Metropolitan Pima Alliance

SAHBA the community builder
Southern Arizona Home Builders Association

SENT VIA ELECTRONIC MAIL – 9/30/11

Ms. Suzanne Shields
Director
Pima County Regional Flood Control District
97 E. Congress
Tucson, Az. 85701

Re: Proposed Onsite Riparian and Offsite Riparian Habitat Mitigation Guidelines

Dear Ms. Shields:

Metropolitan Pima Alliance (MPA) and the Southern Arizona Homebuilders Association (SAHBA) once again appreciate the opportunity to provide comments on the above-referenced proposed guidelines. Per our discussion at the meeting of August 31 we have "re-reviewed" the both the onsite and offsite riparian habitat mitigation guidelines.

Accompanying this cover letter, please find a mark-up of the proposed onsite and offsite riparian habitat mitigation guidelines. These comments are intended to compliment the central comments and areas of focus which we have addressed throughout the stakeholder process and most recently in the letter dated August 26.

While we understand the District's interest in moving this issue to formal Board Approval we maintain there are some changes that must be made to both the guidelines and Title 16. Our comments, and proposed changes, hold consistent with our message of achieving a balanced policy with protecting our region's riparian habitat while ensuring a regulatory environment that does not impede economic growth and development.

Sincerely,

Lisa D. Hoskin

David

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Government Relations Director, MPA

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Off-Site

The fee structure is based on the cost to mitigate onsite, with standard costs determined by the District. A cost is assigned to each onsite mitigation component and is incorporated into a spreadsheet (Appendix E), whereby the user can input parameters, such as acreage of disturbance, resulting in an ILF cost output. The following mitigation components are incorporated into the spreadsheet:

- Plant material (container trees and shrubs);
- Labor for plant material installation;
- Hydroseed (seed, mulch, water, cost for machinery, and labor to apply seed) (cost/acre);
- Irrigation system (materials and labor for installation) (cost/acre). Irrigation costs are calculated as a percentage of the plant material costs;
- ~~Five~~ Three years of maintenance (removal of noxious/invasive plant species, water, replacement plants, etc.). Maintenance costs are calculated as a percentage of the plant material costs; and
- ~~Five~~ Three years of monitoring. Monitoring costs were estimated based on actual projects.

A standard value is assigned to each mitigation component and is based on average cost estimates obtained from local vendors and consultants. An explanation for how costs were obtained is provided in Appendix E. The spreadsheet allows each component of the mitigation plan to be calculated separately so that total mitigation costs can be accurately assessed for each project. For example, a single-lot property owner will typically pay a smaller fee than the developer of a commercial or residential property since they have the ability to minimize installation, seeding, and irrigation costs.

Although use of the standard ILF calculation spreadsheet is encouraged, applicants may hire a qualified professional to prepare an ILF estimate. The estimate shall account for mitigation components, as listed above, and follow requirements in the ILF checklist provided in Appendix F.

For projects undergoing the development review process, an additional surcharge may be applied to the ILF based upon riparian habitat classification and percentage of disturbance. The surcharge does not apply to single-lot development (residential permits). The purpose of the surcharge is to further encourage avoidance, promote habitat continuity, and minimize impacts to Important Riparian Areas (IRA) and other high quality habitat. The following requirement will apply:

> Apply the following surcharge to the base ILF when the noted percentage of total mapped riparian habitat is disturbed:
>
> **For Class H, Xeroriparian Classes A and B, and IRA**
> 20-39% = 5% surcharge added to the base ILF
> 40-59% = 10% surcharge added to the base ILF
> ≥60% = 20% surcharge added to the base ILF
>
> **Xeroriparian Classes C and D**
> No surcharge applies

* Concerned about cost of ILF + methodology, request it be minimized further, eliminated or alternative found (similar to our "flat fee" proposal)

3.0 IN-LIEU FEE PROGRAM ADMINISTRATION

3.1 ADMINISTRATIVE PROCESSING OF IN-LIEU FEES

3.1.1 FEE COLLECTION

Single-lot Residential Development.

A single-lot residential development proposal disturbing more than 1/3 acre of RRH requires a Floodplain Use Permit (FPUP), which must be obtained prior to issuance of the building or grading permit. When onsite mitigation occurs, a Riparian Habitat Mitigation Plan (RHMP) is approved prior to issuance of the FPUP with mitigation occurring after construction is completed. When an ILF is proposed, fees are collected prior to issuance of the FPUP. This process ensures that a property owner compensates for disturbance of RRH prior to the impact occurring.

Collection Procedure

Fees will be collected prior to issuance of the FPUP. For projects that require a specific hold, such as Prior to Slab inspection (P2S) or Prior to Electrical inspection (P2E), submittal of the ILF may be delayed until the time of inspection. The applicant shall provide a written request to delay payment of the ILF, which will be reviewed on a case-by-case basis. Delayed ILF payments, if approved, must be received prior to the P2S or P2E inspection.

Commercial Development and Subdivisions

For projects following the development review process, ILF proposals are approved prior to Tentative Plat or Development Plan approval.

Collection Procedure

ILF payment must be received ~~prior to~~ upon approval of the grading or paving plan. A note will be placed on the plat or plan that states that the ILF shall be paid prior to the authorization of any activity on the parcel.

Fines collected from RRH violations

On May 4, 2010, the Board adopted Ordinance No. 2010-FC5. The amended Ordinance allows the District to impose civil penalties for violations of the code, including violations related to the unpermitted disturbance of RRH. The District will pursue fines equal to the amount of the ILF value based on the amount of unpermitted disturbance. Fines obtained from violations resulting from RRH disturbance will be deposited into the ILF program bank account.

4.1 MITIGATION OF AN OFFSITE PARCEL OF LAND

this conflicts with the onsite guidelines Conservation Plan option.

4.1.1 BASIC REQUIREMENTS

Mitigation in accordance with the onsite mitigation guidelines may be performed on another parcel of land with approval of the District. The proposed parcel must contain comparable or superior riparian habitat, or may only be used if the parcel is suitable for enhancement or restoration of degraded riparian habitat, as determined by the District. A deed restriction that protects the mitigated area(s) in perpetuity must be recorded. Additionally, the parcel must adhere to the following mitigation standards[1]:

- If the proposed mitigation land will be split off from an existing parcel of land, the mitigation land shall be located and consolidated in the most biologically sensitive portion(s) of the property;
- Mitigation land shall be configured to minimize harmful edge effects;
- Mitigation land shall be contiguous with any conserved land on adjacent properties; Preferably, mitigation land should be located within the same watershed as that impacted by development;
- Mitigation land shall be free of all significant harmful land use practices that impair mitigation values (e.g., off-road vehicle use, livestock use/grazing, etc.), or if harmful land use practices have occurred in the past, the land may be restored and protected from future harmful land practices.

too restrictive really limits options

As an alternative to the onsite guideline requirement for providing mitigation on an offsite parcel of land, an applicant may propose mitigation through use of a Riparian Habitat Preservation Plan (RHPP).

[1]Adapted from standards drafted and approved by the Multi-Species Conservation Plan (MSCP) Implementing Agreement Committee

4.1.2 RIPARIAN HABITAT PRESERVATION PLAN

Mitigation of an offsite parcel of land for qualifying larger projects (those that are required to go through the platting, specific plan, comprehensive plan, and/or rezoning processes) may follow requirements of a Riparian Habitat Preservation Plan (RHPP). A RHPP is designed to support the success of onsite preservation of riparian areas and the mitigation of disturbed habitat, as well as serve the special needs of a given project within the context of its natural resources, both upland and riparian.

For qualifying projects, applicants may propose a RHPP as an alternative to the basic requirement. The minimum requirement for a RHPP is to meet the conservation goals and objectives of the Maeveen Marie Behan Conservation Land System (CLS). The RHPP must preserve, enhance, provide connectivity, overall function, and/or restore an impacted riparian system and/or its surrounding areas and is subject to the discretion and approval of the District and the Board.

A RHPP may be acceptable when traditional mitigation does not address unique ecological or project conditions, such as:

- Highly fragmented and/or degraded riparian habitat;
- Sites with other unique ecological functions where a blended preservation plan would be more functional or appropriate; and
- Linear projects, such as roadways and sewers, or linear portions of projects where

- Water Availability (Class H, shallow groundwater/intermittent and perennial streams/springs);
- Hydrology/Hydraulics – Ability to support riparian vegetation (presence of FEMA floodplains or locally mapped floodplains);
- Adjacency to reaches of watercourses defined by the 2002 SDCP Report "Riparian Priorities" (available for viewing and downloading at http://www.pima.gov/CMO/SDCP/reports.html);
- Adjacency to existing District or County-owned property; however, this criterion is subject to verification of future uses of the land prior to being considered. Certain Pima County-owned land are set aside for future development;
- Within Habitat Protection Priority Areas or Private and state priority areas, pursuant to the Conservation Bond Program (2004 and 2010);
- Connectivity with parks, refuges, existing Pima County restoration projects, and undeveloped land;
- Adjacency to platted Natural Open Space (NOS);
- Special Elements (bosques, cottonwood/willow forests, springs, etc.);
- Historical perennial flows;
- Constructed vs. natural riverine systems; and
- Adjacency to or use of Transfer of Development Rights (TDR) Program and Sending Areas. Development rights are severed from these lands, which allows for higher density development in receiving areas (growth areas). TDR Sending Areas must have comparable RRH values.

The Riparian Acquisition Map (RAM) may be used to assist a property owner or developer in assessing property(s) for the criteria listed above. The RAM is a GIS based map that incorporates information derived from reports and data developed in support of the Sonoran Desert Conservation Plan (SDCP). These reports spatially define biologically sensitive lands at a landscape level. Additional information regarding the RAM can be found in Appendix G.

→ TDR an important tool for offsite mitigation

ON site

What is considered alteration of RRH?

The Ordinance considers riparian habitat to be altered on the subject property when:

There is disturbance to RRH (Class H, Xeroriparian Classes A, B, C, D, and/or IRA) that reduces vegetative volume or diminishes the value of the riparian habitat present on the site. Types of disturbances may include, but are not limited to:

- Mass grading/partial grading
- ~~Clearing/thinning (including pruning)~~ Clearing and thinning for fire prevention should be allowed
- Planting of non-native (exotic) species within RRH (outside of developed areas) is discouraged
- Planting of noxious and/or invasive species
- Other modifications that may reduce vegetation volume or diminish the value of the RRH (e.g., implementing turf plantings, livestock areas, fencing, paved walking paths, roads, structures, play areas).

What triggers the need for a Riparian Habitat Mitigation Plan (RHMP)?

While any disturbance to RRH requires District review and approval, a Riparian Habitat Mitigation Plan (RHMP) is required when greater than 1/3 acre of RRH (14,520 square feet) is disturbed.

To prevent a property owner from impacting RRH in a piece-meal manner, disturbance is considered cumulative. All disturbance occurring on a property or project site after the effective date of the Riparian Classification Maps will be counted toward the 1/3 acre mitigation trigger.

See Page 16 for more information related to Modified Development Standards. Detailed information can be found in Chapter 18.07 of the Pima County Zoning Code, which can be viewed at:

http://www.pimaxpress.com/

Minimize Disturbance

Measures that can be taken to minimize impacts to RRH include:

- Reducing grading limits;
- Reducing building footprints;
- Reorienting the structure to minimize impacts;
- Reducing width, length, and/or relocating driveways and parking areas;
- Utilizing modified development standards offered under Chapter 18.07 of the Zoning Code.

set limits on what will be required to demonstrate avoidance is not feasible

Disturbance with Onsite Mitigation

If it is demonstrated that avoidance is not feasible and the amount of disturbance cannot be minimized below 1/3 acre, the RRH may be removed as long as an approved RHMP is implemented.

This alternative is available only when it can be demonstrated that there is no "reasonably practical alternative" to the proposed impact and that impacts are minimized to the greatest extent possible. An approved RHMP is required before disturbance to RRH is permitted and must address how impacts will be minimized, rectified or eliminated over time.

In some instances, the use of Modified Development Standards may be requested as part of a Mitigation Plan submitted to Pima County. (See Chapter 18.07 of the Pima County Zoning Code.)

Disturbance with Offsite Mitigation

Offsite mitigation will be allowed when it has been demonstrated that preservation or onsite mitigation is not feasible. ~~All offsite mitigation proposals will require review and approval by the District and the Board.~~ Offsite mitigation proposals will require approval by the District.

Offsite mitigation includes the following options:

- Mitigation may be performed on another parcel of land with approval of the District. The proposed parcel must contain comparable riparian habitat, or may be used if the parcel is suitable for enhancement or restoration of degraded riparian habitat. The alternate parcel must be under the same ownership as the parcel impacted by development or if under different ownership, must record deed restrictions that protect the mitigated area(s) in perpetuity.

- For Master Planned Communities and large commercial developments, exchange of land in-lieu of onsite mitigation may be allowed. Land exchange proposals must provide multiple benefits such as preservation of valuable habitat corridors, provide habitat connectivity, and proximity to habitat preserved on public land, parks, preserves and habitat restoration projects.

- A financial contribution in-lieu of onsite mitigation. RRH may be removed or altered concurrent with payment of an in-lieu fee which may be used for purchase of property with riparian habitat, educational programs, invasive species management, or towards restoration on property currently owned by the District.

Conservation Plan

For larger developments (those that are required to go through the platting, specific plan, comprehensive plan, and/or rezoning processes), an additional option to the basic requirements for mitigation of IRA, Class H, and Xeroriparian Classes A-D is available. Applicants may propose a Conservation Plan as an alternative to a Riparian Habitat Mitigation Plan. A Conservation Plan is designed to support the success of onsite preservation of ~~riparian areas~~ valuable habitat and the mitigation of disturbed habitat, as well as serve the special needs of a given project within the context of its natural resources, both upland and riparian. The minimum

RHMP Approval Process

Board of Supervisors approval of a RHMP is required when:

- Disturbance of Class H and/or IRA exceeds 1/3 acre and exceeds 5% of the property's total RRH.
- ~~Offsite mitigation~~ for impacts to any xeroriparian classification ~~is proposed, including a Conservation Plan:~~ that exceeds 40% of the property's total RRH

Offsite mitigation and conservation plans should only require District approval

District-only approval of a RHMP is required when ~~on-site mitigation is proposed and:~~

- Disturbance exceeds 1/3 acre of Xeroriparian habitat (Class A-D) and is less than 40% of the property's total RRH.
- Disturbance of Class H and/or IRA exceeds 1/3 acre and is less than 5% of the property's total RRH.

Revisions to Board approved RHMP

Minor revisions to Board approved RHMP may be approved by the Chief Engineer, if the revisions do not result in substantial changes to mitigation requirements. Substantial changes to a RHMP will require review and re-approval by the Board. Minor revisions include the following:

- Modification to location of onsite mitigation area (s)
- Modification to plant species specified on the RHMP
- Modification to irrigation plan
- Modification to seeding method

Overview of Submittal and Review Process

What are Onsite Mitigation Requirements? (continued)

- **Planting and Seeding** of trees, shrubs, and understory as required to re-establish a natural riparian plant community similar to habitat removed.
- **Irrigation** to facilitate the establishment of plants and to assist in re-establishment of riparian habitat~~, within 5 years.~~ 3
- **Maintenance** for a period of ~~5~~ 3 years to ensure re-establishment of riparian. Maintenance practices for riparian habitats will differ from maintenance practices used on traditional aesthetic landscape areas. Refer to Appendix C for Maintenance Requirements.
- **Monitoring** for a period of ~~five~~ three full calendar years, to ensure that the Riparian Habitat Mitigation Plan (RHMP) is implemented and being maintained.

What makes a RHMP unsuccessful?

Common flaws in implementing RHMP's:

- *Planting only trees and failure to use all the plant species identified in the RHMP. Planting shrubs, succulents, forbs, and grasses are key components. All the vegetation layers need to be present in order for the habitat to function properly.*
- *Placement of landscaping rock, and other intensive landscaping measures within the mitigation area.*

Common flaws in maintaining a Mitigation Area include:

- *Pruning or shaping of trees and shrubs,*
- *Removal of ground cover vegetation, leaf litter and woody debris.*

Conflicts with fire prevention

Other activities that diminish the habitat value of Mitigation Areas include:

- *Installing fencing or walls that hinder wildlife movement, diverts natural drainage, or prevents surface water drainage from reaching existing riparian habitat.*
- *Using the mitigated habitat for livestock grazing or as recreation areas (e.g., children's play areas, paved walking paths, gazebos).*

Avoid intensive landscaping in "Avoided" Habitat Area.

Avoid "Hedged" shrub and pruned trees in Mitigation Areas.

*Valuable upland habitats may not meet these criteria. See conservation plan language.

OK

1. Where to locate your Mitigation Area

Basic Requirements:

You must locate your mitigation area within or adjacent to RRH or in areas where conditions are optimal for plant survival. To ensure the long term viability of the mitigation area, and to the extent allowable with respect to the minimum mitigation area size, the plant density should be similar to that which naturally exists and can be supported by site conditions. Where it is not possible to meet all mitigation requirements onsite, see "Options for Treatment of RRH" pages 7-10.

Options to Basic Requirements:

You may locate your Mitigation Area outside of RRH if you can demonstrate that this will enhance the overall habitat value of the site along with providing verification the area will support the required planting density without long-term supplemental irrigation.

An example of an acceptable non-adjacent location would be replanting previously disturbed natural drainages or constructed detention basins. See Pima County Regional Flood Control District Technical Policy, TECH-009 (Appendix G) for guidelines on planting within these areas. Unacceptable areas would be planting in parking lots, in areas with high volumes of vehicle and pedestrian traffic, areas that will be landscaped, or within active recreational areas.

Other Guidelines:

The Mitigation Area should be one continuous area that provides continuity of habitat. If one continuous area is not feasible, several areas in a density that creates habitat may be used. The mitigation area shall not consist of scattered trees used as amenity landscaping on the site.

If the mitigation area cannot be placed adjacent to preserved habitat, an alternative location shall be chosen based on water availability, to facilitate growth/maintenance of habitat, such as areas of shallow ground water, the floodplains of ephemeral, intermittent, and perennial streams, low-lying areas, or water harvesting basins that collect and infiltrate sufficient water to support riparian plant species. If approved by Pima County Development Services Department (DSD), the mitigation area may be located within designated Natural Open Space (NOS). If this option is chosen, design guidelines provided by DSD for planting within NOS must be followed.

What are the Class H Mitigation Standards?

1. Amount of Mitigation Required

Basic Requirement:

Minimum Size: For Class H the mitigation ratio is 1.5:1.0. For example, if you are disturbing 1.0 acre of Class H habitat, you must provide the equivalent of 1.5 acres of mitigation plantings. The actual size of the mitigation area provided shall be the minimum necessary to ensure the long-term viability of the mitigation plantings, accounting for topography, frequency of inundation and existing vegetation, but in no case shall be less than 70 % of the disturbed area, after the mitigation ratio is applied, unless an on-site vegetation survey has been provided that justifies sustainability of a more densely planted area. The 70% minimum mitigation area is based upon the maximum Total Vegetative Volume for each class of riparian habitat at maturity, and as such represents the smallest area within which the required number of plantings can be accommodated for that habitat classification.

Option to Basic Requirements:

The applicant may hire a qualified professional to prepare a RHMP based upon an onsite vegetation survey to be submitted to the District for review and approval. See Appendices F and G for field mapping and vegetation survey requirements. For larger developments, a Conservation Plan may be allowed, subject to District and Board review and approval (see Section 1, page 9).

If it is demonstrated that the full mitigation requirement cannot be completed onsite, a combination of onsite and offsite mitigation will be allowed.

2. Trees: How many and what kind are required

Basic Requirements:

How many: At least 90 trees per acre of disturbance, after the mitigation ratio is applied.

~~*What size:* All trees planted must be at least 15 gallon size.~~ All trees must be at least 5 gallon size.

Species diversity: No more than 75% of the trees used in the Mitigation Area can be of a single species. A minimum of 3 tree species are required. Use existing tree species as a guide for species selection.

Options to the basic requirements are subject to District approval

~~**Options to Basic Requirements:**~~

~~If using the basic requirement, 50% of the trees may be installed using 15 gallon and 50% of the trees may~~

Provide flexibility for other planting types such as tall pots

What are the Class H Mitigation Standards? (continued)

~~be installed using 5 gallon if you add 20% to the~~ total required ~~number of trees~~.

Other Guidelines:
You must select trees from the Approved Class H Plant List found in Appendix B. Select trees appropriate for your location (listed by watershed in Appendix B) and install using standard, approved planting methods (Appendix C). In general, existing native plants found on site are a good indicator of appropriate mitigation plants. Native species identified within the mapped habitat found on-site, but not found on the approved plant list may be allowed pending review and approval by District staff.

3. *Shrubs: How many and what kind are required*
Basic Requirement:
How many: 100 shrubs per acre of disturbance, after the mitigation ratio is applied.
What size: All shrubs must be ~~5~~ gallon or larger.
Species diversity: No more than 35% of the shrubs selected may be of a single species. A maximum of 1 shrub species may be selected from the "cacti & succulents" section of the approved plant list. A minimum of 5 shrub species is required unless an onsite vegetation survey is performed that justifies less diversity.

~~**Option to Basic Requirements:**~~
~~If using the basic requirement, all shrubs may be installed at 1 gallon if you add 20% to the total~~ required ~~number of shrubs~~.

Other Guidelines:
You must select shrubs from the Approved Class H Plant List found in Appendix B. Select shrub species appropriate for your location (listed by watershed in Appendix B) and install using standard, approved planting methods (Appendix C). In general, existing native plants found on site are a good indicator of appropriate mitigation plants. Native species identified onsite but not found on the approved plant list may be allowed pending review and approval by District staff.

What are the Xeroriparian Mitigation Standards? (continued)

survey to be submitted to the District for review and approval. See Appendices F and G for field mapping and vegetation survey requirements. For larger developments, a Conservation Plan may be allowed, subject to District ~~guidelines~~ review and approval (see Section 1, page 9).

2. Trees: How many and what kind are required
Basic Requirements:
How many:

- Xeroriparian A: At least 75 trees per acre of disturbance.
- Xeroriparian B: At least 60 trees per acre of disturbance.
- Xeroriparian C: At least 45 trees per acre of disturbance.
- Xeroriparian D: At least 30 trees per acre of disturbance or 1 tree per existing tree (depending upon method chosen to calculate mitigation requirement). Vegetation in Xeroriparian D mitigation areas must be replaced in like-kind from existing species (see Appendix F).

What size: At least 50% of the trees planted must be 15 gallon size. ~~The remaining 50% must be at least 5 gallon.~~

Species Diversity: No more than 75% of the trees used in the Mitigation Area can be of a single species. A minimum of 3 tree species are required. Use existing tree species as a guide for species selection.

Option to Basic Requirements:
If you use all 15 gallon trees, ~~instead of 50% 5 gallon~~, the total quantity of required trees may be reduced by 20%.

Other Guidelines:
You must select trees from the Approved Xeroriparian Plant List (Appendix B). Select trees appropriate for your location (listed by watershed in Appendix B) and install using standard, approved planting methods (Appendix C). In general, existing native plants found onsite are a good indicator of appropriate mitigation plants. Native species identified onsite but not found on the approved plant list may be allowed pending review and approval by District staff.

3. Shrubs: How many and what kind are required
Basic Requirements:
How many:

- Xeroriparian A: 90 shrubs per acre of disturbance.
- Xeroriparian B: 80 shrubs per acre of disturbance.
- Xeroriparian C: 70 shrubs per acre of disturbance.
- Xeroriparian D: Replace in like-kind and density. (See Appendix F for determining onsite shrub density and composition).

What size: 50% must be 5 gallon or larger~~, the remaining 50% may be 1 gallon~~.

Species Diversity: You may use any shrub species found on the approved Xeroriparian shrub list in Appendix B. A maximum of 1 shrub species may be selected from the "cacti & succulents" section of the approved plant list. No more than 35% of the shrubs selected may be of a single species. A minimum of 5 shrub species is required. Use existing shrub species as a guide for species selection.

Options to Basic Requirements:
If all shrubs planted are 5 gallon, the required number of shrubs may be reduced by 20%.

4. Seeding/Understory requirements
Basic Requirement:
You must hydroseed/hydromulch all disturbed areas within the Mitigation Area with the approved Xeroriparian seed mix and seeding requirements (Appendix B). Follow standard, approved planting methods found in Appendix C.

Options to Basic Requirements:
You may also seed the area using these methods:

- Drill seeding with crimped straw mulch,
- Broadcast seeding and raking into seedbed with straw or other appropriate mulch.

Site-specific seed mixes may be proposed and approved if they better reflect existing/desired conditions.

How will the mitigated area be monitored and what is the responsibility of the property owner?

The property owner is responsible for implementing and maintaining the mitigation area per the RHMP and submitting an annual monitoring report for mitigated areas on their property. Although, it is the property owners responsibility, within multi-lot developments a single report may be coordinated and submitted for multiple lots (e.g., Home Owners Associations). For larger developments, an assigned monitor is recommended, though not required. Reports shall include information as outlined on page 48.

The initial annual monitoring report shall be considered the "as-built" RHMP and provide information regarding any deviations from the approved RHMP based on plant species availability or problems encountered during installation.

In addition to the annual monitoring requirement, a representative of the County will visit the Mitigation Area at least once during the five year establishment period to assess compliance with the RHMP.

Success of the RHMP

The RHMP shall be considered successful if 80% of the plants are living and actively growing without supplemental irrigation or significant die back or loss at the end of the 5-year monitoring period. The monitoring plan will provide an assessment of success. During the monitoring period, the responsible party shall be required to provide annual reports to the District documenting progress toward success. If the site is not progressing as anticipated, proposed corrective actions shall be provided in the monitoring report.

What is the timeframe for monitoring?

Mitigation areas must be monitored following installation, which occurs during the first growing season following completion of construction. The Mitigation Area must be maintained and monitored for five calendar years. Each calendar year has multiple growing seasons typically determined by climate, location, temperature, daylight hours, and rainfall. In Southern Arizona there are three main growing seasons;

March—May "Spring growing season"

July—September "Monsoon season" of summer rains

September—November "Fall growing season"