



**PIMA COUNTY
REGIONAL FLOOD CONTROL DISTRICT**
97 EAST CONGRESS STREET, THIRD FLOOR
TUCSON, ARIZONA 85701-1797

**SUZANNE SHIELDS, P.E.
DIRECTOR**

**(520) 243-1800
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July 8, 2010

Beth A. Norton, Program Specialist
Federal Emergency Management Agency
Engineering Management Branch
Risk Analysis Division
1800 S. Bell Street
Arlington, VA 20472-3010

Subject: Agua Caliente Wash – Community Protest on Changing the LOMR to a PMR

Dear Ms. Norton:

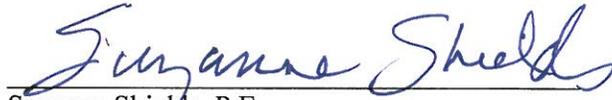
Pima County and the City of Tucson are in receipt of the June 28, 2010 letter from FEMA informing the communities that the Agua Caliente Wash Letter of Map Revision (LOMR), Case No. 09-09-2642P, will now be processed as a Physical Map Revision (PMR). We, as the floodplain administrators for the City of Tucson and Pima County, protest this move and formally request the map revision be finalized as a LOMR for the following reasons:

1. All technical data has been submitted, reviewed and approved through Michael Baker Corporation.
2. The LOMR application from the Pima County Regional Flood Control District (District) included ESRI shape files in FEMA's projection scheme to assist with the map creation.
3. There are significant changes to the Agua Caliente Wash which must be recognized and used for both floodplain management and flood insurance reasons which includes a corrected discharge downstream of Houghton Road. The existing regulatory discharge of 3,200 cfs was changed to 7,180 cfs. As a result the revision reflects increases in flood depths and floodway widths attributable to the more hazardous conditions.
4. All public outreach has been performed by the District. This includes newspaper notifications, individual notifications to 492 property owners, an open house meeting held on June 22, 2010, and the creation of a website: <http://rfcd.pima.gov/reports/aguacalientelomr/>.
5. In the City of Tucson there is one subdivision, two residential properties and one commercial property that are being engineered. In Pima County there is one preliminary subdivision plat and one property owner looking at a large multi-lot development that are being engineered. The LOMR process will ensure that these developments are built to the revised map limits.

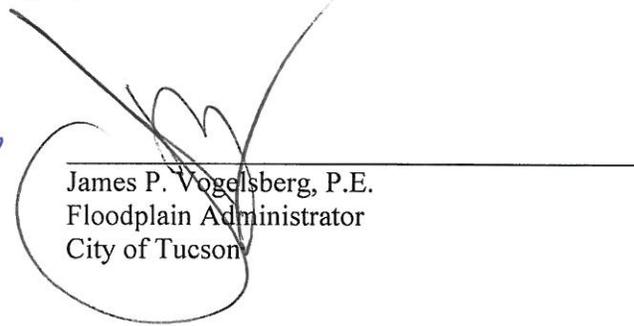
6. Using the data as “Best Available Data” does not modify the flood insurance zones and there are significant changes to the Special Flood Hazard Areas.
7. Using the mapping information as “Best Available Data” does not inform the public on the increase in flood hazards as well as a FEMA approved LOMR would.
8. FEMA Region 9 has not secured funding to process the Agua Caliente map revisions as a PMR. Furthermore, FEMA Region 9 has yet to resolve a protest on the next D-FIRMS which will delay those FIRMS well into next year. The PMR process for the Agua Caliente Wash could not be made until after the new FIRMS are issued, adding to the delays with the mapping Agua Caliente flood hazards.

If you have any questions or need additional information, please contact Terry Hendricks, Chief Hydrologist, Planning and Development Division, at (520) 243-1800.

Sincerely,



Suzanne Shields, P.E.
Director and Chief Engineer
Pima County Regional Flood Control District



James P. Vogelsberg, P.E.
Floodplain Administrator
City of Tucson

SS/JV/tj

- c: Brian Cosson, State NFIP Coordinator – Arizona Department of Water Resources
Edward Curtis, P.E., Risk Analysis Branch – FEMA Region 9
Jaclyn Bloor, CFM – Michael Baker Corporation