LOMR In A Day

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Overview

• Assumptions and Disclaimers
• Overview of Existing Process
  – Review Process and Timeline
  – Pertinent NFIP Regulations
  – Supporting Data and Fee Requirements
  – Factors Affecting Review Process and Timeline
• Proposed “LOMR In A Day” Process
  – Review Process and Timeline
  – Eligibility Requirements
• Next Steps
LOMR – Letter of Map Revision

Before LOMR

After LOMR
Customer Experience

“LOMR In A Day” is a streamlined procedure for reviewing and processing MT-2 applications; map revisions can potentially be issued within 1 to 3 weeks of receipt of the application.

This requires commitment and close coordination from the reviewer and applicant, both before and after the application is submitted.
Assumption & Disclaimers

• Only an idea – not FEMA-approved
• Timeline is a target, but not guaranteed
• At any point, a case can be converted to the regular review process
• Applicant must have a good understanding of the MT-2 process
• Requestor must commit to addressing review comments quickly
• Complex revisions will not be eligible
• Appeal period timeline cannot be changed
Existing Workflow

- On average, a map revision takes 6 to 12 months to be issued
- Becomes effective 4.5 months after issuance
Pertinent NFIP Regulations

Title 44 of the Code of Federal Regulations (44 CFR)
- Chapter 1, Parts 60, 65, and 72 apply to MT-2 LOMCs
- Examples:
  - 65.3 → Requirement to submit new technical data when a project affects flooding conditions
  - 65.9 → Within 90 days of receiving the application, FEMA must either issue a determination or request additional data
  - 72 → Procedures for fees
  - 72.7 → Requestor must provide additional data requested within 90 days, or the case will be suspended and subsequent submittal will be treated as a new case

Regulations can be accessed online:
Supporting Data

General Data Requirements

• Community concurrence/involvement
• Notice of floodway revision by community
• Property owner notifications for adverse impacts
• Endangered Species Act compliance (CLOMRs)
• As-built plans (topo and hydraulic structures)
• Maintenance/operation plans
• Existing conditions (not future)
• State approval
• All data P.E. certified

Modeling Criteria

• Software meets FEMA requirements
  – List of approved software on FEMA website
• All applicable scenarios analyzed
  – Duplicate Effective
  – Corrected Effective
  – Pre-Project
  – As-Built
• BFE tie-in to effective within 0.5 foot
• Floodway surcharges within tolerance
• Adheres to generally accepted modeling practices and FEMA standards
Supporting Data and Fees

Mapping
- Show effective and revised delineations
  - Annotated FIRM
  - Workmap
  - Spatial files
- Matches model results within tolerance

Fees
- Fee varies depending on characteristics of application
- Fee schedule on FEMA website
- Updated regularly
- Exemption for requests based solely on a new study (no project)
Factors Affecting Timeline

• Missing or Incorrect Fee Payment
  – Refer to FEMA website for Fee Schedule
• Clarity of Intent
  – Project narrative
  – Avoid extraneous information
• Missing or Incomplete Data
  – Refer to MT-2 Instructions
  – Applicable NFIP regulations and FEMA Standards
LOMR In A Day

• Applicant:
  – Requests LOMR In A Day
  – Participates in a pre-submittal meeting
  – Coordinates submittal date with reviewer
• Review can be completed much faster than existing process
• Must address review comments immediately
• LOMR can be issued very quickly

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Proposed Workflow

Request LOMR In A DAY*

– Application forms with as much information as available
– Explain proposed approach
– Modeling or mapping prepared so far
– LOMR reviewer will perform preliminary assessment of the case

*Pre-submittal checklist or form will be developed
Proposed Workflow

• Pre-Submittal Meeting (can be conference call or WebEx)
  – Review available data
  – Discuss approach and requirements for the application
  – Invite community to participate
  – Describe features of an ideal submittal
  – Not a training session
• Set date for submittal of official application
• After submittal, work with reviewer to quickly resolve outstanding technical and regulatory issues, if any
Pre-Submittal Discussion

• Encouraged for all cases – not just “LOMR In A Day”

• Call FEMA Map Information eXchange to contact appropriate reviewer
  
  – (877) FEMA MAP (1-877-336-2627)
  
  – Email: FEMAMapSpecialist@riskmapcds.com
“LOMR In A Day” Roles

If applicant:

• Requests LOMR In A Day
• Submits application consistent with feedback from pre-submittal meeting
• Addresses review comments within a day or two

Then the reviewer:

• Reviews case info and schedules a pre-submittal meeting
• Reviews application promptly and coordinates with applicant to resolve comments
• Completes review and processes the application
Benefits

- Earlier feedback from reviewer reduces potential that the application will need rework
- Reviewer will need less time to process the case
- LOMR is issued and effective sooner
- No additional review and processing fee

*Existing*

- Official Application Received → Review Comments Provided ≤ 90 days → Review Comments Addressed ≤ 90 days → Revision Issued

*LOMR in a day*

- Official Application Received ≤ 1 week → Review Comments Provided ≤ 1 week → Review Comments Addressed ≤ 1 week → Revision Issued
Eligible Cases

Not too complex

- Zone A
- As-built follow-up to CLOMR
- Use same model as effective
- Single flooding source with partial panel(s)

Ineligible cases

- Revised hydrology
- 2D modeling
- Coastal
- Levees
- Alluvial fans
- Large scope
  - Multiple panels or flooding sources
Next Steps

• FEMA approval

• Pilot process by end of year

• Option for applicants within the next 2 years
Summary

• Gives some MT-2 cases the potential to be issued within 1 to 3 weeks from receipt of the application – but not a guaranteed timeline

• Meeting with reviewer before application is finalized can result in fewer review comments and less rework by applicant.

• Requires commitment from both applicant and reviewer to be successful