

Town of Sahuarita

Public Works Department

June 26, 2009

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

**Re: Preliminary FIS Report and DFIRM
Town of Sahuarita, Community No. 040137**

Dear Ms. Routh:

The Town of Sahuarita has completed a general review of the revised preliminary Flood Insurance Study (FIS) report and accompanying Digital Flood Insurance Rate Map (DFIRM). Based on that review, we offer the following comments:

A general analysis of changes to the floodplain was completed to determine if any parcels were removed from or added to the floodplain within the Town. Our findings indicate that no parcel will have a change in overall floodplain status. However, due to mapping changes, numerous parcels will have portions of land with changes to the floodplain status. In summary, 55 parcels had areas moved into a Zone AE from Zone X. These areas were typically at the cusp of the two zones and slight changes to the boundary moved a small area in or out. A total of 111 parcels had areas move down in floodplain status, from Zone D to X or one Zone X to another. A summary of impacted parcels is attached. Although our review did not find any areas or parcels with major mapping issues and it does not appear the new mapping will have a significant impact on the floodplain status of individual parcels, we feel it is important that property owners are afforded the opportunity to review and comment on the proposed changes. The Town understands FEMA will initiate a statutory 90-day appeal period after the community coordination meeting is held.

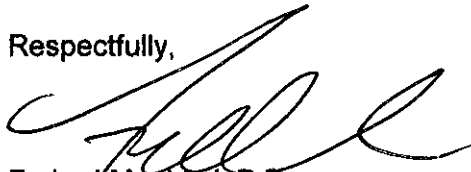
A general review of D-FIRM panels was also completed. There are seven panels affecting the Town. Four of these are published with the new panel numbers 3455, 3460, 3465, and 3955; the other three are un-printed panels. We reviewed the panels for any obvious errors such as floodplain mistakes and errors in nomenclature such as street names. We did not come across any except the following: The RFCD Mapguide tool indicates a drop in WSEL at a point approximately 750 upstream of the Corto Road alignment. The Existing FIRM shows BFE = 2769 where the new DFIRM shows BFE = less than 2768. With the switch to NAVD88 datum, BFEs should be higher, not lower. Additionally, Panel 3955 south of the Town shows a levee running along the west side of the Santa Cruz River between XS JV and KF. We are unaware of a levee along this alignment. This is where the relief channel (Santa Cruz West Loop Channel in the FIS, near Continental) runs west of the river.

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Finally, the May 29 letter from William Blanton to the Town notes, "the DFIRM Database...is central to [FEMA's] modernization effort to increase the usability of [FEMA] flood risk data." However, FIRM panels impacting the Town of Sahuarita have been renumbered, thus negatively impacting their usability. Renumbering of FIRM panels is likely to confuse agency personnel, property owners, design professionals and other stakeholders. We encourage FEMA to revert to the original numbering sequence to ensure existing documents can be accurately understood in their relevance to revised FEMA mapping efforts thus avoiding unintended adverse impacts from misuse.

We appreciate the opportunity to provide comments on the revised preliminary FIS report and accompanying DFIRM. If you have any questions, please contact David Pfordt at 520-344-7106.

Respectfully,



Farhad Moghimi, P.E.
Public Works Director

Attachments

c: William R. Blanton, Jr., CFM, Chief, FEMA Engineering Management Branch
Terry Hendricks, CFM, Chief Hydrologist, Pima County Regional Flood Control District

Town of Sahuarita
Review of Preliminary DFIRM
Parcels with Added Floodplain

TXREGION_	TXREGION_	PARCEL	BK	MP	PCL	PCL_R	BK_MP	AREA of change (sq-ft)
399537	399606	303660090	303	66	90	9	30366	76.91446
407996	408078	304189640	304	18	9640	964	30418	83.069235
413479	413565	304189650	304	18	9650	965	30418	37.940784
402739	402815	304298950	304	29	8950	895	30429	6.375215
402761	402838	304298970	304	29	8970	897	30429	96.385983
405460	405540	304299020	304	29	9020	902	30429	99.155706
410011	410094	304740500	304	74	500	50	30474	0.417478
409960	410043	304740510	304	74	510	51	30474	2.566213
409913	409996	304740520	304	74	520	52	30474	2.018658
409847	409930	304740530	304	74	530	53	30474	1.048187
409796	409879	304740540	304	74	540	54	30474	0.201951
409738	409821	304740550	304	74	550	55	30474	0.101482
410392	410475	304744180	304	74	4180	418	30474	1.711542
410432	410515	304744190	304	74	4190	419	30474	2.072375
410496	410579	304744200	304	74	4200	420	30474	2.579151
410545	410628	304744210	304	74	4210	421	30474	2.579739
410627	410710	304744240	304	74	4240	424	30474	2.304657
410624	410707	304744250	304	74	4250	425	30474	2.031868
410473	410556	304744400	304	74	4400	440	30474	0.304569
410871	410955	304744680	304	74	4680	468	30474	2.064796
410927	411011	304744690	304	74	4690	469	30474	2.005373
410985	411069	304744700	304	74	4700	470	30474	1.995028
411043	411127	304744710	304	74	4710	471	30474	2.048786
411108	411192	304744720	304	74	4720	472	30474	2.400341
411172	411256	304744730	304	74	4730	473	30474	0.800996
410857	410941	304745370	304	74	5370	537	30474	3.949739
408624	408707	999999991	999	99	9991	9991	99999	24.647846
373089	373139							25.174886
373089	373139							47.684385
376006	376064	30306005J	303	6	005J	5J	30306	11.334704
377775	377834	30309017A	303	9	017A	17A	30309	48.682909
377769	377828	30309017B	303	9	017B	17B	30309	6.668064
388370	388433	30335025C	303	35	025C	25C	30335	7.7071
398250	398319	30346028A	303	46	028A	28A	30346	72.011194
398257	398326	30346028B	303	46	028B	28B	30346	1.597142
400719	400790	30353008F	303	53	008F	8F	30353	3.643379
380590	380651	30354002B	303	54	002B	2B	30354	188.128429
384630	384693	30356003B	303	56	003B	3B	30356	190.520927
389149	389212	30356004E	303	56	004E	4E	30356	53.001933
390618	390681	30360138B	303	60	138B	138B	30360	24.957645
390609	390672	30360138E	303	60	138E	138E	30360	4.993421
393004	393068	30361001C	303	61	001C	1C	30361	10.432825
390599	390662	30361001D	303	61	001D	1D	30361	131.763324
394739	394806	30362001F	303	62	001F	1F	30362	203.134904
399536	399605	30366001B	303	66	001B	1B	30366	52.234078
398256	398325	30366002E	303	66	002E	2E	30366	117.249369
399533	399602	30366013A	303	66	013A	13A	30366	0.117633
400715	400786	30367002H	303	67	002H	2H	30367	104.490422
400730	400801	30367002J	303	67	002J	2J	30367	102.805685
406613	406694	30418097P	304	18	097P	97P	30418	550.853498
404050	404127	30429898A	304	29	898A	898A	30429	102.511652
408175	408257	30431030A	304	31	030A	30A	30431	64.852583
408188	408270	30431030B	304	31	030B	30B	30431	3.039225
408794	408877	30431031A	304	31	031A	31A	30431	13.570509

Town of Sahuarita
Review of Preliminary DFIRM
Parcels with Downgraded Floodplain

TXREGIOI	TXREGIOI	PARCEL	BK	MP	PCL	PCL_R	BK_MP	AREA of change (sq-ft)
396832	396900	303450120	303	45	120	12	30345	0.084298
399537	399606	303660090	303	66	90	9	30366	17.889081
413479	413565	304189650	304	18	9650	965	30418	10.113654
402739	402815	304298950	304	29	8950	895	30429	8.943977
402761	402838	304298970	304	29	8970	897	30429	54.934488
405460	405540	304299020	304	29	9020	902	30429	135.650468
411916	412001	304311340	304	31	1340	134	30431	115.190562
411908	411993	304311350	304	31	1350	135	30431	5.56096
411497	411581	304311490	304	31	1490	149	30431	0.133994
411427	411511	304311500	304	31	1500	150	30431	3.732427
411331	411415	304311510	304	31	1510	151	30431	3.132541
411171	411255	304311520	304	31	1520	152	30431	4.674708
411480	411564	304311540	304	31	1540	154	30431	5.60089
411766	411851	304311650	304	31	1650	165	30431	1.630145
411760	411845	304311660	304	31	1660	166	30431	6.301074
411755	411840	304311670	304	31	1670	167	30431	1.273753
411653	411737	304311680	304	31	1680	168	30431	9.673366
411660	411744	304311690	304	31	1690	169	30431	2.032193
412694	412780	304311750	304	31	1750	175	30431	8.69389
412706	412792	304311770	304	31	1770	177	30431	3.413855
412766	412852	304311780	304	31	1780	178	30431	1.05821
412194	412280	304312090	304	31	2090	209	30431	3.593533
412135	412221	304312100	304	31	2100	210	30431	1.17955
412329	412415	304312350	304	31	2350	235	30431	0.044012
412568	412654	304312390	304	31	2390	239	30431	4.779133
412440	412526	304312650	304	31	2650	265	30431	4.241003
412174	412260	304312740	304	31	2740	274	30431	0.630898
413988	414074	304313280	304	31	3280	328	30431	0.743565
413922	414008	304313290	304	31	3290	329	30431	0.850188
413887	413973	304313300	304	31	3300	330	30431	0.68067
413854	413940	304313310	304	31	3310	331	30431	0.688168
413816	413902	304313320	304	31	3320	332	30431	0.695549
413782	413868	304313330	304	31	3330	333	30431	0.273054
413517	413603	304313390	304	31	3390	339	30431	1.176542
413507	413593	304313860	304	31	3860	386	30431	0.099613
413721	413807	304313860	304	31	3860	386	30431	0.119375
414104	414192	304315030	304	31	5030	503	30431	1.128705
414149	414237	304315050	304	31	5050	505	30431	0.224694
414156	414244	304315060	304	31	5060	506	30431	0.126963
414535	414623	304315160	304	31	5160	516	30431	2.675159
414605	414693	304315170	304	31	5170	517	30431	4.608254
414396	414484	304315200	304	31	5200	520	30431	2.596212
414364	414452	304315210	304	31	5210	521	30431	1.726843
414244	414332	304315250	304	31	5250	525	30431	1.243366
414267	414355	304315260	304	31	5260	526	30431	2.634526
414421	414509	304315290	304	31	5290	529	30431	7.616094
414779	414867	304316080	304	31	6080	608	30431	0.110672
414852	414940	304316090	304	31	6090	609	30431	2.204247
414846	414934	304316100	304	31	6100	610	30431	12.069229
408994	409077	304740960	304	74	960	96	30474	0.196915
408964	409047	304740970	304	74	970	97	30474	0.398779
409825	409908	304741250	304	74	1250	125	30474	0.983761
409725	409808	304741260	304	74	1260	126	30474	2.483012
409305	409388	304741460	304	74	1460	146	30474	1.755473
409279	409362	304741470	304	74	1470	147	30474	7.794636
409192	409275	304741490	304	74	1490	149	30474	1.520228
409112	409195	304741570	304	74	1570	157	30474	2.570263
409138	409221	304741580	304	74	1580	158	30474	2.561762
409163	409246	304741590	304	74	1590	159	30474	3.066438
409189	409272	304741600	304	74	1600	160	30474	3.209522
409213	409296	304741610	304	74	1610	161	30474	5.458064
409272	409355	304741620	304	74	1620	162	30474	4.845602
409455	409538	304741700	304	74	1700	170	30474	1.030185
409373	409456	304741710	304	74	1710	171	30474	7.366591
409340	409423	304741720	304	74	1720	172	30474	3.800049

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409317	409400	304741730	304	74	1730	173	30474	3.917038
408826	408909	304741740	304	74	1740	174	30474	10.038738
410158	410241	304744060	304	74	4060	406	30474	3.3473
409985	410068	304744650	304	74	4650	465	30474	2.074341
409924	410007	304744660	304	74	4660	466	30474	1.369484
410072	410155	304744670	304	74	4670	467	30474	0.443285
410163	410246	304746020	304	74	6020	602	30474	0.917528
410419	410502	304746050	304	74	6050	605	30474	0.546073
410502	410585	304746060	304	74	6060	606	30474	2.964885
410581	410664	304746070	304	74	6070	607	30474	2.908404
410662	410745	304746080	304	74	6080	608	30474	1.429242
410733	410817	304746090	304	74	6090	609	30474	1.041086
410800	410884	304746100	304	74	6100	610	30474	1.073191
410886	410970	304746110	304	74	6110	611	30474	1.313543
410957	411041	304746120	304	74	6120	612	30474	2.010677
411015	411099	304746130	304	74	6130	613	30474	1.405095
410159	410242	304746470	304	74	6470	647	30474	0.285878
413055	413141	304842300	304	84	2300	230	30484	36012.12322
412777	412863	304842310	304	84	2310	231	30484	4797.30822
363200	366020	310010060	310	1	60	6	31001	8231.503601
408624	408707	999999991	999	99	9991	9991	99999	50.238472
373089	373139							6.337638
376006	376064	30306005J	303	6 005J	5J		30306	0.72458
377775	377834	30309017A	303	9 017A	17A		30309	6.739911
377769	377828	30309017B	303	9 017B	17B		30309	17.477315
390574	390637	30333009B	303	33 009B	9B		30333	3.031655
398250	398319	30346028A	303	46 028A	28A		30346	0.422489
398257	398326	30346028B	303	46 028B	28B		30346	3.237248
380590	380651	30354002B	303	54 002B	2B		30354	83.680877
384630	384693	30356003B	303	56 003B	3B		30356	216.744345
389149	389212	30356004E	303	56 004E	4E		30356	33.466125
390195	390258	30356004H	303	56 004H	4H		30356	4.076966
390618	390681	30360138B	303	60 138B	138B		30360	14.649867
390609	390672	30360138E	303	60 138E	138E		30360	1.571266
390599	390662	30361001D	303	61 001D	1D		30361	8.948762
394708	394775	30362001F	303	62 001F	1F		30362	170.024787
399536	399605	30366001B	303	66 001B	1B		30366	8.033521
398256	398325	30366002E	303	66 002E	2E		30366	84.057317
399533	399602	30366013A	303	66 013A	13A		30366	0.051375
400715	400786	30367002H	303	67 002H	2H		30367	71.818427
400730	400801	30367002J	303	67 002J	2J		30367	64.888436
402773	402850	30414002A	304	14 002A	2A		30414	0.588547
406613	406694	30418097P	304	18 097P	97P		30418	186.764335
411925	412010	30429002C	304	29 002C	2C		30429	2165.250285
404050	404127	30429898A	304	29 898A	898A		30429	57.458302
415079	415167	30431611A	304	31 611A	611A		30431	4.88103