------|-----------------|--------------|---------------|----------------|
| Project ID                          | Case No.    | LOMC Type | Organization | Final Letter Date | Determination | Flooding Source | Lat/Long     | Map Panel No. | Effective Date |
| LOT D --- 43 ROYDEN ROAD            | 12-01-0124A | LOMA      | STARR        | 11/07/2011        | S-REM         | Mill River      | 42.17,-70.96 | 2502570002B   |                |
| LOT 14 --- 1360 PLEASANT STREET     | 12-01-0131A | LOMA      | STARR        | 12/15/2011        | S-REM         | Herring Brook   | 42.21,-70.93 | 2502570006C   |                |
| LOTS 3-5 --- 13, 20 & 21 EUGENE WAY | 12-01-0596A | LOMA      | STARR        | 01/12/2012        | S-REM         | Local Flooding  | 42.15,-70.96 | 2502570002B   |                |
| MAP 44, BLOCK 488, LOT 6 ---        | 12-01-0638A | LOMR-F    | STARR        | 01/12/2012        | S-REM         | Mill River      | 42.18,-70.96 | 2502570002B   |                |

Figure 5. Community LOMC List

### 4.3 LOMC Categorization

Once LOMC determination documents and geographical locations of LOMCs are identified, the Mapping Partner can start the categorization process. The categorization process is an assessment of how the Flood Risk Project will impact a previously valid LOMC. At each stage—preliminary or revised preliminary, LFD, and effective issuances—the assigned Mapping Partner should sort all MT-1 and MT-2 LOMCs within a community into the following categories:

- Category 1 (LOMCs Incorporated) – Includes those LOMRs (and some LOMAs and LOMR-Fs) whose results are unaffected by new or revised flood hazard data and whose results can and will be incorporated into the revised FIRM panel(s). Large metes-and-bounds or multi-lot property removal LOMR-Fs are sometimes incorporated through Category 1 when map scale limitations do not prohibit it; although typically, these LOMAs and LOMR-Fs will be revalidated through Category 2. Structure removal (both single and multiple determination) LOMCs cannot be incorporated due to scale limitations and shall not be included in Category 1. Therefore, LOMCs in category 1 should only be those that will revise the SFHA within the revised FIRM panel(s).
- Category 2A (LOMCs Not Incorporated: LOMCs on Revised Panels) – Includes those LOMAs and LOMR-Fs whose results are unaffected by new or revised flood hazard data within the revised panel footprint, but could not be incorporated into the revised FIRM panel because of map scale limitations or because the property or structure was determined to be outside the SFHA as shown on the effective FIRM panel and remains outside the SFHA on the revised FIRM panel(s). These LOMCs are included on the Revalidation Letter that becomes effective 1 day after the revised FIRM panels become effective. Multiple-determination LOMCs that include both removals and denials may be included in this category if all determinations in the LOMC are unaffected by the new or revised flood hazard data. MT-2 LOMCs must not be included in category 2. LOMCs whose LAG/LLE is at or above the BFE on the revised FIRM panel(s) and LOMCs that remain out as shown are included in category 2.
- Category 2B (LOMCs Not Incorporated: LOMCs on Unrevised Panels) – Includes those LOMAs and LOMR-Fs whose results are unaffected by new or revised flood hazard data, including LOMRs, and are located outside of the revised panel footprint, but could not be incorporated into the revised FIRM panel because of map scale limitations or because the property or structure was determined to be outside the SFHA as shown on the effective FIRM panel and remains outside the SFHA on the revised FIRM panel(s). For example, if LOMRs are issued outside of the revised panels, the mapping partner is required to review and categorize all valid LOMCs based on those LOMRs, possibly

superseding (Reason 6. Superseded by another LOMC) some LOMCs on unrevised panels.

- Category 3 (LOMCs Superseded) – Includes those LOMCs whose results will not be reflected on the revised FIRM panel because the flood hazard data on which the determinations are based are being superseded by new flood hazard data, or the information available was not sufficient to make a determination. The previously valid LOMCs assessed and categorized in category 3 will be superseded by the revised FIRM panel(s), thus, resulting in the LOMC determination document no longer being valid.
  - Reason 1 – Insufficient information available to make a determination
  - Reason 2 – Lowest adjacent grade is below the proposed BFE
  - Reason 3 – Lowest ground elevation is below the proposed BFE
  - Reason 4 – Revised hydrologic/hydraulic analyses, which result in the LAG/LLE to be below the BFE.
  - Reason 5 – Revised topographic information which results in the LAG/LLE to be below the BFE.
  - Reason 6 – Superseded by another LOMC
- Category 4 (LOMCs To Be Redetermined) – Includes those LOMAs and LOMR-Fs issued for multiple lots or structures for which new determinations must be made because the determination for one or more properties or structures has changed as a result of the new or revised flood hazard information and therefore cannot be completely revalidated or completely superseded. MT-2s and single determination LOMCs must not be included in category 4.

It is important to note that only valid LOMCs should be assessed for the SOMA and Revalidation Letter. Conditional LOMCs and those LOMCs that have been denied, dropped, superseded, suspended, or withdrawn are not considered valid and should not be included. If an MT-1 LOMC determination type was superseded by a FIRM, that LOMC must be listed on an effective revalidation letter for it to be considered valid. Any LOMCs issued prior to the effective date of the current respective FIRM/FBFM panel must be included on the SOMA if they are listed on a current revalidation letter for the community. For MT-2, it is important to also note that only MT-2 determination types issued since the last effective FIRM/FBFM should be assessed. All MT-2s issued prior to the effective FIRM/FBFM were either superseded by that FIRM/FBFM or incorporated into that FIRM/FBFM. If an MT-2 intersects both revised and unrevised panels, please see Physical Map Revision (PMR) guidance document for further information. Effective revalidation letters can be downloaded from the MSC or requested through the FEMA Engineering Library and File Trail, similar to LOMCs.

Once all categorizations are complete, the MIP SOMA workbench can be updated to enter the results of the categorization of all valid LOMCs, or to exclude any necessary LOMCs within a community. Please see MIP User Care page that will highlight step by step instructions of how categorization should be entered into the MIP.



## 4.4 Special Considerations

### Coastal

Standard 614 became effective on July 31, 2015 for the processing of MT-1 LOMCs within coastal flood hazard areas. The standard established the requirement to utilize whole foot BFEs shown on the FIRM panel when making LOMC determinations in coastal flooding areas with coastal flood hazard analysis and mapping, as opposed to utilizing the BFEs that are depicted to a tenth of a foot in the FIS Transect Tables. Historically, in some regions, coastal MT-1 LOMAs were determined based on the FIS Transect Table BFEs, shown to the tenth of a foot, as opposed to utilizing the whole foot BFE on the FIRMs.

During SOMA categorization of LOMCs as part of a Flood Risk Project, in areas that have no SFHA modifications or changes, the Flood Risk Project mapping partner would typically automatically categorize previously issued valid LOMC removals as Category 2 (LOMCs Not Incorporated), which would result in these LOMCs being revalidated after map effective date. Since implementation of this standard, additional analysis needs to occur during LOMC categorization for these types of coastal LOMCs. For studies that include FIRM panels with coastal flooding, where no flood hazard determination updates are being made, mapping partners will now need to assess these LOMCs utilizing the whole foot BFE shown on the FIRM panel, even if the original determination was made based on an assessment of the BFE identified in the FIS Transect Table to the tenth of a foot.

For example, a structure or property that was previously removed from the SFHA and issued a LOMA removal due to the LAG or LLE, as applicable, being equal to or greater than the BFE identified in the FIS Transect Tables to a tenth of a foot, but below the whole foot BFE shown on the FIRM, should now in fact be placed in Category 3 and be superseded (Reason 2. Lowest Adjacent Grade and Lowest Finished Floor are below the proposed Base Flood Elevation. OR Reason 3. Lowest Ground Elevation is below the proposed Base Flood Elevation) as a result of Standard 614, even when the new study did not cause any flood hazard determination changes.

Figure 6 identifies the timeline for this process at preliminary issuance; however, this assessment should occur regardless of the phase that the study is in (i.e. Final SOMA, Revalidation Letter).

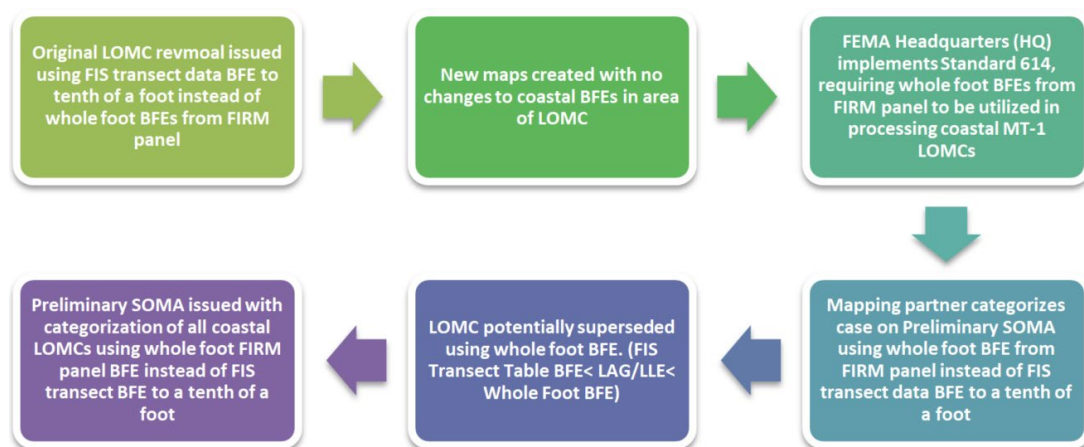


Figure 6. Processing Timeline

Alternate Scenarios – Preliminary SOMA issued prior to July 2015 using old categorization practices:

**STEP 1** – Identify all MT-1 LOMCs categorized in SOMA workbench within coastal zones prior to submittal of Final SOMA during Quality Review 6.

**STEP 2** – Re-examine the coastal MT-1 LOMCs using the new standard as a guide on BFE source. Re-categorize into category 3, superseded, as appropriate.

**STEP 3** – Distribute correct final SOMA at LFD and final Revalidation Letter at map effective date. Coordinate with the Region as needed to provide additional outreach to communities impacted by changes to their final SOMA or Revalidation Letter.

### **Multi-County Communities**

The SOMA and Revalidation Letter will include all valid LOMCs within a community regardless of the number of panels revised within that community. In situations where there are multi-county communities please coordinate with the PPP lead as there may be exceptions to this process such as issuing the SOMA and Revalidation by county.

## **5.0 Creation and Distribution**

### **5.1 Preliminary SOMA, Final SOMA, and Revalidation MIP Export**

The preliminary SOMA for a preliminary issuance or a revised preliminary issuance, final SOMA, and Revalidation Letter can all be exported through the MIP once the SOMA workbench has been populated appropriately for all valid LOMCs. Please see MIP User Care page that will highlight step by step instructions of how to export these. The SOMA and Revalidation Letter are comprehensive, and therefore will include all valid LOMCs within a community regardless of the number of panels revised within that community.

Communities that only have LOMCs in Category 2B do not require a preliminary/final SOMA or Revalidation Letter to be created.

Please note that missing data on the preliminary/revised/final SOMA or Revalidation Letter needs to be entered manually once the Word document is exported via MIP. If there is any missing information, please submit a MIP Help ticket to update the LOMC database with this information.

Preliminary SOMA does not require any other manual updates except those noted above for any missing data. The final SOMA does require that the Mapping Partner enter the projected effective date at the top of the letter.

For Revalidation Letters the mapping partner must confirm and update CEO, Floodplain Administrator, and community information as needed. Additionally, the mail date will need to be added once the Revalidation Letter has been approved by FEMA Headquarters (FEMA HQ) for mailing.



## **5.2 Preliminary SOMA, Final SOMA, and Revalidation Distribution**

A preliminary SOMA is created for each community impacted by the Flood Risk Project and receiving a revised FIRM with valid LOMCs and submitted by the mapping partner as part of Quality Review 3. Once all comments are addressed, QR3 has passed, and Key Decision Point approval is received, the preliminary SOMA is distributed by the mapping partner along with the preliminary letter and products. For guidance regarding the distribution of preliminary and revised preliminaries, please see the Preliminary Distribution and Revised Preliminary Guidance document. It is critical that mapping partners check the SOMA workbench for any LOMCs issued prior and up to the preliminary date to ensure that those have been captured within the preliminary SOMA.

The final SOMA is created for each community that is impacted by the Flood Risk Project and that is receiving a revised FIRM with valid LOMCs and submitted as part of QR6 review. Once all comments are addressed, quality reviews have passed, and distribution of the LFD is approved by FEMA HQ, the final SOMA is distributed as an enclosure within the LFD letter. The LFD and final SOMA will be distributed by the Production and Technical Services provider for all studies. It is critical that mapping partners check the SOMA workbench for any LOMCs issued prior and up to the LFD date to ensure that those have been captured within the Final SOMA.

A Revalidation Letter is created by the mapping partner for each community receiving a revised FIRM with valid LOMCs, and is submitted 4 weeks prior to the FIRM effective date to FEMA HQ or their designee for review and approval. Revalidation letters can be mailed only once FEMA HQ provides approval on the docket, and are mailed 5-7 days before the FIRM effective date. It is critical that mapping partners check the SOMA workbench for any LOMCs issued prior and up to when FEMA HQ provides approval of the revalidation docket to ensure that those have been captured on the revalidation letter. If LOMCs are issued after FEMA HQ docket approval to mail is provided, mapping partners should reach out to the PPP leads who will help coordinate the reassessments and if appropriate, reissuance of those LOMCs, with the MT-1 team.