When are **LOMRs & CLOMRs** required?

A **Letter of Map Revision** (LOMR) is **FEMA**’s official modification to an effective **Flood Insurance Rate Map** (FIRM). LOMRs can change the existing regulatory floodway, the **Base Flood Elevations** (BFEs), or the **Special Flood Hazard Area** (SFHA).

A **Conditional Letter of Map Revision** (CLOMR) is a letter from **FEMA** commenting on whether a proposed project meets minimum **National Flood Insurance Program** (NFIP) standards.

**A LOMR is required when:**

- Project results in BFE increases or decreases in excess of 0.30 vertical feet compared to existing conditions (or a more stringent standard adopted by the local government).
  

- There are any physical changes affecting flooding conditions (extent or elevations).
  
  —Revision of BFE Determinations, Title 44 C.F.R. 1(B)65§65.6 (2022)

- Project has an approved CLOMR.

- Required by the local government.

**A CLOMR is required when:**

- Proposed improvements result in BFE increase of more than 0.50 vertical feet *without a floodway*.

- Proposed improvements result in any BFE increase greater than 0.00 vertical feet *with floodway*.

- Required by the local government.

- Some communities’ regulations require a CLOMR for any modification to the Special Flood Hazard Area (SFHA).

*based on detailed analysis or model-backed; the majority of the Zone A floodplains in the District are both. For questions on the basis of the effective floodplain information, contact **MHFD**’s Floodplain Manager.

**A CLOMR is recommended when:**

- The proposed design modifies (relocates, shifts, or widens) the Special Flood Hazard Area.

- A goal of the project is flood risk reduction. Consider obtaining FEMA’s review and comment during design to ensure the project will meet the intended goal.

- The proposed design is hydraulically sensitive or is very close to causing an increase that would require a CLOMR. The concern in this scenario is that design/field changes could result in the as-built project not being in compliance with NFIP or local government requirements.

- The floodplain administrator cannot verify the impact of the proposed work to ensure the project is compliant with NFIP or local government requirements.

- A change to effective hydrology is requested.
What is a violation?

During review and processing of a CLOMR or LOMR request, FEMA may identify a community is potentially in violation of NFIP Flood Plain Management Criteria for Flood-Prone Areas, Title 44 C.F.R. I(B)60(A)§60.3 (2022).

Violations can result when man-made changes cause unacceptable rises in BFEs. This can occur when as-built projects cause BFE increases on projects that were permitted in the floodway with a no-rise certification and analysis. This can also occur when as-built projects cause BFE increases greater than approved in the CLOMR.

Without an approved CLOMR, any increase greater than 0.00 vertical feet (floodway) or 0.50 vertical feet (no floodway) is a violation. If your project has an approved CLOMR, more leniency is granted for the as-built condition. If a CLOMR was completed, FEMA will consider the following factors when evaluating a potential violation:

- Post-Project BFEs higher than CLOMR, but less than existing conditions (CLOMR stage) BFEs are not considered a violation.
- Post-project BFE increases contained in a flood control structure, such as a constructed channel, are not considered violations because the increased flood risk is mitigated by the flood control structure.
- If total BFE increase is equal to or less than in the CLOMR but occurs in a different location (e.g. a proposed drop was shifted during construction), this is not likely to be considered a violation unless particularly significant.

In some cases, significant design changes following an approved CLOMR can trigger the need for an updated CLOMR, particularly if the changes result in BFE increases greater than the increases proposed in the issued CLOMR. For questions about when design changes may require a new CLOMR, please contact the Community’s Floodplain Administrator or MHFD’s Floodplain Manager for assistance.