
LESSONS FROM LOMRS

Aaron Vandermus, EIT, CFM

Outline

What is a LOMR?

Case Study 1: Trains Trains Trains

Case Study 2: County-City Conundrum

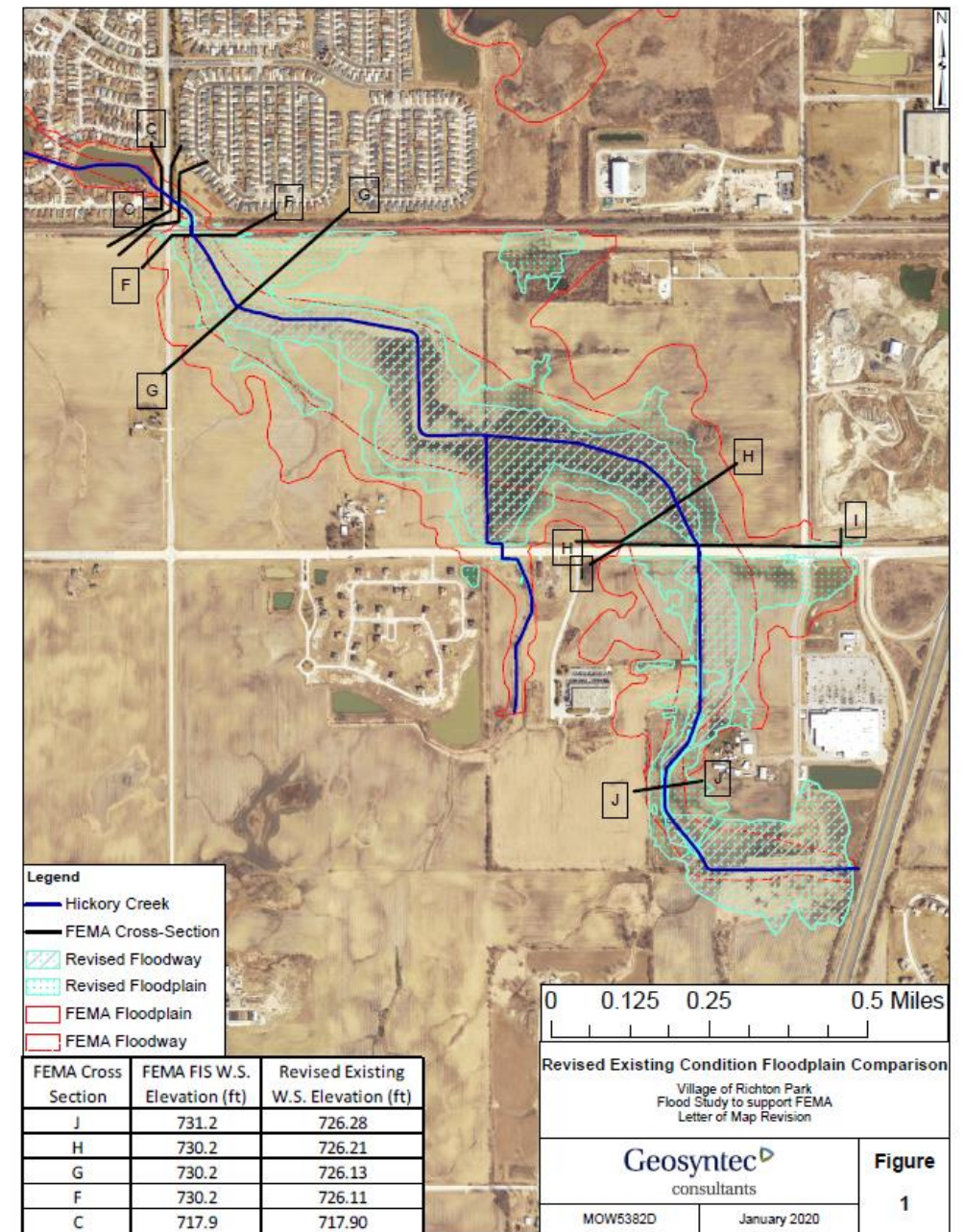
Mini-Cases

What is a LOMR?

- Letter of Map Revision (LOMR)
 - “...A letter from FEMA officially revising the current NFIP map to show changes to floodplains, regulatory floodways, or flood elevations.”

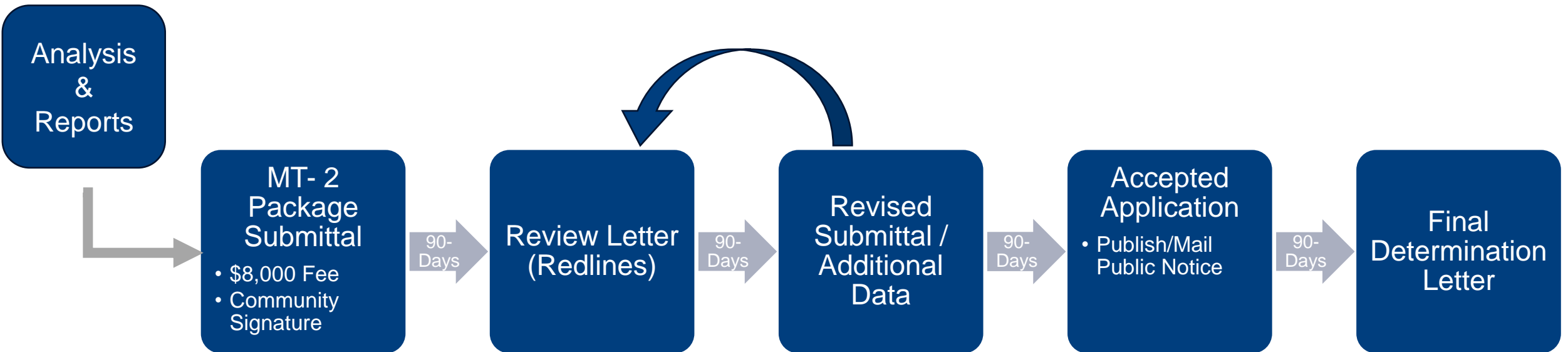
What is a LOMR? (cont.)

- Physical Change to Map
- For Proposed Projects typically predicated by a Conditional LOMR (CLOMR) to receive permit
- Typically requested due to construction/fill in the SFHA and No-Rise Analysis unsuccessful



What is a LOMR? (cont.)

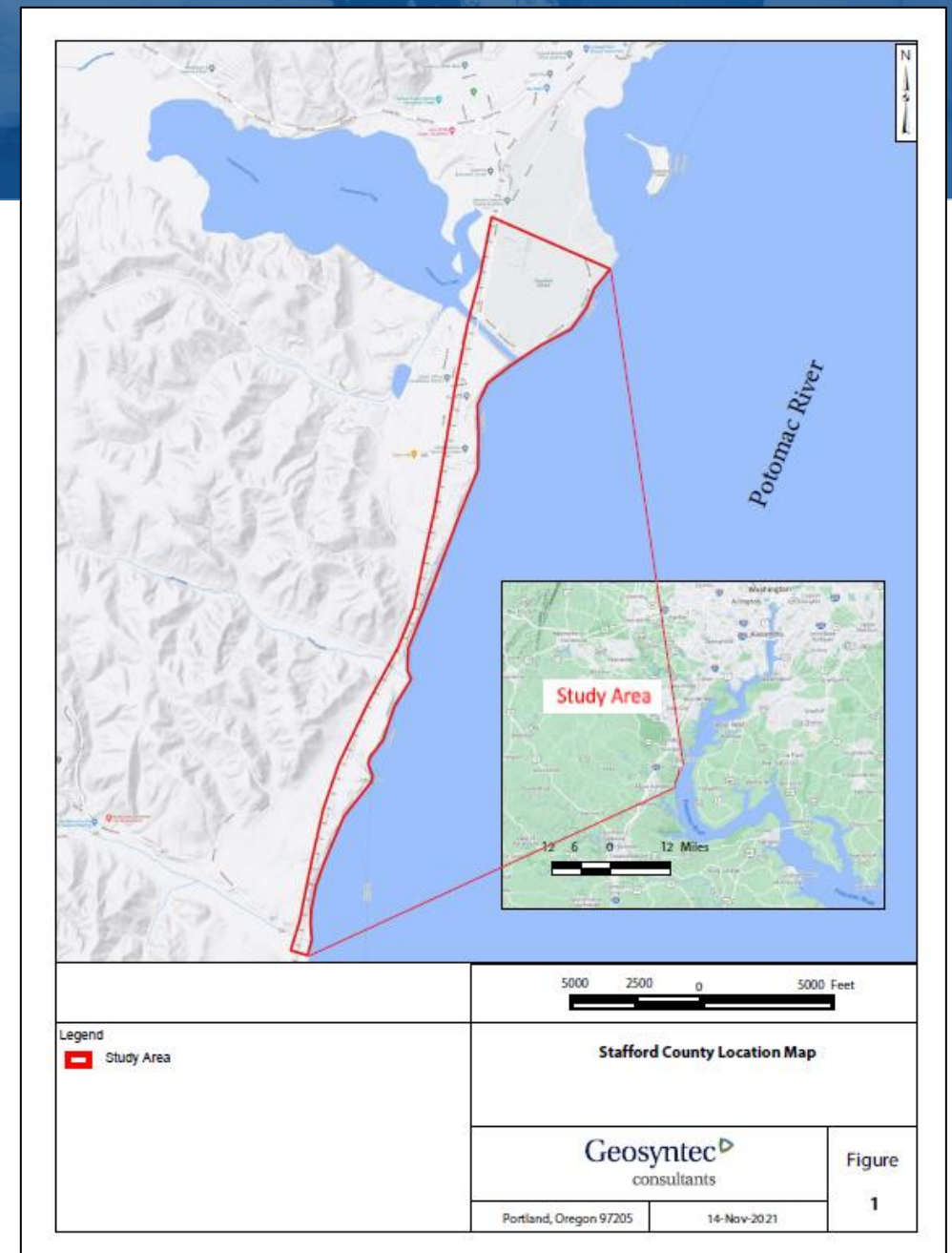
- Timeline
 - Variable
 - 6 – 12+ months



Case Study 1: Trains Trains Trains

Overview

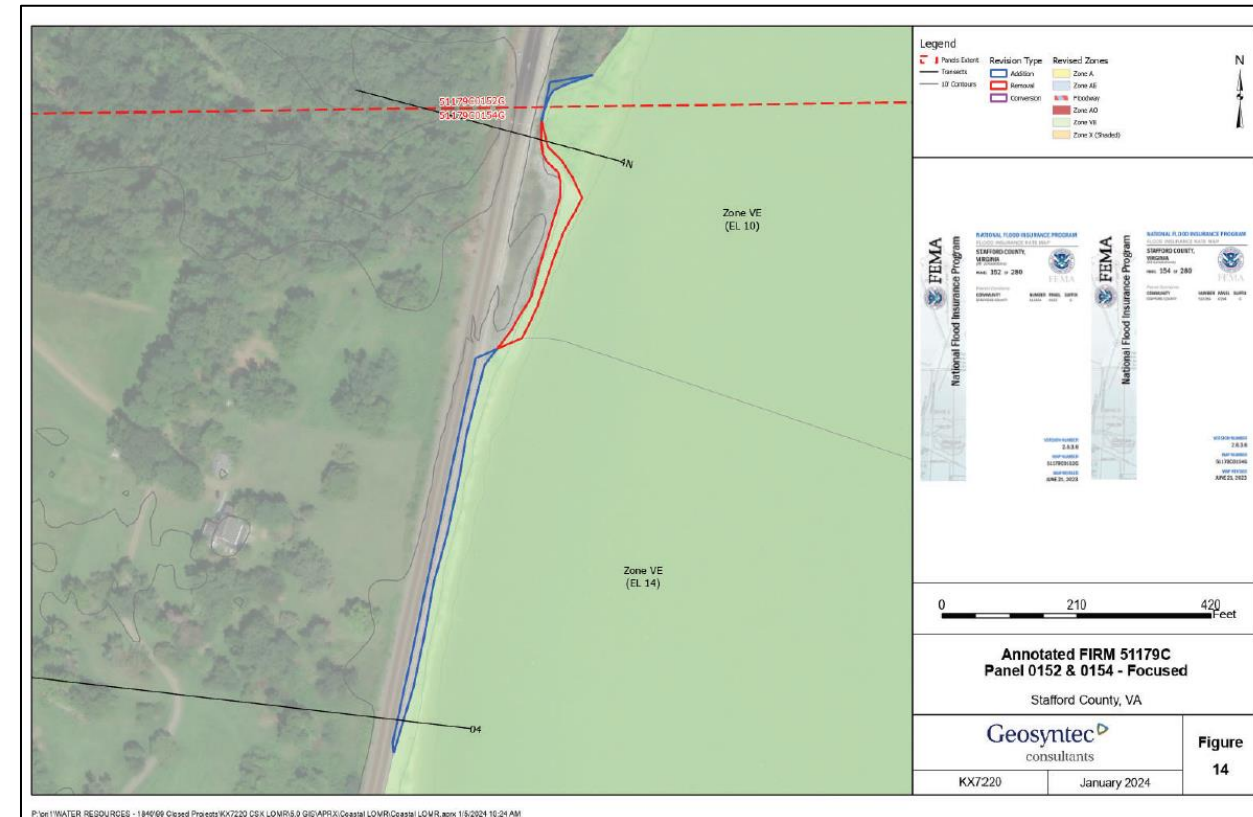
- **Extent**
 - Linear Project – Line Expansion
 - ~7 Miles
 - Two Counties
- **Impacts**
 - Riverine
 - AE, A
 - Coastal
 - VE, AE, AO
- **CLOMR**
 - Accepted – One Application
 - Project Constructed



Quick Technical Summary

- **Coastal**

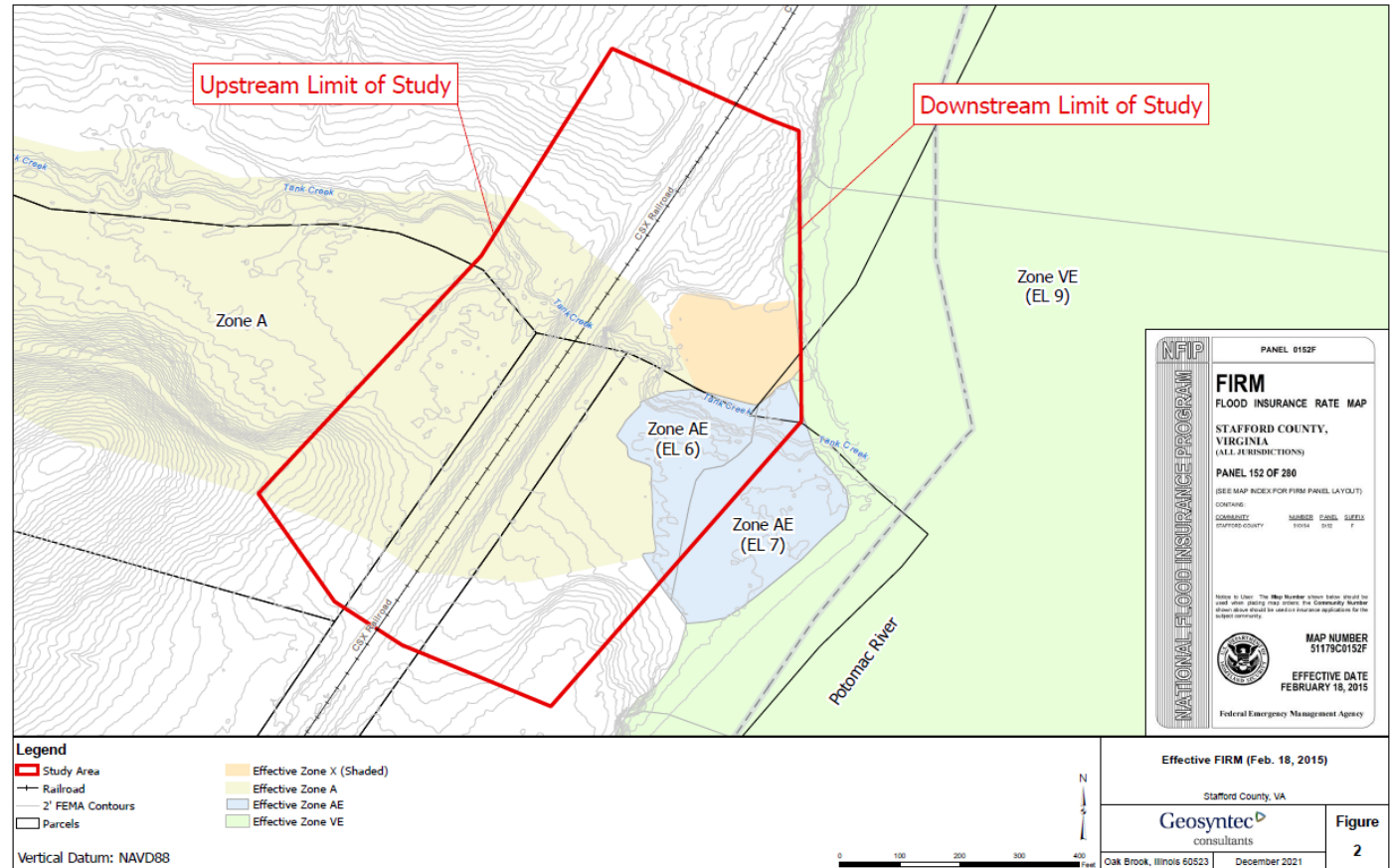
- Wave Height Analysis for Flood Insurance Studies (WHAFIS)
 - Inland Wave Height
- CHAMP 2.0
 - Zone Limits
- RUNUP 2.0, TAW, SPM
 - Wave Runup (Wave Break)



Quick Technical Summary

- **Riverine**

- Little Creek
 - Minor Fill in the Fringe
 - Effective HEC-RAS Model
- Tank Creek
 - In Separate County
 - Culvert Extension for Third Rail
 - Zone A (Approximate)
 - No Effective Model



Submittal!

- **First Submittal**

- Online LOMC Recommended
- MT-2 Forms
- Reports
- Maps
- Models
- Spatial Files



FEMA



Reviewer Comments/Requests

- **Comment Letter**
 - “Additional Data Required”
 - Minimal Comments
 - Map Formatting
 - Clearly Label Tie-Ins
 - Vertical Datum Shown on ALL Maps
 - Too Much Detail in Floodplain



Submittal No. 2

- Revised Materials

- Maps
- Models
- Spatial Files

- Reviewer Call

- Don't Use Online Portal



FEMA



Lesson 1!

Only use the online portal to open case.



- **Requested Meeting**

- Reviewer Wants us to Split Case into Two Applications
- “Two Counties, Two Submittals”
 - CLOMR was “One Project, One Application”
 - “Do you have that in writing?”
- Increased Efforts
 - 2 Reports
 - 2 Applications
 - 2 Fees



Lesson 2!

Get everything in writing.



Case Study 1.1: County A



Case Study 1.1: County A

- **Submittal No. 2**
 - Revised Materials Accepted and Approved
 - Publish Public Notice
 - 90-Day Public Comment Period
 - No Comments
 - Receive Final Determination Letter
 - Done!
- **Total Time**
 - From First Submittal ~ 14 Months

Prince William Times | www.princewilliamtimes.com | May 11, 2023

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Legal Notices

Legal Notices

MANASSAS PARK VOTERS INFORMATION
THE DEADLINE TO REGISTER TO VOTE FOR THE JUNE 20, 2023, REPUBLICAN PRIMARY IS MAY 30, 2023. THE OFFICE WILL CLOSE AT 5:00 PM ON THAT DAY. VOTER REGISTRATION IS LOCATED AT CITY HALL, 100 PARK CENTRAL PLAZA, SUITE 103. CITY HALL WILL BE OPEN ON SATURDAY, JUNE 10, 2023, AND JUNE 17, 2023, FROM 9:00 AM TO 5:00 PM FOR EARLY VOTING. ALL MANASSAS PARK CITIZENS ARE QUALIFIED TO VOTE EARLY WITHOUT NEEDING A REASON. JUNE 17, 2023 IS THE LAST DAY FOR THIS ELECTION ON WHICH QUALIFIED APPLICANTS MAY VOTE EARLY. ALL VIRGINIA VOTERS ARE REQUIRED TO PRESENT IDENTIFICATION WHEN THEY COME TO VOTE. A DROP BOX IS AVAILABLE AT VOTER REGISTRATION M-F 8:30AM-4:30PM. ON ELECTION DAY A DROP BOX WILL BE AVAILABLE AT EACH POLLING LOCATION AS WELL AS VOTER REGISTRATION. FOR MORE INFORMATION, CALL MANASSAS PARK VOTER REGISTRATION AT (703) 335-8806.

VOTANTES DE MANASSAS PARK INFORMACIÓN OFICIAL DE VOTACIÓN
LA FECHA LÍMITE PARA REGISTRARSE PARA VOTAR PARA LAS PRIMARIAS REPUBLICANAS DEL 20 DE JUNIO DE 2023 ES EL 30 DE MAYO DE 2023. LA OFICINA CERRARÁ A LAS 5:00 PM DE ESE DÍA. EL REGISTRO DE VOTANTES SE ENCUENTRA EN EL AYUNTAMIENTO, 100 PARK CENTRAL PLAZA, SUITE 103. EL AYUNTAMIENTO ESTARÁ ABIERTO EL SÁBADO 10 DE JUNIO DE 2023 Y EL 17 DE JUNIO DE 2023, DE 9:00 A.M. A 5:00 P.M. PARA LA VOTACIÓN ANTECIPADA. TODOS LOS CIUDADANOS DE MANASSAS PARK ESTÁN CALIFICADOS PARA VOTAR TEMPRANO SIN NECESIDAD DE UNA RAZÓN. EL 17 DE JUNIO DE 2023 ES EL ÚLTIMO DÍA PARA ESTA ELECCIÓN EN LA QUE LOS SOLICITANTES CALIFICADOS PUEDEN VOTAR TEMPRANO. TODOS LOS VOTANTES DE VIRGINIA DEBEN PRESENTAR UNA IDENTIFICACIÓN CUANDO VENGAN A VOTAR. UN BUZÓN ESTÁ DISPONIBLE EN EL REGISTRO DE VOTANTES DE LA MAÑANA A LAS 8:30 A.M. A LAS 4:30 P.M. EL DÍA DE LAS ELECCIONES HAY UN BUZÓN DISPONIBLE EN CADA LUGAR DE VOTACIÓN, ASÍ COMO EL REGISTRO DE VOTANTES. PARA OBTENER MÁS INFORMACIÓN, LLAME AL REGISTRO DE VOTANTES DE MANASSAS PARK AL (703) 335-8806.

Public Notices

The Prince William County Department of Public Works Environmental Services Division in accordance with National Flood Insurance Program regulation 65.7(b)(1), hereby gives notice of the County's intent to revise the flood hazard information on Little Creek, generally located between Windsor Road and Quinceo Creek. Specifically, the flood hazard information shall be revised from Little Creek's confluence with Quinceo Creek to a point approximately 2,900 feet upstream of Geiger Road. As a result of the floodway revision, the floodway shall widen, with a maximum widening of 42 feet at a point approximately 290 feet upstream of the Geiger Road bridge crossing, and narrow.

In addition, the 1% annual chance water-surface elevations shall increase and decrease, and the 1% annual chance floodplain shall widen and narrow within the area of revision.

Maps and detailed analysis of the revision can be reviewed at the Department of Public Works at 5 County Complex Ct, Prince William, VA 22192. Interested persons may call Scott Sheridan (804) 465-2910, or Raj Bhatti at (703)-792-7078 for additional information from May 11th to June 12th.

Employment

Crew Leader
with traffic control experience. CDI, Class B Dump Truck driver. Interstate 66 in Fauquier Co. Contact: Greg Settle 540-620-8998

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Call 301-697-4812 for more info!

BACKHOE OPERATOR
Marshall VA Operator needed to run How-Ram, Great pay and benefits, Health/Dental/Life, Vacation, IRA. Qualified employees assigned a company pickup. Applicants must pass a drug screening. Submit resume to: Curtiss@shambhushammers.com 540-360-5548, EEO

LEAD TEACHERS & ASSISTANT TEACHERS
Full or Part Time Walnut Grove Child Care 540-347-0716 or 540-349-8656

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Do you feel overwhelmed as a property Association Manager? Our business model is different from what you are used to. Our property manager has been with us for over 20 yrs. & enjoys coming to work in an atmosphere based upon Christian principles. No night/weekends. FT. in our Manassas Office for someone with great organizational skills, & rotary certification. We've been in business for over 40 yrs. & look forward to talking with you about the specifics of the opening we have. Please send resume & salary requirements to: mflapp@jgmail.com

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Case Study 1.2: County B



Case Study 1.2: County B

- **Get to Work**
 - Prep New Materials
 - Open a New Case Number
 - Submit Materials
- **Comment Letter**
 - Comments Unique from First Combined Submittal
 - NEW: Request to Survey Culvert
 - Great...
 - Typical 90-Days



Lesson 3!

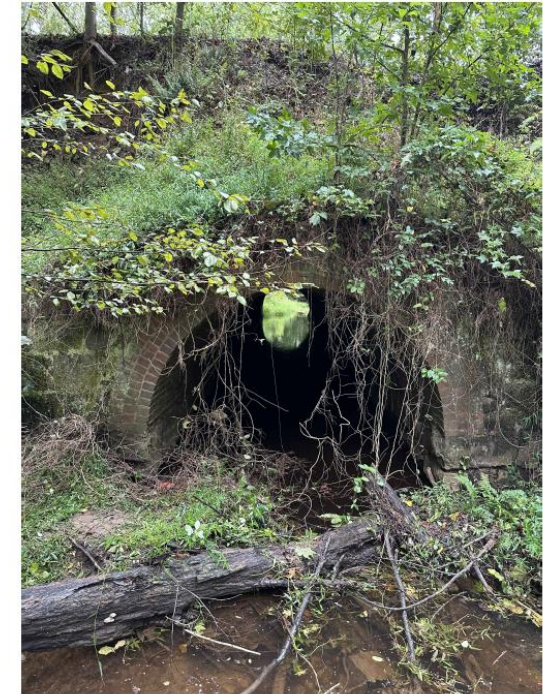
Assume comments won't be consistent.



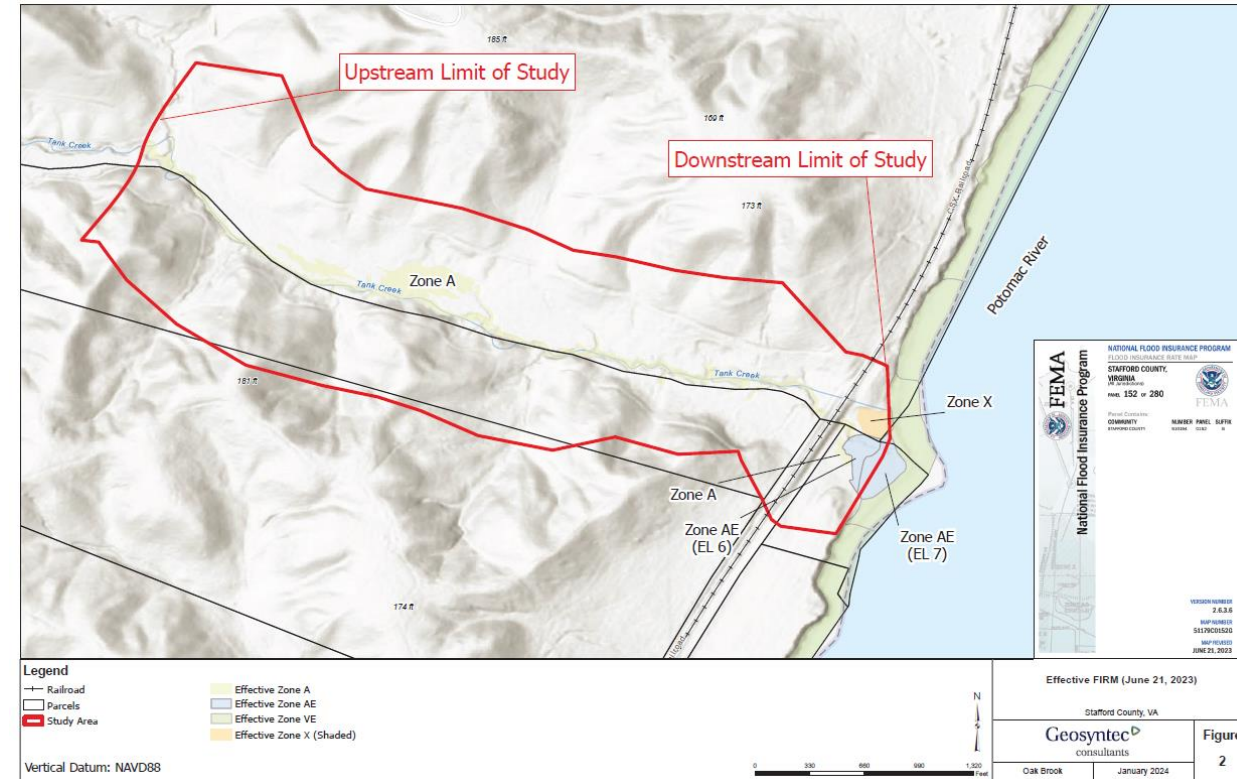
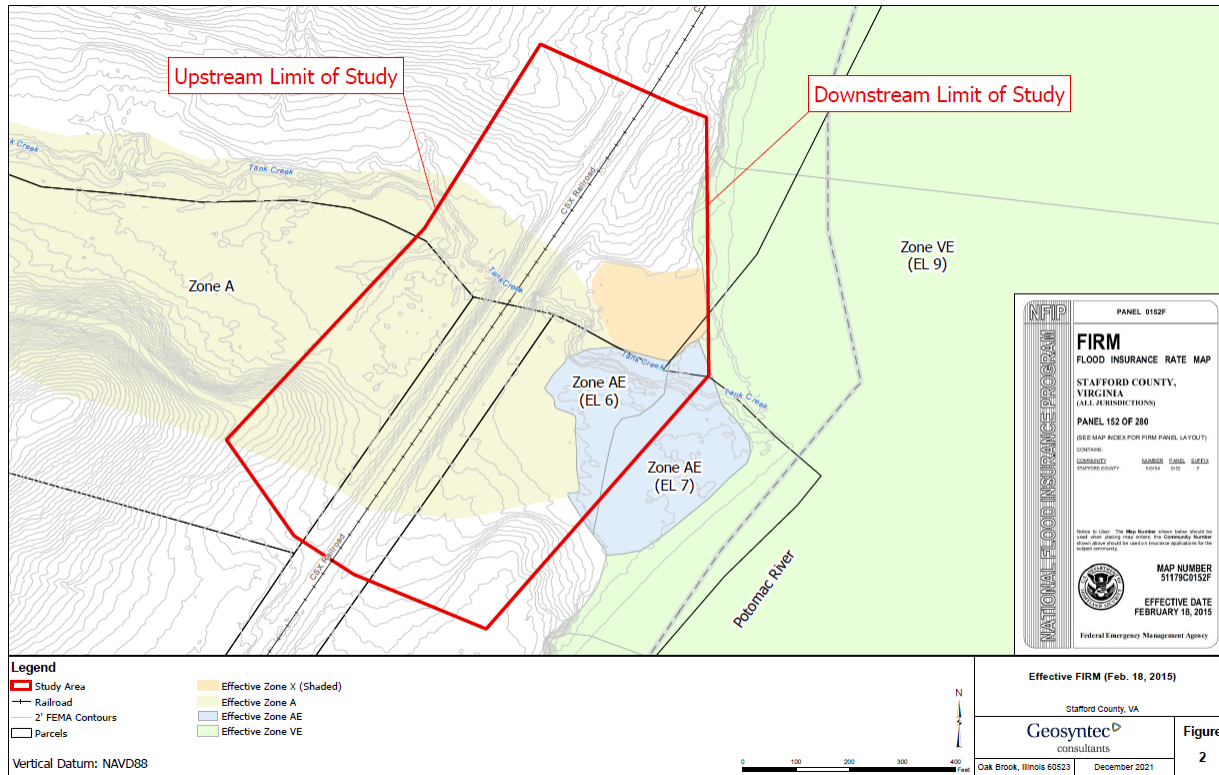
Case Study 1.2: County B

- **Revisions**

- Survey of Culvert/Tracks
- Sealed Survey 2-Months Later
 - 30 Days Left for Revised Submittal
- Working on Other Comments
 - “Request Effective Model”
 - Zone A Approximate?
 - CLOMR found No Model
 - ... Right?



Case Study 1.2: County B



Proactively, inquire on FIS Updates or Physical Map Revisions.

Case Study 1.2: County B

- **FIS Updated**
 - Updated During our LOMR Review
 - Comments are now Referring to Updated FIRM
 - New Effective Model
 - Zone A
 - Our Work/Materials Outdated
- **Discussion with Reviewer**
 - Submit what we have completed
 - Request Extension
 - No Guarantees

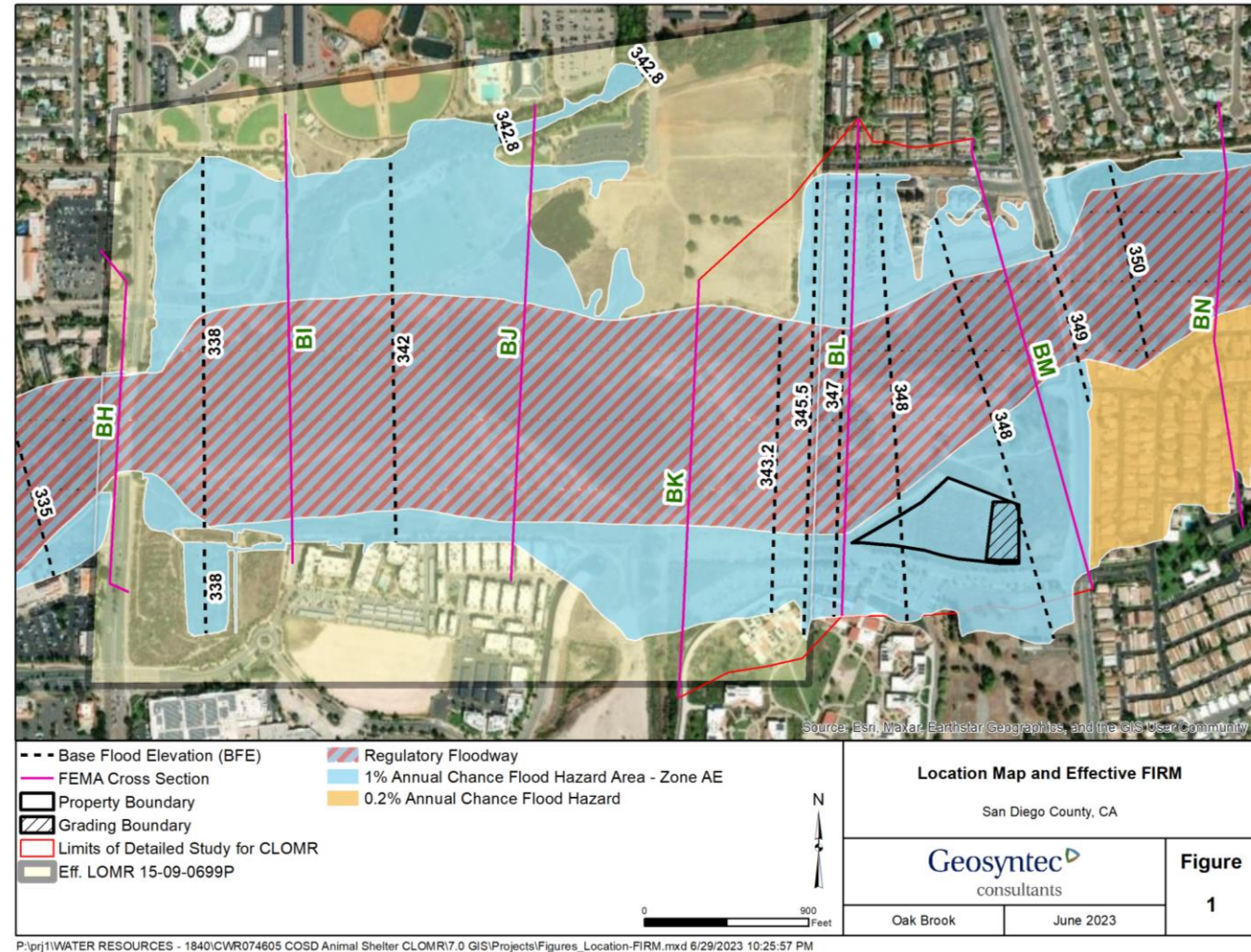
Case Study 1.2: County B

- **Extension Granted**
 - Request Effective Model from FEMA
 - ~1 Month
 - Send to County for Review/Concurrence
 - ~1.5 Months
 - Submittal Again
 - 2-3 Weeks Ago
- **Forecast**
 - 90-Days for Review
 - 90-Days for Revision
 - 90-Days for Public Notice
 - Total Timeline ~27 Months

Case Study 2: Animal Shelter CLOMR

Overview

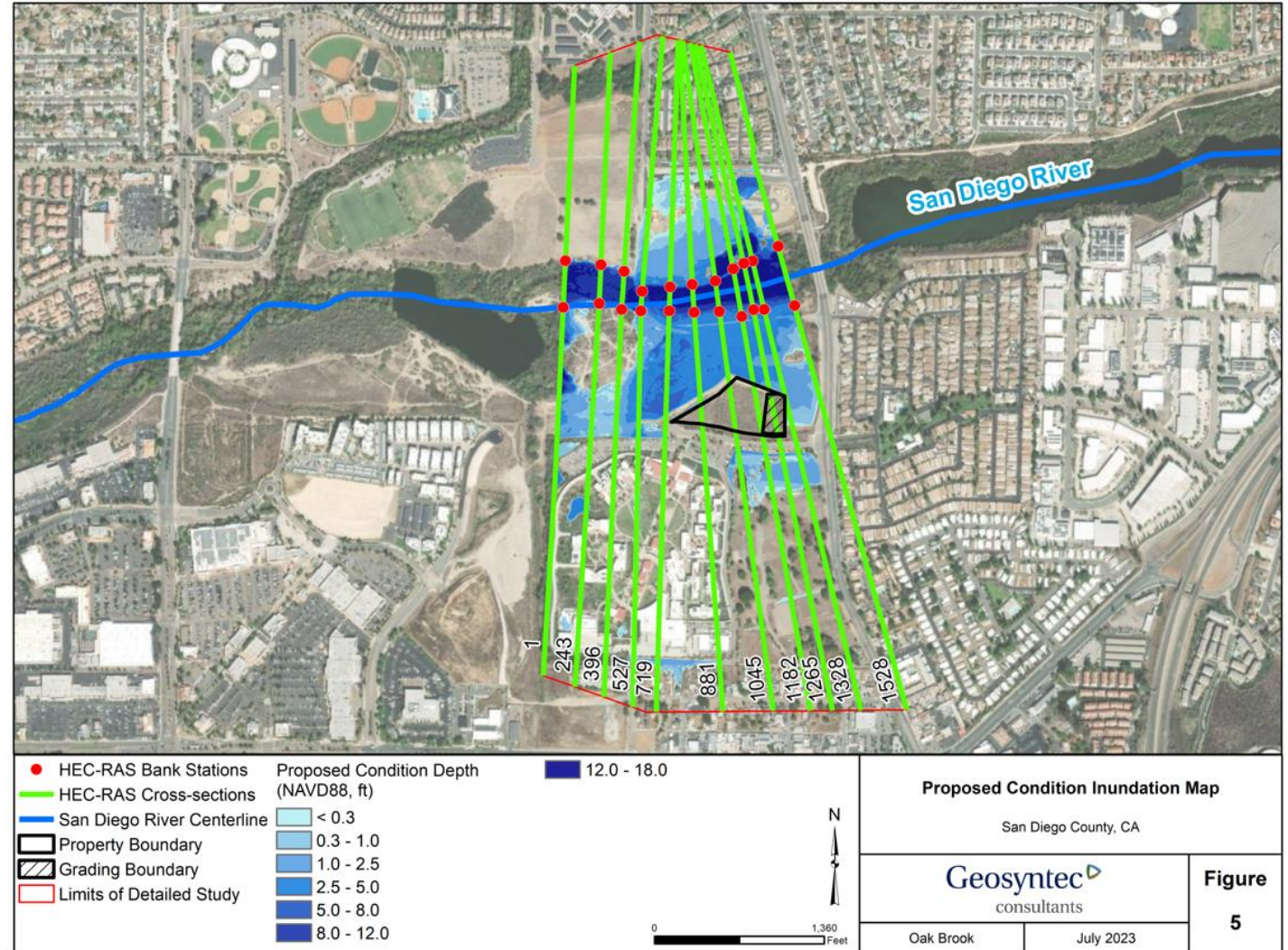
- **Extent**
 - Corner of Building in Zone AE
 - City is FIS Community
 - County is Builder of Shelter
- **Impacts**
 - Riverine
 - No-Rise?
 - CLOMR – County Ordinance
- **Timeline**
 - Breaking Ground in 8-Months
 - **“No they’re not.”**



Quick Technical Summary

• Riverine

- San Diego River
 - Fill in the Fringe
- Request Model
 - ~ 1 Month
 - Effective HEC-2 Model
- Revision Package
 - Quick Work
 - ~ 3-4 Weeks
 - Close to Completion



P:\proj1\WATER RESOURCES - 1840\CWR074605 COSD Animal Shelter CLOMR\7.0 GIS\Projects\Figure 4-5_Inundation.mxd 7/3/2023 1:42:27 PM

Project Coordination

- Meeting 1

- Community Concurrence
 - County wants to Sign
 - “Superior Legal Entity”
 - Don’t recommend but okay

- Meeting 2

- City Representative Involved
 - LOMR Across the River in Public Notice Phase
 - Can’t Submit our CLOMR...



Lesson 5!

Coordination is key. Involve your stakeholders early.



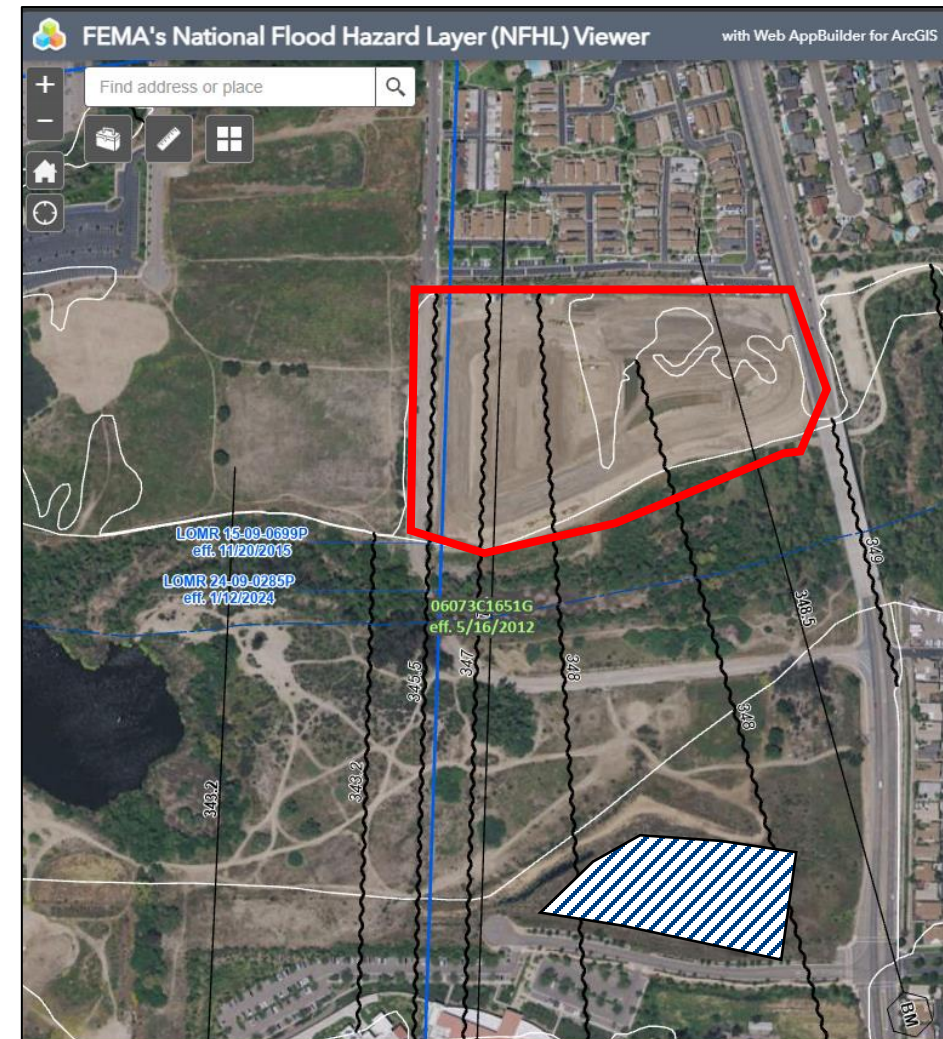
Case Study 2

- **Path Forward**

- Wait for Final Determination on LOMR
- Use the LOMR Model from Across the River

- **Update**

- Model Requested
- Moving Forward



Mini-Cases



- **Coastal No-Rise**
 - Regional Model
 - Data Request – 400 GB
- **Chicagoland LOMR**
 - Long Wait on Review
 - **Pet cat lost data**
 - **Extension Granted!**
- **IL No-Rise**
 - Placed Fill (Conservation)
 - Geometric Considerations
 - Rise-Below 0.1 ft
 - **Requested Rise Below 0.01 ft**
- **CA Alluvial Fan CLOMR**
 - Revisions on revisions
 - **~4 Years**



Lessons

1. The Online LOMC Portal is not recommended.
2. If it's not in writing, it's not happening.
3. Assume "Additional Data" comments won't be consistent.
4. Proactively inquire on FIS updates and map changes.
5. Coordination is key; involve stakeholders early.

Overall, budget and schedule conservatively for the uncertainty involved in the LOMR process.



Questions?