NFIP Common Questions about FEMA Maps and Map Changes

Have other questions? Contact the Flood Hazard Management Program for answers!

Q: How can I apply for a Letter of Map Amendment (LOMA)?

An approved Letter of Map Amendment (LOMA) is an official amendment to a FEMA Flood Insurance Rate Map (FIRM, FBFM), removing a property from the floodplain. LOMAs are common when a property has been inadvertently mapped as being in the floodplain but is actually on natural high ground above the Base Flood Elevation (BFE).

All LOMA applications are submitted to FEMA. FEMA does not charge a fee to review a LOMA request, but requesters must provide specific mapping and survey information for their property. For FEMA to remove a structure from the floodplain through the LOMA process, the lowest ground touching the structure, or Lowest Adjacent Grade (LAG), must be at or above the BFE. This can be shown on an Elevation Certificate that has been completed and signed by a licensed surveyor or engineer.

If the property has been elevated by fill, the requester will need to use the Letter of Map Revision based on Fill (LOMR-F) process and is not eligible for a LOMA.

If the FEMA maps show a structure is outside the floodplain, the property can be referred to as "out as shown." No elevation data is needed in this case for the LOMA submittal.

Fact Sheet: How to Request a LOMA or LOMR-F

Fact Sheet: Letter of Map Amendment (Out as Shown) - Documentation & Submittal Process

FEMA's Website: LOMA & LOMR-F Process

Q: How do I apply for a LOMA in an unnumbered Zone A?

Unnumbered A zones are flood zones where FEMA has released no base flood elevation data. How to determine what the base flood elevation is may vary depending upon how the base flood elevation is used. If you are looking for a Letter of Map Amendment (LOMA) for your site, you can ask FEMA's Map Service Center to determine one for the purpose of the LOMA analysis.

Property owners applying for a LOMA may request that FEMA's Map Service Center provide a base flood elevation if the applicant has first checked for other sources and has found none. Here are other sources to check:

- 1. Local engineering studies or local agency/community/neighboring community
- 2. Federal agencies (USACE, USGS, etc.)
- 3. Preliminary or Draft FIRM data
- 4. Model-backed Zone A Water Surface Elevations (WSEs)
- 5. Nearby LOMCs

Once you have done this research, contact the FEMA Map Service Center at 1-877-336-2627 and tell them that you want to submit a Letter of Map Amendment (LOMA) but do not have a base flood elevation, nor any other supporting data. You can refer them to any other LOMAs in your area that you feel might be applicable. Typically, they will help to determine the BFE in a situation like this.

Q: What is a Letter of Map Revision Based on Fill (LOMR-F)?

If fill has been placed in the floodplain, causing the grade of the ground to be above the base flood elevation, and if a property owner wishes to show that the structure is above the base flood elevation, then the property owner must submit a Letter of Map Revision Based on Fill (LOMR-F) to FEMA. If fill is proposed for a development in the floodplain but not yet placed, a Conditional Letter of Map Revision based on Fill (CLOMR-F) can be requested, to receive FEMA's comments on the proposed project prior to any fill being placed. Even if a CLOMR-F is submitted, a LOMR-F must also be submitted after the fill has been placed, and BEFORE any construction begins, in order to officially change the flood maps.

Both the CLOMR-F and LOMR-F applications require a Community Acknowledgement Form to be signed by the local floodplain management official. This form tells the (C)LOMR-F reviewers that the local community has documentation showing the that proposed/constructed structures will be/are "reasonably safe from flooding". An excerpt from this form is below:

In addition, we have determined that the land and any existing or proposed structures to be removed from the SFHA are or will be reasonably safe from flooding as defined in 44CFR 65.2(c), and that we have available upon request by DHS-FEMA, all analyses and documentation used to make this determination. For LOMR-F requests, we understand that this request is being forwarded to DHS-FEMA for a possible map revision.

FEMA has provided a technical bulletin, <u>TB-10-01: Ensuring That Structures Built on Fill In or Near Special Flood Hazard Areas Are Reasonably Safe From Flooding</u>, to help developers and communities ensure that structures are meeting the requirements for "reasonably safe from flooding". In order to approve the removal from the floodplain through a LOMR-F, this documentation needs to be provided to the local building official, and in certain cases, FEMA as well.

Q: My community has had Preliminary Maps issued. Can I use these maps to regulate development?

This answer varies depending on your role in your community:

If you're a Building Inspector: For the MA Building Code, the answer is no. Building Officials are required to use the currently effective Flood Insurance Rate Maps (FIRM) and Flood Insurance Study (FIS) reports until FEMA issues Letters of Final Determination for the preliminary FIRMs and FIS, per MA State Building Code, 10th Edition, Section 2.00: Flood Hazard Areas and MA Residential Code, 10th edition, R322.1.1 Base Flood Elevation, Flood Maps, Delineations and Definitions

If you're on a Conservation Commission: For the Wetlands Protection Act, the answer is yes. DEP NERO advises that Conservation Commissions can use Preliminary FEMA FIRMs as best available data per the Wetlands Protection Act <u>definition of Special Flood Hazard Area in 310 CMR 10.04</u>. Conservation Commissions can always speak with their DEP Regional Representative for additional guidance.

If you are the Zoning Enforcement Officer: The FEMA maps adopted in your current floodplain zoning regulations are the regulatory maps.

The Wetlands Protection Act, State Building Code, and local Zoning floodplain regulations are different regulations with different standards for what floodplain data can be used to regulate development.

Q: Can a community request a copy of a map study?

Local governments can request FEMA data from a study by contacting FEMA's Map Service Center at 877-336-2627 or by reaching out to <u>FEMA-FMIX@fema.dhs.gov</u>. This information should be free of charge for a local NFIP community.

Q: Can our community get paper copies of FEMA's flood maps?

When the most recent flood maps became effective for your community, FEMA would have sent your community printed copies. It may be worth checking with different departments (Planning, Building, Conservation, etc.) to see if your community already has copies. Copies of the flood maps can always be downloaded and printed from <u>FEMA's Map Service Center</u>.

If your community is part of a FEMA mapping update project and receiving new maps, FEMA will send printed copies of the new maps once an effective date of the new maps has been determined.

How to Print & Download a copy of the FEMA Flood Map

Q: My community has had Preliminary Maps issued. How can I view them and understand what has changed?

The FEMA <u>Flood Map Changes Viewer</u> lets you compare your preliminary FEMA FIRMS to your currently effective FEMA FIRMS. FEMA has instructions for the viewer here: <u>FEMA's Flood Map Changes Viewer</u>