



Office of the Mayor & Town Council

June 22, 2009

Stephanie Routh, CFM  
Map IX – Mainland – Dewberry  
7204 North 16<sup>th</sup> Street, Suite 108  
Phoenix, AZ 85020

Dear Ms. Routh:

Per Mr. Blanton's May 29, 2009 letter, our Staff has reviewed the preliminary Flood Insurance Study (FIS) Report, Summary of Map Actions and Digital Flood Insurance Rate Map panels that were provided for the Town of Oro Valley, Arizona. Our review comments with proposed changes and modifications have been documented and are attached.

We thank you for this advance opportunity to review these important documents and ensure they are the most accurate possible in providing for the life safety and protection of property for all citizens in our community. Please feel free to contact our Floodplain Administrator, Mr. Craig Civalier, (520) 229-4875 or our Storm Water Engineer, Mr. David Parker, (520) 229-5058 with any questions in regards to our comments.

Sincerely,

Paul H. Loomis  
Mayor

Attachment  
Town of Oro Valley Review Comments

cc: Mr. William R. Blanton, Chief Eng Mgt Branch, FEMA HQs  
Mr. Edward Curtis, Senior Engineer, FEMA Regional IX  
Mr. Brian Cosson, NFIP Coordinator, Arizona Dept of Water Resources  
Ms. Suzanne Shields, Director, Pima County Regional Flood Control District  
Mr. David Andrews, Town Manager, Town of Oro Valley  
Mr. Craig Civalier, Town Engineer, Town of Oro Valley

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Oro Valley Administration Building  
11000 N. La Cañada Drive • Oro Valley, Arizona 85737  
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**Review Comments on Preliminary Flood Insurance Study (FIS), Digital Flood Insurance Rate Maps (DFIRMs), and Summary of Map Actions**

Community:           Town of Oro Valley,  
                          Pima County,  
                          Arizona

Community No.:     040109

I. Flood Insurance Study (FIS)

a. CLOMR #08-09-0112R for the Canada Del Oro Wash was approved effective November 14, 2007. This CLOMR is the basis for a significant LOMR # 08-09-1811P for the entire wash (7 panels) that is currently under review by FEMA and very close to approval. The results of the CLOMR/LOMR change the flood flows, profiles, and BFEs for the entire CDO and are not included in the Preliminary FIS received on May 29, 2009. It would greatly benefit the homeowners, realtors and insurance agents of Oro Valley if this CLOMR/LOMR could be incorporated into both the Preliminary DFIRMs and the FIS prior to going final as opposed to having to use a very large LOMR for all determinations along this major wash until the next DFIRM update occurs.

b. LOMR # 08-09-1800P is currently under review by FEMA and is for a previously unstudied section of Big Wash. This LOMR uses the current regulatory Qs for Big Wash which have not changed in the preliminary FIS; however, the BFEs for this section of Big Wash have now been determined and should be incorporated into the Preliminary FIS and DFIRMs prior to going final.

II. Digital Flood Insurance Rate Maps (DFIRMs)

a. LOMC 04-09-0958P is identified as having been incorporated into the new DFIRM; however, the floodplain boundaries shown on the DFIRM panel appear different than those submitted with the LOMC. At attachment 1 are the original shape files and line work for this previous LOMR plus the LOMR determination documentation. In addition, LOMR # 08-09-1800P (discussed above) that is currently under FEMA review and close to approval will revise the floodplain boundary from that shown on the preliminary DFIRM. The floodplain map showing this section of LOMR # 08-09-1800P and a CD with the associated drawings and shape files is also at attachment 1. This LOMR should be incorporated into the preliminary DFIRMs as soon as approved to accurately reflect the hazard for the affected homeowners.

b. LOMC #07-09-1088P is identified as having been incorporated into the new DFIRM; however, the floodplain boundaries shown on the DFIRM Panel 04019C1070L appear different than those submitted with the LOMC. At attachment 2 is a screen shoot

**Review Comments on Preliminary Flood Insurance Study (FIS), Digital Flood Insurance Rate Maps (DFIRMs), and Summary of Map Actions  
(Continued)**

of the preliminary DFIRM and a copy of the LOMR showing the difference between the two documents.

c. LOMC 07-09-1167P is identified as having been incorporated in the new DFIRM; however, the floodplain boundaries shown on DFIRM Panel 04019C1080L and 04019C1085L are different than those submitted with the LOMC. At attachment 3 is a copy of the preliminary DFIRM and a copy of the LOMR showing the difference between the two documents.

d. On DFIRM Panel 04019C1070L two apparent floodplain errors have been identified impacting two residential properties (attachment 4). In one location the floodplain travels up and over a 30 foot hill and at the other an approximate 10 foot water surface elevation exists from one side of the channel to the other. Since these floodplains were originally developed using USGS quad maps and no underlying aerial photography this type of error is expected but these two are significant enough that correction is warranted.

e. In 2006 additional land was annexed on the extreme north side of the Town as shown on the attached Town Annexation map and DFIRM panel 0419C1080L (attachment 5).

f. Redlined DFIRM panels 04019C1070L, 1080L, 1085L and 1090L are attached at the end of this package.

g. DFIRM Panel 04019C1089L the A zone floodplain on the Oro Valley Wash, Rooney Wash and one unnamed tributary to Oro Valley Wash were realigned to match the tops of the channel banks along both sides of these washes with a Shaded zone X floodplain on the landward side of the channel. The linework of the A zone boundaries does not line up with the top of the banks or surrounding topography in several locations placing residential and commercial properties protected by the CDO levee and channel in the A zone as opposed to Shaded Zone X. Attached is a map with the topography, A Zone floodplain and aerial photography highlighting this discrepancy.

h. Numerous washes that have FEMA floodplains associated with them either are unnamed or have an alpha designation. These washes should be named in accordance with either the names used by local residents or names associated with the wash location listed below. All names listed below are also shown on the attached preliminary DFIRM panels:

(1) On Panel 04019C1089L, unnamed tributary to Oro Valley Wash should be named "Mutters Wash" as shown on the attached redlined panel.

**Review Comments on Preliminary Flood Insurance Study (FIS), Digital Flood Insurance Rate Maps (DFIRMs), and Summary of Map Actions  
(Continued)**

(2) On Panel 04019C1089L, unnamed wash to the North of Pusch Wash should be name "El Conquistador Wash" as shown on the attached redlined panel.

(3) On Panel 04019C1070L, Wash E should be named "Lomas De Oro Wash" as shown on the attached redlined panel.

(4) On Panel 04019C1070L, unnamed wash to the east of Wash E should be named "Canyon Shadows Wash" to provide an identifier to this floodplain as shown on the attached redlined panel.

(5) On Panel 04019C1070L, Wash D should be named "Canada Hills Wash" as shown on the attached redlined panel.

(6) On Panel 04019C1070L, Wash B should be named "Cross Wash" as shown on the attached redlined panel.

III. Summary of Map Actions

a. LOMA 04-09-1711A issued on November 3, 2004 is not listed on the preliminary SOMA for any action. This LOMA should be identified as not having been incorporated and be revalidated 1 day after the revised FIRM becomes effective. A copy of the LOMA is at Attachment 6.

b. LOMR 04-09-1576P issued on January 14, 2005 is not listed on the Town of Oro Valley preliminary SOMA for action (attachment 7). Since this area was annexed by the Town since the last maps were approved the SOMA may be listed in another jurisdiction. It appears that this LOMC was incorporated in the preliminary DFIRM.

c. LOMR-F 93-09-420A issued on September 20, 1993 is listed as being superseded by new detailed flood hazard information or the information provided was not sufficient to make a determination. It appears that LOMR 99-09-783P (attachment 8) which was incorporated into the preliminary DFIRMs supersedes this prior LOMR but is not mention in the succeeding LOMR write-up.

d. LOMA 199107253FIA is listed as an LOMC to be re-determined; however, the location of the structure of this home is not near any floodplain shown on either the effective FIRMs or on the preliminary DFIRMs. This LOMA was reapplied by LOMC

99-09-339V issued on February 9, 1999 (attachment 9) but appears to be better suited as a LOMC not incorporated as opposed to re-determined.

**Review Comments on Preliminary Flood Insurance Study (FIS), Digital  
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(Continued)**

e. LOMA 99-09-453A (attachment 10) is listed as a LOMCs superseded because of revised hydrologic and hydraulic analyses. LOMR 04-09-1576P issued on January 14, 2005 could potentially be the LOMR that superseded however LOMA 99-09-453A has two structures on the property one addressed by LOMR 04-09-1576A and one not. Need to clarify the extent of LOMA 99-09-453A.



Community: Oro Valley, Town of  
Resident Address: 9800 N. La Cholla Blvd  
Oro Valley, AZ 85737

Community No: 04019  
Panel #: 04019C1070L

2000 Topo NAVD 88  
2477' contour

2000 Topo NAVD 88  
2487' contour

Green Shade is  
Preliminary DFIRM  
A Zone



This Picture shows that the Floodplain boundaries are not accurate as they show an 10' Water Surface Elevation difference from one side of the channel to the other.



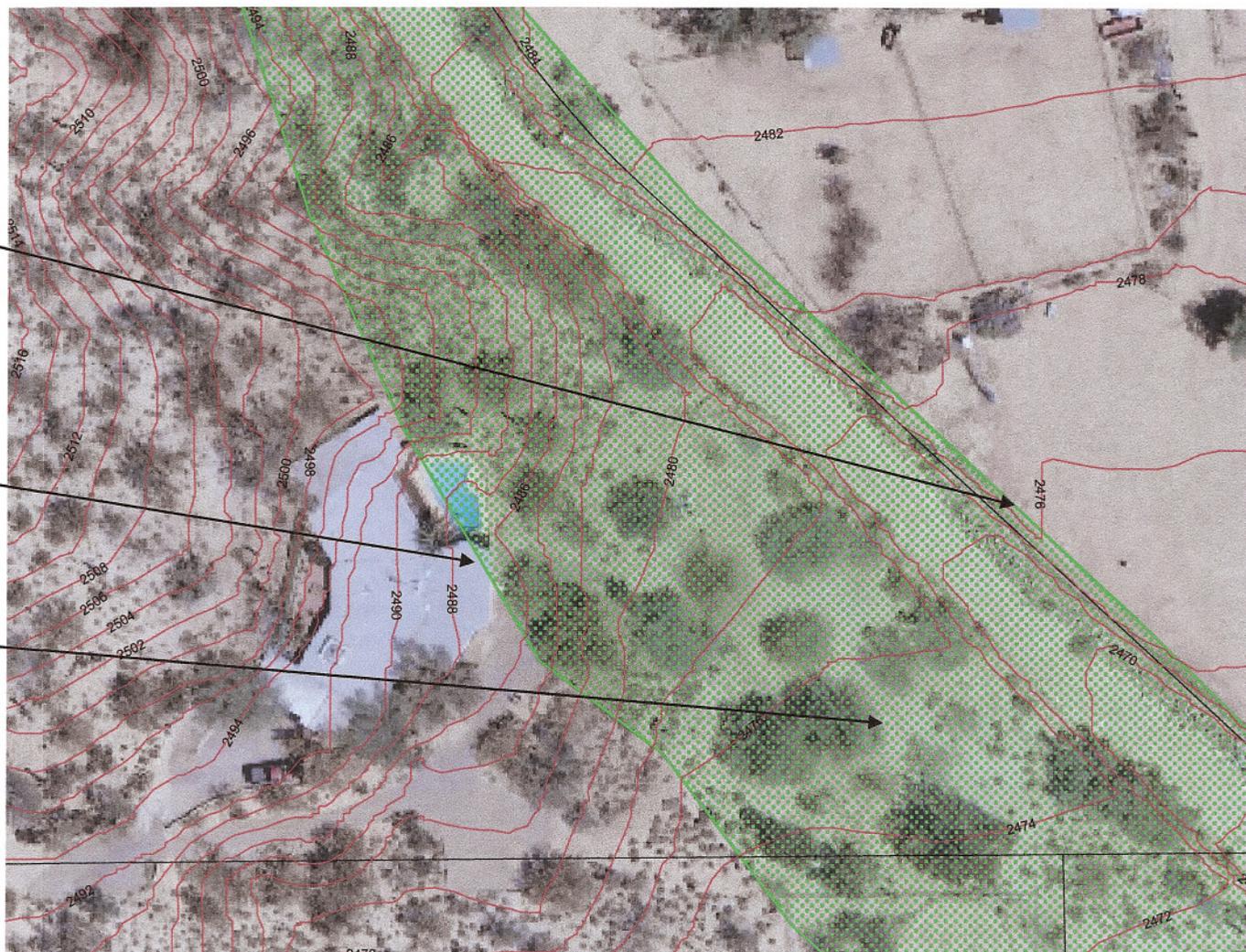
Community: Oro Valley, Town of  
Resident Address: 9800 N. La Cholla Blvd  
Oro Valley, AZ 85737

Community No: 04019  
Panel #: 04019C1070L

2000 Topo NAVD 88  
2477' contour

2000 Topo NAVD 88  
2487' contour

Green Shade is  
Preliminary DFIRM  
A Zone



This Picture shows that the Floodplain boundaries are not accurate as they show an 10' Water Surface Elevation difference from one side of the channel to the other.

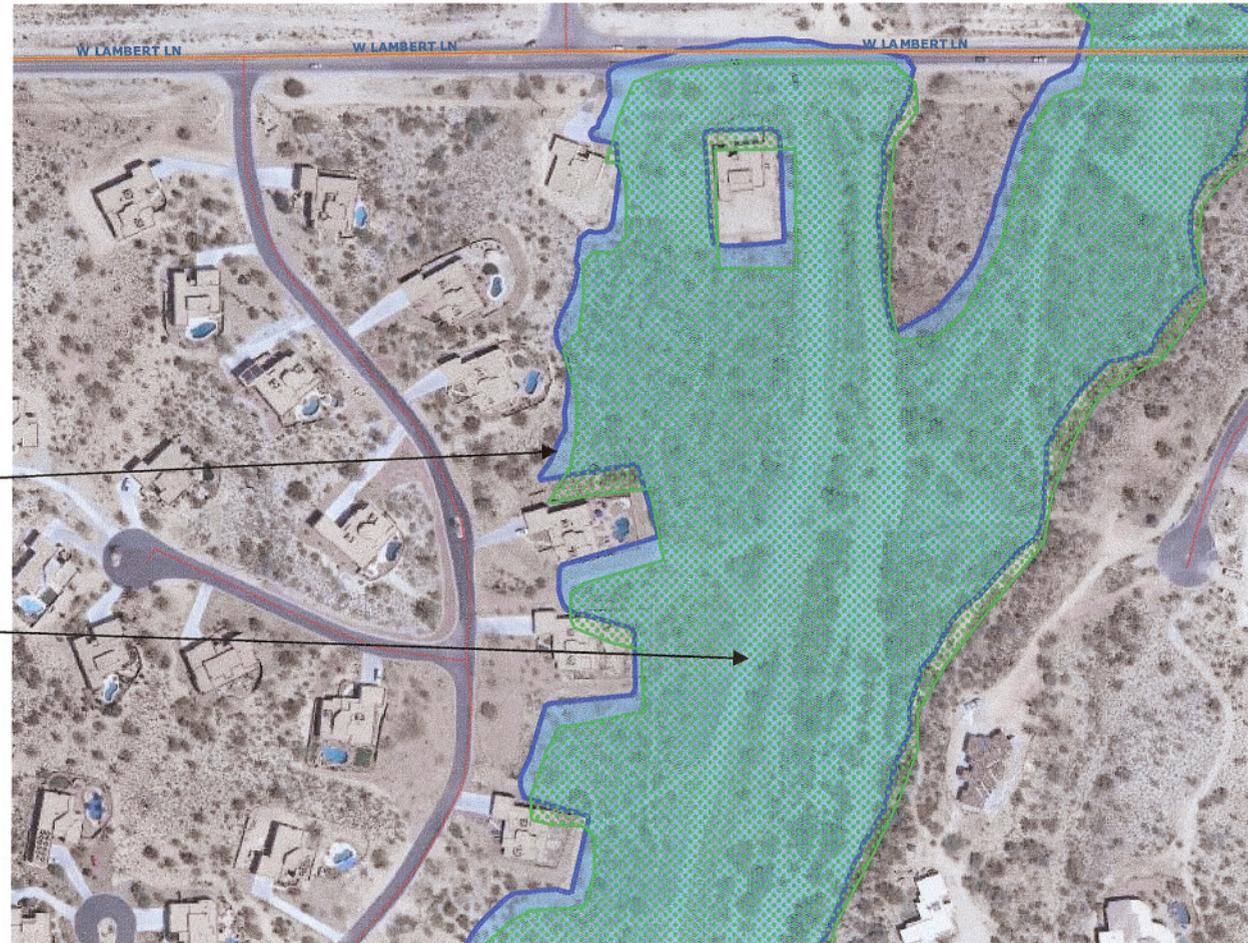


Community: Oro Valley, Town of  
Resident Address: Lambert Land and Wild Creek Dr  
Oro Valley, AZ 85737

Community No: 04019  
Panel #: 04019C1070L

Blue Shade is the  
Effective FIRM  
A Zone

Green Shade is  
Preliminary DFIRM  
A Zone



This Picture shows that the Floodplain boundaries have been shifted since the original LOMC was issued.

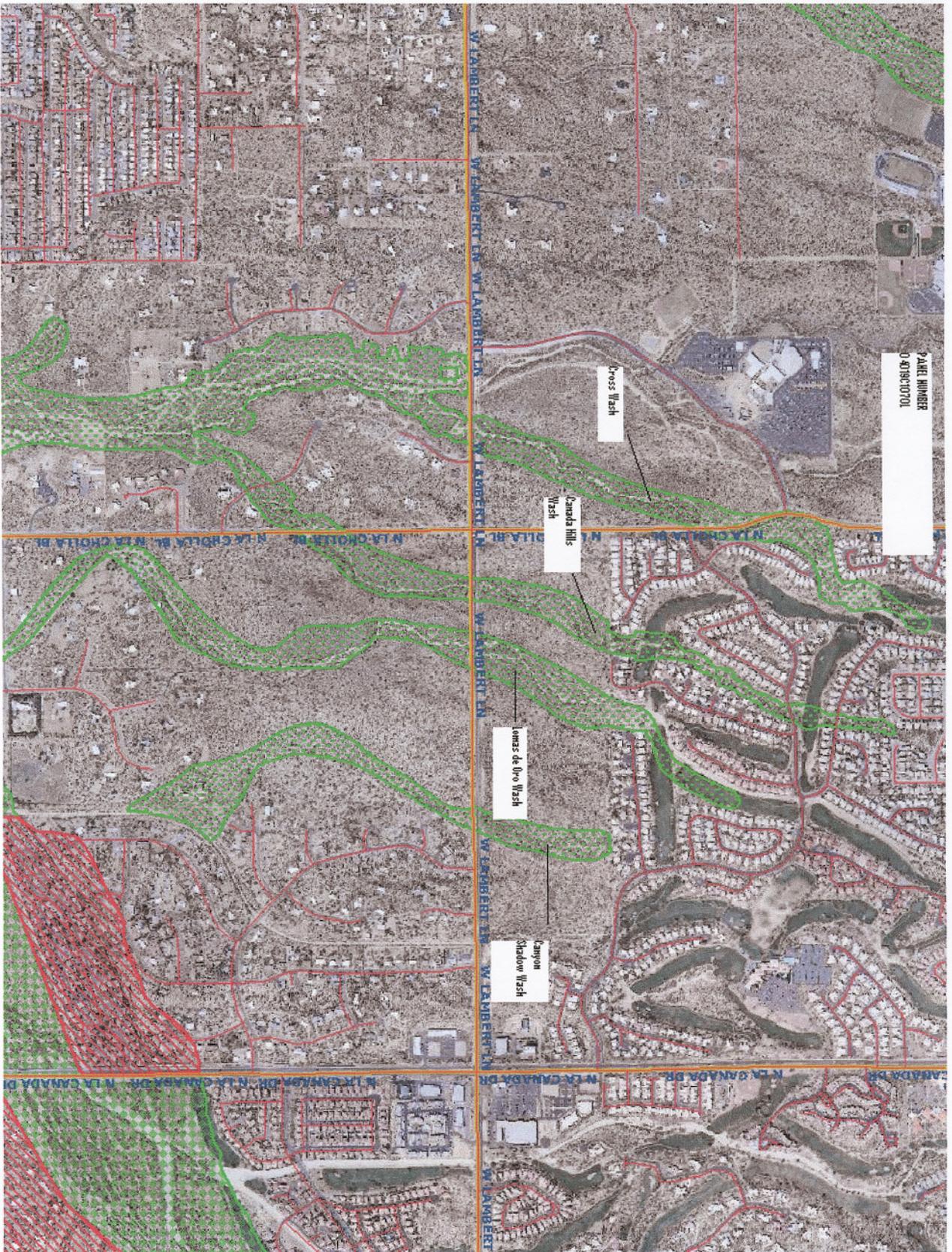


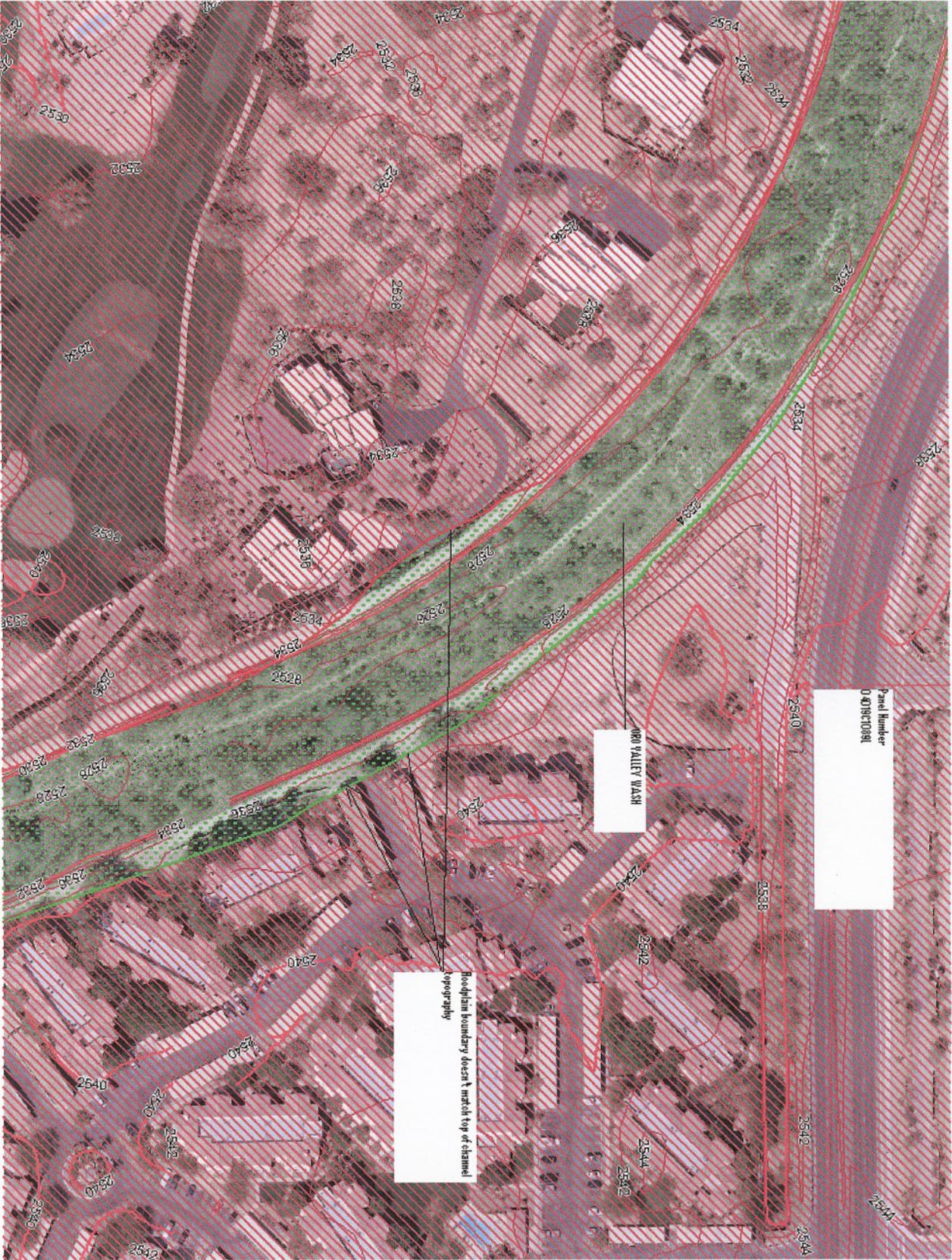
Community: Oro Valley, Town of  
Resident Address: 2445 E. Cargondera Canyon Dr.  
Oro Valley, AZ 85755

Community No: 04019  
Panel #: 04019C1085L



This Picture shows that the DFIRM BFE extends to a higher ground elevation than what the water elevation will be. Floodplain is shifted the wrong direction. Existing floodplain line work should be used.





Panel Number  
04019C10891

1000 VALLEY WASH

Floodplain boundary doesn't match top of channel topography