Letter of Map Change Fundamentals

FEMA Region III
National Flood Insurance Program Essentials and Best Practices

Jana Green, CFM, RAMPP
Topics of Discussion

- Why Apply for a Letter of Map Change (LOMC)?
- Types of LOMCs
- LOMC Scenario Review
- Requirements for Submitting LOMCs
- Community Acknowledgment and Concurrence
- Understanding the LOMC Review Process
- Online Tools
- Resources and Wrap Up
Why Apply for a LOMC?

Most Common Reasons:

- Remove the mandatory flood insurance requirement
- To adjust flood insurance rate information
- To better understand the flood risk associated with a structure or property

Other Reasons:

- To support a floodplain development permit application
- To understand the effects of proposed development in the floodplain
- To reflect the effects of recent development in the floodplain
- To determine whether the floodplain ordinance requirements apply
Letters of Map Amendment (LOMAs)

- **LOMAs** provide flood zone determinations for individual properties and structures
  - Usually used to show a structure is out of the SFHA
  - Not required by floodplain management regulations
  - Based on *natural ground* elevations
  - No physical change to the FIRM
Conditional Letters of Map Revision Based on Fill (CLOMR-Fs)

- **CLOMR-Fs** comment on whether a structure or parcel of land that will be elevated by fill will be located within the SFHA after the project is complete.
  - **CLOMR-Fs** do **not** remove a floodplain designation.
  - **CLOMR-Fs** do **not** waive floodplain development requirements.
  - An as-built LOMR-F **must** follow a CLOMR-F for an official change.
Letters of Map Revision Based on Fill (LOMR-Fs)

- **LOMR-Fs** provide official flood hazard determinations for individual structures and properties that have been elevated by fill.
  - Usually to show structure is elevated out of the SFHA.
  - Conditional LOMR-F (CLOMR-F) may be required by the local floodplain ordinance.
  - No physical change to the FIRM.
Conditional Letters of Map Revision (CLOMRs)

- **CLOMRs** comment on the impact of a proposed project to floodplain boundaries, floodway boundaries, or BFEs
  - **Must** be followed by as-built LOMRs
- NFIP regulations **require** a CLOMR when:
  - Floodway encroachments increase the BFE
  - Zone AE without floodway development will raise the BFE more than 1.0 feet
- Communities can pass the responsibility to obtain a CLOMR to the developer through the local floodplain ordinance
**Letters of Map Revision (LOMRs)**

- **LOMRs** *physically* update or refine the flood hazard information used to create the FIRM.
  - Results in adjustment to the height of the BFE or boundaries of the SFHA
  - Ensures that the FIRM is the most accurate reflection of the flood risk
- Requires engineering analyses and scientific data
When to Request a LOMC

- To remove the mandatory flood insurance requirement
  - Inadvertent inclusions – structures built on natural high ground (LOMA)
  - Structures elevated on fill* (LOMR-F)
- To update the map due to better topographic data, a physical change in the floodplain, or better modeling (LOMR)

*Caution:* Placement of fill around an existing foundation to increase the LAG could result in non-compliance.
Requirement to Submit New Data

When is a community required to initiate a revision?

- Development occurring in Zones A1-30 and AE without a designated floodway for proposed increases of more than 1.0 foot
- Floodway encroachment (no-rise requirement)
- Alteration or relocation of a stream (including but not limited to installing culverts and bridges)
- Submission of new technical or scientific data

The Coordinated Needs Management Strategy (CNMS) tracking tool is used by FEMA to track map update needs. Communities can share needs with FEMA using this tool.
LOMC Request – Scenario One

Property owner receives letter from bank requiring flood insurance for a home.

Property owner must either provide proof of adequate flood insurance coverage or provide proof that the house is not in the high risk flood zone within 45 days. No fill has been placed on the property.
Scenario One – Option and Considerations

Options

- Request a LOMA if the house is on natural ground

Considerations

- How many structures are on the property?
- Are the structures in the SFHA or is only part of the property in the SFHA?
- Is future development planned?
Property owner would like to build a house on a vacant parcel of land that is shown in an SFHA on the effective FIRM. Ground elevations at the project site are higher than the BFE because fill has been placed.
Scenario Two – Options and Considerations

Options

- Request a LOMR-F for the portion(s) of land above the BFE
- Request a CLOMR-F for the proposed structure

Consideration

- If a CLOMR-F is requested for a structure, its proposed lowest floor should be above the BFE; Federal development requirements apply until the structure has been removed from the SFHA.
LOMC Request – Scenario Three

A developer would like to improve a large area of vacant land by building a subdivision within the SFHA. There are areas above and below the BFE on the site. The developer would like to ensure that the future residents will not be required to carry flood insurance and that if they chose to they could get a low risk premium.
Scenario Three – Options and Considerations

Options

- Submit a multiple structure CLOMA request for proposed structures with natural ground above the BFE; submit a multiple structure CLOMR-F request for proposed structures in lower lying areas.

- Obtain grading permit; add fill to lower lying areas and request a LOMR-F for all areas above the BFE, defined by metes and bounds.

Considerations

- The developer and the Floodplain Administrator should discuss ways to design the subdivision so that the structures will be located on naturally high ground.
LOMC Request – Scenario Four

A community has permitted a major urban drainage project that has enlarged culverts, installed detention ponds, and has buried a section of a stream underground. The improvements have reduced obstructions to flows and the effective FIRM no longer reflects the actual flood risk.

http://www.khatibalami.com/content/projects/p-jedd.html
Scenario Four – Options and Considerations

Option
- The community should request a LOMR to incorporate the changes into the effective FIRM.

Consideration
- If improvements are made and a LOMR is not issued to update the flood hazard information, flood insurance rates and flood insurance requirements will continue to be determined based on the outdated, effective information. Further, LOMAs and LOMR-Fs can only be issued against the effective flood hazard information.
LOMC Request – Scenario Five

A developer would like to build a shopping center in the regulatory floodway. The Floodplain Administrator believes the project will cause an increase in the BFE. The developer has stated that measures will be taken to avoid an increase in the BFE.

http://i1.getreading.co.uk/incoming/article6473151.ece/ALTERNATES/s615/Oracle-6473151.jpg
Scenario Five – Options and Considerations

Option

- Because there is a floodway present, the Floodplain Administrator must ask the developer to provide a “no-rise” certification from an engineer to prove that the development will not cause an increase in the BFE.

  or

- The Floodplain Administrator must request that the developer secure a CLOMR, as a condition of permitting the development.

Consideration

- An as-built LOMR must be requested before the community’s FIRM will reflect the post-project conditions.
LOMC Application Forms

MT-EZ
- Single-lot or single-structure residential LOMA requests

MT-1
- Multiple-lot or multiple-structure LOMA requests
- LOMA request for commercial properties
- CLOMAs and CLOMR-Fs
- LOMR-Fs

MT-2
- LOMRs and CLOMRs
Elevation Form

Elevation Form – MT-EZ / MT-1 Application

5. ELEVATION INFORMATION (SURVEY REQUIRED)

• Lowest Adjacent Grade (LAG) to the structure (to the nearest 0.1 foot or meter) __________ ft. (m)
• Elevation of the lowest grade on the property; or within metes and bounds area (to the nearest 0.1 foot or meter) __________ ft. (m)
• Indicate the datum (if different from NGVD 29 or NAVD 88 attach datum conversion)  □ NGVD 29  □ NAVD 88  □ Other (add attachment)
• Has FEMA identified this area as subject to land subsidence or uplift? □ No □ Yes (provide date of current releveling):

This certification is to be signed and sealed by a licensed land surveyor, registered professional engineer, or architect authorized by law to certify elevation information. All documents submitted in support of this request are correct to the best of my knowledge. I understand that any false statement may be punishable by fine or imprisonment under Title 18 of the United States Code, Section 1001.

- Only includes information required to make a LOMC determination
Elevation Certificate

- Three main purposes
  - Rate an insurance policy
  - Demonstrate NFIP compliance
  - Request a FIRM amendment
- May be submitted instead of the Elevation Form
Documentation for a LOMA

Required

- **Recorded** plat map or
- A **recorded** deed accompanied by tax assessor’s map

Usually Required

- Elevation Form with the certified Lowest Adjacent Grade (LAG) or Lowest Lot elevation(s)

May be Required

- **Certified** metes and bounds description and map
- Other elevation data
Common Application Issues –
LOMAs

- Failure to write the legal property description and address on the application
- Failure to enter contact information and sign/date the application
- Submitting a deed or plat map that is not recorded
- Missing vertical datum on the Elevation Form
- Elevations not based on finished construction for an as-built determination
Documentation for a CLOMR-F

Required

- **Recorded** plat map or
- **A recorded** deed accompanied by a tax assessor’s map
- Community acknowledgment
- Processing fee
- Endangered Species Act (ESA) compliance

“No Effect” Statement for ESA Compliance

To avoid any direct or indirect effects to the Mead’s milkweed in Pretty Prairie, Big Tree will install the pipeline at least 6 feet deep under the prairie extending 50 feet on both sides using directional drilling. Big Tree has concluded that by using these drilling techniques the Mead’s milkweed will not be exposed to project.

For these reasons, we conclude the Stewart Branchline Extension Project will have “no effect” on listed species, their habitats, or proposed or designated critical habitat.
Documentation for a LOMR-F

Required

- **Recorded** plat map or
- A **recorded** deed accompanied by tax assessor’s map
- Community acknowledgment
- Processing fee

Similar to CLOMR-F requests, other data may also be required.
Documentation for a CLOMR

Required

- Community concurrence and adoption
- Applicable forms within the MT-2 application
- Hydrologic and hydraulic data and modeling
- Topographic data
- Work maps
- Annotated FIRM panel(s) and FIS tables and/or profiles showing nature and extent of revised floodplain boundaries, floodway boundaries, and BFEs
- Public notice
- Processing fee
- ESA Compliance

FEMA
Documentation for a LOMR

Required

- Community concurrence
- Applicable forms within the MT-2 application
- Hydrologic and hydraulic data and modeling of completed development
- Topographic data
- Work maps
- Annotated FIRM panel(s) and FIS tables and/or profiles showing nature and extent of revised floodplain boundaries, floodway boundaries, and/or BFEs
- Public notice
- Processing fee
- If fill in floodway, “no-rise” analysis or CLOMR

FEMA
Required Modeling for LOMRs and CLOMRs

- Effective Model
- Duplicate Effective Model
- Corrective Effective Model
- Existing Conditions Model
- Post-Project/Proposed Conditions Model
Common Application Issues – LOMRs

- Vertical and horizontal tie-ins
- Missing Overview and Concurrence Form
- Misunderstanding of fee exemptions
- Individual Property Owner Notifications and Public Notice
- No Annotated FIRM and FIS pages
- Inconsistencies between mapping and modeling
Role of the Community - Amendment

- Community Acknowledgement Form
  - Understand your role - you do not have to sign!
- Assist applicant with proposed development considerations
- Tracking and storing information
  - LOMC determinations
  - Elevation Data
  - Permit and Inspection Data
Role of the Community – Revisions

- Review CLOMR and LOMR applications
  - Ensure revision is appropriate and in line with ordinance
  - Make use of local resources, such as an engineer or legal counsel
  - Require developers to request revisions through the local floodplain ordinance
- Make use of conditional process to ensure compliance before a project is complete
- Clearly communicate to developers their responsibility in the revision process
- Follow-up - ensure a LOMR is completed for final projects before C.O.
LOMCs: Basis of Determination

- For structures, the LAG must equal or exceed the regulatory flood elevation, to the nearest tenth of a foot.
Zone A LOMCs: Basis of Determination

- For Zone A areas which do not show BFEs on the FIRM/FIS, a 1% annual chance Water Surface Elevation (WSEL) must be determined to compare against the property information for a determination.

- For requests for which a flood elevation cannot be provided, one will be established by the LOMC reviewer using the best data available.
  - In some cases, supporting data may be required before an elevation can be established by the reviewer.
LOMA/LOMR-F Outcomes

Removal
- The subject of the determination has been removed the SFHA

Non-Removal
- The subject of the determination remains in the SFHA

Out as Shown
- The subject of the determination is not shown in the SFHA

Other Response
- A determination cannot be made
LETTER OF MAP AMENDMENT
DETERMINATION DOCUMENT (REMOVAL)

COMMUNITY AND MAP PANEL INFORMATION

COMMUNITY
TOWNSHIP OF NORTHAMPTON,
BUCKS COUNTY, PENNSYLVANIA

COMMUNITY NO.: 420988

AFFECTED MAP PANEL
NUMBER: 42017C0426F
DATE: 5/18/1999

FLOODING SOURCE: 42017C0426F
APPROXIMATE LATITUDE & LONGITUDE OF PROPERTY: 40.245, -74.997
SOURCE OF LAT & LONG: GOOGLE EARTH PRO
DATUM: NAD 83

DETERMINATION

<table>
<thead>
<tr>
<th>LOT</th>
<th>BLOCK/SECTION</th>
<th>SUBDIVISION</th>
<th>STREET</th>
<th>OUTCOME WHAT IS REMOVED FROM THE SFHA</th>
<th>FLOOD ZONE</th>
<th>1% ANNUAL CHANCE FLOOD ELEVATION (NGVD 29)</th>
<th>LOWEST ADJACENT GRADE ELEVATION (NGVD 29)</th>
<th>LOWEST LOT ELEVATION (NGVD 29)</th>
</tr>
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<tbody>
<tr>
<td>22</td>
<td>-7-</td>
<td>Chimney Farm</td>
<td>165 Tinari Drive</td>
<td>Structure (Residence) x</td>
<td>122.9 feet</td>
<td>125.0 feet</td>
<td>-</td>
<td></td>
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</table>

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)

PORTIONS REMAIN IN THE SFHA
STUDY UNDERWAY
## CLOMA Outcome

### Conditional Letter of Map Amendment

**Community and Map Panel Information**
- **Community:** Borough of Macungie, Lehigh County, Pennsylvania
- **Community No.:** 426950
- **Affected Map Panel:** Number: 42077/C8243F
- **Date:** 7/16/2004

**Flooding Source:** Swabia Creek
- **Approximate Latitude & Longitude of Property:** 40.515, -75.559
- **Source of Lay & Long: Google Earth®**

**Lot** | **Block/Section** | **Subdivision** | **Street** | **Outcome** | **What Would Be Removed from the SFHA** | **L/A Annual Change Flood Elevation (NOV 29)** | **Lowest Adjacent Grade Elevation (NOV 29)** | **Lowest Lot Elevation (NOV 29)** |
--- | --- | --- | --- | --- | --- | --- | --- | --- |
--- | --- | --- | 76 Race Street | Structure (Shed) | X (Shaded) | 376.9 feet | 377.1 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 equalled or exceeded in any given year (base flood).

**Additional Considerations:** Please refer to the appropriate section on Amendment 1 for the additional considerations listed below.

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This comment document is based on the flood data currently available. The endorsed documents provide additional information regarding this request. If you have any questions about this document, please contact the FMAA Map Amendment Center at (877) 328-2621 OR FEMA MAPS via e-mail at the Federal Emergency Management Agency, LGMC Clearinghouse, 347 South Fiddlers Street, Alexandria, VA 22304-6004.
LOMR Outcomes

- Official Determination Document
- Accompanied by annotated FIRM panel(s) and Flood Insurance Study (FIS) tables and/or profiles
# Fee Schedule

<table>
<thead>
<tr>
<th>LOMC Type</th>
<th>Fee</th>
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<tbody>
<tr>
<td>LOMR-F</td>
<td>$425-$800</td>
</tr>
<tr>
<td>CLOMA</td>
<td>$500-$700</td>
</tr>
<tr>
<td>CLOMR-F</td>
<td>$500-$800</td>
</tr>
<tr>
<td>LOMR-F following CLOMR-F</td>
<td>$325-$700</td>
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<tr>
<td>CLOMR (New Hydrology, Bridge, Culvert, Channel, or Combination Thereof)</td>
<td>$4400</td>
</tr>
<tr>
<td>CLOMR (Levee, Berm, or Other Structural Measures)</td>
<td>$6050</td>
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<tr>
<td>LOMR (New Hydrology, Bridge, Culvert, Channel, or Combination Thereof)</td>
<td>$5300</td>
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<td>LOMR (Levee, Berm, or Other Structural Measures)</td>
<td>$7150</td>
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<tr>
<td>LOMR following CLOMR</td>
<td>$5000</td>
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<tr>
<td>LOMR (Alluvial Fans)</td>
<td>$5600 initial fee</td>
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LOMC Processing Timeframes

- LOMAs, LOMR-Fs, CLOMAs, and CLOMR-Fs are completed within 60 days of receiving all required data.
- If additional data or a fee has been requested, the applicant has 90 days to submit the required data before the case is suspended.
  - Extensions may be granted.
- LOMRs and CLOMRs are completed within 90 days of receiving all required data.
  - Issued LOMRs require a 4-6 month adoption period before becoming effective for legal use.
Revalidation Letters

- LOMCs are only valid as long as the FIRM on which it was determined is still effective.
- When a new FIRM is issued, all previously issued LOMCs are reviewed to determine whether the outcome has changed based on the new flood hazard area.
- LOMRs are either superseded or incorporated into the new FIRM.
- LOMAs and LOMR-Fs may be superseded, but those that are still valid are listed on a Revalidation Letter.
- The Revalidation Letter is effective the day after the FIRM is effective.
- Automatically initiated by FEMA as a map action.
Online LOMC

- Allows a FIRM amendment or revision to be requested through an online platform instead of mailing in an application
- Supporting documentation can be uploaded online and case-related correspondence is e-mailed to the applicant
eLOMA

- Online determination tool for simple LOMA requests
- Audits ensure accuracy
- Registration form available at:
  - [http://hazards.fema.gov](http://hazards.fema.gov)
- Registration form can be:
  - E-mailed to [miphelp@riskmapcds.com](mailto:miphelp@riskmapcds.com)
  - Faxed to (800) 684-6860
  - Mailed to:
    - RAMPP eLOMA Coordinator
    - Jonathon Foster, CFM
    - 8401 Arlington Boulevard
    - Fairfax, VA 22031-4666
# eLOMA Eligibility

<table>
<thead>
<tr>
<th>Eligible for eLOMA</th>
<th>Not Eligible for eLOMA</th>
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</thead>
<tbody>
<tr>
<td>Structure/lot on natural ground</td>
<td>Structure/lot elevated by fill</td>
</tr>
<tr>
<td>Single structure/lot</td>
<td>Multiple structures/lots; condominiums</td>
</tr>
<tr>
<td>Existing structure</td>
<td>Proposed construction</td>
</tr>
<tr>
<td>Zones A1-30 (except in floodway), AE (except in floodway), and AH</td>
<td>Zones A, V, VE, V1-V30, AO, D, B, C, X</td>
</tr>
<tr>
<td>New LOMA requests</td>
<td>Re-issuances or LOMAs in progress</td>
</tr>
<tr>
<td>Subject area on FIRM panel has not been revised by a LOMR</td>
<td>Subject area on FIRM panel revised by LOMR</td>
</tr>
<tr>
<td>Structure/lot located on land that has not been annexed</td>
<td>Structure/lot located on annexed land</td>
</tr>
</tbody>
</table>
Resources

- FEMA Map Information eXchange (FMIX)
  - Toll free by phone at 1-877-336-2627
  - By email at FEMAMapSpecialist@riskmapcids.com
- FEMA Map Service Center
- National Flood Hazard Layer – FEMA GeoPortal
- eLOMA (Mapping Information Platform)
- Online LOMC
- Code of Federal Regulations
- LOMC Fee Information
- FEMA Forms
- NFIP Technical Bulletins
- USGS Vertical Datum Conversion Information
## Contacts

- **FEMA-R3-FMI@fema.dhs.gov** - FEMA Region III Floodplain Management and Insurance Branch

<table>
<thead>
<tr>
<th>State</th>
<th>Name</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington, D.C.</td>
<td>Phetmano Phannavong, P.E., CFM</td>
<td>202-535-2248</td>
<td><a href="mailto:phetmano.phannavong@dc.gov">phetmano.phannavong@dc.gov</a></td>
</tr>
<tr>
<td>Delaware</td>
<td>Michael Powell, CFM</td>
<td>302-739-9921</td>
<td><a href="mailto:michael.powell@state.de.us">michael.powell@state.de.us</a></td>
</tr>
<tr>
<td>Maryland</td>
<td>David Guignet, P.E., CFM</td>
<td>410-537-3775</td>
<td><a href="mailto:dave.guignet@maryland.gov">dave.guignet@maryland.gov</a></td>
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<td>Pennsylvania</td>
<td>Daniel Fitzpatrick, CFM</td>
<td>717-720-7445</td>
<td><a href="mailto:dafitzpatr@state.pa.us">dafitzpatr@state.pa.us</a></td>
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<td>Virginia</td>
<td>Charley Banks, CFM</td>
<td>804-371-6135</td>
<td><a href="mailto:charley.banks@dcr.virginia.gov">charley.banks@dcr.virginia.gov</a></td>
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<td>West Virginia</td>
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<td>304-957-2571</td>
<td><a href="mailto:kevin.l.sneed@wv.gov">kevin.l.sneed@wv.gov</a></td>
</tr>
</tbody>
</table>
Questions?
Upcoming Webinars: NFIP Essentials and Best Practices Series

- **Building Codes and Floodplain Management**
  Wednesday, May 7th; 10:00 – 11:30 am

- **Substantial Improvement**
  Tuesday, May 13th; 10:00 – 11:30 am

- **Substantial Damage**
  Wednesday, May 14th; 10:00 – 11:30 am

- **Managing Zone A Floodplains**
  Wednesday, May 28th; 10:00 – 11:30 am

- **Reviewing & Interpreting Elevation Certificates**
  Thursday, May 29th; 10:00 – 11:30 am