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IID Sunset Date

Mr. Dan Bursuck,

The IID sunset date is approaching and I have some comments and feedback concerning the IID.

First, I think the IID has been successful in promoting infill development in downtown area properties. Some of these properties have been difficult to develop due to a variety of issues and the IID has offered solutions to ameliorate many of the issues.

I worked on the IID after the last sunset date and am familiar with the document and how it's working. I believe that any ordinance should be reviewed to understand what is working well and to make changes in areas to improve its performance. The following are some ideas that may improve the IID.

1) **Vision and goals.** It's unclear to me what the vision is for both near and long range development in Tucson. I believe that a vision needs to be crafted and accompanied by development goals that will help guide the IID in its use.

2) Connected to that vision is the proliferation of student housing projects near 4th Ave. and at Main Gate. **Student housing developers should not be able to use IID for several reasons. This includes both group dwelling and market rate housing built by the student housing developers.**

a) Student housing occupants are transitory, spend little in local retail businesses and create problems for adjoining residential and business districts. Main Gate, The District, Junction at Iron Horse all have negatively impacted adjacent neighborhood areas. **Section 5.12.1 E. IID**

b) To date all student housing developers are out of state and after construction, proceeds leave the state and don't return. The tendency to build density solely of student housing (Main Gate and 4th Ave.) reduces the possibility of any true market rate housing being built in the general downtown area. Tucson needs to maintain a diverse housing stock that is affordable to recent grads, empty nesters, people that are downsizing, retiring etc., This is a population that invests in the community through creating and patronizing business and by engaging the community in many other ways.

c) One solution for more student housing is used by many universities nationwide. The UA entered into a public/ private partnership (as many universities do) to build the Honors College. Community and City leaders can work with the UA to encourage public /private housing collaborations on campus. Neighborhoods already bear a large burden to house students with few if any positive impacts.

3) Tucson needs to protect its remaining and shrinking historic structures. **Any historic or potentially historic properties in the IID should have a thorough evaluation of their status before any demolition permit is issued. If a historic property in the IID is demolished that property should not be able to use the IID for a minimum of 5 years.**

4) The IID offers many development incentives with the expectation of a higher level of design in IID projects. One of the goals of the last IID revision is to improve design review - **Page 1 of ordinance No. 11246. To help accomplish this goal the COT should engage CAPLA to create a basic design review process training that all members of the IID Design Review Committee, DRC, must participate in. This will give all committee members a baseline to help review projects.**

5) **Pedestrian and Transit Oriented Development** is one of the important purposes of the IID. Section 5.12.1. **One of the ways to promote this is for the COT to offer bulk rate transit discounts to all developers and require developers offer transit passes to their tenants.**

6) There are concerns by neighborhoods that diversity will be developed out of the area by the lack of affordable housing. **A solution is to require any housing development in the IID to build a minimum of 20% of their units at a local affordable rate.** This isn't necessarily LITEC housing but a lower rental rate so Tucson can retain some of its college grads, recent additions to the work force, working people looking to downsize and older Tucson area residents.

7) **Final design review.** The projects the DRC reviews use architects from both in and out of Tucson or the State for plans. The design professional should review the final submitted plans to ensure they conform to what the DRC passed. If there are any substantial changes, the plans should come back to the DRC for review.

Thank You,

Chris Gans

IID DRC CHAIR