



May 14, 2015

Honorable Chair and Members

Pima County Board of Supervisors

130 W. Congress

Tucson, Arizona 85701

On behalf of Imagine Greater Tucson, I am writing in strong support of the adoption of Pima County's proposed Comprehensive Plan Update known as Pima Prospers. We find Pima Prospers substantially moves toward implementing the Regional Vision.

Imagine Greater Tucson (IGT) engaged the communities of metropolitan Tucson in a two year process to develop a regional vision for the area, to shape a future consistent with our shared values. Those shared values, 60 of them, addressed nine fundamental principles: accessibility, education excellence, environmental integrity, good governance, healthy communities, higher education, prosperity, quality neighborhoods and regional identity. The results in a nutshell showed people want change and people want choices, requirements to keep our next generations here and continuing to contribute to our economy, cultural diversity and vibrancy.

Bringing the vision to reality throughout the region focuses on five implementing components, and Pima Prospers to its credit addresses all of them, in some cases extensively:

- Decision Making and Regional Collaboration
- A Strong and Diverse Economy
- Quality Places and Neighborhood Choices
- Resource Conservation and the Natural Environment
- An Accessible Region

Pima Prospers recognizes and promotes the county's role in the region and in the Sun Corridor. It relies substantially on the regional vision and its principles, recognizing that due to the vastness of the unincorporated area of the County, the plan must also address the needs of rural and small town areas. A number of policies throughout the plan address regional collaboration or developing new concepts on a regional basis. This thought process is very definitely a step in the right direction, supportive of the regional vision.

The plan recognizes the coming changes in demographics of our communities noted in the IGT Regional Vision and elsewhere, and plans accordingly. This is not just a land use matter, but one that is addressed in a number of places in the plan, notably in the Health Element, Housing Element and Focused Development Investment Element. Aging in place and removing barriers to multi-generational communities are prime examples.

The plan promotes the concept of healthy communities to organize its goals, policies and implementation strategies. While creating healthy communities is also a core principle of Imagine Greater Tucson, Pima Prospers uses it to incorporate other IGT principles as well, such as economic prosperity, community design, accessibility and natural resource conservation.

The unincorporated county has the largest land mass invested in resource conservation and the natural environment, contributing to the environmental integrity of the county overall. The plan maintains and adds clarification on off-site mitigation to Pima County's Sonoran Desert Conservation Plan.

Lastly, we applaud the implementation program for Pima Prospers as county staff will work with citizen stakeholders and others to bring the plan to reality, as much as prudent budgeting will allow. IGT followed a three step process of "Talk, Think and Act"; with the adoption of Pima Prospers along with the region's adopted municipal plans and those plans currently in progress, we continue to move the Regional Vision forward toward implementation.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin Shambach". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robin Shambach, AIA

Chair, Imagine Greater Tucson

Cc: C.H. Huckelberry, County Administrator

Robin Brigode, Clerk of the Board

Arlan Colton, Planning Director



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Road
Tucson, Arizona 85716
Phone: (520) 795-5114
Fax: (520) 326-8665
Web: www.sahba.org

President
David M. Godlewski

2015 Executive Officers

Chairman
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Mattamy Homes

1st Vice Chairman
Amy McReynolds
KB Home

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Mike Leung
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May 14, 2015

The Honorable Sharon Bronson
Chair, Pima County Board of Supervisors
130 W. Congress St., 11th Floor
Tucson, AZ 85701

Dear Chairwoman Bronson,

SAHBA appreciates the time and effort put forth in crafting *Pima Prospers*. Furthermore, we appreciate the outreach of Mr. Colton, and staff, to the building industry as well as the opportunity to provide comments throughout the process.

We share the County's interest in having a final product that potential employers, investors, and all residents can view and quickly determine that Pima County is committed to fostering an environment where businesses (including home builders) thrive and families succeed. Key to the success of Pima Prospers in achieving our community goals will require balanced, reasonable and realistic policies and implementation measures.

We are all very well aware that today in Pima County too many families struggle to make ends meet, too many businesses struggle to keep their doors open and owning a home is out of reach and undervalued. *Pima Prospers* should reflect that wealth creation, upward social mobility, and long-term prosperity begins with economic development, job creation and home ownership. It should also acknowledge the home building industry's role in achieving that and recognize the implications a document like *Pima Prospers* would have on making, or not making, it a reality.

While there have been many changes based on feedback from SAHBA and our members, we believe the document can be further enhanced prior to adoption. We believe by incorporating our suggestions found below, *Pima Prospers* would better align our collective goals and values while simultaneously providing the necessary framework to move Pima County forward towards a prosperous future for everyone.

Consider the Impacts: *Pima Prospers* consists of many policy objectives that, when implemented in the form of ordinances, guidelines, standards and/or conditions of rezoning for new development, will impose additional constraints on land development and home construction further diminishing housing affordability and prospects of owning a home. Therefore, in light of the current housing market, we ask that implementation measures of *Pima Prospers* which increase housing costs only be implemented once we reach a level of 3,500 single family residential permits per year in unincorporated Pima County.

While it may not be practical to require a cost benefit analysis for every goal, policy or implementation measure, we recommend the County do so where feasible and encourage staff to consider costs as new development is being asked to comply. It is imperative *Pima Prospers* recognizes that in our current (and foreseeable) economic climate, any additional costs must appropriately balance

against community desires and our resident's ability to pay. Further, we suggest where there may be additional costs imposed that incentives or flexibility are offered as an off-set.

Maximize the Utility of Land: We are concerned that Chapter 3 *Use of Land* in particular puts development projects at a substantial competitive disadvantage in the market, results in increased costs and leads to diminished land value. The goal of *Pima Prospers* should be to guide and facilitate and maximize the use of land for economic development and affordable housing. Chapter 3 should support and advance regional efforts to attract economic development by balancing land use objectives and conservation with promoting the use of land to achieve various other economic and social initiatives outlined in the Plan and in other county efforts.

- A) How Much Open Space is Enough?** While we assume this is simply a non-starter, it must be reiterated that the taking of on-site private land, which does not contribute to the economic vitality of the project and only indirectly to the overall community, continues to be problematic for the recovery of the building industry and a hindrance to our economy.

The sheer amount of acreage of open space requirements creates situations where it's not proportional to what's necessary for a viable project and questionable for environment protection. How much on-site open space is needed to support a premium value for the real estate? Is 66.6%, 80%, 95% really necessary?

At least one reasonable implementation measure we propose adding in Section 3.4 would be: *As threatened or endangered species are delisted, or candidate species are determined not to warrant protections, the CLS map and policies will be revised to remove the open-space requirements or land use restrictions that were put in place for the species and habitat in the formation of the map and policies.* In other words, if protections were put in place for species that no longer warrant that protection, the associated land use restrictions should be reduced.

- B) Allow for Flexibility:** SAHBA recommends allowing for adding flexibility into the policies will signal to the development community what the County's desires are without establishing mandates. For example:

1. Section 3.1 Goal #1 Policy 8-Change REQUIRE to ENCOURAGE
2. Section 3.1 Goal #1 Policy 2-Add WHERE FEASIBLE AND COST EFFECTIVE
3. Section 3.1 Goal #1 Policy 2 D. Add WHERE FEASIBLE AND COST EFFECTIVE
4. Section 3.1 Goal #1 Policy 11-Add AND FEASIBLE
5. Section 3.1 Goal #1 Policy 18-Add ENTITLED BUT NOT CONSTRUCTED and OR OTHER TURF INTENSIVE USES.
6. Section 3.2 Goal #1 Policy 3 A. Add UPON WHOM THE EXPECTATION AND COST OF IMPLEMENTATION MAY BE PLACED.
7. Section 3.2 Goal #1 Policy 3 A.2-Add WHERE FEASIBLE AND COST EFFECTIVE
8. Section 3.2 Goal #2 Policy 2-Add WHEN FEASIBLE AND COST EFFECTIVE IN ACCORDANCE WITH AZ REVISED STATUTE.

C) Reconsider Previously Rejected Comments:

1. Section 3.2, Goal #1: ADDITIONAL POLICY: *Encourage expanding the community and integrating population growth, job growth and expansion of the tax base to support our unique regional identity and provide the necessary funds for making investments with our community values.*
2. Section 3.2, Goal #1: ADDITIONAL POLICY #14 *Increase and maximize employment opportunities and growth of area median income as a component of quality of life.*
3. Section 3.2, Goal #5, Policy 2: ADDITIONAL IMPLEMENTATION MEASURE *Provide for conveniently located mix of residential housing and neighborhoods.*
4. Section 3.4, Goal #1, Policy 3 E): ADD *or with an in lieu agreement.*
5. Section 3.4, Goal #1, Policy #10 ADD *or corrections to the original map are supported by best available regional science.*

It is our hope the final version of *Pima Prospers* serves as the building block to foster the climate necessary to achieving Pima County's numerous social, economic and environmental goals. Ensuring current and future employees in Pima County are more easily able to obtain housing will only further enhance efforts to attract economic development and primary job employers.

Sincerely,



David Godlewski, President
Southern Arizona Home Builders Association

cc: Honorable Board of Supervisors, Mr. Chuck Huckelberry, Mr. Arlan Colton