

August 15, 2018

Ms. Juliana P. Blackwell, Director, Office of National Geodetic Survey  
National Ocean Service  
National Oceanic and Atmospheric Administration  
c/o NGS Feedback  
NOAA/NOS/National Geodetic Survey  
1314 East-West Hwy Rm9340 N/NGS1  
Silver Springs, MD 20910

Dear Ms. Blackwell:

In response to your request for comment regarding the Policy and Procedures Documents for the State Plane coordinate System of 2022 we would like to offer the following for consideration:

- 1) Usage of current SPCS in your organization, how your organization expects to use SPCS2022, and whether it will facilitate migration to the 2022 TRFs.
  - a. Arizona has statute reference to the NAD 83 SPCS
  - b. APLS makes reference to SPCS 83 for PLSS Corner Record Surveys
  - c. Currently Arizona has several regional LDP designs that have been developed by member organizations as a supplement to SPCS1983.
- 2) Whether the proposed default SPCS2022 definitions will impose a hardship or be beneficial to your organization.
  - a. The current proposed default SPCS2022 will require Arizona to, at a minimum, update their State Statutes to reflect the new projection parameters and the new TRF
  - b. This necessitated State Statute update gives rise to the opportunity to go beyond the default approach of modernizing the current three zones in AZ (which offers limited benefit) and migrate to the 'layered' approach of several zones with improved performance characteristics (i.e. a single State zone with underlying regional >50ppm zones crossed over by special purpose zones for specific key features and organizations).
- 3) Whether there is insufficient or excessive flexibility in the characteristics of SPCS2022 that can be established through user input.
  - a. The current proposal is insufficient because it does not also include special purpose zones.
  - b. The current proposal is insufficient because it does not provide zone design tools to the States. APLS requests that NGS provide support and tools to aid in appropriately designing LDPs, including development of software for that purpose.
- 4) Whether the deadlines are acceptable and realistic for making requests or proposing characteristics for SPCS2022.
  - a. If adequate support is provided to the States, namely with design software and tools, the current proposed deadlines are sufficient. SPCS Zone Design tools should be available to the States by the end of 2018 so they can meet the proposed dates outlined in the current NGS proposal.
- 5) Whether including "special purpose" zones as part of SPCS2022 would be beneficial, problematic, or irrelevant to your organization.
  - a. Including "Special Purpose" zones would be beneficial to APLS. There are several examples that currently exist within Arizona that would directly benefit from SP zones, namely the Navajo Nation, Grand Canyon and several DOT and utility corridor applications. It is also very advantageous to include SP zones as an option to be fully vetted. These options cannot be vetted or chosen to be applied if they are not in the policy. The policy should give the opportunity to have this as an option to explore, because if it is not an option in the final policy it will never be given the opportunity to be fully explored. Having it as an option does not mandate that it be acted upon or executed, but it is mandated to have it in the policy so the opportunity exists.

Respectfully,



Doug Schnieder, RLS  
APLS Chair



Brian S. Fisher, RLS  
Arizona State Geodetic Coordinator  
National Geodetic Survey



James Meyer, GISP  
Arizona Geographic Information  
Council Chair