

# REVISED AREA

ZONE AE

*North Fork  
High School  
Tributary*

JOINS PANEL 0177

WESTMINSTER DR

City of  
Marion  
170719

WOLF DR

TESTA DR

PAULA DR

CASTLEBERRY DR

*High School  
Tributary*

423

B

423

427

D

426

425

424

24

421

422

420

ZONE  
AE

*High School  
Tributary*

BEVABECK  
RD

RITCHEY DR

RANCH LN

88° 56'

HEMLOCK DR

## Common LOMR Application Issues

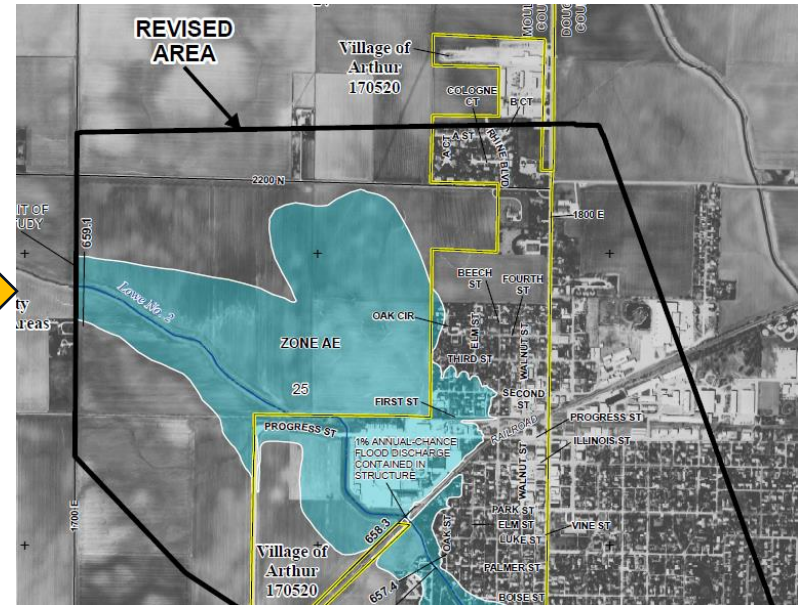
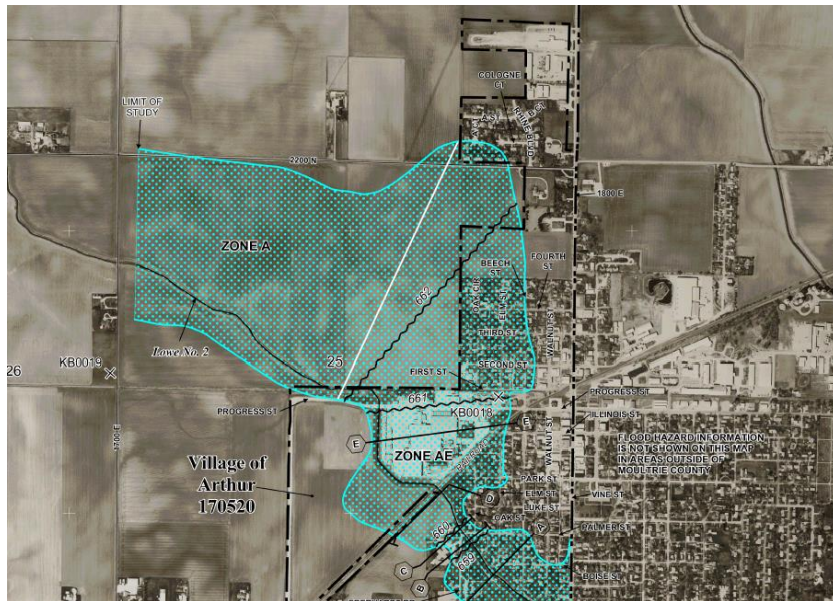
Chris Hanstad, P.E., CFM  
Illinois State Water Survey

*Crab  
Orchard  
Creek*

# What is a LOMR?

## Letter of Map Revision

- A **LOMR** is a letter from FEMA officially revising the current NFIP map to show changes to floodplains, regulatory floodways, or flood elevations.



# What is a LOMR?



# What is a LOMR?



# What is a LOMR?

## LOMR-F or LOMA

- Does not update mapped floodplains
- No models
- Generally, for single properties
- Usually requires elevation certificates

## LOMR

- Revises mapped floodplain boundaries
- Involves hydrologic and/or hydraulic modeling
- Larger footprint
- No ECs

# Illinois LOMR Review Partner Program

- In 2010 ISWS became a LOMR Review Partner with FEMA
- At that time, we were one of only 3 states that participated in the pilot program
- Currently, there are 9 state and local agencies that participate in the LOMR Review Partner Program



**FEMA**

# Illinois LOMR Review Partner Program

- Since 2010 we have received and processed over 300 LOMR and CLOMR applications
- Those applications have affected floodplain mapping in over 130 Illinois communities

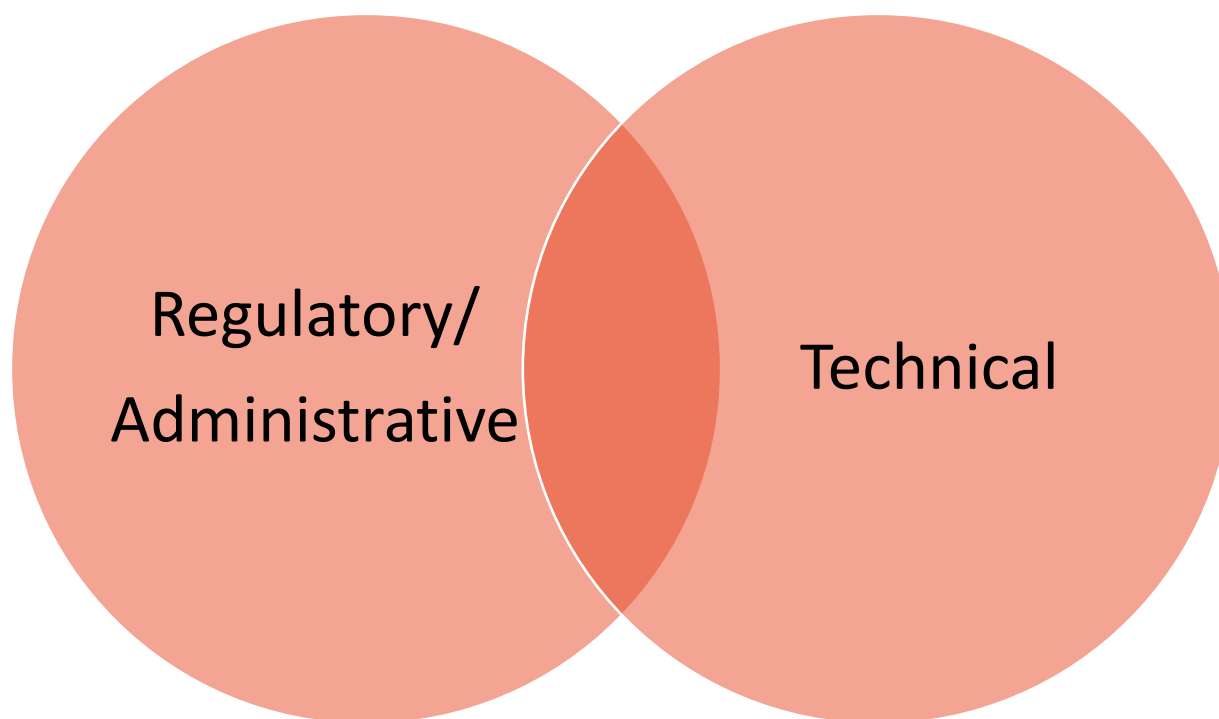


**FEMA**

# LOMR Application Resources

- MT-2 Form Instructions
  - [https://www.fema.gov/sites/default/files/documents/fema\\_mt-2-instructions-2022.pdf](https://www.fema.gov/sites/default/files/documents/fema_mt-2-instructions-2022.pdf)
- FEMA MT-2 (LOMR) Guidance
  - [https://www.fema.gov/sites/default/files/documents/mt-2\\_requests\\_guidance\\_dec\\_2020.pdf](https://www.fema.gov/sites/default/files/documents/mt-2_requests_guidance_dec_2020.pdf)
- ISWS LOMR page
  - <https://www.illinoisfloodmaps.org/lomr.aspx>

# Common LOMR Application Issues



# Common Regulatory/ Administrative Issues

# Common Issue #1 – MT-2 Application Forms

- Incomplete MT-2 Application forms or missing forms
  - Form 1 – Overview and Concurrence – Always required
  - Form 2 – Riverine Hydrology and Hydraulics – Almost always required
  - Form 3 – Riverine Structures – Often required

# Common Issue #1 – MT-2 Application Forms

- Incomplete MT-2 Application forms or missing forms
  - Form 1 – Overview and Concurrence – Always required
    - List **ALL** affected communities
    - Provide **ALL** required signatures
      - Requestor should generally be owner of property involved in the request
      - Community Concurrence should be signed by CEO or more commonly the floodplain administrator. Multiple signed Form 1s may be required if multiple communities affected.
      - Certification by Registered Professional Engineer

# Common Issue #1 – MT-2 Application Forms



# Common Issue #1 – MT-2 Application Forms

- Incomplete MT-2 Application forms or missing forms
  - Form 2 – Riverine Hydrology and Hydraulics – Almost always required
    - Indicate the upstream and downstream limit of your revision.
    - Include the file/plan names for each of your submitted models and the vertical datum

# Common Issue #1 – MT-2 Application Forms

- Incomplete MT-2 Application forms or missing forms
  - Form 3 – Riverine Structures - Often required but overlooked
    - List **ALL** riverine structures within revised reach including
      - Bridges/Culverts
      - Dams/Detention Basins
      - Channelization
      - Levees/Floodwalls
    - Completely fill out associated section for each structure

# Common Issue #2 – Correct Review Fee

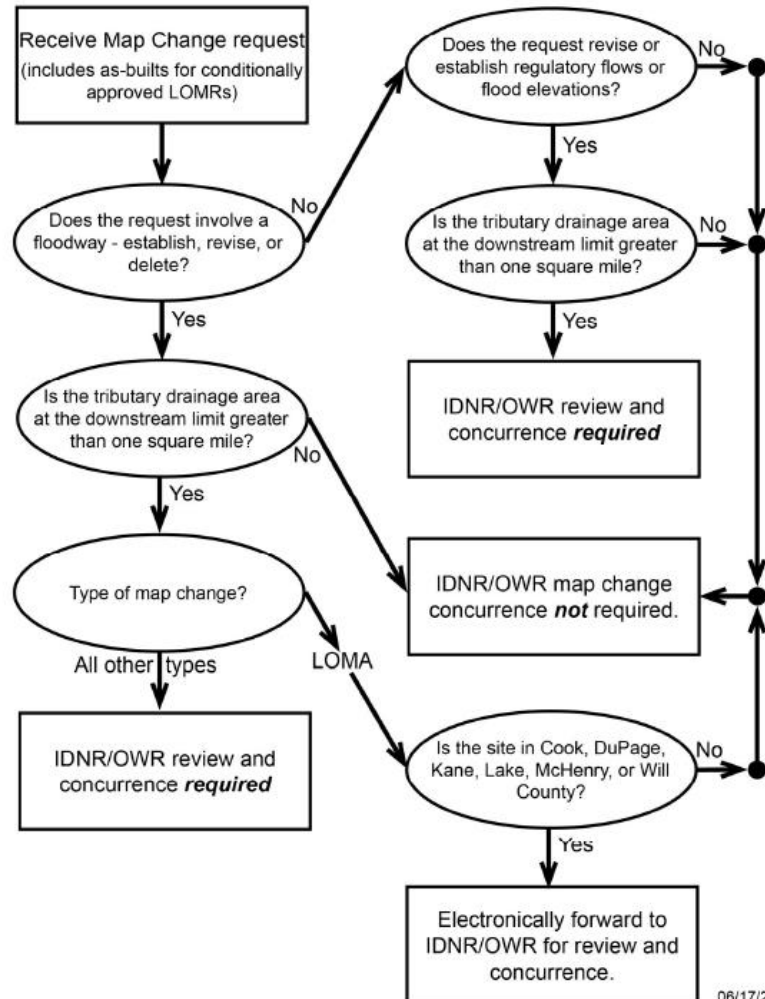
- LOMR Review Fee Schedule
  - <https://www.fema.gov/flood-maps/change-your-flood-zone/status/flood-map-related-fees>
  - CLOMR: \$6,500
  - LOMR: \$8,000
  - PMR: \$8,000 + \$2,500 per FIRM panel
  - Additional \$250 fee for hard copy submittals (online submittals preferred)
- LOMRs based on more detailed data or analysis are generally fee exempt

# Common Issue #3 – State Approval

- General Rule – If stream drainage area is greater than 1 sq. mile *and* LOMR/CLOMR will revise or establish regulatory flows, BFEs, or floodway, IDNR concurrence is required.

# Common Issue #3 – State Approval

When is IDNR/OWR review/concurrence required for LOMCs?

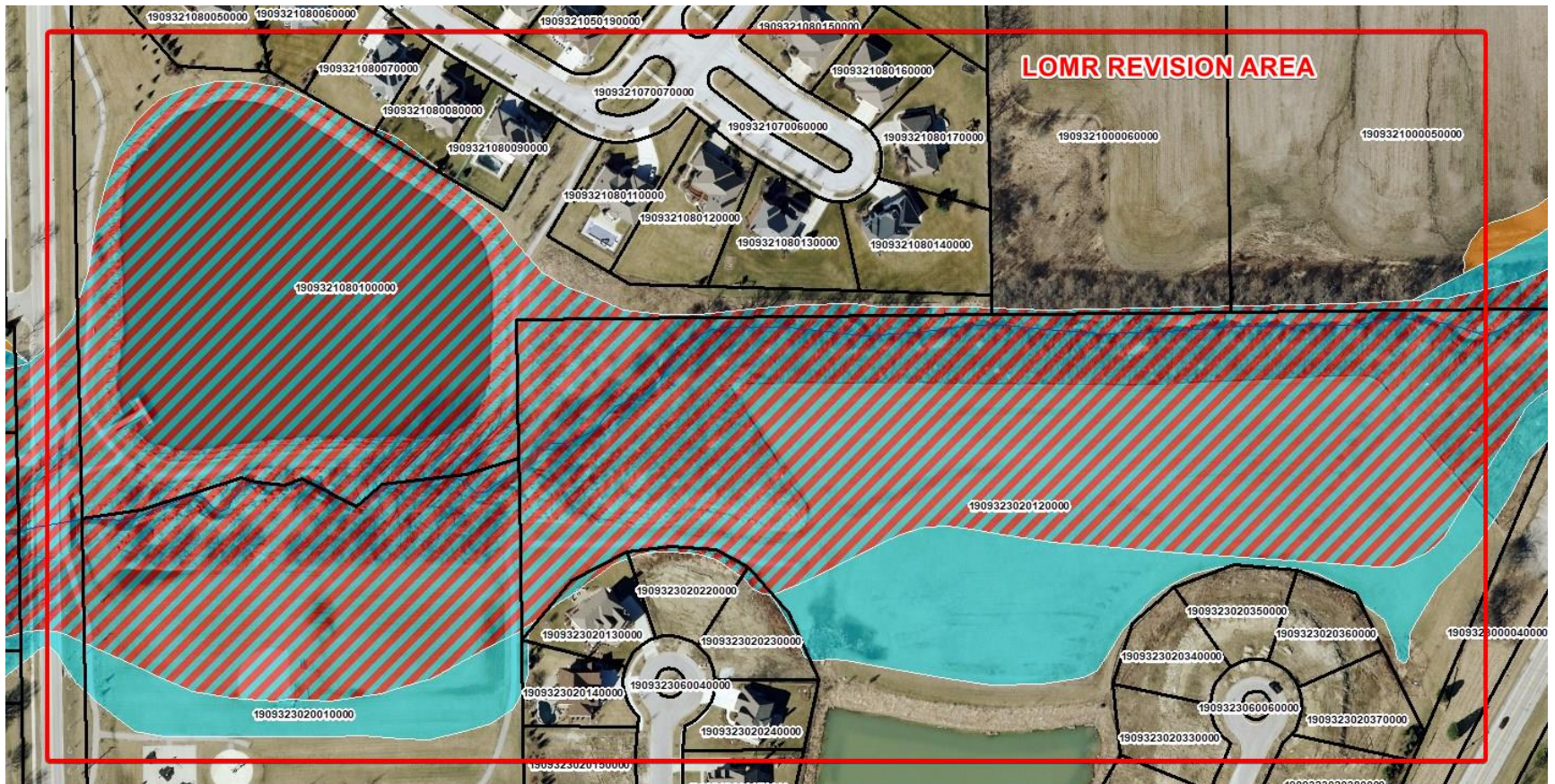


# Common Issue #4 – Notifications/Public Notice

- Two types of notification requirements
  - Property Owner Notifications for increases/establishment of BFEs and/or Special Flood Hazard Areas (SFHA)
  - Floodway Revision Notifications when floodway is being established or revised.
- Notifications can be done separately or combined either as individual property owner letter or a published public notice
- Template letters and public notice provided in MT-2 form instructions

# Common Issue #4 – Notifications/Public Notice

## Consider providing a parcel map for revision area



# Common Issue #5 – Endangered Species Act (ESA) – CLOMRs Only

- Projects that do not involve federal construction, permitting, or funding must document that:
  - No potential for “Take” of endangered species exists
  - Incidental Take Permit has been granted
- Projects with federal involvement must document:
  - “No Effect” determination made by or concurred by federal agency
  - A “Not Likely to Adversely Affect” determination with concurrence from F&W services
  - Copy of federally issued permit

# Common Technical Issues

# Common Issue #6 – Understanding the Required Hydraulic Models

- Duplicate Effective Model – Must match effective model within 0.5'
- Corrected Effective Model – Corrects errors and add detail (physical change cannot be included)
- Pre-Project (Existing) Conditions Model – Should reflect existing or pre-project conditions
- Revised/Post-Project Conditions Model – Should reflect the post-project conditions

# Common Issue #6 – Understanding the Required Hydraulic Models

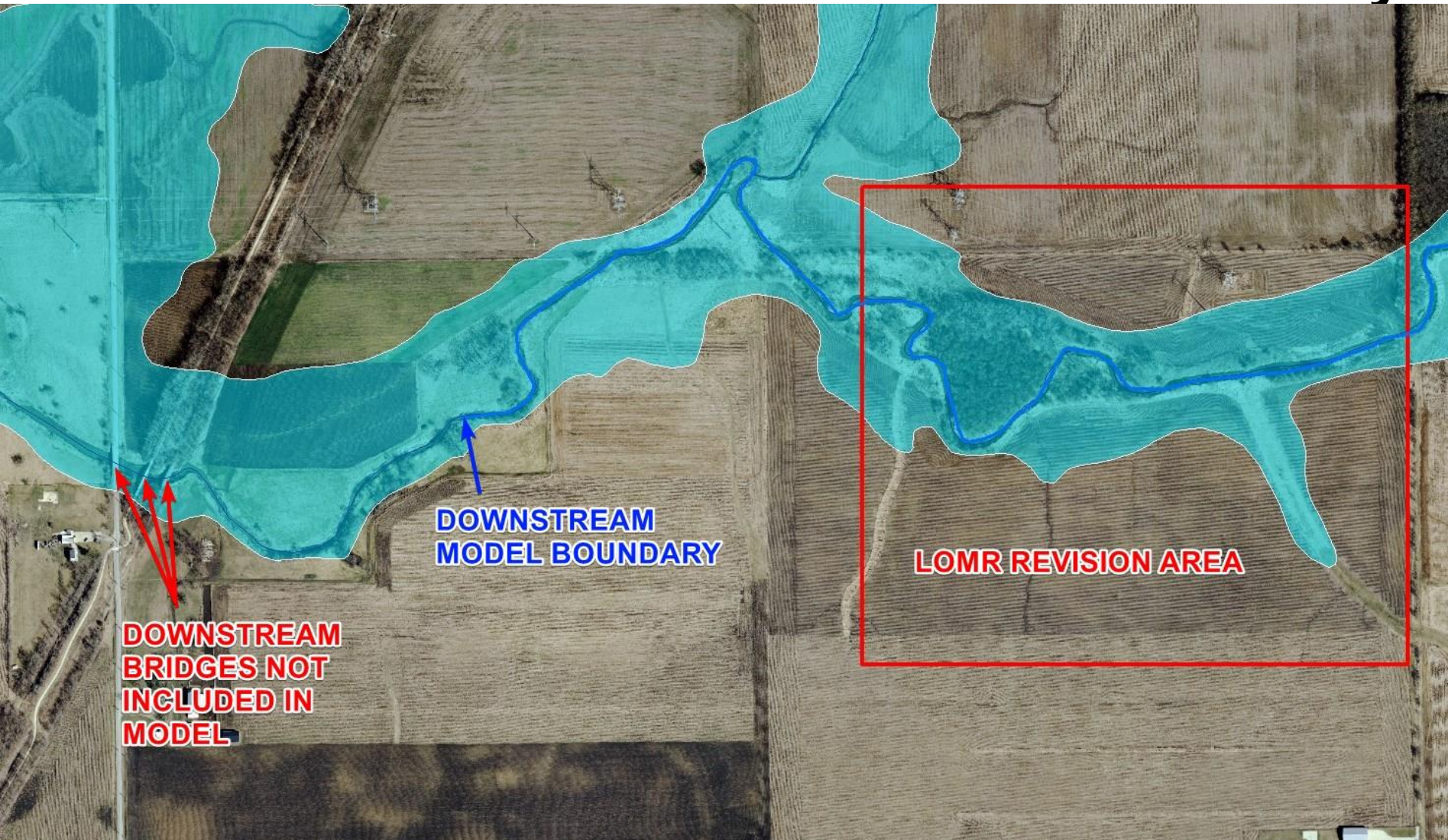


# Common Issue #6 – Understanding the Required Hydraulic Models

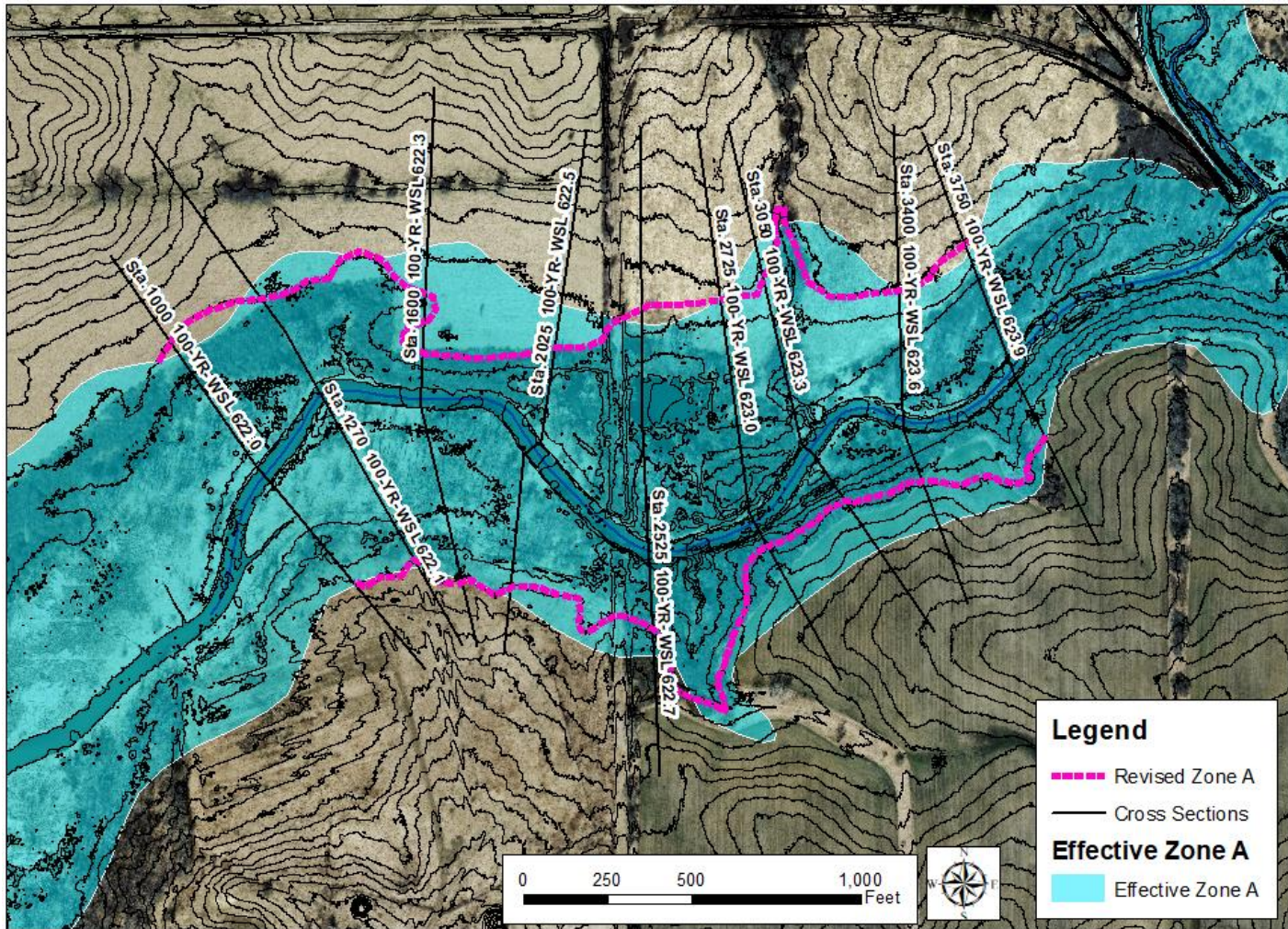
Corrected Effective – Duplicate Effective	Pre-Project – Corrected Effective	Post-Project – Pre-Project
BFE increases are allowable since increases are due to natural changes or effective model errors	BFE increases are flagged for potential violations since a physical change has caused increase	BFE increased are flagged for potential NFIP violation since project has caused increase
BFE decreases are allowable	BFE decreases are allowable	BFE decreases are allowable

BFE increases due to proposed project must obtain CLOMR first and satisfy the requirements of 44 CFR 65.12.

# Common Issue #7 – Downstream Boundary



# Common Issue #8 – Topographic Work Map



Topographic Workmap - Sugar Creek



\*ALL ELEVATION REFERENCE NAVD 88

# Common Issue #9 – Tie into Effective Data

- Vertical Tie-in Requirement
  - Revised studies should tie-in to within 0.5' of effective data *for all flood frequencies* at upstream and downstream limits
- Horizontal Tie-in Requirement
  - Revised floodplain/floodway mapping should tie-in to effective floodplain/floodway at upstream and downstream limits within tolerance of 5% of map scale.
    - 1"=500': 25' tolerance
    - 1"=1000': 50' tolerance
    - 1"=2000': 100' tolerance

# Common Issue #10 – Not Modeling all Effective Flood Frequencies

- If the FIS shows the 10-yr, 50-yr, 100-yr, and 500-yr flood frequencies studied then the LOMR model must include those frequencies.
- If 500-yr floodplain (shaded Zone X) is mapped, the LOMR should include 500-yr floodplain mapping.

# Bonus Tips

- Always provide GIS shapefiles or at least CAD data of the revised floodplain/floodway boundaries, cross sections, and waterlines. Include spatial projection reference.
- LOMR narrative should be robust enough to explain your project, the modeling data and assumptions, and your supporting documentation.



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[www.illinoisfloodmaps.org](http://www.illinoisfloodmaps.org)