

February 17, 2026



Ms. Cassie Lundin  
Division Manager  
Pima County Community & Workforce Development  
2797 E. Ajo Way  
Tucson, AZ 85713

Re: Comments on the Draft Regional Affordable Housing Strategy and Funding Plan

Ms. Lundin,

I submit these comments in my capacity as an appointed Commissioner, informed by my professional work with the Tucson Association of REALTORS® and regular engagement with the market participants who deliver housing: homebuyers, renters, property owners, builders, and the professionals who transact and finance housing. I support the plan's recognition that the region must increase supply across the spectrum, including both market rate and income restricted housing.

Importantly, the most scalable 'affordable housing' action local governments control is not only funding. It is approval time, predictability, and regulatory feasibility. When the process runs long or rules shift midstream, subsidy dollars buy fewer units, deed restricted projects stall, and market rate supply tightens, which pushes rents and prices up regionwide.

Below are targeted recommendations and proposed language changes focused on improving development outcomes, aligning local action with affordability goals, strengthening metrics, creating regional participation incentives, and reinforcing the connection between housing supply and economic growth.

1. Add development process performance to the public dashboard with targets and accountability.

The plan commits to a public facing housing metrics dashboard, but it does not specify development process performance measures that directly determine feasibility, cost, and unit delivery speed. Without process metrics, the region will struggle to diagnose why targets are missed and which bottlenecks drive project failure.

**Recommendation:** Add a Development Process and Timeliness metric set to the dashboard, publish monthly, and set targets with corrective actions when targets are not met. Suggested dashboard metrics for consideration:

Median days for planning and zoning review - Median days for building plan review  
Median days to first correction cycle - Percentage approved on first submittal  
Average number of resubmittals - Median days from complete submittal to permit issuance  
for common project types



**Proposed implementation language:**

“Within 180 days of plan adoption, the County<sup>i</sup> will publish and maintain monthly development process performance metrics as part of the public dashboard, including review and inspection timelines and resubmittal cycles. The County shall establish target benchmarks and require corrective action plans when performance falls below targets for two consecutive reporting periods.”

2. Convert “evaluate feasibility impacts” into a standardized feasibility and unintended consequences protocol

The draft appropriately states that development regulations and standards should be evaluated for cost and feasibility impacts. It does not define how that evaluation occurs, when it occurs, whether the findings are public, or how the region verifies outcomes after adoption. This is where local rhetoric often fails to translate into local action.

**Recommendation:** Adopt a standardized feasibility and impact protocol for any housing related ordinance, fee, manual, or development standard, with required pre-adoption publication and post adoption review.

**Proposed implementation language:**

“Adopt a Housing Feasibility and Impact Protocol applicable to any new or amended housing related ordinance, fee, manual, or development standard. At minimum, the protocol shall include a time impact estimate, a basic pro forma feasibility review for representative project types, and an assessment of distributional impacts across income levels and tenure types. Findings shall be published prior to adoption. The County shall conduct 12 month and 24-month evaluations to measure outcomes, identify unintended consequences, and recommend modifications when results conflict with housing production targets or affordability objectives.”

3. Establish service level standards and governance for coordinated permitting

The plan calls for improved coordination across departments, but it does not commit to operational service standards or a governance structure that forces consistent interpretation and predictable outcomes. Coordination without performance targets typically turns into meetings, not speed.

**Recommendation:** Establish service level standards by review type and department, publish performance, and create a defined escalation path for stalled projects.

**Proposed implementation language:**

“Adopt service level standards for all key development reviews, including defined timelines for completeness determinations, first cycle comments, resubmittal review, and inspection scheduling. Publish performance monthly. Establish an interdepartmental escalation pathway for projects that exceed service level standards, including a single point of contact project navigator model for infill, missing middle, mixed income, and deed restricted projects.”

4. Add a market rate affordability safeguard for fees and standards

The plan correctly addresses reviewing and revising fees and standards. It does not include a policy safeguard that prevents cumulative fee and standard growth from eroding market rate attainability. If the region constrains market rate supply through escalating cost and time, affordability worsens across the board and subsidy demand grows faster than funding capacity.

**Recommendation:** Add a market rate affordability safeguard tied to income trends and feasibility.

**Proposed implementation language:**

“Fees and development standards shall not increase faster than regional income growth and construction productivity unless the County demonstrates a quantified net housing benefit and the Housing Feasibility and Impact Protocol confirms no material reduction in feasible housing supply across price points. Where fees serve critical infrastructure needs, the County shall evaluate alternatives that reduce per unit burden, including right sizing requirements for smaller scale projects.”

5. Translate income targets into real world attainable rents and purchase prices

The draft uses AMI bands extensively, but it does not convert those bands into approximate rents and purchase prices that residents, elected officials, and implementation partners can understand. If the plan stays abstract, policy decisions will become detached from outcomes.

**Recommendation:** Add a simple table that translates key AMI thresholds into approximate monthly rent and attainable purchase price ranges using stated assumptions.

**Proposed implementation language:**

“For each priority income band identified in the plan, staff shall publish a table showing estimated affordable rent levels and estimated attainable purchase price ranges using transparent, current assumptions for interest rates, taxes, insurance, and standard underwriting. The table shall be updated at least annually and incorporated into public communications and ordinance feasibility reviews.”

6. Create real levers for municipal participation tied to adoption and performance

The plan identifies that jurisdictions can use tools such as fee reductions and expedited permitting, and it emphasizes sharing best practices. It does not establish regional levers that reward jurisdictions for adopting specific reforms or meeting measurable performance outcomes.

**Recommendation:** Tie discretionary regional resources to adoption and outcomes, not participation alone.

**Proposed implementation language:**

“A portion of regional housing and housing enabling infrastructure resources shall be prioritized for jurisdictions that adopt specified reforms within defined timeframes and report standardized process and production metrics. Reforms may include by right pathways for defined housing types, reduction of discretionary review for code compliant projects, adoption of standardized permit pathways, and publication of monthly process performance metrics consistent with the regional dashboard.”

7. Align housing production with employer attraction and wage growth strategy

The plan includes workforce development elements and construction and trades training, which TAR support. It does not explicitly align housing targets with broader employer attraction, wage growth, and sector strategy. The region must grow jobs and housing supply in tandem, or it will intensify cost burdens.

**Recommendation:** Add an implementation directive linking economic development strategy to housing outcomes.

**Proposed implementation language:**

“The County shall align regional economic development efforts with housing production targets to ensure job growth and wage growth occur alongside expanded housing supply. The public dashboard shall include key indicators such as job growth, wage trends, and major employer expansions to inform housing target updates and infrastructure investment priorities.”

The draft strategy provides a strong framework through its targets, reporting structure, and dashboard commitment. To achieve its desired outcomes, plan implementation must prioritize development timeliness, regulatory feasibility, and jurisdictional participation and accountability. If policy continues to add cost and time while expecting increased production, regional targets will remain unmet regardless of funding levels.

Sincerely,



Tucson Association of REALTORS®

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<sup>i</sup> Reference to 'the county' is intended to be multi-jurisdictional, inclusive of the other jurisdictions participation.