

# THE VOICE

FEMA REGION 6  
MITIGATION NEWS  
& INFORMATION

VOLUME 18

## LOCAL MAP MAINTENANCE THROUGH LOMCs

The Federal Emergency Management Agency (FEMA) relies on community officials responsible for local floodplain management to inform the agency when flood hazards have been altered by local development. When local communities participate in the National Flood Insurance Program, they take on the role of maintaining their Flood Insurance Rate Maps, or FIRMs. As buildings go up, land use is altered, or community drainage systems are updated or modified, the flood hazards within a community also change. Local developers and transportation authorities should work closely with community officials to determine the impacts of development and submit identified flood hazard revisions to FEMA for incorporation in the national flood hazard inventory.

FEMA updates FIRMs through a variety of approaches, together known as Letters of Map Change, or LOMCs. There are two categories: amendments and revisions.

An amendment, in general, is a simpler and more straightforward process that provides flood zone determinations for individual properties and structures. Amendments are what property owners apply for when their goal is to remove the federal flood insurance requirement.

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ACT FAST TO PROTECT THE LIFE YOU'VE BUILT.

You could save on flood insurance.

Different weather patterns, new development, and erosion mean that your flood risk changes over time even if your FIRM map has not been recently updated. A Letter of Map Change could also change your flood insurance premium. So now's the time to renew or sign up for coverage. Whether your property is in a high-risk flood area or even if you're in a moderate-to-low risk area -- talk to your agent about how you can get a lower-cost flood insurance policy.

Get started by checking your flood risk at [mac.fema.gov](https://www.fema.gov/mac).

They do not result in actual changes to the FIRM. Examples of amendments include:

- Letter of Map Amendment (LOMA)
- Letter of Map Revision Based on Fill (LOMR-F)
- Conditional versions of these documents for proposed projects (CLOMA and CLOMR-F)

Revisions affect the floodplain on a scale larger than an individual property and structure. Revisions may help communities understand the effects of development, support permit applications for development in the floodplain, or determine whether floodplain ordinance requirements apply.

Examples of revisions include:

- Physical Map Revision (PMR)
- Letter of Map Revision (LOMR)
- Conditional Letters of Map Revision (CLOMR) for proposed projects.

For some processes, FEMA charges fees to review applications. For others, there is no additional cost.

For more information on LOMCs, see the table on the next page or visit <https://www.fema.gov/letter-map-changes>.

## LETTER OF MAP CHANGE (LOMC)

AMENDMENTS (MT-1)		REVISIONS (MT-2)	
<b>LOMA</b>	LETTER OF MAP AMENDMENT — Typically, a LOMA is used to officially determine whether a specific lot or structure is within the Special Flood Hazard Area (SFHA) shown on a FIRM. A LOMA requires a homeowner to work with a professional land surveyor or engineer to collect information related to the structure’s elevation. A successful LOMA means the property may no longer be subject to the federal mandate to purchase flood insurance, although the mortgage lending company may still require coverage. (Flood insurance coverage is available for areas outside the SFHA.)	<b>LOMR</b>	LETTER OF MAP REVISION — A LOMR is an official revision to an effective FIRM that may change flood insurance risk zones, floodplain and/or floodway boundaries, floodplain metric features, and/or Base Flood Elevations (BFEs). These revisions are used for physical, man-made changes to the ground that affect the hydraulic or hydrologic characteristics of a flooding source. The National Flood Insurance Program requires that communities identify these areas of physical change and submit supporting technical and/or scientific data to depict updated risk on the FIRM.
<b>CLOMA</b>	CONDITIONAL LETTER OF MAP AMENDMENT — A letter from FEMA stating a proposed structure and/or site would not be inundated by the base flood (i.e., a flood with a 1-percent annual chance of happening in any given year) if built as proposed.	<b>CLOMR</b>	CONDITIONAL LETTER OF MAP REVISION — A CLOMR is a letter from FEMA stating a proposed project would, upon construction, affect the hydrologic or hydraulic characteristics of a flooding source. The review allows a community to understand a proposed project’s effects on flood insurance and floodplain management requirements. FEMA charges a fee for this review. Once the project has been completed, the community must request a revision to the FIRM with "as-built" certification and other supporting data to reflect changed conditions. CLOMRs are required prior to projects in the floodway to determine if the project will result in an increase in Base Flood Elevation.
<b>LOMR-F</b>	LETTER OF MAP REVISION BASED ON FILL — A LOMR-F is similar to a LOMA and is also used to determine if a lot or structure is in the SFHA, but instead of being based on natural ground elevations, the property or structure has been raised by fill to elevate it above the BFE. In other words, the land has been physically raised.	<b>PMR</b>	PHYSICAL MAP REVISION — FEMA and/or its Cooperating Technical Partners may perform an engineering analysis to add or modify flood hazard information shown on FIRMs. The outcome is an update to the map and Flood Insurance Study (FIS) to incorporate changes in BFEs, floodplains, or floodways. PMRs resolve comments and technical appeals, revalidate LOMAs and LOMR-Fs as needed, and are used when a LOMR is larger than one full FIRM panel or when specifically requested by the community.
<b>CLOMR-F</b>	CONDITIONAL LETTER OF MAP REVISION-FILL — A letter from FEMA stating a parcel of land and/or proposed structure that will be elevated by fill would not be inundated by the base flood if developed as proposed. A CLOMR-F does not update the flood zones. A LOMR-F should be applied for after completion of the construction project.		

## ALL ABOUT LOMRs

A LOMR allows FEMA to revise flood hazard information on a FIRM by letter without physically revising and reprinting the entire map panel. LOMRs are like PMRs in that they are used to change flood zones, floodplain and/or floodway delineations, and flood elevations, but they typically take less time and are less expensive.

Because of their limited distribution, LOMRs are primarily intended for small areas of change and areas where flood hazards are usually decreasing. LOMRs result in the FIRM and FIS being annotated, but not republished. LOMRs include the revised portion of the flood hazard map and FIS report information (such as affected flood profiles, floodway data tables, etc.) as attachments to the letter.

### How Do We Get Started?

A LOMR application must be submitted within six months of construction completion. Individuals, developers, or communities may apply. A LOMR must be signed by the

community's Chief Executive Officer (such as a mayor or the president of a county commission) because the community is responsible for adopting the revised information into its floodplain management ordinances and regulations. In most cases, there is a cost for FEMA to review a LOMR (view FEMA's [current fee schedule](#) for more details). A LOMR request can be submitted using the paper [MT-2 application forms](#), or it can be submitted online through the [Online LOMC application](#).

### How Long Will It Take to Become Final?

The length of a LOMR review depends on the completeness of the community's submission, the complexity of the analysis and changes, and whether FEMA needs to request additional information. On average, it takes six to 12 months for FEMA to issue a preliminary map revision. All LOMRs are then subject to a 90-day appeal period if they involve any changes to BFEs, the SFHA, or floodway boundaries. If no appeal is submitted, the LOMR will become effective 30 days after the end of the appeal period; at this point, any changes in local building and federal lending requirements take effect. (For more details on effective dates, view this [table](#).)



## HELPFUL LINKS & RESOURCES

- National Flood Insurance Program (NFIP): <https://www.fema.gov/national-flood-insurance-program>
- The Risk MAP Project Lifecycle for Flood Risk Projects: <https://www.fema.gov/risk-map-flood-risk-project-lifecycle>
- LOMRs: <https://www.fema.gov/letter-map-revision>
- Revalidation Letters for LOMC: [https://www.fema.gov/media-library-data/20130726-1840-25045-1194/understanding\\_soma\\_revalidation\\_letter.pdf](https://www.fema.gov/media-library-data/20130726-1840-25045-1194/understanding_soma_revalidation_letter.pdf)
- Online LOMC: <https://www.fema.gov/change-flood-zone-designation-online-letter-map-change>

### LOMAs AND LOMR-Fs

- LOMA and LOMR-F Processes: <https://www.fema.gov/letter-map-amendment-letter-map-revision-based-fill-process>
- How to Request a LOMA or LOMR-F: <https://www.fema.gov/media-library/assets/documents/19871>

### APPLICATION INFORMATION

- MT-1 (amendments): <https://www.fema.gov/mt-1-application-forms-instructions>
- MT-2 (revisions): <https://www.fema.gov/mt-2-application-forms-and-instructions>
- FEMA forms: <https://www.fema.gov/flood-mapping-related-forms>

### FEMA MAP INFORMATION EXCHANGE (FMIX)

- FEMA Map Service Center (MSC): <https://msc.fema.gov/portal>
- Contact a Map Specialist: 877-336-2627, [FEMAMapSpecialist@riskmapcfs.com](mailto:FEMAMapSpecialist@riskmapcfs.com)

## LOMR COORDINATION DURING A MAPPING UPDATE

Communities and developers may submit LOMRs at any time, even when there is an ongoing flood map update. Determining what data to use can be tricky, since the update could affect the results of the LOMR determination. It is best to coordinate the request with the community's floodplain administrator, FEMA Regional office, and MT-2 mapping partner, who can help the requester determine what data is available and how it could affect the LOMR. It may be advisable to look at both effective and preliminary study data and then make a determination. For example, using whichever hydrology analysis indicates more conservative flows may help ensure

that the revised LOMR area does not end up back in the SFHA once the flood risk mapping update is complete.

FEMA reviews all LOMRs and LOMAs before issuing preliminary and effective FIRMs. There is, however, a cutoff prior to the Letter of Final Determination (LFD), one of the final steps in a map update. Any LOMRs that are issued or become effective 60 days prior to the LFD date will be incorporated into the effective FIRMs. Those that are issued after this cutoff will be issued no earlier than the day after the FIRM goes effective.

FEMA's [National Flood Hazard Layer Viewer](#) allows communities to print an updated FIRM panel with any LOMRs issued after the effective date. The viewer and on-demand mapping are available at <https://msc.fema.gov/nfhl>.

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## COMMUNITY REQUIREMENTS FOR MAINTAINING FIRMs

Communities participating in the National Flood Insurance Program (NFIP) enter into an agreement with FEMA to submit new or revised map information when it becomes available. Section 65.3 of the NFIP regulations states: "A community's base flood elevations may increase or decrease resulting from physical changes affecting flooding conditions. As soon as practicable, but not later than six months after the date such information becomes available, a community shall notify [FEMA] of the changes by submitting technical or scientific data in accordance with 44 CFR 65.3."

A community also must notify the FEMA regional office and the state within one year of annexing land, or whenever it assumes or relinquishes authority to adopt or enforce floodplain management regulations for an area.

Local staff should review revisions to maps, including CLOMRs and LOMRs, to ensure they align with the floodplain management ordinance and other community regulations. FEMA encourages communities to work with their FEMA Regional Compliance Specialist to report these changes.

### DEFINITION OF "DEVELOPMENT"

**Development means any man-made change to improved or unimproved real estate, including, but not limited to buildings or other structures, mining, dredging, filling, grading, paving, excavation or drilling operations or storage of equipment or materials.**

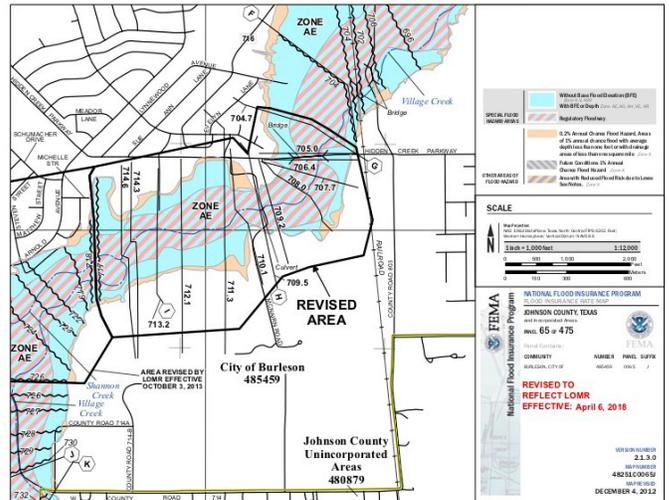
**Title 44 of the Code of Federal Regulations, Section 59.1 (44 CFR 59.1)**

## COMMON LOMR APPLICATION ISSUES

From time to time, FEMA reviewers come across a few submittal issues that can be easily avoided. An incomplete or poorly documented submittal can cause delays in the update of the FIRMs and increase costs for FEMA, communities, and submitters.

Some common submittal omissions and issues are:

- Certification of modeling, mapping, and/or underlying topographic information is not included
- Project description is unclear (What is changing? What is the basis of the FIRM update?)
- Confusion about the project area (e.g. bridge) versus revision area (e.g. stream reach)
- Fee payment is not included
- Fee exemptions are not documented or not applicable
- Failure to properly notify public or individual property owners
- Updated/Annotated FIRM/Flood Boundary and Floodway Maps/Profiles are not included
- Tie-ins—showing how revisions relate to current, effective floodway boundaries and elevations—are not within required specifications
- Missing community acknowledgment forms/signatures, particularly if revision area intersects multiple communities
- Topographic data issues, such as not covering the entire revision area, no map legend, etc.
- Incorrect model used as the basis for update/failure to incorporate other approved map revisions
- Missing digital model runs
- Submitted exhibits/maps are not consistent with modeling
- If structures, coefficients, drainage areas, etc. change from the effective data, the source and reason for change should be documented



FEMA reviews submitted models to validate exhibits and documentation, as well as to ensure engineering practices meet FEMA’s standards. Some common modeling issues include:

- Calculated/modeled water surface elevations are higher than the actual model cross sections
- Mixed or supercritical flow used without explanation
- Inconsistency in BFEs between multi-profile and floodway models
- Floodway surcharges outside acceptable range
- Basis for boundary conditions application not documented
- Problems with methodology/coefficients for new structures
- Cross sections not located or spaced properly
- Ineffective flow areas (expansion/contraction issues or incorrect use)
- Split flow not modeled for multi-profile or floodway runs

If you have questions about LOMR submittal requirements or would like to review a particular revision area, contact Ron Wanhanen ([ronald.wanhanen@fema.dhs.gov](mailto:ronald.wanhanen@fema.dhs.gov)) for any policy, procedure, or application questions related to LOMRs.



## REGION 6 VIRTUAL BROWN BAG SERIES

FEMA Region 6 has developed a suite of monthly training sessions on flood risk data and how communities can use these tools to increase resiliency, plan for future development, prepare for emergencies, help residents understand their risk, and make informed choices. These training sessions are free. We encourage local officials, staff, citizens, and stakeholders to join us each month for these interactive, live demonstrations. To view upcoming sessions and to register, go to <https://r6virtualbrownbag.eventbrite.com>.

## USING BASE LEVEL ENGINEERING DATA TO SUBMIT A LOMA

In some areas, FEMA has developed information with Base Level Engineering (BLE), a cost-efficient, map-modeling process that produces broad yet accurate flood risk data for a specific watershed area. When BLE data is available, property owners can use an online interface, the Estimated Base Flood Elevation Viewer (<http://InFRM.us/estBFE>), to determine the Base Flood Elevation for their property as part of the LOMA application process. Utilizing BLE, the estBFE Viewer can help identify Base Flood Elevations in areas where such information is not currently shown on Flood Insurance Rate Maps, such as those identified as Zone A. If a property owner believes that a structure is above or outside of the base flood extent in an effective Zone A, they may submit a LOMA request using the flood risk report generated by the estBFE Viewer.

### The following items are needed to apply for the LOMA using BLE:

- One of the following:
  - A copy of a plat map that identifies the property and includes recording information.
  - A parcel or tax map identifying the location, plus a copy of the property deed with recording information and the property's written legal description.
- Elevation information indicating the lowest adjacent grade to the building certified by a licensed land surveyor or registered professional engineer, except for buildings clearly shown outside the Special Flood Hazard Area; if built recently, building permit files may contain this information.
- An elevation certificate; professionals may use the estBFE Viewer results for the Base Flood Elevation value on the elevation form or elevation certificate.
- The estBFE Viewer flood risk report for the property generated through the estBFE Viewer, indicating the estimated flood level and model.
- A letter from the community stating acceptance of the estimated Base Flood Elevation generated by the viewer; a template letter for community use can be found at [http://www.riskmap6.com/documents/resource/BLE\\_LetterCommunitySupportTemplate.docx](http://www.riskmap6.com/documents/resource/BLE_LetterCommunitySupportTemplate.docx).

Keep in mind that other types of development may require additional documentation and possibly an application fee.

## CAN YOU GET A LOMA WITHOUT AN ELEVATION CERTIFICATE?

When it is clear just by looking at a Flood Insurance Rate Map (FIRM) that a property is not located in the Special Flood Hazard Area, FEMA may issue a Letter of Map Amendment-Out as Shown (LOMA-OAS). For these determinations, an elevation certificate is not necessary. All that is required is a copy of the property deed, a FIRMette created using FEMA's National Flood Hazard Layer Viewer, and a map of the property from Google Maps or a community's GIS department. For instructions on how to submit a request for a LOMA-OAS, see this [fact sheet](#).

**Letter of Map Amendment - Out As Shown (OAS) Instructions**

LOMA-OAS is a determination made by the Federal Emergency Management Agency (FEMA) for the property and/or buildings as to whether it is located within the Special Flood Hazard Area (SFHA). Only use this method if it is clear, visually, that the structure is not in the SFHA.

Obtain MT-EZ form Found on FEMA's site of [www.fema.gov/mt-ez-form](http://www.fema.gov/mt-ez-form) (also available in Spanish)

Documents Needed to Submit with MT-EZ Form:

1. Deed Copy of property deed can be obtained from the Register of Deeds.
2. FIRMette Created at FEMA's National Flood Hazard Layer (NFHL) Viewer - <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=80a051596444879386528a0fcd>

3. Map Obtained from community's GIS department or a website like Google Maps