

# MONTANA HIGHGROUND

February 2021

Erosion on the Yellowstone in Billings. The [Stream Permitting Guide](#) can be a resource for communities facing eroding waterways.

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## E.O. 13690

The Federal Flood Risk Management Standard is back in play.

Get more info on Page 2

## TRAINING RESOURCES

The next training opportunity will be a virtual event March 2<sup>nd</sup> through 4<sup>th</sup>. We hope to see you there!

Find more training info on Page 5

# EXECUTIVE ORDER 13690 REINSTATED

On January 20th, the new White House administration impacted floodplain management with one of their first executive orders, Executive Order (E.O.) 13990. E.O. 13990 effectively reinstates E.O. 13690, which established the Federal Flood Risk Management Standard (FFRMS) in 2015. The Standard ensures that federal agencies expanded management from the base flood level to a higher vertical elevation to address current and future flood risk.

E.O. 13690 was itself related to a previous executive order, E.O. 11988, signed in 1977. E.O. 11988 required federal agencies to avoid impacts associated with the occupancy and modification of floodplains. E.O. 11988 also required agencies to avoid support of floodplain development wherever there is a practicable alternative.

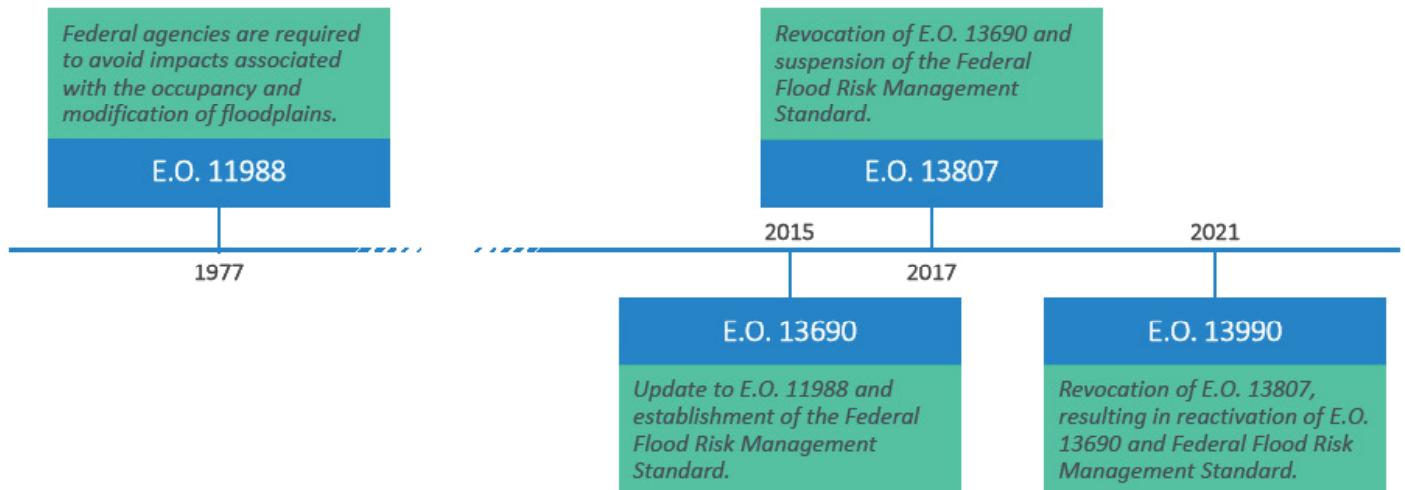
When E.O. 13690 was issued in 2015, the Executive Director of the Association of State Floodplain Managers, Chad Berginnis, commented “Since the issuance of Executive Order 11988 38 years ago, we as a nation have learned a lot about floodplain management and flood risk [...] The changing nature of flood risk, including increased risks due to sea level rise, demands competent standards that will withstand the test of time and the forces of nature. And we think the new E.O. and FFRMS is a great step in the right direction.” (See the [ASFPM press release](#) for full article).

E.O. 13690 applies to federal actions, such as development by federal agencies or projects funded through federal grants. The FFRMS gives agencies the flexibility to select one of three approaches for establishing the flood elevation and hazard area they use in siting, design, and construction. They can:

- Use data and methods informed by best-available, actionable climate science;
- Build with two feet of freeboard above the 100-year (1%-annual-chance) flood elevation for standard projects, and three feet of freeboard for critical buildings like hospitals and evacuation centers; or
- Build to the 500-year (0.2%-annual-chance) flood elevation.

Floodplain administrators should be mindful of the implications of both E.O. 13990 (the newest order) and E.O. 13690 and aware of the consequences to federal projects within their communities. More on the implications of E.O. 13690 can be found on the [ASFPM website](#).

All executive orders are posted on the Federal Register. Click on each order below to access the National Archives link:  
[E.O. 11988](#)  
[E.O. 13690](#)  
[E.O. 13807](#)  
[E.O. 13990](#)



# Community Rating System UPDATES

The [2021 Addendum to the 2017 CRS Coordinator's Manual](#) is now available.

The Addendum will be used by communities in conjunction with the current Coordinator's Manual. It will serve as a "bridge" between the existing guidance materials and the more comprehensive update that is anticipated to be needed when FEMA implements NFIP transformation. Page A-4 of the Addendum explains, "How to Use the 2021 Addendum." It says:

*This Addendum material is presented in an order that corresponds to the 2017 Coordinator's Manual. Only those sections of the Coordinator's Manual that are being changed appear in this Addendum. Each section begins with a short summary of the changes for that section. This is followed by a series of bulleted entries that identify the section or subsection and page number in the 2017 Coordinator's Manual at which the change is to be incorporated. Significant changes in each section are listed first, followed by more minor corrections, if any, most of which are needed to make other parts of the Coordinator's Manual consistent with the new language (such as re-numbering where a new subsection has been inserted, or a implementing a change in terminology). Those portions of the 2017 Coordinator's Manual that are not included in this Addendum remain unchanged. The Index and Appendices have not been updated.*

*For the convenience of communities, the new inserts and the replacement language are presented mostly as one or more full paragraphs, rather than as word-by-word changes. This makes it possible for the community to more easily incorporate the new material into whatever format it uses.*

The 2021 Addendum includes two new prerequisite requirements, several new CRS credit opportunities, and some updates and modifications aimed at simplifying credit and reporting requirements. A collection of frequently asked questions about the Addendum are also available at [fema.gov/community-rating-system](http://fema.gov/community-rating-system) and recently the FAQs for the [new Class 8 Freeboard Prerequisite](#) have

## *Be in the know!*

There are new CRS Class 8 freeboard prerequisites.

[been updated](#). The updates to the Class 8 Freeboard Prerequisite FAQs are the result of new questions asked by stakeholders regarding manufactured homes, historic homes, machinery and equipment, and attached garages.

For the changes in the Class 9 prerequisite for Elevation Certificates and other construction certificates, a [template for written construction certificate management procedures](#) has been drafted to help any CRS community produce a document that describes the manner in which its office collects, reviews, corrects, and maintains the certificates, and how they are made available to inquirers.

Guidance materials for new credit opportunities will be available in the coming weeks. They will include information on how to develop floodplain species assessments and floodplain species plans for natural functions plan credit under Activity 510 (Floodplain Management Planning), and how to develop a plan for the management of substantial damage.

Webinars in the [CRS Webinar Series](#), and recordings of CRS webinars will continue to focus on the 2021 Addendum.

**Note:** This article was originally printed in the NFIP/CRS Update winter newsletter. You can read the entire newsletter [here](#).

## *New resources*

Construction certificate management procedures are required for all cycles started after January 1, 2021 — but you can use the template!

## THANK YOU to Constance Lake, departing ISO CRS Specialist

Constance supported Montana communities participating in the CRS Program since 2017. She was a wealth of information and a supportive resource. Constance has accepted a position with the City of Fort Lauderdale and we wish her well in the sunshine state. We look forward to working with our new ISO CRS Specialist.

# eLOMA: A Collaborative Tool for Licensed Professionals, Communities, and FEMA

David Mummert, FEMA eLOMA Coordinator  
DMummert@mbakerintl.com

eLOMA is an interactive online MT-1 determination tool, which is available on the Mapping Information Platform (MIP) ([www.hazards.fema.gov](http://www.hazards.fema.gov)). This time saving, user-friendly web-based application provides licensed land surveyors and professional engineers (Licensed Professionals or LPs) with a system to submit Letter of Map Amendment (LOMA) requests to FEMA. This tool is designed to make a determination based on the information submitted by the LP and allow them to generate a determination from FEMA in a fraction of the time that is required for the standard LOMA process.

Approximately 75% of the LOMA applications FEMA receives annually meet the eLOMA criteria and could be submitted using the eLOMA tool. An eLOMA determination document serves the same functions as a standard LOMA determination. The main purpose of eLOMA is to reduce the level of effort to process LOMAs and provide a faster method of generating LOMA determinations. The eLOMA process has significantly reduced the determination time of up to 60 days (standard LOMA processing) when an audit is not required. Even when an audit is required the audit is processed within 5 business days of FEMA receiving all of the required supporting data.

The tool has been updated to make the eLOMA process even easier to use. The audit selection criteria have been revised so that fewer eLOMA submittals are selected to be audited. Also, more help links have been added to the eLOMA tool to provide more information about the requirements for the data entry fields.

Once an eLOMA LP has demonstrated that they have a comprehensive understanding of the eLOMA application process they can be promoted to eLOMA Super User status. Typically, in order to be promoted to the Super User level an LP has to submit three consecutive eLOMAs that have complete supporting data and that require zero corrections, and they also need to use the eLOMA tool on a regular basis. Once an LP reaches the Super User level their audit frequency is reduced dramatically. Super Users are not subjected to many of the automatic audit triggers that default users are and even when Super Users are audited the turnaround time for those audits is typically shorter than it is for default users.

In order to begin using eLOMA, a surveyor or engineer sets up an account through the MIP using individual license certification information. Once the LP is registered on the MIP they can log into eLOMA and start submitting MT-1 applications. For more information on eLOMA, please select the 'Learn about eLOMA' link on the MIP homepage.

If you have additional questions regarding the eLOMA tool, please contact the FEMA Mapping and Insurance eXchange (FMIX) at 1-877-336-2627 or [FEMAMapSpecialist@riskmapcds.com](mailto:FEMAMapSpecialist@riskmapcds.com).

## What are the benefits of eLOMA?

### QUICK & EASY



- Receive a determination from FEMA in minutes
- Print a copy almost instantly and save digital copy

### ACCEPTS MOST LOMA REQUESTS



- Approximately 75% of all LOMA requests are eligible

### COMPLETELY ONLINE



- Electronic transfer of data, **no mailing required**
- Electronic communication
- Register and renew license info online
- Save an in-progress request and resume later

### CENTRAL LOCATION



- Track status of all submitted requests in one spot
- Holds data for 3 years
- Easy to organize required data and submit audit requirements

### NO COST



- **NO FEE** to use eLOMA tool or print final determination

# Training Corner

## New DNRC resources

Visit [floodplain.mt.gov/training](https://floodplain.mt.gov/training) to find videos posted from the “New FPA Training” virtual event held on January 20th.

## Helpful resources

Matt Buddie, a Floodplain Specialist with FEMA Region VIII in Denver, has compiled a handy list of resources for newcomers to floodplain administration, whom he calls new “floodies”. The full list was distributed at the New FPA Training in January. Check out the side panel for a partial list of his recommendations, and find something to add to your toolkit!

## Upcoming opportunities

In conjunction with the Association of Montana Floodplain Managers, the DNRC Floodplain team will be hosting a 3 day virtual training event March 2<sup>nd</sup>-4<sup>th</sup>.

### The event will be organized into three thematic days:

March 2<sup>nd</sup>: Stream restoration  
March 3<sup>rd</sup>: Enforcement  
March 4<sup>th</sup>: Technical

Additional details and registration links will be shared in the coming weeks. CFM credits will be offered.

Floodplain Administrators are always welcome and encouraged to share training opportunities and materials with their elected officials.

# KNOWLEDGE FOR NEW FLOODIES

1. Building Codes
  - [FEMA Flood Building Codes](#)
  - [Building Codes Save: A Nationwide Study of Loss Prevention](#)
  - [Reducing Flood Losses through the International Code Series](#) (sample permit/site plan checklists and a crosswalk between the IBC/IRC and the 44 CFR 60.3 standards are in the appendices)
  - [Model ICC Code-Coordinated Ordinances](#) and [Building Code resources for floodplain managers](#)
  - [Reducing Flood Losses Through the International Codes](#) (2019)
2. Guidance
  - FEMA P-936 [Floodproofing Non-Residential Buildings](#) (2013)
  - FEMA Technical Bulletin 3: [Non-Residential Floodproofing](#) (January 2021)
  - FEMA P-85 [Protecting Manufactured Homes from Floods and other Hazards](#) (2009)
  - FEMA P-348 [Protecting Building Utilities Systems from Flood Damage](#) (2017)
  - FEMA P-993 [Variances and the National Flood Insurance Program](#) (2014)
  - FEMA P-259 [Engineering Principals and Practices](#) (2012)
  - [FEMA Floodplain Management Requirements for Agricultural and Accessory Structures](#)
3. Policy
  - FEMA Policy #104-008-2: [Guidance on the Use of Available Flood Hazard Data](#) (2016)
  - DRRS Section 1206: [Building Code and Floodplain Management Administration and Enforcement](#)
  - [Executive Order 11988/11990](#)
  - [Intergovernmental Collaboration](#)
4. Flood Insurance
  - [Basic Flood Insurance handout/fact sheet](#)
  - [Myths and Facts about Flood Insurance](#)
  - [Flood Insurance Manual](#) (lowest floor guide, current rate tables, list of CRS communities, etc.)
  - [NFIP Summary of Coverage](#) (plain language booklet explaining coverage (2020))
  - [NFIP Flood Insurance Claims](#) (plain language booklet explaining how an NFIP claim will work (2020))
  - [NFIP Claims Manual](#)
  - [Specific rating guidelines](#) (Submit for rate – how much extra does it cost to be out of compliance with minimum FPM requirements)
  - [Interagency Questions and Answers Regarding Flood Insurance](#)
  - [Explanation of how private flood determination companies make flood determinations for lenders, insurance agents, etc.](#)
  - [Flood Insurance Requirements for Recipients of Federal Disaster Assistance](#) (2019)
  - FEMA [Increased Cost of Compliance Coverage](#) Fact Sheet

# Around the State Staff Updates

## Thank you to outgoing Floodplain Administrators

BRIAN ANDERSON | City of Billings Floodplain Administrator

CARLA WISE-WEIDINGER | Town of Lima Floodplain Administrator

## Welcome to our new Floodplain Administrators

JESSICA IVERSON | City of Billings Floodplain Administrator

DINA YOUNG | Town of Lima Floodplain Administrator

LONNIE HILL | City of Great Falls Floodplain Administrator

ANGELA STAHL | Treasure County Floodplain Administrator

Updated list of  
local Floodplain  
Administrators

[CLICK HERE](#)

Contact [shaye.bodine@mt.gov](mailto:shaye.bodine@mt.gov)  
with updates

## Howdy to our new Silver Jackets USACE Lead

We are excited to welcome **Laurel Hamilton**, Hydraulic Engineer with the U.S. Army Corps of Engineers Omaha District, as the incoming Montana Silver Jackets Team Lead. Laurel replaces **Rachel Schrader Williams**, who supported many Montana communities through Silver Jacket projects. Please join us in thanking Rachel and welcoming Laurel!

**What's the Silver Jackets Program?** Silver Jackets teams are continuously operating, state-led, collaborative interagency teams working together to reduce flood risk and vulnerability to other natural hazards. This program was initiated as a result of discussions between the U.S. Army Corps of Engineers and the Federal Emergency Management Agency. Today, Silver Jackets teams exist in almost every state in the nation.



Photo credit: Shaye Bodine

# Welcome Aboard New State Leadership

**GOVERNOR** GREG GIANFORTE  
**LIEUTENANT GOVERNOR** KRISTEN JURAS

**DIRECTOR,**  
**MONTANA DEPARTMENT OF NATURAL RESOURCES AND**  
**CONSERVATION** AMANDA KASTER

Director Kaster brings a decade of experience working on energy and natural resources issues, most recently serving as the Acting Deputy Assistant Secretary for Land and Minerals Management at the U.S. Department of the Interior.

**ADMINISTRATOR,**  
**WATER RESOURCES DIVISION** ANNA PAKENHAM STEVENSON

Administrator Pakenham Stevenson joins the DNRC after managing the Water Program at the Oregon Department of Fish and Wildlife since 2016. Anna's leadership at the Water Program built on experience in natural resource management nationally and abroad. Anna holds a B.S. in Biology and Environmental Science from Connecticut College and a M.S. and Ph.D. in Resource Management and Water Policy from Oregon State University.

## ABOUT THE MONTANA HIGHGROUND

We are always accepting articles and ideas for this newsletter! Please email your contributions at anytime to [shaye.bodine@mt.gov](mailto:shaye.bodine@mt.gov).

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Persons with disabilities who need an alternative accessible format of this document should contact the DNRC Public Information Officer at 406-444-0465.

### MONTANA DNRC FLOODPLAIN STAFF

1424 9th Ave, PO Box 201601, Helena, MT 59620-1601

Steve Story  
Water Resources Bureau Chief  
406.444.6816 | [sestory@mt.gov](mailto:sestory@mt.gov)

Tiffany Lyden  
Outreach Specialist  
406.444.0599 | [tlyden@mt.gov](mailto:tlyden@mt.gov)

Doug Brugger  
Engineering Specialist  
406.444.1300 | [douglas.brugger@mt.gov](mailto:douglas.brugger@mt.gov)

Peri Turk  
Floodplain Mapping Specialist  
406.444.6656 | [peri.turk@mt.gov](mailto:peri.turk@mt.gov)

Katie Shank  
Flood Hazard GIS Specialist  
406.555.6664 | [katherine.shank@mt.gov](mailto:katherine.shank@mt.gov)

Nadene Wadsworth  
Outreach Specialist  
406.444.6732 | [nadene.wadsworth@mt.gov](mailto:nadene.wadsworth@mt.gov)

Traci Sears  
CAP/NFIP Coordinator  
406.444.6654 | [tsears@mt.gov](mailto:tsears@mt.gov)

Shaye Bodine  
Floodplain Specialist  
406.444.1343 | [shaye.bodine@mt.gov](mailto:shaye.bodine@mt.gov)

### MONTANA DNRC REGIONAL ENGINEERS

Sam Johnson  
Billings Regional Office  
406.247.4423 | [sam.johnson@mt.gov](mailto:sam.johnson@mt.gov)

Larry Schock  
Missoula Regional Office  
406.721.4284 | [lschock@mt.gov](mailto:lschock@mt.gov)

Anthony Moritz  
Havre Regional Office  
406.265.5516 | [anthony.moritz@mt.gov](mailto:anthony.moritz@mt.gov)

Sterling Sundheim  
Lewistown Regional Office  
406.538.7459 | [ssundheim@mt.gov](mailto:ssundheim@mt.gov)

Marc Pitman  
Kalispell Regional Office  
406.752.2713 | [mpitman@mt.gov](mailto:mpitman@mt.gov)

Brent Zundel  
Bozeman Regional Office  
406.556.4508 | [bzundel@mt.gov](mailto:bzundel@mt.gov)



[www.floodplain.mt.gov](http://www.floodplain.mt.gov)