

Ordinance level review

Federal Requirement per 44 th CFR	State Requirement via State Model Ordinance & ARS 48-3601 et al	Santa Cruz County Ordinance	Pima County	Cochise County
Specific Proposed Changes in the Ordinance				
Elevation of Structure/Service – requires lowest finished floor of a structure and any attached electrical/mechanical service to be elevated at the Based Flood Elevation, per 44 th CFR Part 60.3.	Requires lowest floor of a structure and any attached electrical/mechanical service to be elevated a minimum of one foot above the Base Flood Elevation.	Current – Meets State Minimum Requirement of one foot of freeboard. Proposed – Increase elevation by one foot. This will decrease the Flood Insurance Premiums for any and all structures meeting this requirement. Also, along with Compensatory Storage, increases Community Rating System (CRS) Program, Section 432.b, points by 250. With no other changes, this can bump our rating to a Class 6 from a Class 7, providing a 20% discount in premiums.	Same as State Minimum Requirement of one foot of freeboard	Same as State Minimum Requirement of one foot of freeboard
Compensatory Storage – No requirement at this time.	No requirement at this time.	Current – No requirement Proposed – call for all new development to provide compensatory storage for new fill placed into the floodplain, at a rate of 1.5 to 1. Under Section 432.b of the CRS, additional credit is provided, 25 points with a 2 foot freeboard. Also has the effect of helping to slow down long term increases in flood depth due to increased structures and fill in the floodplain. Additional credits, between 130 and 195) are available under Section 432.a for this requirement.	No requirement	No requirement
Substantial Damage/Substantial Improvement Limit – If a “non-conforming” structure is damaged or improved to 50% of its value before damage or improvement, it must then be brought into full compliance with mapping and local community floodplain requirements, or FEMA minimum requirements, whichever is more restrictive. 44 CFR Parts 59 & 60	Requirement is the same as FEMA.	Current – Same as FEMA, 50% Proposed – Reduce limit from 50% to 49%. The CRS, Section 432.e, provides 20 points of credit for having a limit lower than 50%. A limit of 49% is the minimum that can be done to receive the credit. At this time, there is no incentive to have a limit lower than 49% as the points no longer increase as the limit decreases.	Was at 49% in one section of the Ordinance, but 50% in another location. Appears to have been set at 50% in latest update.	Same as FEMA, 50%
Encroachment Limit – FEMA limits encroachment effect to one foot	Same as FEMA	Current – Limit is set to six inches	Limit of increase, assuming equal encroachment, is one tenth of one foot.	Same as FEMA
Fees – No requirements	No fees required	No fees required	Allows a fee in lieu of meeting Retention/Detention Requirements	Fees required: Residential structures without Drainage/Hydrology Study \$150.00 Residential structures with Drainage/Hydrology Study submitted and approved \$65.00 Accessory Structures \$40.00 per structure
Life of Structure - Undefined	Undefined	Current – in perpetuity. The current Ordinance requires all improvements/damages to non-conforming buildings be tracked, with no time limit, and that when the structure reaches the 50% threshold, the structure be brought into compliance with current mapping and	Undefined. One definition only states that when the “total cost of all improvements, modifications, additions, reconstruction or repairs” which would indicate similar to Santa Cruz County in perpetuity. Not mentioned anywhere else.	Undefined, open to interpretation.

		<p>Ordinance. Under the current Ordinance, we receive 60 points for this requirement.</p> <p>Proposed – The Draft Ordinance proposes a two tier system. Structures that remain within their original footprint have the life of structure defined as 10 years, from the date of damages/repairs/improvements.</p> <p>Structures that increase the size of their foot print will remain with the definition of in perpetuity.</p> <p>CRS Credit does not change because of this change.</p>		
Floodway – FEMA requires any construction or fill within the floodway have engineering documentation to demonstrate that the fill/construction will cause no rise in water surface elevation, at all. 44 th CFR Parts 59 & 60	Same requirement as FEMA.	<p>Current Ordinance prohibits any and all fill and/or construction in the floodway. CRS, Section 432.m, provides some credit, up to 100 points, for this and other standards not specifically mentioned in Section 400 of the CRS.</p> <p>Proposed, provide an exemption to the current restriction for structures mapped into the floodway. Exemption would require structures to stay in the same/original footprint, properly elevate, and allow the floodwaters to pass through. No additional credit for this, but would allow the numerous structures within the City, within the floodway, to be repaired if damaged. Current Ordinance would not allow those buildings to be reconstructed.</p>	Some uses allowed, some uses prohibited. Open uses (agriculture, airport landing strips, parking areas, loading areas, golf courses, parks, wildlife and natural preserves, game farms, and accessory residential uses such as lawns, gardens, parking areas and play areas) are allowed . Uses that create a danger or hazard to life or property, divert, retard, or obstruct the flow of regulatory flood waters, increase water surface elevations, increase erosion potential, fill, etc are prohibited. This appears to include most if not all buildings.	Same as FEMA, also no applications will be accepted without engineering proving FEMA “no rise” requirement has been met.
Abandoned Structure/Use – No definition	State Model Ordinance talks about a use or structure being abandoned for 12 consecutive months, then if the use or structure is non-conforming, it must then be brought into conformance.	<p>Current – Same as the State Model.</p> <p>Proposed – Ordinance Committee and Staff tried to craft a definition for abandoned that would not result in problems because of the economy leading a structure to be considered abandoned. Therefore the property must not be maintained and the property taxes are not being paid in order for the property to be considered “abandoned”.</p>	Same as State Model	Same as State Model
Critical Facilities/Service – No definition or mandated requirement.	Same as Federal.	<p>Current – District adopted (via the General Manager, Mr. Ken Zehenter) a standard for Critical Facilities/Services back in 2001. CRS Section 432.f provides 80 points of credit for this activity.</p> <p>Proposed – Language from existing standard is included into the body of the Ordinance. No other changes proposed.</p>	Pima County adopted a standard similar to Santa Cruz County, and included it in its Ordinance in 2010.	Same as Federal
Attached Garages – Must be at or above the Base Flood Elevation, 44 th CFR Part 60.3.	Requires the floor of the garage to be one foot above the Base Flood Elevation, OR, if not	Current – Same as the State Model.	Same as State Model	Same as the State Model

	elevated to that height, must have openings to allow for the flow through of water.	Proposed – Because of the propensity of garage areas to be converted into habitable areas in the building, require the garage level to be at or above the Regulatory Flood Elevation. This will prevent future conversions from technically coming out of conformance with State requirements, and will prevent future conversions from resulting in increases in flood insurance premiums.		
Retention/Detention – No definition or mandated requirement.	Same as Federal, but State of Arizona does provide a State Standard (#8-99) for this issue.	Current – Utilizes State Standard. Credit under CRS Section 452. Proposed – Add requirement for redevelopment of any industrial, commercial or residential development (at the plat level or multifamily housing) to provide some sort of peak or volumetric runoff reduction to 90% of the pre-redevelopment amount. Proposal is to help offset impacts of past developments when said developments are redeveloped. Also requires use of best management practices to help improve storm water quality. Credits available under CRS Section 452.	New development required to have retention/detention “regardless of size or land use density”. Possibility of a Fee in Lieu. Requirements dependent on basin classification. Balanced requires retention/detention back to pre-existing. Critical Basins requires flow to be less than pre-existing.	Utilizes State Standard. Credit under CRS Section 452
Rain Garden – Not Covered	Not Covered	Current – Not Covered. Proposed – Added as a voluntary alternative to providing engineered retention/detention for lots/developments less than one acre in size. Defined as 15% of the impervious area, six inches deep, with plantings and soil amendments.	Not covered, no option.	Not covered
Riparian Habitat – Not covered	Not covered	Current – Covered by the current Ordinance by requiring habitat to be disturbed as little as possible. Proposed – Better defines what is or is not habitat. Requires areas of habitat being set aside by a development for preservation be labeled as Natural Areas on the plat. For individual property owners, creates an exemption to the currently required Floodplain Use Permit for the creation of a wildfire protection zone (clearing vegetation within 30 feet of the structure, removing dead and down within 125 feet of the structure). CRS Credit available under Section 420 (Open Space Preservation) and 450 (Low Impact Development Standards)	Separate Ordinance, requires between 1 and 1.5 times the disturbed area, depending on type, to be mitigated. Requires long term monitoring and irrigation. No allowance for wildfire protection zones or pre-existing subdivisions.	Not covered
In Channel Sand and Gravel Operations – Not Covered by FEMA	Requires Floodplain Use Permit/review.	Current – Prohibits any new in channel sand and gravel operations.	Allowed only if watercourse is determined to be in Sediment Balance, i.e. amount of sediment coming in is equal to or greater than what is	Same as State Model

		Proposed – Requires a Variance be issued by the Board of Directors for any new in channel sand and gravel operations.	going out under normal, undeveloped, flow conditions.	
Section by Section review of the Ordinance				
1.3 Statement of Purpose – Not covered by 44 th CFR	Section 1.3 of State Model Ordinance	Current – Same as State Model Proposed – Same as State Model, & added Sections J and K are request of Ordinance Committee.	More detailed than State Model or proposed Santa Cruz County Ordinance	Similar to State Model
1.4 Level of Standard – Partially covered by 44 th CFR Part 60.2	Not in State Model Ordinance	Current – sets the standards within the Ordinance as the minimum standards that address general floodplain management requirements. Allows the District and Floodplain Administrator to establish standards and/or policies necessary to carry out the provisions of the Ordinance. Was added originally as it is in keeping with several other floodplain management ordinances consulted during the writing of the current ordinance. Proposed – added language to clarify that not all requirements can be contained or listed in this Ordinance; added language regarding specific reoccurring issues; and added language that standards/policies may be superseded should appropriate engineering documentation that said standard or policy should not apply is provided.	Similar to Santa Cruz County Ordinance, but instead of Board of Directors and/or General Manager setting standards and/or policies, it says the Flood Control District can.	Similar to Santa Cruz County Current Ordinance, but more vague.
2.0 Definitions – Many of the definitions are found in the 44 th CFR Part 59	Section 2.0 of State Model Ordinance	Current – many of the same definitions as both 44 th CFR and State Model. Some were taken from other Ordinances to cover items mentioned in the Ordinance, but not defined elsewhere. Proposed – approximately 55 new definitions added. Some at the request of FEMA/State of Arizona, many added at the request of the Ordinance Committee to better define terms used within the Ordinance.	More definitions than the State Model Ordinance, fewer than Santa Cruz County Current Ordinance	Same as State Model Ordinance.
3.1 Land to which this Ordinance Applies – Indirectly covered by 44 th CFR Part 60.1-3	Section 3.1 of State Model Ordinance	Current – Adds language regarding locally regulatory floodplain and erosion hazard areas to better define limits of where the Ordinance applies. Similar to other communities where the local community has jurisdiction over flooding areas not recognized as high hazard areas by FEMA, but where communities have had problems in the past. CRS Credit under Section 432.i Propose – No changes proposed.	Language is very similar to the Santa Cruz County Current Ordinance, including only mentioning incorporated and unincorporated areas of the county.	Similar to State Ordinance, specifically names communities that are incorporated that are also covered by the Ordinance. Also sets a minimum threshold for applicability of the ordinance at 50 cubic feet per second (same as Santa Cruz County)

<p>3.2 Areas of Special Flood Hazard and Regulatory Floodplains, Floodways – partially covered by 44th CFR Parts 59 and 60.3 in terms of defining the areas of federally recognized Special Flood Hazard Areas.</p>	<p>Section 3.2 of State Model Ordinance – This appears to have been condensed in the latest version of the State Model Ordinance</p>	<p>Current – More extensive as it goes into local regulatory areas, and is divided into sub-sections, whereas current State Model Ordinance appears to have been condensed. Was in keeping with other ordinances within the state at the time of the original writing. CRS Credit under Section 432.i</p> <p>Proposed – Address of the office has been changed to reflect office location. Section D altered to mention standard accepted methodologies and practices for mapping and that outside mapping by an Arizona Registered Professional Engineer may, upon review and approval, supersede mapping done under the direction of the Floodplain Administrator.</p> <p>Subsection F clarified to make it clear that it deals with areas not mapped by FEMA.</p> <p>Subsection H added, showing that when mapping between different engineers conflicts, the more restrictive, unless otherwise approved by the Administrator, will take precedent. But at no time will the accepted mapping be less restrictive than the effective Flood Insurance Rate Map.</p>	<p>Language is similar to Santa Cruz County Current Ordinance. Adds language about areas subject to revision, and requires watersheds with discharges above 5000 cubic feet per second listed.</p> <p>Contains language similar to the proposed Section H.</p>	<p>Similar to State Model Ordinance</p>
<p>3.3 Compliance – Not covered under 44th CFR</p>	<p>Section 3.3 of State Model Ordinance</p>	<p>Current – Similar to State Model, but adds language about repairs, modifications, or additions.</p> <p>Proposed – No change proposed.</p>	<p>Language is dissimilar to State Model, and is spread out among provisions regarding Authority, and Contents and Purpose of Provisions.</p>	<p>Similar to State Model</p>
<p>3.7 Statutory Exemptions – 44th CFR touches on topic of Pre-Existing Non-Conforming Structures, requiring work/damages equal or exceeding 50% to cause structure to be brought into compliance.</p>	<p>Section 3.7 of State Model Ordinance – Appears to have been reorganized.</p>	<p>Current – Essentially same, but structured differently. More in keeping with the 1999 version of the State Model Ordinance.</p> <p>Proposed – adds abandoned structure to the language, to refer back to definitions; adds language to clarify that Floodplain Use Permits to track the value of changes are not prohibited; and changes the limit from 50% to 49%.</p> <p>Language added to clarify exemption for Historic Structures.</p> <p>Language added to refer to life of the structure, and to the definition of such added to Definitions Section.</p>	<p>More restrictive than Current Santa Cruz County Ordinance or State Model Ordinance regarding Non-Conforming Uses by adding additional limitations such as not increasing water surface elevation in floodway, encroaching further into an erosion hazard area, et al.</p> <p>Similar to both State Model and Current Santa Cruz County Ordinance (3.7.B). Structure nearly identical to Current Santa Cruz County Ordinance.</p>	<p>Similar to both State Model and current Santa Cruz County Ordinance.</p>
<p>3.9 Unlawful Acts – Not directly covered by 44th CFR. There is some language referring to revocation of Flood Insurance for non-compliance with local regulations and federal</p>	<p>Section 3.8 of State Model Ordinance</p>	<p>Current – Same as State Model with a slightly different structure. Subsections B & C appear to have been merged in State Model.</p> <p>Proposed – No changed proposed.</p>	<p>Similar to State Model Ordinance, adds language about riparian habitat and neglect of maintenance responsibilities on private improvements to the list of unlawful acts.</p>	<p>Not directly included in the Ordinance. Some language under enforcement is similar to some of the language in State Model.</p>

minimum standards, under section 1316 of the National Flood Insurance Act of 1968.				
3.10 Abatement of Violations – not directly covered by 44 th CFR	Section 3.10 of State Model Ordinance	Current - Same as State Model Proposed – Added Calendar to clarify what type of days are specified in the Section (as opposed to working days).	Similar to State Model Ordinance but more detailed, adds language about a hearing officer.	Not directly included. Some language under enforcement is similar to State Model.
3.11 Remedies for Damages – Actions Authorized – not covered under 44 th CFR	Not in State Model Ordinance	Current – Added in keeping with other referenced Ordinances at the time of writing. Provides a mechanism for anyone who may be damaged or has been damaged as a result of a violation of the Ordinance to seek relief through the courts, and potentially seek damages. Proposed – No change proposed.	Similar to Current Santa Cruz County Ordinance.	Same as State Model.
3.12 Removal of Violation Authorized When – Not covered by 44 th CFR	Not in State Model Ordinance	Current – Added in keeping with other referenced Ordinances at the time of writing. Gives the District, in the event of a known violation that can adversely impact other properties, during a flood, and is considered to be an immediate danger to life or property, the ability to cause the removal of the violation, at the property owner expense. Providing an option that may be able to prevent additional damages or loss of life. Proposed – No change proposed.	Similar to current Santa Cruz County Ordinance.	Some language similar to current Santa Cruz County Ordinance under Violations.
3.13 Recovery of Administrative and Other Costs – Not covered by 44 th CFR	Not in State Model Ordinance	Current – Added in keeping with other referenced Ordinances at the time of writing. Give the District the ability to seek compensation for costs of removing a violation. Proposed – No changes proposed	Similar to current Santa Cruz County Ordinance.	Language similar to current Santa Cruz County Ordinance under Enforcement
4.2 Duties and Responsibilities of the Floodplain Administrator – indirectly covered by 44 th CFR part 60.3	Section 4.2 of State Model Ordinance	Current – Same as State Model, with minor organizational differences Proposed – Same as State Model, adding responsibility to determine if a development qualifies as Pre-Existing Non-Conforming, and tracking the improvements; added language about how market value is determined and when, and how the value is locked in, and other language to be more specific about the duties of the Floodplain Administrator.	Similar to State Model, more detailed. Has the Chief Engineer in charge of the District, and the Floodplain Administrator is a designee of the Chief Engineer for day to day operations. Also adds a section authorizing specific actions/duties to the Board.	Similar to State Model
4.3 Establishment of a Floodplain Use Permit – required under the language of 44 th CFR part 60.3	Section 4.3 of State Model Ordinance	Current – Same as State Model Ordinance, with minor organizational differences, and additional sections in keeping with other referenced Ordinances for more specificity in the permitting process, such as more detailed Specific Permit Conditions Authorized, Permit Denial Conditions (which specifically limits when a permit can be denied), Permit Revocations (which specifies when a permit may be revoked), and Certificates	Similar to current Santa Cruz County Ordinance, with more detail. Adds a section of Exemptions for when a permit is not required. – Structure less than 200 square feet, or improvements to existing structures where value of materials and labor is less than \$7,500.00, provided other requirements are met. In 2010, Pima County adopted Critical Facility	Similar to State Model, does not indicate what would cause denial or revocation of permit.

		<p>of Elevation (specifying when certain elevation certificates are required).</p> <p>Proposed – Same as current, added language to better clarify when a permit is required for development in the floodplain. Also refers back to definition of Development, which restricts Development to essentially that which alters the ground elevations, or physical structure/utilities of a building.</p> <p>Also adds specific language pertaining to Critical Facilities/Structures.</p> <p>Also adds language in 4.3.B.3, identical to language found in 44th CFR part 60 regarding development occurring in Zone A Special Flood Hazard Areas. Similar to State Model Ordinance 4.3.D.</p> <p>In section 4.3.D, added language to clarify and emphasize that some conditions are site specific and all possible conditions cannot be contained in one document.</p>	language identical to existing Santa Cruz County Standard.	
5.1 Standard of Construction – certain portions covered under 44 th CFR part 60.3	Section 5.1 of State Model Ordinance	<p>Current – Similar to State Model, with minor organizational differences, breaking sections down into more detail.</p> <p>Proposed – Most of the proposed changes are to bring this section into compliance with the newer (2009) version of the State Model Ordinance, such as adding more information about Accessory Structures. Also more specifics about what qualifies as Non-Habitable.</p>	Similar language though out multiple sections, but no similar section like the State Model Ordinance.	Not specifically a section. Some language similar to State Model spread throughout document.
5.3 Standards for Utilities – certain portions covered under 44 th CFR Part 60	Section 5.3 of State Model Ordinance	<p>Current – Same as State Model, with addition of No Waste Disposal in Erosion Hazard Areas, and all utilities and service facilities to be elevated at or above the Regulatory Flood Elevation. Both added in keeping with referenced Ordinances at time of writing, and to receive additional credit under CRS Section 430.</p> <p>Proposed – Added language to clarify when waste disposal systems are permitted within the floodplain in section B. Added language stating critical facilities must also meet the requirements of section 5.13.</p>	Similar to current Santa Cruz County Ordinance.	Under Other General Requirements, similar to State Model
5.4 Standards for Commercial and Industrial Developments – certain portions covered under 44 th CFR Part 60.	Not separated out in State Model Ordinance, partially covered by Section 5.4 Additional Development Standards, including Subdivisions.	<p>Current – In keeping with referenced Ordinances at the time of writing. Goes into more specific detail than State Model Ordinance for commercial and industrial developments.</p> <p>Proposed – No changes proposed</p>	Similar language to Current Santa Cruz County Ordinance though out multiple sections, mostly combined with requirements for Subdivision and Developments	Some similar language to Current Santa Cruz County Ordinance. Requires Drainage Report required for all development one acre or larger, or more than 50% impervious.

<p>5.5 Standards for Subdivision – certain portions covered under 44th CFR Part 60.</p>	<p>Section 5.4 of State Model Ordinance</p>	<p>Current – In keeping with State Model Ordinance and referenced Ordinances at the time of writing. Goes into more detail and specifics about what is and is not required than State Model Ordinance.</p> <p>Proposed - language in Sections A and B (previously C) added to better clarify original language. Additional clarification that records of survey, especially for large lot (greater than 40 acres) splits are included, to keep in conformance with requirements of 44th CFR Part 60.3.B.3, and State Model Ordinance. Section C (Previously B) also expanded to keep in conformance with requirements of 44th CFR Part 60.3.B.3, and State Model Ordinance regarding development in Zone A for large developments (land area greater than 5 acres or resulting in 50 or more units). Also added requirement for compensatory storage, and renumbered existing sections.</p> <p>In Section G, added requirement that building envelopes in floodplains be proven to be safe building sites, and again mention compensatory storage for fill in the floodplain.</p> <p>Section J, updated language referencing State Standard for Retention/Detention and any updates of said standard. Added requirement for redevelopment of existing developments (not including single residential structure) that were built prior to any requirement for retention/detention to reduce runoff by 10% when redeveloped. Added language on Best Management Practices to help improve storm water quality, and gain credits under CRS Section 450 (said practices also are shown to lower the amount of maintenance work required in retention/detention basins). Added option of Rain Garden for small (one acre or less) developments so engineered Retention/Detention not required. Added requirement for larger watersheds, that retention/detention systems not be in channel.</p> <p>Section K – Added language to specify how a cost recovery system for public flood control systems is to be created, especially for new developments.</p> <p>Added Section M, Riparian Habitat, to clarify what has to be done by developers when dealing</p>	<p>Similar to State Model and Current Santa Cruz County Ordinance, combines both Subdivisions and Commercial/Industrial developments.</p>	<p>Similar to State Model</p>
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		with riparian habitat areas, and define what is riparian habitat, and how, if set aside by the developer, it is to be labeled. Indirectly will generate points under CRS Section 420 as areas designated to protect Floodplain Open Space and Riparian Habitat to protect the Natural and Beneficial Functions of the Floodplain increase.		
5.6 Standards for Manufactured Homes and Manufactured Home Parks and Subdivisions. Portions covered under 44 th CFR Part 60.	Section 5.5 of State Model Ordinance	Current – In keeping with State Model Ordinance and referenced Ordinances at the time of writing. Goes into more detail and specifics about what is and is not required than State Model Ordinance. Proposed – Added language from State Model Ordinance that anchoring requirements are in addition to, not in replace of other state and local requirements for resisting wind forces.	Similar to State Model Ordinance, but more detailed like current Santa Cruz County Ordinance.	Not specifically addressed
5.8 Floodways – Portions covered under 44 th CFR Part 60.	Section 5.7 of State Model Ordinance	Current - more restrictive than State Model, forbidding new construction or fill in the floodway. Credits in CRS 430 for higher standards. Proposed – exceptions proposed for “open” structures, usually used for agriculture or recreation, and for buildings, excepting critical facilities, mapped into the floodway. Exceptions appear to not detract from previously earned CRS Credit.	More detailed and restrictive than State Model Ordinance. Similar to Current Santa Cruz County Ordinance, but has more requirements to be met to allow development in the Floodway beyond open uses.	Same as FEMA, must have No Rise Certification from Engineer
5.9 Floodway Fringe Areas – Portions covered under 44 th CFR Part 60	Not in State Model	Current – In keeping with referenced Ordinances at the time of writing. Goes into addition detail regarding certain conditions for fill, construction, and sand and gravel operations. Proposed – Added language about compensatory storage, and language to provide for a Variance by Board to allow new in channel mining.	Similar to Current Santa Cruz County Ordinance. Does not deal with Sand and Gravel Operations in this section. Adds Critical Facilities/Services (same language as Santa Cruz County Standard). Includes some requirements found in Sections 5.4 and 5.5 of the Current Santa Cruz County Ordinance.	Mentioned in Definitions
5.10 Flood Related Erosion-prone (Erosion Hazard) Areas and Building Setbacks – Portions covered under 44 th CFR Part 60.24 (pending mapping of Zone E Special Flood Hazard Areas).	Not in State Model Ordinance	Current – In keeping with referenced Ordinances at the time of writing. Ensures buildings that could be damaged or destroyed by erosion are properly protected as flood related erosion is not covered by Flood Insurance if water does not enter the structure. Based directly on State Standard. Sets Santa Cruz River setback at 500 feet Proposed – No changes proposed.	Similar section to Current Santa Cruz County Ordinance, but specifically setbacks for multiple watersheds, or for watershed of a specific discharge. Also specifies setbacks for constructed channels.	Requires a minimum setback of 50 feet, refers to State Standard for determination of setback.
5.11 Vehicular Access – Not covered by 44 th CFR.	Not in State Model Ordinance	Current – In keeping with referenced Ordinances at the time of writing. Added based on experience of other communities in regards to access during floods, especially in rural areas with unpaved roads.	Language and section similar to Current Santa Cruz County Ordinance.	Not in Ordinance

