

PIMA COUNTY REGIONAL FLOOD CONTROL DISTRICT TECHNICAL PROCEDURE

POLICY NO.: Technical Procedure, TECH-104 EFFECTIVE DATE: **March 19, 2014**

PRODECURE NAME: Evaluating and Adjusting the Riparian Classification Maps

PURPOSE: To establish a clear and consistent approach to evaluating the extent and classification of the Riparian Classification Maps (RCM) to account for spatial error, age of disturbance relative to the effective date of the RCM, and accuracy of the classification.

BACKGROUND: Section 16.30.080.B of the Floodplain Management Ordinance (Ordinance) states that: *“Where a question arises as to the location of any regulated riparian habitat or Important Riparian Area, the question shall be decided by the Chief Engineer consistent with riparian habitat standards adopted by the Board.”*

Some questions regarding interpretation of the Riparian Classification Maps arise more frequently than others. Specifically, they include projection errors when comparing the Riparian Classification Maps to aerial photos and the parcel base, determining when disturbance of regulated riparian habitat occurred as relative to the effective date of the Riparian Classification Maps, and confirming the accuracy of the riparian habitat classification based on site conditions.

This procedure will provide guidance on how these interpretations should be made and how these interpretations can be memorialized so that they can be consistently applied as appropriate.

PROCEDURE:

I. Effective date of the Riparian Classification Maps (RCM)

Disturbances that occur after the RCMs became effective are the only disturbances that shall be counted. The following RCM effective dates shall be used:

1994 Riparian Classification Maps (commonly known as the “1999 RCM”) became effective on August 13, 1998 for all development, unless specifically called out on the development plan or subdivision plat approved prior to this date.

2005 Riparian Classification Maps became effective on October 20, 2005 for all development.

The following typical scenarios show how to determine when disturbances should be counted:

A. Subdivision Plats and Development Plans:

For plats or development plans that were approved prior to the effective date of the RCM, any new disturbances on individual lots that occur after the effective date of the RCM shall be counted toward 1/3 acre of disturbance on that lot. For example, custom lot subdivisions frequently obtain a grading plan for infrastructure, such as roads and utilities, but leave the lots ungraded until purchased and developed by the new owner. Although the plat may have been approved prior to adoption of the RCM, each building permit application is considered a new project and falls under current regulatory requirements. There are a few exceptions to this approach and administrative plat notes have been added to these subdivisions, which state these exceptions.

B. Single-lot Development:

Disturbance of regulated riparian habitat (RRH) that occurred prior to the effective date of the RCM is considered pre-existing and does not count toward the 1/3 acre mitigation threshold, unless native vegetation has regrown within the disturbed area, or a portion thereof. In this case, the new disturbance within this area will count toward the 1/3 acre mitigation threshold, although a different riparian classification may be applied.

Current and historical aerial photography shall be used to estimate when disturbance of RRH occurred and determine whether the disturbance occurred before or after the effective date of the RCM. If the disturbance occurred near the effective date of the RCM and aerial photographs cannot provide a definite determination, historical permits for the property are reviewed to determine if the improvement was permitted prior to the effective date of the RCM. If it cannot be verified that the disturbance occurred prior to the effective date of the RCM, the disturbance will be considered pre-existing.

Upon completion of the evaluation, the determination shall be documented in the permit file and used to determine if cumulative disturbance exceeds 1/3 of acre. Only those disturbances occurring after the effective date of the RCM are considered cumulative and will be counted toward the 1/3 acre mitigation threshold. Disturbances existing prior to the effective date will not be counted.

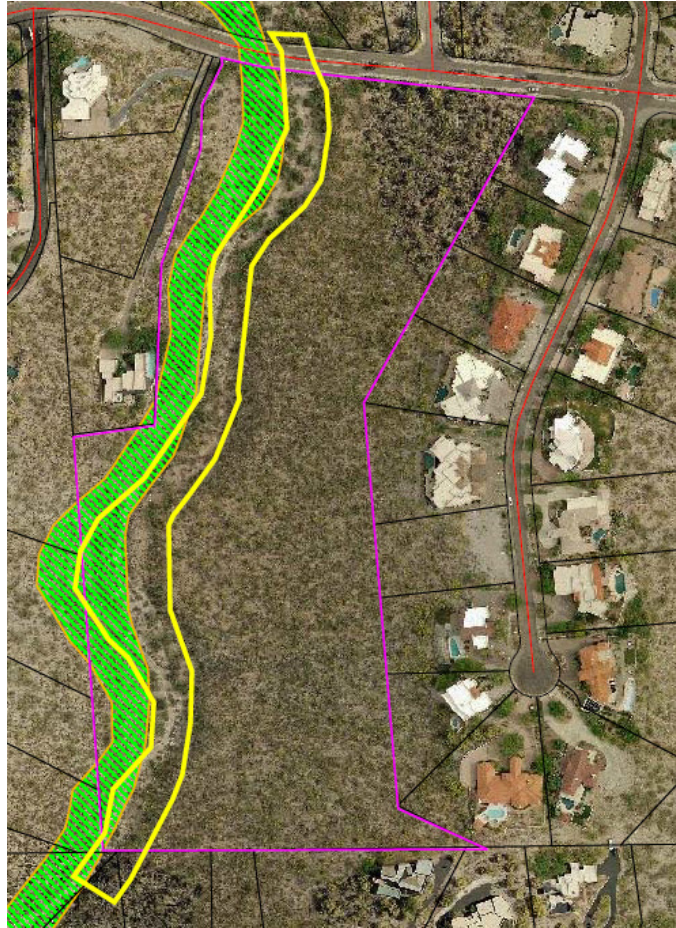
When disturbances are of natural origin, such as erosion, fire, or frost, a qualified professional may present information to establish modified riparian boundaries or classification in accordance with *Technical Policy TECH-116*.

II. Accounting for projection issues of the Riparian Classification Maps:

The RCM were developed at a planning scale level. The use of broad-based planning maps, in combination with mapping projection issues when the RCM are overlain with aerial photography sometimes results in riparian habitat boundaries incorrectly aligned with the actual location of riparian habitat on the project site. The following tips will help determine if the RRH boundary is correctly aligned with the aerial photograph when there are no obvious vegetation boundaries visible. Answer the following questions in this order to determine if the RRH boundary requires rectification:

1. Is the RRH polygon centered over the denser, larger vegetation adjacent to the sandy bottom wash channel?
2. Is the RRH polygon centered over and aligned with the 100-year floodplain limit?
3. Is the RRH correctly aligned over the lowest elevations of the watercourse?
 - o If available, utilize ground surface topography to help correctly align the RRH.

Example of an RRH polygon “shifted” (yellow polygon) to align with the wash and actual location of the riparian vegetation:



Upon request by the applicant of a single lot development, or upon submittal of an exhibit associated with a subdivision plat or development plan, District staff shall review and adjust RCM boundaries, as appropriate, when a projection issue is confirmed. These adjustments shall nominally maintain the width, length and overall area of the RRH polygon. Any adjustment shall be completed by the District as a separate action and shall not delay the permitting process.

When adjustments are warranted, the District may revise the RCM as follows:

- 1) Adjustments shall be made to an entire reach of habitat rather than just the individual parcel being evaluated. This typically would include the length between connections to other mapped riparian habitat and which usually coincides with upstream and downstream confluences.
- 2) A review of other active permits in the affected area shall occur so that the decision is equally and uniformly applied.
- 3) When the transition between the riparian and upland areas is gradual, the line shall be drawn at the location where the habitat is clearly upland, based on factors such as species composition, vegetation density, and topography. However, the width should not exceed the original width of the RCM at that location.
- 4) The areal extent of the existing and proposed boundaries shall be compared in order to ensure the area is nominally the same.

- 5) The rectification is subject to approval by the Floodplain Administrator.
- 6) Once approved, the modified polygon shall be provided to the Information Management Section for incorporation into the GIS. The following information is necessary:
 - a. Tax parcel ID number, north arrow and scale,
 - b. RRH boundary and classification designation,
 - c. Proposed modified boundary,
 - d. Property boundaries of the affected reach,
 - e. Topography and floodplain boundaries, if known

III. Important Riparian Areas with no underlying riparian classification

The Maeveen Marie Behan Conservation Lands System (CLS) designation Important Riparian Area (IRA) was adopted by the Pima County Board of Supervisors as part of the Pima County Comprehensive Plan in December 2001 and updated in June 2005 and is considered during development planning. These areas are subject to specific land use standards for development that is requesting a rezoning, Specific Plan, or certain Conditional Uses. At the planning level, the CLS provides direction to consider not only the riparian habitat but also the associated upland areas, and other open space area for the purposes of wildlife connectivity and the preservation of intact wildlife corridors, among other things. For this reason the IRA identified within the CLS may contain additional areas that are not in the adopted RCMs, and are beyond the scope of the District to regulate.

When projects do not need these planning level discretionary actions, the standard for development is authorized pursuant to Floodplain Management Ordinance, whose authority is limited to watercourse and adjacent floodprone areas. As such, these additional upland areas are not subject to regulation or mitigation requirements pursuant to the riparian habitat regulation found in the Floodplain Ordinance. Only those portions of Important Riparian Area that have an underlying riparian classification are subject to the mitigation standards, including the 1/3 acre disturbance threshold.

IV. Adjusting the Classification of RRH or Making Boundary Modifications to the RCM:

If an applicant feels the classification of the RRH is not correct or would desire to make a major boundary shift which affects the areal extent of the RRH, the applicant shall provide technical data to redefine the boundary and/or class of riparian habitat found on the project site using methods outlined in Technical Procedure 116, *Quantitative Methods for Onsite Vegetation Survey of Regulated Riparian Habitat*

APPROVED BY:

 Suzanne Shields 3/25/2014

Suzanne Shields
Director

Date

Original Policy Approved:
Date(s) Revised: