DFIRMS and Maps: What Does the Digital Transition Mean?

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Oklahoma communities that have had new or updated FIRM maps issued in the past few years may have noticed the number of paper maps distributed to them has decreased considerably. The transition to all digital products is in full swing, leaving many wondering how participating communities can work through the digital transition and continue to implement the NFIP policies effectively.

To provide some background on this digital transition, here is an excerpt from “Paper-to-Digital Flood Hazard Information” from FEMA’s website:

> Beginning with flood maps distributed on or after October 1, 2009, FEMA will provide a single paper map and Flood Insurance Study (FIS) to each mapped community and will convert all other distribution of maps and FIS reports to digital delivery. FEMA will continue to provide free digital map products and data to Federal, State, Tribal, and local National Flood Insurance Program (NFIP) stakeholders. Since Flood Map Modernization (Map Mod) began in 2003, FEMA has achieved a 50-75% reduction in the number of flood maps distributed in paper form. A key goal of Map Mod has been to convert the NFIP paper map inventory to digital products and to replace the distribution of paper maps with digital delivery via the Internet.

As the state coordinating agency, the OWRB is taking an active role in developing short- and long-term strategies to educate floodplain administrators and provide resources to communities to help with the digital transition. There is a sense of urgency on my part to help establish that base of knowledge and to promote the incorporation of Geographic Information System (GIS) technology into all floodplain management plans and practices.

One of the short-term strategies was the development of the online floodplain viewer, now accessible through the “Floodplain Management” page of the OWRB website. This Geographic Information System data viewer can be used to locate the Special Flood Hazard Areas throughout the state utilizing FEMA data. In the upcoming months, the online viewer will be expanded to provide access to multiple levels of users. A goal for the following year is to re-publish the digital data, which will make importing and viewing faster for new users. We are also exploring the possibility of offering GIS classes to the state’s floodplain managers through the Oklahoma Floodplain Managers Association (OFMA), which has an educational mission of helping to advance Oklahoma toward the digital transition.
Q: What is a LOMA or a LOMR-F?

A: LOMA stands for “Letter of Map Amendment.” LOMR-F stands for “Letter of Map Revision based on fill.” The Federal Emergency Management Agency (FEMA) applies rigorous standards to develop Flood Insurance Rate Maps (FIRMs) and uses the most accurate hazard information available. However, limitations in the scale or topographic detail of the source maps used to prepare a FIRM may cause small elevated areas to be included in a Special Flood Hazard Area (SFHA). SFHAs are high-risk areas subject to inundation by the base (one-percent annual-chance) flood; they are also referred to as one-percent annual chance floodplains, base floodplains, or 100-year floodplains. To change the flood hazard designation for properties in these areas, FEMA has established the LOMA process for properties on natural high ground and the LOMR-F process for properties elevated by the placement of fill. LOMAs and LOMR-Fs are letter determinations that officially amend an effective FIRM. They can establish that a property is not in an SFHA, and by doing so, remove the federal flood insurance requirement.

How to Request a Letter of Map Amendment or Letter of Map Revision Based on Fill

A LOMA application form can be downloaded from the FEMA website at [www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm](http://www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm). FEMA does not charge a fee to review a LOMA request, but requesters are responsible for providing the required mapping and survey information specific to their property. For FEMA to remove a structure from the SFHA through the LOMA process, Federal regulations require the Lowest Adjacent Grade (LAG) elevation, the lowest ground touching the structure, to be at or above the Base Flood Elevation (BFE). The exception to this requirement is when the submitted property information shows that the structure is outside the SFHA; in this case, the property is referred to as “out as shown.”

If elevation information is required for the LOMA request, the requestor should submit the elevation data requested on the MT-EZ form, available at [www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm](http://www.fema.gov/plan/prevent/fhm/dl_mt-ez.shtm). An Elevation Certificate, which includes this required elevation data, may be submitted to meet this data requirement and may be available from the community in lieu of a new survey.

If the property has been elevated by fill (see drawing page 3), the requester will need to use the LOMR-F process. Application forms are available at [www.fema.gov/plan/prevent/fhm/dl_mt-1.shtm](http://www.fema.gov/plan/prevent/fhm/dl_mt-1.shtm). For a LOMR-F to be issued, the LAG must be at or above the BFE, and community floodplain officials must determine that the land and any existing or proposed structures to be removed from the SFHA are “reasonably safe from flooding.” FEMA charges a fee for the engineering review of LOMR-Fs. Fee information is located at [www.fema.gov/plan/prevent/fhm/frm_fees.shtm](http://www.fema.gov/plan/prevent/fhm/frm_fees.shtm).

Please send completed application forms to the following address:

LOMC Clearinghouse
Attn: LOMA Manager
7390 Coca Cola Drive, Suite 204
Hanover, MD 21076

What if no BFEs have been Determined?

In some instances, BFEs for certain SFHAs have not yet been determined. FEMA will attempt to calculate the BFE when a LOMA application is submitted for properties of less than 50 lots or 5 acres. Sometimes, BFEs can be developed from sources such U.S. Geological Survey topographic quadrangle maps. If that information is not available, the property owner will be asked to supply a survey for the property with the information necessary to allow FEMA to develop a site-specific BFE.

National Flood Insurance Program (NFIP) regulations require that the requester determine the BFEs for properties larger than 50 lots or 5 acres. A variety of computational methods can be employed to determine BFEs, but these methods can be expensive. Before computational methods are used, every attempt should be made to obtain information, in the form of floodplain studies or previous computations, from Federal, State, or local agencies. Data obtained from these agencies may be adequate to determine BFEs with little or no additional research, calculation, or cost.

The FEMA document entitled “Managing Floodplain Development in Approximate Zone A Areas, A Guide for Obtaining and Developing Base (100-Year) Flood Elevations” provides guidance on computing BFEs. This document, which can be viewed on the FEMA Library website at [www.fema.gov/library/index.jsp](http://www.fema.gov/library/index.jsp), provides methods for developing BFEs, as well as a list of agencies that can be contacted to determine whether BFE data are already available.

How will a LOMA or LOMR-F Affect my Flood Insurance Requirement?

The federal flood insurance requirement applies to structures in SFHAs that carry a mortgage backed by a federally regulated lender or servicer. If you have a LOMA or LOMR-F proving that your property is not in the SFHA, the mandatory federal flood insurance requirement no longer applies. However, your lender still has the prerogative to require flood insurance as a condition of...
the loan. Premiums will be lower for structures outside the SFHA.

If FEMA issues a LOMA or LOMR-F and your lender agrees to waive the flood insurance requirement, you may be entitled to a refund of the premium paid for the current policy year. To cancel your policy, you can submit a copy of the LOMA or LOMR-F and the lender’s waiver to your flood insurance agent or broker. The agent will send these documents and a completed cancellation form to the appropriate insurance provider.

It is important to note that approximately 30 percent of all flood insurance claims occur in areas designated as moderate or minimal flood risk. Therefore, not having a flood insurance policy could have disastrous consequences, leaving you with no financial protection from future flood losses. FEMA recommends flood insurance coverage even if it is not required by law or a lender.

The good news is that you may be eligible to pay much less for flood insurance coverage if your property is removed from the SFHA.

**Matt Rollins Joins OWRB Floodplain Management Team**

Gavin Brady, Oklahoma’s NFIP Coordinator, asked me to write a brief introduction of myself for this issue of the *Flood Current*. Since we just completed adopting 50 community ordinances and regulations during the month of April, I have already had the opportunity to meet many of our floodplain managers in person, but here is a quick bio for the rest of you.

I was born and raised in Massillon, Ohio. After high school, I spent four years in the US Navy as an Avionics Technician aboard the *USS Enterprise*. I then attended Kent State University in Ohio, earning a degree in Geography/Cartography and GIS with a good dose of Geology thrown in.

In the “real world,” I have worked for a major regional electricity supplier, an environmental consulting firm, and most recently, the OWRB, where I spent nine years in the Monitoring Section of the Water Quality Division. My previous job duties included conducting water sampling activities for the state’s Beneficial Use Monitoring Program (BUMP), which means I’ve been through many of the towns and cities that I now work with for Floodplain Management. Also during those nine years, I married my better half, Julie, and we now have a 5 year-old daughter.

In July of 2012, I accepted a position in the OWRB’s Floodplain Management program. CAV’s, classes, complaints, and contacts. I am doing it all!! The past nine months have been exciting, challenging, rewarding, confusing, and lastly, a great opportunity for me to learn and apply the virtues of floodplain management!

Any time you are in Oklahoma City, please feel free to stop by the office for a visit.

Matt Rollins
The 1980 Oklahoma Floodplain Management Act authorizes communities to develop floodplain regulations, designate flood hazard areas and establish floodplain boards. Community floodplain administrators must become accredited and receive training through the Oklahoma Water Resources Board (OWRB). Consistent with protecting the natural functions of the floodplain and reducing flood losses, the OWRB values the “No Adverse Impact” floodplain management approach, promoting responsible floodplain development through community-based decision making. For more information about Oklahoma's Floodplain Management Program, go to www.owrb.ok.gov/hazard/fp/floodplain.php or visit the Oklahoma Floodplain Managers Association’s web site at www.okflood.org.