

PDSD Staff responses to comments received before, during, and after the June 28 PDSD Advisory Committee meeting			
#	Received via	Comment	Staff Response
THEME 1: CLARITY AND TRANSPARENCY			
1	Email	All project signs? What does this mean? [Comment on: Require a City point of contact (name and phone number) on all project signs]	A Committee member requested that all building project post signs with a City Point of Contact and phone number. Staff has not discussed this in more detail.
2	Email	Recommendation 2: Provide user and staff training for IBC, UDC, TSM, and best code methods for older buildings and sites	This is the intent of Recommendation 2 and the Actions that support it.
3	Email	Recommendation 3: Provide retrievable archive for determinations, appeals, and variances and a schedule for code changes	Determinations can be viewed at https://www.tucsonaz.gov/pdsd/all-codes-plans-determinations . Appeals and variances are available on PRO.
4	Email	Document findings for use of 1st, 2nd, and 3rd parties.	Determinations can be viewed at https://www.tucsonaz.gov/pdsd/all-codes-plans-determinations . Appeals and variances are available on PRO.
5	Email	Notes on Recommendation 4 (Maintain and broaden stakeholder involvement as changes are made at PDSD): Provide a next PDSD-AC study focus on the required interface between the public and development including notification improvements. Include a focus to guide the public and the development community in the intermediate and long term development of PDSD changes and policies include Plan Tucson goals. Consider a cross section of committee members that include resident-community interests such as TRGG member(s)	This suggestion for focused study of the public and development, including notification improvement, is noted and will be considered along with other focused study suggestions. It should be noted, that PDSD staff are looking into implementing an on-line notification process in which anybody interested could sign up for any of the notifications PDSD provides.
6	Email	Recommendation 5: Improve public notification process One Committee briefly mentioned PDSD's role beyond permitting, in particular, notifications. PDSD has several code process requirements that mandate notification of residents within a certain distance of a proposed project at various points in the entitlement and permitting process.	PDSD staff are looking into implementing an on-line notification process in which anybody interested could sign up for any of the notifications PDSD provides.
7	Email	Related to R5 - I recommend that we simplify DDO notification options for a single sign off from adjacent property owners for simple residential yard setbacks. Consider options in other notification processes to allow NHA sign-off of certain requirements for projects that deemed by said NHA to be an asset to said community, thereby creating incentives for positive development.	NHA sign-off for detached accessory buildings is already allowed. Applying this for residential additions would change setback requirements for all residential development.
8	Email	Move this from Long Term to Short Term: Re-evaluate PDSD policies, considering other cities' standard operating procedures, revise the policies, and continue to refine over time	We are already starting to do this, but establishing new formal SOPs will take time.
9	Email	Short term actions under Theme 1: Add a policy that acknowledge's architect's qualifications to perform engineering incidental to their work.	The Board of Technical Registration allows individuals to perform within their expertise.
10	Email	I also am asking for a policy that acknowledges state law, allowing architects to do engineering on their projects.	The Board of Technical Registration allows individuals to perform within their expertise.
THEME 2: STREAMLINE REVIEW PROCESS			
11	Email	Clarify, I heard that once the online Portal is available that they will do away with APAs, is that true? Seems fine to me but please clarify if both options will be available. [This comment in regards to: Develop an online portal for credit card payments]	APA is intended as a mechanism for contractors to pull permits online, over the phone, or via fax. The proposed credit card portal, plus the ability for electronic review, would eliminate the need for the APA portal. There are no immediate plans to remove the APA as our new systems are not available yet. PDSD will make notification to APA account holders prior to deleting their accounts.
12		Building appeals process - not one-by-one but process appeals as a group	Processing appeals as a group would require denying all submissions associated with the group if one or more is denied. Since appeals are an exception to a regulation based on unique situations, they should be reviewed on a case by case basis.
13	Email	Add Action under Theme 4: A deeper integrated building appeal process that supports early determinations and can handle bundle appeals for older buildings under the IEBC.	Appeals must be associated with a specific code determination. See also response to #12.
14	Email	Add Action under Theme 4: PDSD pre-submittal process that enables applicants to obtain integrated site and building determinations for change of use and infill projects.	The information provided at pre-submittal is usually not sufficient to make determinations.
15	June Meeting	Predetermination process - should not be done in isolation, should be seen as part of the process	The information provided at pre-submittal is usually not sufficient to make determinations.
16	Email	Add Action under Theme 4: Develop a policy for Tucson's CBO that supports independent determinations by 2nd and 3rd party review services.	PDSD already has a policy in place (IBC Section 103.3) to allow the CBO to appoint technical officers for code interpretations.
17	Email	Note on Recommendation 9 (Expand scheduling options): Match criteria here with 3rd party criteria so we are all on the same page	Setting out firm timelines for 3rd party reviewers would hinder an applicant's ability to negotiate a favorable review timeline.
18	Email	Note on Short Term Action under Theme 2: Expand third-party reviews to all projects	PDSD staff already will consider projects that have a lower valuation than the threshold for 3rd party review.
19	Email	There is a feeling that 3rd party options should have a valuation threshold. I'm recommending against any limitation.	PDSD staff already will consider projects that have a lower valuation than the threshold for 3rd party review.
20	Email	If they give us the 7 day turn around for small projects and use cross discipline reviewers, people won't want to pay the extra for 3rd party.	PDSD provides over-the-counter review for small projects. For projects that do have to submit, providing additional options for review timeframes will require the migration to Accela Automation be complete.
21	Email	Note on Recommendation 10 (Modify the review timeframe): 7-day turnover for small projects with a 3-day back check. Match with 3rd party criteria.	PDSD provides over-the-counter review for small projects. For projects that do have to submit, providing additional options for review timeframes will require the migration to Accela Automation be complete.
22	Email	Move this from Long Term to Short Term: Implement modified processes, including application, queue management, and workflow, in conjunction with the Accela upgrade and based on stakeholder input	Providing additional options for review timeframes will require the migration to Accela Automation be complete.
23	Email	Add Action under Theme 2: Streamline policy that mimics what Pima County is doing.	In order to do this, PDSD would need to have electronic submittal process up and running. Staff is working toward that goal, but existing systems do not currently support this option.
24	Email	Add Action under Theme 2: Policy for small projects that need site compliance formality to submit an integrated site and building package with simpler content control and flexibility in layout...and reviewed by a single source if possible.	One package for smaller projects is something that could be considered. It is unlikely that PDSD could get to a place where one person could be responsible for both site and building review.
25	Email	Add Action under Theme 2: Relieve staff concerns over the regulatory bill of rights, which resulted in overstated and lengthy review comments designed to protect staff from State law.	Staff has attempted to reduce over statement and lengthy comments.

THEME 3: PROJECT FACILITATION			
26	Email	I am also lobbying to get rid of the development package protocol for small projects that need site compliance. It needlessly isolates site and building review. Additionally, there is no constructive reason for the additional formatting protocol the package mandates.	The formatting protocol facilitates faster reviews of projects. The isolation of building and site review is a result of the isolation of the building code and UDC, not the result of the development package. An inspector does not have the authority to 'trump' a plan reviewer. When discrepancies arise, however, we require staff to discuss the issue to determine the application of the code. Unfortunately, mistakes do occur on occasion and we rely on our inspectors to help identify them when they happen.
27	June Meeting	Inspectors shouldn't trump site reviewers in the field (or only rarely)	
28	June Meeting	Presubmittal - design your own process, including site visits if needed Notes on Recommendation 14 (Improve pre-submittal meetings): Allow applicant to design a specific pre-submittal. Use a fee structure for requested site visits and pre-determinations, appeals, etc., if necessary, but don't limit content. Do this for for building and site. Train staff to cross reference building and site requirements for better response to applicant questions.	Applicants can request a specific presubmittal meeting, including with a site visit. Providing custom presubmittal meetings automatic ally to all applicants would be challenging given limited staff resources. One of the challenges with pre-submittals is that applicants often aren't fully ready and ask staff to answer hypotheticals.
29	Email	Recommendation 15: Use project facilitators on larger projects and allow smaller projects to benefit from cross-discipline review	Applicants can request a specific presubmittal meeting, including with a site visit. Providing custom presubmittal meetings automatic ally to all applicants would be challenging given limited staff resources. One of the challenges with pre-submittals is that applicants often aren't fully ready and ask staff to answer hypotheticals.
30	Email	Recommendation 15: Use project facilitators on larger projects and allow smaller projects to benefit from cross-discipline review	Cross training is underway for site reviews.
31	Email	New Action under Theme 3: Use cross-trained reviewers earlier on small work. Pima County maintains a flexible approach, project specific.	Cross training is underway for site reviews.
32	June Meeting	Add Pima County Health Department to Recommendation 16	Done.
33	June Meeting	More coordination with Economic Initiatives	Staff agrees that more coordination with Economic Initiatives is a good idea, and will pursue.
34	Email	Notes on Recommendation 16 (Improve coordination between reviewers and inspectors and between PDS and other review agencies): Require that inspectors support reviewer decisions by policy allowing the override of compliance to said policy stipulations.	we agree with the need to, and are working on, improving coordination between PDS reviewers and inspectors, and reviewers and other review agencies. Due to the complexities of site conditions, the plan review process may not always provide a comprehensive determination of such conditions. Field staff are encouraged to identify plan review discrepancies.
35	Email	New Action under Theme 3: In the short term, I recommend better understanding between building codes and zoning staff.	Staff agrees with this recommendation; continual efforts are made to increase the understanding between building code and zoning staffs.
36	Email	New Action under Theme 3: Developing long-term goals of cross training should begin with an attitude shift in the short term.	Efforts to address staff morale and attitude has been underway for some months. External and internal anecdotal evidence suggests these efforts are having an effect.
THEME 4: REDUCING POLICY AND REGULATORY BARRIERS			
37	Email	The description of the 4th meeting being about the code changes seems off. Although I was not present, I was told that meeting focused almost entirely on the PDS Director criteria and process?	The first half of the meeting consistent of a presentation/update on code revisions that are planned or in process. Committee members asked questions at that time, and suggested a couple of other code changes. The second half of the meeting focused on the PDS Director, desired qualifications, and selection process.
38	Email	In the last section, there is mention of a number of code amendments (time extensions, etc). I do not remember the committee getting that specific in its discussions on the Code issues/changes. Again, these may be things that staff is moving forward to fulfill the committee's desires. If that is the case, I think it should be clear these are staff's suggestions to move these goals/items forward and the report should give more detail on what these amendments actually are so committee members are aware.	At each meeting, PDS staff presented on actions the department was already taking or planning to take to address the Committee concerns that were to be addressed at that meeting. Since the Committee had time to ask questions and comment on any of those actions, the lack of disagreement was reflected as support for PDS continuing those efforts. All actions planned or in progress by PDS staff that were not raised during the Committee meetings are noted with "Staff" at the end. Appendix G will provide a description of all proposed Code changes.
39	Email	Related to the Sign Code – my recollection was a discussion about moving the Sign Code INTO the UDC (thereby eliminating the need for the Sign Committee since any changes to the UDC go through Planning Commission and would not then need the Sign Committee.) As opposed to making it sound like a formatting issue with the Sign Code and UDC. Definitions also need to be aligned, which would be taken care of if the Sign Code is moved into a chapter of the UDC.	Moving the Sign Code into the UDC is the ultimate plan of PDS and a longer-term goal of the Sign Code rewrite. In the shorter-term, however, staff is starting by aligning the language, including definitions between the Sign Code and the UDC, in order to provide an easy integration process. Another factor in this discussion is the Mayor and Council-initiated review of all City boards, committees, and commissions. PDS is respectful of that process and is waiting to see the recommendations regarding the Sign Code Committee before moving forward with any changes. Various options could be considered that would inform the Sign Code/UDC integration process, including making the Sign Code Committee a sub-committee to the Planning Commission or getting rid of the Sign Code Committee altogether.
40	June Meeting	Don't see anything about the sign code that addresses my concerns. Signs may be an issue that needs to be further researched, options identified, then codified.	City staff is working on a sign code proposal that will be shared with stakeholders for review and comment. See also response to Comment #39.
41	June Meeting	Look at groups of appeals to determine items that could become code	If multiple appeals are approved for the same regulation, then a recommendation can be made to the Building Code Committee for an amendment to the code. This was done in the process of preparing the UDC, and should be done on a continuing basis.
42	Email	Notes on Recommendation 18 (Continue to make changes to the UDC as issues are identified): Correlate code changes with archiving of determinations, interpretations, and variances with a priority list for UDC revisions and building code amendments that may support appeals and other processes until said change occurs.	If multiple appeals are approved for the same regulation, then a recommendation can be made to the Building Code Committee for an amendment to the code. This was done in the process of preparing the UDC, and should be done on a continuing basis.
43	Email	Notes on Recommendation 19 (Continue to make changes to the IBC as issues are identified): Correlate archiving determinations, interpretations, and appeals with a priority list for IBC revisions.	If multiple appeals are approved for the same regulation, then a recommendation can be made to the Building Code Committee for an amendment to the code. This was done in the process of preparing the UDC, and should be done on a continuing basis.
44	Email	Add Action under Theme 4: Look at changes in the UDC that work towards correlating better between use descriptions in the IBC and use descriptions in the UDC.	This is a good idea, but very challenging given IBC frequent updates and differences in intent between UDC and IBC. Staff will continue to look for opportunities to correlate the two.
45	Email	Add Action under Theme 4: Codify the 200 square foot allowable size for accessory storage buildings.	PDS staff are working on this issue by proposing revised amendments to the IBC.
46	June Meeting	Issue: Trash and recycling enclosures (size)	This topic is already under discussion by stakeholders and PDS staff.

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THEME 4: REDUCING POLICY AND REGULATORY BARRIERS, continued			
47	June Meeting	Issue: Reusing older buildings and sites that are hard to work with; bring buildings up to code	Issue of adaptive reuse of buildings is suggested in the PDSO Advisory Committee Final Report as a possible topic for focused consideration.
48	June Meeting	Issue: Getting rid of old buildings	Assuming that it is not disrupting the historic fabric of our community, there is a process in place to accommodate demolition of older buildings.
49	June Meeting	Issue: Naming alleys so that parking is allowed	Issue of naming alleys to allow parking is suggested in the PDSO Advisory Committee Final Report as a topic for future focused consideration.
50	June Meeting	Issue: Lot splits shouldn't require a Final Plat. Can criteria be established?	Issue of lot splits is suggested in the PDSO Advisory Committee Final Report as a possible topic for focused consideration.
51	June Meeting	Issue: Overlays - there are too many, it is too complicated	The issue of the number of overlays is a repeated theme. PDSO has been exploring possible ways to have a set of "overlay-like" standards that could be applied more broadly, but initial public reaction suggests that this will be a challenging effort.
52	June Meeting	Planning tools should apply city-wide rather than to specific projects such as Broadway or Grant	Staff is meeting with each Council Member to talk about where and how planning tools, such as reinvestment overlay districts, could be useful in their ward.
53	Email	The first part of this recommendation was discussed by the committee relative to the "silos." I do not remember any discussion of Plan Tucson or the need to create a system to ensure those policies are followed. I agree with the statements, but if this is a report of the committee work, there should be a clear delineation between what the committee discussed and recommended and then what staff is suggesting to help to bring forward these goals/actions.	The broader role of PDSO with respect to long-range planning and Plan Tucson was covered at the first meeting. A committee member provided a written comment at the first meeting saying: "Address other aspects/responsibilities of PDSO in addition to permitting. For example, notifications." Another comment stated: "Phasing out and/or consolidation of neighborhood/area plans, and concurrent plan review and rezoning process." Addressing this comment would be under the purview of the long-range planning unit of PDSO, which was not explicitly revisited in later meetings. Staff attempted to address all comments that were raised during the meeting, and this recommendation tries to capture both of these comments, while also supporting the Committee's broader concern about internal coordination. All actions planned or in progress by PDSO staff that were not raised during the Committee meetings are noted with "Staff" at the end.
54	Email	Note on Recommendation 20 (Continue to focus on integrated approaches): Think synergy. The CM has already pushed staff to work effectively together and in more suited ways.	PDSO's intention is to continue working on integrated approaches.
55	Email	Add Action under Theme 4: Review of conditions to site compliance exemption section 3.3.3.H...for conditions that exclude uses that otherwise are desirable.	Staff is unaware of this being a broad-based issue. Clarification of this issue would be helpful.
56	Email	Add Action under Theme 4: (Regarding short-term rentals) - Reduce 10,000 square foot site threshold to a more optimal limit. Allow use of site and building standards that are allowed when occupancy duration is over 30 days and occupancy is less than 4 unrelated persons regarding UDC needs.	Staff understands the issue, but given State statute regarding short-term rentals, the silence of the UDC on this topic, and the provisions in the IBC related to this topic, it is unclear how this issue can be addressed.
CLARIFICATION NEEDED			
57	Email	Note on Recommendation 12 (Increase use of external reviews): Assume external review is 2nd or 3rd party. 2nd party review, i.e., ESD is currently isolated from the applicant. Require 2nd party reviewers to work with applicants and coordinate issues	Clarification needed.
58	June Meeting	Issue: Requiring assurances for \$250 worth of off-site improvements is not reasonable	Clarification needed.