

National Flood Insurance Program FEMA Letters of Map Change

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FEMA

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Definitions

- Base Flood – 1% Annual chance flood (100-year)
- BFE – Base Flood Elevation
- SFHA – Special Flood Hazard Area
- FIRM – Flood Insurance Rate Map
- FBFM – Flood Boundary and Floodway Map



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NFIP Requirements

- Sound floodplain management and insurance rating must be based on up to date flood risk information
- Map revision process allows communities to request revisions to NFIP maps to incorporate new or corrected flooding information
- Map revisions processed under part 65 and part 70 of NFIP regulations



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NFIP Requirements

- Section 65.3 requires communities to inform FEMA of physical changes that affect BFEs and submit supporting data when available but no later than 6 months
- Adequate supporting data required
 - Must adhere to the same supporting standards used to prepare NFIP maps



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FIRM and FBFM

- FIRM reflects flooding information
 - Base Flood Elevations (BFEs)
 - Base flood depths
 - 100- and 500-year floodplain boundaries
 - Flood Insurance risk zones
 - Floodway boundaries (after January 1, 1985)
- FBFM
 - 100- and 500-year floodplain boundaries and floodway boundaries
 - Created prior to January 1, 1985



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Map Revision Types

- Amendments:
 - Structures or legally defined parcels
 - Does not involve H&H analysis (*Unless Zone A*)
 - Requires submittal of MT-1 Forms
- Revisions:
 - More complex map changes
 - Not usually lot or structure specific
 - Typically involves H&H analysis
 - Requires submittal of MT-2 Forms
- MT-1
 - LOMA
 - LOMR-F
 - Conditional
 - LOMR-FW (Floodway)
- MT-2
 - PMR
 - LOMR
 - Conditional



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Amendments (MT-1)

- Letter of Map Amendment (LOMA)
 - Request for exclusion of individual structure(s) and or legally defined parcel(s) of land that were inadvertently included in the SFHA
 - Process outlined in Part 70 of NFIP Regulations

- Letter of Map Revision Based on Fill (LOMR-F)
 - Request for exclusion of individual structure(s) and or legally defined parcel(s) of land that were elevated by earthen fill



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Amendments (MT-1)

- Conditional
 - FEMA's comment on whether a proposed structure, if built as proposed, would be excluded from the SFHA



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LOMA Data Requirements

- Completed MT-1 Form 1 (or MT-EZ)
 - www.fema.gov/mit/tsd/frm_form.shtm
- Copy of the NFIP Map indicating the subject property location
 - FEMA Flood Map Store – view effective FIRM and create FIRMette
- Copy of recorded Deed or Plat map



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LOMA Data Requirements (cont.)

- Copy of certified site survey showing property and structure location
- Completed MT-1 Form 2 (Elevation Certificate)
- Metes & bounds description and map, if request is for portion of property
- BFE, and supporting data, if in unnumbered Zone A Area



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LOMA Required Fees

Product or Service	User Fee
<ul style="list-style-type: none">• LOMA• CLOMA<ul style="list-style-type: none">✓ Single lot/structure• CLOMR-F<ul style="list-style-type: none">✓ Multiple lot/structure	<ul style="list-style-type: none">• Exempt• \$500• \$700

www.fema.gov/mit/tsd/frm_fees.shtm



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LOMA Review by FEMA

- FEMA is required to notify the applicant in writing within 60 days from the date of receipt of all data
- Requesters may check on status of all Letter of Map Change requests by contacting the FEMA Map Assistance Center toll-free at 877-FEMA MAP (336-2627).



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LOMA Distribution

- Applicant
- Community's map repository
- Community or governmental unit that requests a LOMA
- FEMA's community file
- State NFIP Coordinator
- FEMA Regional Office
- Federal Register



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Letter of Map Revision Based on Fill

- Revision to the SFHA with no change to the BFE
- In areas with special flood hazard, it may be feasible to elevate areas with fill above the BFE



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LOMR-F Data Requirements

- In addition to LOMA Data requirements, need:
 - Completed MT-1 Form 4 (Community Acknowledgement Form)
 - Topographic map indicating present ground elevations and fill



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LOMR-F Required Fees

Product or Service	User Fee
<ul style="list-style-type: none">• LOMR-F or CLOMR-F<ul style="list-style-type: none">✓ Single lot/structure✓ LOMR-F following CLOMR-F	<ul style="list-style-type: none">✓ \$425✓ \$325
<ul style="list-style-type: none">• LOMR-F or CLOMR-F<ul style="list-style-type: none">✓ Multiple lot/structure✓ LOMR-F following CLOMR-F	<ul style="list-style-type: none">✓ \$800✓ \$700



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LOMR-F Review by FEMA

- FEMA is required to notify the applicant in writing within 60 days from the date of receipt of all data



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LOMR-F Distribution

- Community's CEO
- Applicant
- Community's map repository
- Community or governmental unit that requests a LOMR-F
- FEMA's community file
- State NFIP Coordinator
- FEMA Regional Office
- Federal Register



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Premium Refund

- A flood insurance policy-holder whose property/structure has been removed by a LOMA or LOMR-F may cancel the policy within the current policy year and receive a premium refund
- Much more information regarding refunds, premiums, etc. can be found on FEMA's website (www.fema.gov) or by calling the FEMA Map Assistance Center (877-FEMA MAP)



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Conditional LOMA or LOMR-F

- FEMA's review of proposed projects
- For an applicant proposing to build on property that is inadvertently included in a SFHA
- A CLOMA or CLOMR-F does not amend the NFIP map
- A CLOMA or CLOMR-F is NOT a building permit!
- Rather it is simply a comment document stating whether or not a structure/parcel of land will be safe from flooding if built as proposed.



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CLOMA and CLOMR-F Data Requirements

- Same data requirements as LOMR or LOMR-F request, but with proposed data



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Map Revisions

MT-2s



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Map Revision Types

- Physical Map Revision (PMR)
 - Map revision where FEMA republishes affected map panels and FIS report, if necessary
- Letter of Map Revision (LOMR)
 - A document that revises FIRM panel involving small areas
 - Includes annotated copy of affected FIRM panel and FIS report



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Map Revision Types

- Conditional
 - FEMA's comment on whether a proposed project meets the minimum NFIP standards and would warrant a revision to the effective map if built as proposed



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Basis of Revision

- More detailed analyses
- Projects involved
- Natural changes
- Error corrections



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Types of LOMR Requests

- Revision with no change to BFE
 - In SFHAs, it may be feasible to elevate areas with fill above the BFE
 - Except in V Zones and floodways
 - LOMR-Fs are processed under provisions of Section 65.5
 - Updated topographic information



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Types of LOMR Requests

- Revision of BFEs
 - Include new H&H analyses and delineation of new floodplain and floodway boundaries
 - Revised and unrevised BFEs must match within 0.5 foot at transitions



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LOMR Requirements

- FIRMs cannot be revised based on proposed conditions
- Must demonstrate that topographic changes have not encroached in floodway
- FIRMs will not be revised based on discharges unless change is statistically significant
- Revised H&H must include same recurrence intervals as effective FIS



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LOMR Requirements

- Any computer program used to perform H&H analyses in support of a LOMR must meet FEMA criteria
 - Acceptable model's list on FEMA's web site
 - www.fema.gov/mit/tsd/en_modl.shtml
- Analyses should be done with the same model as effective model unless:
 - Alternative hydraulic methodology; or
 - Original modeling is not available



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LOMR Data Requirements

- Correcting Map Errors
 - Data identifying mathematical errors
 - Data identifying measurement errors and providing correct measurements



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LOMR Data Requirements

- Changed physical conditions
 - *Affecting hydrologic conditions*
 - Description of the changes
 - Construction plans
 - New hydrologic analysis
 - New hydraulic analysis and profiles using the new discharges
 - Revised delineation of floodplain and floodway boundaries on topographic map



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LOMR Data Requirements

- Changed physical conditions
 - *Affecting hydraulic conditions*
 - Description of the changes
 - Construction plans
 - New hydraulic analysis and profiles using FIS published discharges
 - Revised delineation of floodplain and floodway boundaries on topographic map



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LOMR Data Requirements

- Changed physical conditions
 - *Involving topographic conditions*
 - Description of the changes
 - New topographic information
 - Revised delineation of floodplain and floodway boundaries on topographic map



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LOMR Data Requirements

- Incorporating improved data
 - Data believed to be better than those used in original analysis
 - Documentation of source of the data
 - Why the new data will improve the results of the original analysis
 - Revised hydrologic analysis
 - Revised hydraulic analysis
 - Revised delineation of floodplain and floodway boundaries on topographic map



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LOMR Data Requirements

- Incorporating improved methods
 - Why the alternative methodologies are superior to original methodologies
 - New hydrologic analysis
 - New hydraulic analysis
 - Revised delineation of floodplain and floodway boundaries on topographic map



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LOMR Data Requirements

- Floodway revisions with BFE change
 - Meet previous requirements
 - Copy of public notice from community stating intent to revise floodway
 - Floodway analysis must use hydraulic model used to determine revised BFEs
 - Neither effective BFE nor revised BFE can be increased by more than 1 foot
 - Revised floodway must be delineated on same topographic map used for revised floodplain boundary
 - Revised floodway must tie-in to the effective floodway



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LOMR Data Requirements

- Floodway revisions without BFE change
 - Copy of public notice from community stating intent to revise floodway
 - Revised floodway delineation on work map (proper tie-in)
 - Original hydraulic model used to develop effective BFEs must be modified to include all encroachments
 - Combined effects of past encroachments and new floodway limits do not increase the effective BFEs by more than 1 foot



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LOMR Data Requirements

- Data must be certified by registered professional engineer or licensed surveyor
- Annotated FIRM panel (with logical tie-in to effective)
- MT-2 Forms
 - www.fema.gov/mit/tsd/frm_form.shtm



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LOMR Data Requirements

- For SFHA increases
 - Property owner notification/acceptance
- Allowable increases in BFE
 - Without floodway: 0.1 foot (State requirement)
 - With floodway: None



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Conditional LOMR

- If community proposes to permit encroachments which will cause BFE increases in excess of those permitted, they must apply for conditional approval
 - Work in the floodway
 - Work in floodplain, no floodway established, with increases greater than 0.1 foot
- 65.12 requirements must be met



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Conditional LOMR

- What is an increase?
 - Comparison between
 - Pre-project model
 - Post-project model



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Conditional LOMR

- Zone A Increases (FEMA Policy)
- Proposed projects that cause increases > 1.00 foot should obtain a CLOMR
- This policy requires that projects meet data requirements outlined in 65.12



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Conditional LOMR

- 65.12 Data Requirements
 - Evaluation of alternatives
 - Certification that no structures are impacted
 - Individual legal notice to all impacted property owners
- Other Data Requirements
 - Same as LOMR; accept data reflect proposed conditions



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MT-2 Required Fees

Product or Service	User Fee
• LOMRs/PMRs	
✓ Bridge, Culvert, Channel, or Combination	✓ \$4,200
✓ Levees, Berm, or Other Structural Measure	✓ \$6,000
✓ As-built follow-up to CLOMR	✓ \$3,800
✓ Detailed Data	✓ \$0



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MT-2 Required Fees

Product or Service	User Fee
<ul style="list-style-type: none">• CLOMRs<ul style="list-style-type: none">✓ Hydrology, Bridge, Culvert, Channel, or Combination✓ Levees, Berm, or Other Structural Measure	<ul style="list-style-type: none">✓ \$4,000✓ \$4,500
<ul style="list-style-type: none">• LOMRs/CLOMRs for Structural Measures on Alluvial Fans	<ul style="list-style-type: none">• \$5,000<ul style="list-style-type: none">✓ Initial Fee



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MT-2 Fee Exemptions

- Mapping or analysis error
- Effects of natural changes within SFHAs
- Adding detail to Zone A
- Projects that are 50% federally funded
- Improved data
 - Not including man made modifications



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MT-2 Review by FEMA

- FEMA is required to notify requester and community as to adequacy of submittal within 60 days
- FEMA is required to provide requester and community LOMR or CLOMR or other written comment within 90 days of receipt of all data



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Obtaining FIS Back-up Data

- Must request in writing
- Approximately 2 to 4 weeks to process requests
- Typically costs \$100-\$200
- Can fax request to (703) 751-7391
- David DeHaven library manager (703) 960-8800 ext.7489



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Where To Submit Request

FEMA LOMA/LOMR Depot
3601 Eisenhower Avenue
Suite 130
Alexandria, VA 22304



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Recap

- Letter of Map Change Types (MT-1 and MT-2)
- Data requirements
- Fees involved



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