

# MAP IX-Mainland

A Joint Venture of URS, Dewberry, Schaaf & Wheeler, Airborne 1, and TerraPoint

February 25, 2010

Jim Vogelsberg, P.E.  
Planning & Development Services Department  
201 North Stone Avenue, 1<sup>st</sup> Floor  
P.O. Box 27210  
Tucson, Arizona 85701

RE: Response to community comments on Revised Preliminary DFIRM and FIS

Dear Mr. Vogelsberg:

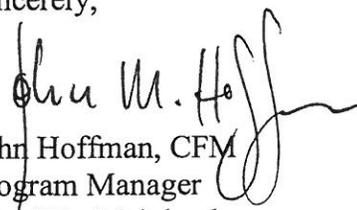
This letter is being sent to you in response to your letter dated August 4, 2009, to the Department of Homeland Security's Federal Emergency Management Agency (FEMA) regarding your review and comments of the preliminary Flood Insurance Rate Map (FIRM) and Flood Insurance Study (FIS) for the City of Tucson.

As discussed during the June 29, 2009 final Consultation Coordination Officer (CCO) meeting held for the communities in Pima County, FEMA provided the communities a 30-day general comment period for all FIRM and FIS and a statutory 90-day appeal and protest period for the restudy that affected panels within the City of Tucson and Pima County Unincorporated Areas. The Statutory Appeal and Protest period officially began October 16, 2009 and ended January 18, 2010.

We value your comments and contributions to the FIRM production process. Attached to this letter is a table showing a summary of comments your community provided during the 30-day general comment period and MAP IX - Mainland's responses. In cases where the comment was not incorporated as requested, we provided a reason for this decision within the response field of the table.

If you need additional information or assistance, please contact our MAP IX - Mainland Project Manager, Stephanie Routh, by telephone at (602) 943-1585 x110 or via email at [srouth@dewberry.com](mailto:srouth@dewberry.com)

Sincerely,

  
John Hoffman, CFM  
Program Manager  
Map IX - Mainland

Enclosure

cc: Steve Tineo, City of Tucson Dept. of Transportation Engineering Project Manager  
Ed Curtis, FEMA Region IX  
Suzanne Shields, Pima County Regional Flood Control  
Brian Cosson, State NFIP Coordinator  
Mike Skowronek, RSC 9

**Table 1: Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
Index	Label panel 2295L on the Index.	Changes Incorporated
	Planning and Development Services.	Map Repository has been changed.
1660	Label wash as Hardy Wash	Changes Incorporated
	Label road as River Road	Changes Incorporated
	Label Wash as Casas Adobe Wash	Changes Incorporated
1666	Label wash as Rillito River	Changes Incorporated
	Move Sunset Road to left of Camino De la Tierra	Changes Incorporated
	Label Road as Jusnic Court	Changes Incorporated
	Label road as Jusnic Cl. Add Cl	Changes Incorporated
	Label wash as Del Cerro Wash	Changes Incorporated
	Check contour lines in relationship to topo lines throughout this floodplain. Not matching approximately at 2238 elevation.	Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
	Check contour lines in relationship to the topo lines throughout this floodplain. Not matching north of 2247 WSEL. Street Name and Stream name Changes	Street name corrections made.  Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
1667	Check contour lines in relationship to the topo lines throughout this floodplain. Not matching between WSEL 2250 and 2254.	Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
1668	Add following road names: Villa Campana Del Oro, Villa Campana Del Cobra, Avinida Albor, Corte Albor, Placita Del Comiezo, and Vuelta De Los Mineros. Street name Changes	Changes Incorporated
1669	Tucson protests categorization of Zone A located east of adjacent Zone AE, in area west of I-10 embankment, between Gardner Land alignment and Flowing Wells Wash. Zone To east of Zone AE should be shaded Zone X. Limits of floodplain between Zone AE and shaded Zone X should be revised as depicted in attached documentation. Line for east edge of shaded Zone X shall be per previous panel into and as depicted in documentation.	Changes incorporated as provided in proof DFIRM to City of Tucson on 12/18/2009
	Tucson protests structures shown newly in Zone A and requests these structures that are not in Zone AE be categorized as shaded Zone X.	Changes incorporated as provided in proof DFIRM to City of Tucson on 12/18/2009
	Old panel correctly shows boundaries of LOMR 01-09-407P. Proposed DFIRM shows an older LOMR 99-09-1305, which should be superseded by 01-09-407P. Street name changes	Street name corrections made.  Area revised by later LOMRs 04-09-1150P and 06-09-B741P so latest LOMRs incorporated in this location.

**Table 1 (cont): Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
1669	00-09-407P - Zone X Shaded includes new structures - per Problem LOMC List from City of Tucson	Changes Incorporated
1686	See redline hard copy panel for minor changes. Street name changes	Changes Incorporated
	This is a Pima County parcel on Tucson boundary line. Tucson supports recommendation from County to correct delineations of proposed Zone A for this lot. Floodplain line should wrap around building pad.	Changes Incorporated
1689	99-09-589P - Floodplain includes new structure - per Problem LOMC List from City of Tucson	Changes Incorporated
1693	DFIRM aerials do not show new Alvernon Bridge over Rillito or new roadway alignment. Tucson asks that an updated aerial be applied to this panel or at a minimum the bridge structure and any associated cross sections be added to panel.	Changes Incorporated
1693	07-09-0551P - Floodplain includes new structure - per Problem LOMC List from City of Tucson	Changes Incorporated
1694	Tucson asks that the Zone AE floodplain along Backlidge Drive be labeled as "1% annual chance flood discharge contained within channel".	Changes Incorporated
	New alignment of Columbus Wash SFHA does not accurately follow topo based on WSEL XSs between Flenn and Grant. Alignment shifts AE SFHA to east and places all the homes along the east side of Columbus into SFHA.	Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
	08-09-0001P - Zone AE and X shaded revised per "Problem LOMC List" spreadsheet from City of Tucson 04-09-0547P - Zone AE and X shaded revised per "Problem LOMC List" spreadsheet from City of Tucson	Changes Incorporated
1715	04-09-0547P - Zone AE and X shaded revised per "Problem LOMC List" spreadsheet from City of Tucson	Changes Incorporated
2260	City limits do not match most recent City Limits Map at the end of west of 36th street.	Changes Incorporated
	City limits do not match most recent City Limits Map west of Anklam Road/N Players Club Drive intersection.	Changes Incorporated

**Table 1 (cont): Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
2260	<p>Correct items identified on redline panel.</p> <p>99-09-1084P - Zone X shaded revised per Problem LOMC List from City of Tucson</p> <p>Street name changes</p>	<p>Street name corrections made.</p> <p>Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.</p>
2270	<p>Map Nomenclature revisions needed in 7 locations.</p> <p>Street and Stream name changes</p>	Changes Incorporated
2276	<p>Section of preliminary SFHA shows existing structures in proposed AE Zone. Redraw AE floodplain limits line to exclude these structures from preliminary AE Zone. See contour line for 2370 line above which is close to the suggested general location of revised proposed AE floodplain delineation.</p>	Changes Incorporated
	<p>Santa Cruz west embankment is higher than west side bank protection. Tucson protests categorization of this west embankment as "X-Shaded - Protected by Levee" and requests change to "X-Shaded 0.2%".</p>	Changes Incorporated
	<p>See redline hard copy for proposed changes.</p> <p>Street name changes</p>	<p>Street name corrections made.</p> <p>Bank and protection levee will not be added. These elements are outside of the FEMA guide and specifications for FIRMs.</p>
	<p>See file named "2276L-AE-Riverside.doc" for proposed changes.</p>	Changes Incorporated
	<p>See file named "2276-AE-Lee10th.doc" for proposed changes.</p>	Changes Incorporated
2277	<p>See file named "2276L-AE-Riverview.doc" for proposed changes.</p> <p>01-09-400P - Floodplain includes new structure - per Problem LOMC List from City of Tucson</p>	Changes Incorporated
	<p>Structure is out of SFHA -- realign floodplain limits.</p> <p>Structure out</p>	Changes Incorporated
2278	<p>See redline hard copy for proposed changes.</p> <p>Street name changes</p>	Changes incorporated
	<p>Stream and Street name corrections made.</p>	<p>Stream and Street name corrections made.</p> <p>Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.</p>
2279	<p>Map Nomenclature revisions needed in 17 locations.</p> <p>Stream and Street name changes</p>	Changes Incorporated
2281	<p>Stream and Street name changes</p>	Changes Incorporated
2281	<p>See redline hard copy for proposed changes.</p> <p>Street name changes</p>	Changes Incorporated

**Table 1 (cont): Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
2282	Updated street name: Rosemont Avenue not Boulevard.	Changes Incorporated
	Tucson protests Zone AE delineation in this area. AE flood limit should be shifted back to old FIRM location. Street Name Changes	Street name corrections made.  AE flood limit matches LOMR-04-09-0547P, 08-09-0001P & 99-09-1301P no change has been made.
2283	Floodplain and channel are not aligned properly at intersection of 22nd street and Alvernon Way. Realign floodplain and channel correctly.	Floodplains have been incorporated per the corrected digital LOMR shapefile. Requested revision can not be performed without submitting for another LOMR.
	Floodplain at Forgeus and 18th Street adds additional structures to floodplain	Current SFHA location matches LOMR. No change was made.
	Add the name Forgeus Avenue to DFIRM.	Changes Incorporated
2284	Floodplain and street are misaligned on Desert Avenue between 16th street and 14th street. Realign floodplain and street correctly.	Changes Incorporated
	Between Columbus Boulevard and 22nd street, channel and floodplain are misaligned.	Changes Incorporated
	Floodplain encompasses new structure.  07-09-0707P - Zone AH revised per Problem LOMC List from City of Tucson	Changes Incorporated
2286	Correct items identified on redline panel including street names, area of significant difference and area where BFEs are not matching contours. Street name changes	Street name corrections made.  Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
	Correct items identified on redline panel.  99-09-1084P - Zone X shaded revised per Problem LOMC List from City of Tucson Street name changes	Street name corrections made.  Fitting of effective products to available base map information was performed as much as could be done without in-depth re-delineation of the floodplain.
2288	Map Nomenclature revisions needed in 11 locations. Street name changes	Changes incorporated
2289	See redline hard copy for proposed changes. Stream and Street name changes	Changes incorporated
2291	See redline hard copy for proposed changes. Street name changes	Changes incorporated

**Table 1 (cont): Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
2293	Continue blue line for Earp Wash for "1% Chance Flood Discharge Contained in Channel" from Zone A north of Nantac Rim Dr, through to S Alvernon Way.	Changes incorporated
2293	Label Earp Wash and label E Transcon Way and S Antrium Loop on east side of panel, on either side of Alvernon Way.	changes incorporated
	Label Lisa Fran Avenue (misabeled as Asterson Avenue).	changes incorporated
2295	See redline hard copy for proposed changes. Street name changes	changes incorporated
2301	See redline hard copy for proposed changes. Street name changes	Changes incorporated
2302	See redline hard copy for proposed changes. Zone Changes	Changes incorporated
2303	Floodplain encompasses new structure. 07-09-1087P - Zone AE revised per Problem LOMC list from City of Tucson	Changes incorporated
2304	Floodplain encompasses new structure.	Current SFHAs match the revised floodplain shapefile provided by the County. No change made.
2304, 2312	XSs for WSELs 2703 and 2700 should be continued north across natural channel to the constructed channel extending to associated contours 2703 and 2700 on north bank of constructed channel.	Area north of WSEL 2703 and 2700 is a Zone A designation. Please use the LOMR process to add new BFEs to this area.
2306	See redline hard copy for proposed changes. Street name changes	Changes incorporated
2307	See redline hard copy for proposed changes. Street name Changes	Changes incorporated
2308	00-09-591P - Floodplain includes the edges of two new structures - per Problem LOMC List from City of Tucson	The imagery that is being used in this comment is not being used in the production of this FIRM. Imagery must be supplied to us and approved to be used in this FIRM. Until then we can't make the requested changes accurately with the information that we are currently using.
2309	Floodplain now crossed Houghton Road, it didn't before. Extended floodplain to cross Houghton road based on effective. Street name changes	Changes incorporated

**Table 1 (cont): Comments and Responses on 3rd Revised Preliminary Map Panels  
for the City of Tucson**

Panel	Comment	Response
2312	Move green line to blue line south of Poinciana Drive. See attached documentation. 00-09-969P - Zone X shaded includes multiple new structures per Problem LOMC List from City of Tucson	The imagery that is being used in this comment is not being used in the production of this FIRM. Imagery must be supplied to us and approved to be used in this FIRM. Until then we can't make the requested changes accurately with the information that we are currently using.
2312	Move green line to blue line south of Poinciana Drive. See attached documentation.	The imagery that is being used in this comment is not being used in the production of this FIRM. Imagery must be supplied to us and approved to be used in this FIRM. Until then we can't make the requested changes accurately with the information that we are currently using.
2315	Thalweg does not match aerial.	Changes Incorporated
	Pima Air Museum Wash is not labeled.	Changes incorporated
	Panel number to the west is missing.	Changes incorporated
2320	Panel number to the west is incorrect.	Changes incorporated
	Street name Drexel is misspelled on east side of panel.	Changes incorporated
	Dots on FIRM panel signify areas in question. 05-09-0185P - Zone A revised per Problem LOMC List spreadsheet from City of Tucson	The imagery that is being used in this comment is not being used in the production of this FIRM. Imagery must be supplied to us and approved to be used in this FIRM. Until then we can't make the requested changes accurately with the information that we are currently using.
2860	See redline hard copy for proposed changes. No Changes	No changes requested
2880	See redline hard copy for proposed changes. Street and stream name changes(2 panels)	Street and Stream labels have been incorporated. The SFHA within the mentioned location matches the floodplain shapefiles sent to us by the county. Jurisdictional labels were placed following FEMA Guide and Specs
2890	See redline hard copy for proposed changes. Stream name changes	Changes incorporated
2900	See redline hard copy for proposed changes. Stream name changes	Changes Incorporated
2905	Wilmot Road is misspelled south of I-10. Street name change	Changes incorporated
3460	See redline hard copy for proposed changes. Street and Stream name changes	Changes incorporated

**Table 2 : Comments and Responses on 3rd Revised Preliminary SOMA  
for the City of Tucson**

LOMC Case #	Comment	Response
99-09-589P	Add panel 1643K to Old Panel column	Changes incorporated
99-09-799P	Add panels 2220K and 2236K to Old Panel column	Changes incorporated
98-09-1060P	Add panel 2243K to Old Panel column	Changes incorporated
99-09-719P	Add panel 1644K to Old Panel column	Changes incorporated
99-09-1084P	Add panels 2241K, 2243K, 2245K, 2264K, 2855K, and 2875K to Old Panel Column Add 04019C2293L to New Panel column, Delete 04013C2925L	Changes incorporated
99-09-1305P	Add panels 2210K, 2220K, 2228K, 2236K, 2237K, 2239K to Old Panel column	Changes incorporated
99-09-1301P	Add 2253K and 2232K to Old Panel column Change Project Identifier to Arcadia Wash, 22nd Street to Grant Road	Arcadia Wash has been added to the project identifier in MIP as the flooding source. Other identifier has not been changed.
99-09-1303P	Add panel 2830K to Old Panel column	Changes incorporated
00-09-616P	Change Project Identifier from "Fort Lowell Road to Rillito Wash" to Alamo Wash	Changes incorporated
00-09-407P	Change Project Identifier from Silvercroft Wash LOMR to Greasewood Wash at Silvercroft Wash	Changes incorporated
00-09-793P	Add multiple panels to Old Panel column Change New Panel column to show different panels Change Old Panel column to 1663K Change New Panel to 1713L	SOMA changes incorporated as much as possible. LOMR physically incorporated into FIRM.
00-09-591P	Add panel 2258K to Old Panel column	Changes incorporated
00-09-274P	Delete 2279L from New Panel column	Changes incorporated
01-09-994P	Add panels 2256K, 2257K, add 2258K to Old Panel column	Changes incorporated
00-09-051P	Add panels 2226K to Old Panel column Change Project Identifier to Tucson Arroyo and Arroyo Chico	Changes incorporated
04-09-0465X	Add panel 1610K, 1616K, 1617K, 1636K, 1637K, 1639K, 1643K, 1644K, 1645K	Changes incorporated