

Response to Public Comments for OMB No. 1660-0016, Revision to National Flood Insurance Program Maps: Application Forms for LOMRs and CLOMRs

The 60 day Federal Register notice regarding the updates to the MT-2 Forms was published on July 27, 2010. The following comment was received:

We would like the public notification requirements more defined. As I understand it, if an entire FIRM panel is revised affecting potentially thousands of individuals, only a public notice in a newspaper is required. A smaller LOMR that only effects a portion of a FIRM, requires each individual property owner to be notified by a certified letter. We have done a detailed study of a small watershed that is actually on three different FIRM panels. After much debate, it was decided to handle it through a LOMR rather than a full panel revision. This meant all 125 property owners had to receive a certified letter from us. This is both costly and time consuming.

-Greg Williams

Response:

A Flood Insurance Rate Map (FIRM) may be revised by either a Physical Map Revision (PMR) or a Letter of Map Revision (LOMR).

- A PMR results in republication of the revised FIRM panels. The revised panels are first issued preliminary. A public notice is published, followed by an appeal period. Once all appeals are resolved, the revised FIRMs will be issued with the new effective date.
- A LOMR does not result in republication of the revised FIRMs. A LOMR is comprised of a determination document that describes the revision and attachments that show the revised portion of the FIRM panel(s). LOMRs are issued with the new effective date already established. Therefore, all adversely affected property owners are sent individual legal notices prior to the LOMR being issued. Adversely affected properties are those where the revision will result in increases in the Special Flood Hazard Area, the area that would be inundated by the base (1-percent –annual chance) flood, or Base Flood Elevations.

Legal notice may take the form of certified mailing receipts or certification that all property owners have been notified, with an accompanying mailing list and a copy of letter sent.

The LOMR process is significantly faster than the PMR process. Therefore, a LOMR is the desired process for most applicants. LOMRs are generally issued for small revision areas where there are relatively few affected property owners. Large revisions will likely have more affected property owners and a PMR is more appropriate.

The LOMR requirement for property owner notification is addressed in Form 086-0-27A (Form 2 - Riverine Hydrology & Hydraulics Form), Section D(1)(b). This requirement is also explained on page 11 of the instructions for completing the forms. In addition, letter templates are provided in Figures 6-8 of these instructions.