

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
Department of Energy and Environment

**TECHNICAL GUIDANCE**

**FROM:** Department of Energy and Environment (DOEE)  
Natural Resources Administration  
Regulatory Review Division

**DATE:** December 21, 2023

**SUBJECT:** Letters of Map Change (LOMC)

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This document provides technical guidance on how to comply with the District’s Flood Hazard Rules and Construction Codes, known together as the District’s Floodplain Management Regulations. DOEE provides these and other technical guidance documents to make compliance and the application and permitting processes clearer and easier. Ultimately, however, compliance with the Flood Hazard Rules and Construction Codes is the responsibility of the applicant.

Specifically, this document provides guidance to applicants who wish to propose a change to the effective Flood Insurance Rate Maps (FIRM) published by the Federal Emergency Management Agency (FEMA). These changes are known as Letters of Map Change (LOMC). [Title 20 DCMR Chapter 31 - Flood Hazard Rules](#) details the requirements for submitting requests for LOMCs to DOEE. Please contact [flood.risk@dc.gov](mailto:flood.risk@dc.gov) if you have any questions about this document or have questions about your specific project.

## **Overview**

Letters of Map Amendments (LOMAs) and Letters of Map Revisions (LOMRs) are the two types of LOMCs. A project receives a FEMA approved conditional LOMR (CLOMR) or conditional LOMA (CLOMA) to qualify for a LOMR or LOMA, respectively. DOEE must review, make comments, and/or sign the “Community Acknowledgement Form” for all LOMCs.

If your project requires a LOMC, please include the appropriate checklist from the following pages with your application. Checklists are derived from the Flood Hazard Rules and [44 CFR Parts 65 and 70](#).

## **LOMRs and Development Timelines**

An approved CLOMR represents FEMA’s determination that, if a project is built as designed, an official map revision or amendment can be made after the application for a LOMR is approved. Therefore, with an approved CLOMR, DOEE can approve design plans enabling the applicant to obtain a building permit and begin construction, assuming the design plans are compliant with Title 20 DCMR Chapter 31 - Flood Hazard Rules.<sup>1</sup> DOEE will not, however, approve a Certificate of Occupancy before the FEMA approved LOMR is in effect. LOMR applications require as-built drawings, so applicants should plan to submit their LOMR to FEMA well in advance of when occupancy is expected.

Conditional Letters of Map Revision based on Fill (CLOMR-Fs) and Letters of Map Revision based on Fill (LOMR-Fs) have similar timing requirements. In cases where applicants are proposing to remove a site from the regulated floodplain with fill, a FEMA-approved CLOMR-F allows DOEE to approve site excavation and grading plans for those construction activities to begin. Once site work is complete, the applicant can use site as-builts to submit a LOMR-F to FEMA. All building plans submitted before a LOMR-F is approved by FEMA and in effect, will be reviewed as if the development is in the regulated floodplain. Permits will not be issued for work that is dependent on a LOMR or LOMR-F, until the FEMA approved LOMR is in effect. Applicants, however, may receive permit approval for other work that is not dependent on a map change, such as grading or land disturbance work, but that approval may be based on the condition of an approved LOMR or LOMR-F.

## CLOMR and LOMR Checklist

<b>CLOMR</b>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
Submit MT-2 application with documents prepared by a District registered professional engineer in a format required by FEMA. <sup>ii iii</sup>			
Submit hydrologic and hydraulic analysis (See criteria in 44CFR 65.7)			
Submit plans showing the proposed project is compliant with Title 20, Chapter 31 (DC Flood Hazard Rules)			
Identify impacted properties and submit to DOEE draft notification letters to owners			
Comply with submittal requirements, including notifications, for floodway revisions (See 44CFR 65.7)			
Submit the following “scientific and technical information to support a request to gain exclusion from an area of special flood hazard of a structure or parcel of land that has been elevated by the placement of engineered earthen fill” must also be submitted to DOEE <sup>iv,v</sup>			
(1) A copy of the deed or recorded plat			
(2) A topographic map with ground elevation and base flood elevation <sup>vi</sup>			
(3) Plans and documents showing compliance with the DC Flood Hazard Rules and federal minimum requirements <sup>vii,viii</sup>			
(4) An elevation certificate <sup>ix</sup>			
(5) Data to support the proposed base flood elevation <sup>x</sup>			
(6) An encroachment analysis based on the proposed conditions <sup>xi</sup>			
(7) The Community Acknowledgement Form			
(8) Photos of site prior to fill placement			
Comply with regulatory requirements 44CFR65.12			

<b>LOMR</b>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<b>A FEMA Approved LOMR must be submitted to receive Certificate of Occupancy</b>			
Adhere to checklist requirements for CLOMR			
Submit as-built plans prepared and signed by a District registered professional engineer			
Adhere to the Flood Hazard Rules and Construction Codes			

## CLOMR-F and LOMR-F Checklist

CLOMR-F	Yes	No	N/A
Do you plan to develop below grade or below the proposed base flood elevation?			
Submit MT-1 application with documents prepared by a District registered professional engineer in a format required by FEMA. <sup>xii</sup>			
Submit the following “scientific and technical information to support a request to gain exclusion from an area of special flood hazard of a structure or parcel of land that has been elevated by the placement of engineered earthen fill” must also be submitted to DOEE <sup>xiii,xiv</sup>			
(1) A copy of the deed or recorded plat			
(2) A topographic map with ground elevation and base flood elevation <sup>xv</sup>			
(3) Plans and documents showing compliance with the DC Flood Hazard Rules and federal minimum requirements <sup>xvi,xvii</sup>			
(4) An elevation certificate <sup>xviii</sup>			
(5) Data to support the proposed base flood elevation <sup>xix</sup>			
(6) An encroachment analysis based on the proposed conditions <sup>xx</sup>			
(7) The Community Acknowledgement Form			
(8) Photos of site prior to fill placement			

LOMR-F	Yes	No	N/A
<b><i>A FEMA Approved LOMR-F must be submitted to receive Certificate of Occupancy</i></b>			
Adhere to checklist requirements for CLOMR-F			
Submit as-built plans prepared and signed by a District registered professional engineer			
Submit photos of site after fill placement			

**Note:** For CLOMR-Fs, DOEE’s administrative procedures require developers to provide information on future development plans (E.g., underground parking, basement levels, etc.) for the site. If the planned work will not be reasonably safe from flooding (E.g., residential space below-grade or parking levels that are not designed to withstand flood loads), DOEE will not sign the Community Acknowledgement Form until the plans are revised to incorporate required flood protections. If the project is approved, the following language may be added to the Community Acknowledgement Form for future reference:

“In accordance with DCMR Title 20, Chapter 31, Section 3102.2, the duties of DOEE include ensuring that sites are reasonably safe from flooding. By issuance of Technical Bulletin 10-01, FEMA has noted that residual flood hazards may exist in areas elevated above the BFE by the placement of engineered earthen fill. In order to avoid such hazards and maintain a reasonable degree of safety, future development in such areas should be elevated above or floodproofed to the Design Flood Elevation.”

## CLOMA and LOMA Checklist

<b>CLOMA</b>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
<i>Submission to DOEE and DOEE review is only required for structures inadvertently shown in the floodway. Otherwise, applicants work directly with FEMA.</i>			
<i>E-LOMA is now available. Approval based on Lidar is now available.</i>			
Submit MT-1 application with documents prepared by a District registered professional engineer in a format required by FEMA. <sup>xxi</sup>			
Submit scientific or technical data, including the following:			
Submit deed or plat <sup>xxii</sup>			
Submit topographic data and base flood elevations			
Submit FRIM panel			
Submit a certification by a registered professional that the property is not in the Special Flood Hazard Area <sup>xxiii</sup>			
Submit a Community Acknowledgement Form			
If submitting LiDAR in lieu of surveyed data, please submit the following:			
(1) an exhibit that displays either: (1) an overlay of the LiDAR contours or (2) an overlay of the LiDAR points both of which must be with an accurate aerial image of the structure/property in question.			
(2) Vertical Datum			
(3) Address or Parcel Number for Property In Question (PIQ), and PIQ clearly identified			
(4) Name & Organization of map creator (with contact info)			
(5) Date LiDAR was collected			
(6) Source of the LiDAR data			
(7) LiDAR accuracy information (Accuracy Report)			
(8) Location of the data archive or metadata file (must be available for independent verification through a publicly available website or metadata)			

<b>LOMA</b>	<i>Yes</i>	<i>No</i>	<i>N/A</i>
Adhere to checklist requirements for CLOMA			

## **FEMA Resources and Endnotes**

FEMA Flood Hazard Mapping Frequently Asked Questions: <https://www.fema.gov/flood-hazard-mapping-frequently-asked-questions>

Flood Map Revision Processes: <https://www.fema.gov/flood-map-revisionprocesses#1>

LOMA and LOMR-F Processes: <https://www.fema.gov/letter-map-amendmentletter-map-revision-based-fill-process>

Establishing Effective Dates for LOMRs: <https://www.fema.gov/guidelinesestablishing-effective-dates-fema-letters-map-revision-lomr>

Fee Schedule: <https://www.fema.gov/flood-map-related-fees>

eLOMA information: <https://hazards.fema.gov/femaportal/wps/portal> (Look for “Learn about eLOMA” under “Tools for Professionals”)

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<sup>i</sup> Title 20 DCMR Chapter 31, Section 3104.10 (a)(2)- If the applicant proposes to undertake activities that increase the base flood elevation, the applicant shall submit such analysis to FEMA as specified in § 3105.7 of this chapter and shall have received a Conditional Letter of Map Revision from FEMA;

<sup>ii</sup> Title 20 DCMR Chapter 31, Section 3104.9-If the base flood data is to be used to support a request for a Letter of Map Change from FEMA, the applicant shall provide the analyses prepared by a District registered professional engineer in a format required by FEMA. It shall be the responsibility of the applicant to satisfy the submittal requirements. Application forms and instructions for Letters of Map Change are available at [www.fema.gov](http://www.fema.gov).

<sup>iii</sup> [Title 20 DCMR, Chapter 31, Section 3104.11](#)

<sup>iv</sup> 44CFR 65.5 (a) 1-7

<sup>v</sup> [Title 20 DCMR, Chapter 31, Section 3104.11](#)

<sup>vi</sup> [44CFR65.5 \(a\)\(3\)](#)

<sup>vii</sup> [44CFR65.5 \(a\)\(4\)](#)

<sup>viii</sup> [Title 20 DCMR Chapter 31, Section 3104.11](#)

<sup>ix</sup> [Title 20, Chapter 31, Section 3199.1](#)

<sup>x</sup> [44CFR65.5 \(a\)\(6\)](#)

<sup>xi</sup> [44CFR 65.5 \(a\)\(7\)](#)

<sup>xii</sup> Title 20 DCMR Chapter 31, Section 3104.9-If the base flood data is to be used to support a request for a Letter of Map Change from FEMA, the applicant shall provide the analyses prepared by a District registered professional engineer in a format required by FEMA. It shall be the responsibility of the applicant to satisfy the submittal requirements. Application forms and instructions for Letters of Map Change are available at [www.fema.gov](http://www.fema.gov).

<sup>xiii</sup> [44CFR \(a\) 1-7](#)

<sup>xiv</sup> [Title 20 DCMR, Chapter 31, Section 3104.11](#)

<sup>xv</sup> [44CFR65.5 \(a\)\(3\)](#)

<sup>xvi</sup> [44CFR65.5 \(a\)\(4\)](#)

<sup>xvii</sup> [Title 20 DCMR Chapter 31, Section 3104.11](#)

<sup>xviii</sup> [Title 20, Chapter 31, Section 3199.1](#)

<sup>xix</sup> [44CFR65.5 \(a\)\(6\)](#)

<sup>xx</sup> [44CFR 65.5 \(a\)\(7\)](#)

<sup>xxi</sup> Title 20 DCMR Chapter 31, Section 3104.9-If the base flood data is to be used to support a request for a Letter of Map Change from FEMA, the applicant shall provide the analyses prepared by a District registered professional engineer in a format required by FEMA. It shall be the responsibility of the applicant to satisfy the submittal requirements. Application forms and instructions for Letters of Map Change are available at [www.fema.gov](http://www.fema.gov).

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xxii [44CFR70.3 \(a\)](#)  
xxiii [44CFR70.3 \(4\)](#)