



Southern Arizona Home Builders Association

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March 17, 2025

The Honorable Rex Scott, Chair
33 N Stone Ave (11th Floor)
Tucson, AZ 85701-1207

Subject: Board of Supervisors Agenda 3.18.2025, Item #9, *Floodplain Management Plan Update*

Supervisor Scott:

On behalf of the Southern Arizona Home Builders Association (SAHBA), thank you for the opportunity to provide comments on the Proposed 2025 Floodplain Management Plan (Plan). We appreciate the Regional Flood Control District's proactive approach to flood resilience and the significance of this undertaking.

As you consider this Plan, and other floodplain management policies, we urge you to consider the careful balancing act with the County's broader goals for the protection of public/private property, the environment, and housing affordability.

In general, we are supportive of the Plan, however, there are elements we have concerns with that will likely impede much needed housing inventory:

1. **Expanding Floodplain Regulations** – It appears the intent of the plan, and multiple action items will result in the expansion of the regulated floodplain and/or result in greater restrictions on development. For example, **Action Plan Ref. # 1.26** (Conducting Flood Risk Mapping Studies Using CISA) may result in broader floodplain designations that decreases developable land.
2. **Uncertain Impact on Land Entitlements** – Homebuilders and developers make decisions based on the certainty of entitlements which allows them to plan and finance projects efficiently. If proposed action items can be applied to projects with entitlements but have not yet been built, it will create uncertainty and risk. This could result in making projects infeasible and restrict housing production. Action plan items (and related new policies and regulations) should not be applied to entitled projects (or development agreements) with approved land use plans.
3. **Consistency with Statute and Climate-Based Floodplain Designation** – ARS 48-3601 defines floodplain regulations as “codes, ordinances, and other regulations relating to land use and construction within floodway and floodplain areas,” based on the 100-year flood event. However, the Plan's continued reference of 500-year flood models and climate-informed science appear to exceed statutory authority. For example, **Action Plan Ref. # 1.20** proposes incorporating climate-based modeling into the Pima County Comprehensive Plan, which may introduce floodplain restrictions beyond state and federal guidelines. *Requiring new development to be built to the 500-year flood event would be infeasible for most projects and have a chilling effect on new housing.*

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4. **Practical Effects of the Flood Control Resource Area (FCRA) Designation** – The FCRA appears lacks clarity on its implications for private landowners. For example, **Action Plan Ref. #1.19** (Study unmapped watercourses including floodways, flow corridors, floodplains, Erosion Hazard Setbacks and riparian habitat for potential inclusion in FCRA) may result in private property being included at the discretion of RFCD. That property may then be subject to additional restrictions that diminish the value of the land and/or increase project costs decreasing housing affordability. Property owners should have the option of opting out of an FCRA or be compensated for any economic losses. Further, RFCD should study existing FCRA's to determine if any of the land currently included could be removed.
5. **Development Costs** – As evident by numerous **Action Plan Items (Ref. # 2.11, 2.7, 2.10)** RFCD acknowledges the plan will result in increased costs thereby diminishing housing affordability and proposes strategies to offset the cost for "Affordable Housing." These should also be extended to market rate projects.
6. **Implementation Costs and Budget Considerations** – The 2025 Floodplain Management Plan includes significant Capital Improvements Plan (CIP), new mapping, green infrastructure initiatives, and Low Impact Development (LID) requirements, raising questions about implementation costs and funding sources. The Plan should include cost estimates for each action item, identify sources of revenue and whether the public or private sector is responsible for paying those costs or contributing the revenue.

The 2025 Floodplain Management Plan presents an opportunity to enhance flood resilience while ensuring that housing remains affordable. We appreciate the County's commitment to stakeholder engagement and encourage continued discussions on how to balance these important priorities.

Respectfully,

BT Lyons

Brendan Lyons, MPA
Director of Government Affairs
Southern Arizona Home Builders Association

cc: Supervisor(s) Matt Heinz, Jennifer Allen, Steve Christy, Adelita Grijalva,
Administrator Jan Leshner, and Deputy County Administrator Carmine DeBonis
RFCD: Eric Shepp, Greg Saxe