



PLANNING COMMISSION

Planning & Development Services Department • 201 N. Stone Ave. • Tucson, AZ 85701

DATE: May 22, 2013

TO: Planning Commission

FROM: Ernie Duarte
Executive Secretary

SUBJECT: *Final Draft of Plan Tucson: City of Tucson General & Sustainability Plan*

Issue – This item is scheduled for a public hearing.

This is the Planning Commission's second public hearing to hear testimony on the Final Draft of Plan Tucson, released for public review on March 20, 2013. The first public hearing on the Final Draft was held on April 3, 2013. Written comments on the Final Draft were due on May 1, 2013.

This memo highlights key issues identified to date based on written comments and on public hearing testimony. Staff also is meeting or talking by phone with commenters for further clarification regarding issues raised. Accompanying each issue summary is an explanation of steps being taken by staff to address the issue. Several attachments are included that provide further information related to particular issues.

Given that additional testimony is anticipated at the upcoming Planning Commission public hearings on the Final Draft scheduled for May 22 and 29, 2013, staff has included only limited, procedural recommendations with this memo. However, staff will provide a preliminary set of recommendations following the public hearing on May 22.

Background

Staff's February 3, 2013, Planning Commission memo included a description of the types of public comments received on the Draft Plan, and the February 27, 2013, memo included staff recommendations on proposed revisions to be made to the Draft Plan. The Final Draft Plan, which is the subject of this memo, reflects those revisions.

Public Comments

A total of sixteen e-mails, letters, and on-line comment forms have been received regarding the Final Draft. Some of the letters were signed by multiple parties for a total of twenty-two separate commenters representing governmental agencies, non-governmental organizations, and individual commenters.

The comments have been put into spreadsheets, which have been posted on the Plan Tucson website. Staff is now in the process of reviewing each comment closely and providing written responses. The responses will be added to the spreadsheets, and once completed will also be posted on the Plan Tucson website and provided to the Planning Commission. [Please note that a pdf of the comment spreadsheets will be provided to Planning Commissioners via email. This format can be enlarged for easier reading. The spreadsheet can also be provided as a hard copy upon request.]

Many of the comments received in writing were reiterated at the Planning Commission public hearing on April 3, 2013.

The following highlights key issues raised and describes how staff is addressing the issues.

1. Issue: Davis Monthan

Some members of the public have expressed concern about potential noise and safety impacts from the possible introduction of the F-35 at Davis-Monthan, particularly on surrounding residences. Other members of the public have expressed support for Davis-Monthan, with emphasis on the Base's economic contributions to the City.

As staff has previously noted, zoning is the primary tool at the City's disposal to address land use compatibility in the vicinity of Davis-Monthan. In the Final Draft, staff provided a new policy (Policy LT23), which reads, "Ensure that proposed land uses are compatible with adjacent military operations, coordinating with stakeholders in planning for such uses in the event of future significant changes in mission and/or flight operations."

At the April 3, 2013, Planning Commission public hearing, the Commissioners requested that staff look at the general plans of other communities with military bases to see how those general plans address issues raised by commenters. Staff has reviewed ten plans and will provide its findings at the Planning Commission meeting on May 22.

There were also comments suggesting specific revisions to Plan Tucson language and exhibits related to Davis-Monthan. Staff is in the process of reviewing these suggestions and developing responses.

2. Issue: Opportunity Areas Map

Members of the public, as well as some Planning Commissioners, have asked questions about the purpose and use of the illustrative Opportunity Areas Map, which is presented as Exhibit LT-7, pg. 3.122, in the Final Draft. In reviewing written comments, listening to testimony at the Planning Commission public hearing on April 3, and meeting with several consultants who work with developers, staff has determined that further clarification of the purpose and use is needed. That text is under development.

Staff is also reviewing the map in conjunction with specific questions raised by commenters about certain areas on the map. Any revisions to the map will be presented at the Planning Commission public hearing on May 29.

3. Issue: Compliance with State Legislation

Some commenters have questioned whether Plan Tucson is in compliance with Arizona State Statutes (ARS) 9-461.05. At the April 3, 2013, Planning Commission meeting, staff Commissioners with corrected copies of Appendix A, Mandated Elements Matrix, to be included in Plan Tucson. This matrix shows the correlation between elements identified in ARS 9-461.05 for inclusion in the general plan and elements included in Plan Tucson. Additionally, staff is preparing a more detailed analysis that outlines the ARS requirements and identifies where and how requirements are addressed.

4. Issue: Neighborhood & Area Plans

Members of the public, as well as some Planning Commissioners, have raised concerns about the status of neighborhood and area plans if specific planning were to be undertaken for the “planning and service areas” (PSAs) proposed in the Final Draft, Chapter 3, Policy LT25, pg. 3.128. These commenters want to know whether and how neighborhood and area plans would be taken into account in the development of PSAs.

Staff has responded that the existing neighborhood and area plans would provide the foundation for the creation of PSAs and that there would be a public process to develop the planning, public outreach, and implementation approach. The rationale for developing planning and service areas includes:

- Increasing the focus on the relationship of land use and service (e.g., roadways, water and sewer, parks) planning
- Extending specific plans to cover the approximately 20% of the City not currently covered by specific plans
- Providing a system of specific plans that would be more manageable given staff and funding resources. The current neighborhood and area plans are the result of a great deal of work over many years by dedicated staff and committed citizens. However, the number of plans, the age of the plans, inconsistencies in and outdated terminology; multiple approaches to mapping, and outdated infrastructure references make it challenging to undertake updates and to translate them into geographic information system (GIS) layers for use in ongoing neighborhood planning, as well as in regional and citywide planning. *Attachment A* provides a summary of the existing plans, when they were adopted, when they were amended, and their content.

Existing neighborhood and area plans have many inconsistencies in content and terminology, as well as content that is no longer relevant to a neighborhood or area. Addressing inconsistencies in the plans could be a first step in undertaking specific planning for larger areas. *Attachment B* presents a diagnostic report that highlights examples of some neighborhood and area plans issues that it would be helpful to address.

5. Issue: Development Review Guidelines

Comments were received requesting review and revisions to specific language pertaining to signs in the Development Review Guidelines. These revisions seem generally acceptable, but Plan Tucson staff will review them further with Planning and Development Services staff before making a recommendation.

6. Issue: Poverty

Several commenters have suggested that the issue of poverty is not addressed directly enough. Poverty, an important issue for Tucson, came up in the Plan Tucson public participation discussions. Participants considered approaches to help address poverty such as economic development initiatives to provide more jobs, affordable housing, affordable food, and education. Staff believes that many of the policies if implemented would help to address both the causes and effects of poverty. One of the two new goals provided in the Final Draft was, “The City strives for a community where no one lives in poverty.”

7. Issue: Sustainability

While “sustainability” was frequently mentioned during the public participation process and the concept considered in the draft of goals and policies, the Final Draft was revised to incorporate the term more prominently. A section titled “A Sustainable Community,” was added to Chapter 2 of the Final Draft. This section notes the alignment between the General Plan and the Framework for Advancing Sustainability, developed by the City’s Office of Conservation and Sustainable Development and adopted by Mayor and Council in 2008. Given this alignment, and the perceived value of having one, rather than two, high-level plans to guide future City actions, the Final Draft was titled “Plan Tucson: City of Tucson General & Sustainability Plan 2013.”

Staff has not heard resistance to the concept of “sustainability,” but it has heard some concern about making the “General Plan” and the “Sustainability Plan” equal since the combination was not made explicit during the public participation program. Staff suggests that consideration be given to an alternative title that embraces the concept of sustainability. One suggested alternative is “Plan Tucson: City of Tucson General Plan for a Sustainable City.”

8. Issue: STAR Community Rating System

One of the requests of the Planning Commission and others was to provide additional detail on the implementation of Plan Tucson. In preparing the Final Draft, staff considered further how the progress of implementing Plan Tucson goals and policies might be assessed and decided to introduce the STAR Community Rating System, which is being developed nationally to provide indicators for measuring communities’ progress in meeting sustainability objectives. A description of STAR was provided in the Final Draft, Chapter 2, pg. 2.12, and referenced again in Chapter 4, Implementation & Administration.

Some commenters actively involved in the public participation process for the development of Plan Tucson have expressed concern that the STAR Community Rating System was not brought up or discussed during the public participation process. Staff is considering recommending that the references to STAR be revised to talk more generally about the need for indicators of progress in implementing Plan goals and policies, and that if STAR is referenced it be as an example of a system being used by some communities.

9. Issue: Election Schedule

Arizona House Bill 2145, passed in April 2010, extended the deadline for re-adopting the existing general plan or adopting a new general plan to July 1, 2015. If Plan Tucson were not to be placed on the ballot for the 2013 General Election, the alternatives would be:

- To hold a special election in March or May 2014 at a cost of approximately \$800,000 to the City;
- To include Plan Tucson on the Pima County ballot in November 2014 at a cost of approximately \$350,000 to the City
- To determine whether an acceptable option would be to take Plan Tucson to Mayor and Council for adoption prior to the July 1, 2015, deadline and then put the Plan on the ballot for the next City General Election, which would be November 2015

Staff Resources: Plan Tucson relied primarily on City planners for its development. These planners organized and ran over fifty meetings and made many requested presentations; did the background research for the Plan, including preparing a variety of working documents; documented and reviewed public input; wrote, edited, and revised the Plan; provided many of the images, and oversaw the Plan's production. The City's planning staff is limited, and the assumption has been that the Plan would provide a foundation for more specific planning, which would be undertaken by City planners following completion of Plan Tucson. If the development of the Plan were to be extended, other planning projects would need to be deferred to allow staff to continue work on the General Plan.

Public Participation: Plan Tucson was developed with an interactive Public Participation Program, adopted by Mayor and Council on March 22, 2011, to which participants gave many hours over two years. To honor this participatory approach, staff would need to amend the Public Participation Program so that governmental agencies, non-governmental organizations, and the general public had a defined role in the ongoing effort.

Next Steps & Schedule Adjustments

Below are the next steps in the public review of Plan Tucson based on the schedule to place the Plan on the ballot for the November 5, 2013, General Election.

- May 24, 2013 *Memo to Planning Commission* in preparation for the second of the two new Planning Commission Public Hearings on the Final Draft Plan
- May 29, 2013 Second of the two new Planning Commission Public Hearings on the Final Draft Plan
- May 30, 2013 Planning Commission Letter of Recommendation to Mayor and Council regarding the Final Draft Plan
- June 4, 2013 Mayor and Council Study Session
- June 11, 2013 Mayor and Council Public Hearing and Adoption Resolution
- July 9, 2013 Mayor and Council Meeting to Adopt Ordinance calling the election with final ballot language for Plan Tucson

Recommendation – Staff recommends

- that the Planning Commission continue the public hearing to May 29, 2013
- that at the May 22, 2013, Planning Commission meeting, Commissioners provide any specific comments on the Final Draft, and in particular on the goals and policies, that they would like staff to take into consideration in preparing for the May 29, 2013, public hearing

Attachments: 2

Attachment A
City of Tucson Neighborhood & Area Plans

Plan Name, Adoption Date, Amendment Dates, Key Content Headings (compiled May 2013)

Plan	Adopted by Mayor & Council	Amended	Contents
12th Avenue-Valencia Road Area Plan	5/4/2001 Res. # 18902		Introduction; Land Use and Policies; Parks, Recreation, Open Space, and Public Lands Policies; Transportation Policies; Community Policies; Design Guidelines; Plan Administration Guidelines
"A" Mountain Neighborhood Plan	6/28/1976 Res.# 9882	12/21/1981 Res. #11702 7/5/1983 Res. #12340 3/11/1985 Res. #13069 3/24/1986 Res. #13562 1/9/1989 Res. #14763	Land Use; Circulation
Alvernon-Broadway Area Plan	2/27/1995 Res. #16833	8/3/1998 Res. #18096 10/12/1998 Res. #18078 9/5/2000 Res. #18699 4/24/2007 Res. #20645	Land Use; General Design Guidelines; Transportation & Storm Water Control; Plan Administration Guidelines
Arcadia-Alamo Area Plan	12/14/1992 Res. #16184	4/11/2006 Res. #20318	Land Use Policies; General Design Guidelines; Transportation Policies; Management Policies for Storm Water Quality and Storm Water Control; Plan Administration Guidelines
Arroyo Chico Area Plan	3/24/1986 Res. #13487		General Policies; Residential Sub-areas; Public/Semi-Public; Residential Commercial, Development along Major Streets; Industrial; Transportation; Davis-Monthan Air Force Base
Bear Canyon Neighborhood Plan	10/4/1984 Res. #12827	Re-Adoption 10/9/1984 Res. #12903 7/6/1987 Res. #14089 3/28/1988 Res. #14381 1/11/1993 Res. #162301 3/23/1998 Res. # 17983	Residential Uses; Non-residential Uses; Transportation; Environment; Parks; Recreation & Open Space; Plan Administration
Blenman Vista Neighborhood Plan	10/27/1986 Res. #13826	6/25/1990 Res. # 15358 11/25/1991 Res. #15876 6/8/1992 Res. #16005 5/10/1993 Res. #16285	Land Use, Compatible Design, Plan Administration, Historic Preservation, Transportation & Flood Control, Neighborhood Programs

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Plan	Adopted by Mayor & Council	Amended	Contents
Broadmoor-Broadway Village Neighborhood Plan	3/28/1988 Res. #14378		Plan Goal & Policies; Plan Administration; Neighborhood Programs; Maps & Graphics
Broadway-Craycroft Area Plan	9/26/1988 Res. #14625		Residential Policies; Non-residential Policies; Commercial District/Node Policies; Transportation and Floodplain Policies; Schools & Parks Policies; Plan Administration Policies
Craigin-Keeling Area Plan	3/12/1990 Res. #15235	10/10/1994 Res. #16699	Introduction; Land Use Policy; General Design Guidelines; Plan Administration; Definitions
El Encanto / Colonia Solana Neighborhood Plan	1/14/1980	3/24/1984 Reaffirmed 2/27/1995 Reaffirmed 9/13/1999 Amended 3/14/2002 Amended	Plan Recommendation & Design Criteria; Land Use Recommendations
El Montevideo Neighborhood Plan	9/25/1973	2/27/1995 M/C Action	Land Use Policies; Residential; Non-residential; Transportation; Plan Administration Guidelines
El Presidio Neighborhood Plan	1/13/1986 Res. # 13488		Neighborhood Conservation; Residential Land Use; Non-residential Land use; Transportation & Public Projects
Esmond Station Area Plan (Updated June 14, 2005)	3/24/1986 Res. #13563	Revision: 6/7/2005 Maps & text were revised as a result of the <i>Houghton Area Master Plan</i> , which superceded this Plan. Res. #20101	Introduction; Land Use Policies; Public Facilities Policies; Maps
Grant-Alvernon Area Plan Updated 2009	9/27/1999 Res. # 18396	11/13/2000 Res. #18770 6/14/2004 Res. #19849 3/20/2007 Res. #20609 11/13, 2007 Res. #20819 9/9/2009 Res. #21381	Introduction; Land Use & Development Policies; Community Policies; Design Guidelines; Transportation Policies; Storm Water Management & Flood Control; Plan Administration Guidelines
Greater South Park Plan	5/29/1984 Res. #12699		Introduction; Policies & Implementation Measures/Exhibits

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Plan	Adopted by Mayor & Council	Amended	Contents
Groves Neighborhood Plan	1/13/1984 Res. #10061		Formal Action; Profile; Related Plans; Purpose; Adopted Policies & Recommendations; Neighborhood Land Use Map
Houghton Area Master Plan	6/7/2005 Res. #20101		Introduction; Existing Conditions; Planned Communities – Comprehensive Land Planning for Urban Development; Strategy for the Future Development of the HAMP Area; Glossary
Houghton East Neighborhood Plan	11/12/1985 Res. #13400	1/22/1990 Res. #15017	Introduction; Flood Control & Drainage; Maps; Illustrations
Jefferson Park Neighborhood Plan	12/16/2008 Res. #21173		Introduction; Neighborhood Past & Present; Neighborhood Vision Statement; Land Use Goals, Policies & Strategies; Community Goals; Policies & Strategies
Kino Area Plan	5/5/1980 Res. # 11120	12/21/1981 Res. # 11701; 6/28/1982 Res. # 11910; 2/22/1983 Res. #12158 & 12160; 7/5/1983 Res. # 12340; 10/28/1985 Res. #13385; 9/14/1987 Res. # 14181; 12/14/1994 Res. #16779; 3/27/2000 Res. #18563; 7/1/2002 Res. #19280; 8/5/2002 Res. #19326; 11/18/2008 Res. #21143	Introduction; Residential; Industrial; Commercial; Public & Semi-public; Maps
Kroeger Neighborhood Plan	6/21/1982 Res. #11905		Introduction; History; Population; Environment; History; Land Use; Circulation; Summary of Policy Objectives & Activities
Lincoln Park Neighborhood Plan	2/25/1980 Res. #11056		Profile Related Plans; Purpose, Adopted Policies & Recommendations
Manzo Neighborhood	2/13/1978 Res. #10422	6/14/1983 Res. #11870 5/8/1989 Res. #148887	Formal Action; Profile/Related Plans; Purpose; Adopted Policies and Recommendations

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Plan	Adopted by Mayor & Council	Amended	Contents
Miles Neighborhood Plan	2/17/2009 Res. #21442		Introduction, Miles Neighborhood – Past & Present, Mile Neighborhood – Assets & Challenges; Miles Neighborhood Plan Implementation' Goal 1: Neighborhood Preservation & Enhancement; Goal 2: Compatible Development; Goal 3: Neighborhood Infrastructure Improvements; Goal 4: Community Development
Miramonte Neighborhood Plan	6/17/2009 Res. #20984		Past and Present; Future: Vision Statement; Plan Implementation; Plan Progress Assessment; Goal #1: Neighborhood Infill Compatibility; Goal #2: Neighborhood Preservation & Rehabilitation; Goal #3: Transitions; Goal #4: Infrastructure Enhancement; Goal #5: Safety and Property Maintenance; Goal #6: Involvement Opportunities
National City Neighborhood Plan	2//27/1978 Res. #10433		Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations
North Stone Neighborhood Plan	2/27/1978 Res. #10433; 9/22/1986 Res. #13791	10/26/1987 Res. # 14237; 2/12/1990 Res. # 15212; 11/27/1995 Res. # 17093; 1/10/2000 Res. #18475	Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations; Introduction; Definitions; Purpose/Plan Goals; Buffering Techniques & Visual Criteria; Land Use Policies
Northside Area Plan	11/16/1987 Res. #14256	1/13/1992 Res. #15910 1/9/1995 Res. #16799 6/30/2003 Res. #19638	Introduction; General Goals & Policies; Sub-area Goals & Policies; Maps & Figures
Old Fort Lowell Neighborhood Plan	1/23/1984 Res. # 12565; Reaffirmed 10/26/1992 Res. #16143	10/24/1994 Res. #16740; 10/6/1997 Res. #17822; 1/12/1998 Res. #17924	Preamble; Goal 1: Residential Land Use; Goal 2: Natural Environment; Goal 3: Neighborhood Conservation, Goal 4: Nonresidential Uses, Goal 5: Transportation, Goal 6: Effectiveness of Plan
Old Pueblo South Community Plan	1/2/1979 Res. #10663	4/5/1982 Res. #11805; 9/26/1983 Res. #12433	Formal Action; Profile; Related Plans; Purpose; Adopted Policies and Recommendations
Oracle Area Revitalization Plan (conceptual framework document)	Final Report Endorsed 9/13/2011		Introduction; Context; Challenges & Opportunities; Guiding Principles; Project Components; Project Implementation; Ongoing Oversight

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Pantano East Area Plan	6/28/1982 Res. #11930	8/6/1984 Res. #12828 10/9/1984 Res. #12904	Introduction; Definitions; Plan Goals; Residential; Commercial; Industrial; Transportation; Parks, Recreation, Open Space; Annexation
Pullman Neighborhood Plan	Planning & Zoning Commission Adopted 1/26/1971	10/28/1985 Res. #13386; 11/27/1995 Res. #17093	Profile/Related Plans; Purpose; Adopted Policies & Recommendations; Land Use Plan
Richland Heights Neighborhood Plan	9/26/1977 Res. #10332	12/8/1986 Res. #13876; 12/16/1987 Res. #14256; 3/26/1990 Res. #15252	Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations
Sabino Canyon-Tanque Verde Neighborhood	5/13/1996 Res. #17262		Introduction; Land Use Policies; General Design Guidelines
Sam Hughes Neighborhood Plan	9/16/1985 Res. #13267		Introduction; Plan Goals, Land Use; Transportation; Neighborhood Street Lighting; Neighborhood Programs & Activities; Neighborhood Safety & Property Maintenance; Questionnaire Summary
San Clemente-Country Club Heights Neighborhood Plan	11/10/1980 Res. #11330	4/25/1983 Res. #12221 10/10/1988 Res. #14645 2/27/1995 Res. #16833	Overview; Area Location & Boundaries; General Goals; Land Use Policies; Conceptual Land Use Map
Santa Cruz Area Plan	2/6/1984 Res. #12564	12/17/1984 Res. #12978; 1/28/1991; Res. #15576; 2/8/1993 Res. #16217; 11/14/1994 Res. #16759; 12/12/1994 Res. #175590	Introduction; Section I: Development Policies; Section II: Santa Cruz Riverpark Policies
Sewell/Hudlow Neighborhood Plan	3/14/1988 res. # 14368	4/21/2005 Res. #20046; 4/17/2012 Res. #21881	Introduction; Glossary; Plan Goals; Plan Implementation; Land Use Policies; Buffering Techniques; Public/Semi-Public Policies; Plan Administration
Silverbell Road (Interim Land Use Policy for Annexed Area West of)	7/5/1983		Formal Action; Profile/Related Plans; Purpose; Policies & Recommendations
South Pantano Area Plan	12/3/1983 Rex. #12941	6/7/2005 Res. #20101	Formal Action; Introduction; General Policies; Subareas

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Plan	Adopted by Mayor & Council	Amended	Contents
Tumamoc Area Plan	4/27/1998 Res. #18006	10/13/2003 Res. #19696	Introduction; General Policies & Design Guidelines; Sub-area Policies; Plan Administration Guidelines
Unit Six Neighborhood Land Use and Circulation Plan	9/27/1976 Res. #9970	1/10/1977 Res. #10084; 3/15/1982 Res. #11781	Profile/Related Plans; Purpose; Adopted Policies & Recommendations
University Area Plan	5/8/1989 Res. #14889	6/10/1991 Res. #15693; 2/24/2003 Res. #19520	Introduction; Overall Goals; Neighborhood Conservation Historic Preservation; Land Use Development; Transportation; Environment; Public Services; University of Arizona, General Design Guidelines, Defensible Space Guidelines, Definitions
West University Neighborhood Plan	2/1/1982 Res. #11733	2/1/1982 Res. #11733; 3/24/1986 Res. #13561; 10/12/1987 Res. #14220; 8/1/1988 Res. #14564; 11/28/1988 Res. # 14706; 2/11/1991 Res. #16107; 9/14/1992 Res. #16107; 6/28/1993 Res. #16335; 4/14/1997 Res. #17608; 4/12/1999 Res. #18264; 1/12/2004 Res. #19760; 12/7/2009 Res. # 21449	Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations
Western Hills / Pueblo-Sunland Gardens Neighborhood Plan	9/25/1978 Res. #10628	4/20/1981 Res. # 11486 5/14/1987 Res. # 13996 7/1/2002 Res. #19280	Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations
Wrightstown Neighborhood Plan	8/4/1980 Res. #11241	11/8/1982 Res. #12057; 1/14/1985 Res. #13020; 11/25/1985 Res. #13422	Formal Action; Profile/Related Plans; Purpose; Adopted Policies & Recommendations

Attachment B

PRELIMINARY REVIEW OF CURRENT LAND USE PLANS

May 15, 2013

Prepared by City of Tucson Planning and Development Services Department

INTRODUCTION

The City of Tucson land use plans are made up of a series of specific plans at different scales. When referring to the various land use plans the State Statute term is “specific plan,” which may include land use plans or other special plans that are related to implementing the General Plan.

The City of Tucson currently has three types of land use plans, including Sub-regional Plans (3), Area Plans (17), and Neighborhood Plans (30). These specific plans are intended to implement the General Plan for a specific geographic area or at the parcel level. About 20% of the City is not covered by adopted Sub-regional, Area or Neighborhood Plans. Land use direction for these areas is provided directly by the General Plan. The earliest land use plans were adopted in the 1970s. The earliest active plan is the 1971 Pullman Neighborhood Plan, and the most recent plan is the 2009 Miles Neighborhood Plan.

This report describes how the specific plans are currently being used and some of the deficiencies that are common among them. The intent of this report is to provide a sampling of issues that may need to be addressed in any comprehensive updating of specific plans and to offer a set of preliminary recommendations for an updating project.

USE OF PLANS

The Unified Development Code (*UDC*) establishes the zoning and development review processing standards affecting various land use proposals and policy changes affecting the City. Processes for adoption or amendment of the General Plan, specific plans, rezonings, special exceptions, Board of Adjustment variances, and so on are spelled out in the *UDC*. Some of these processes require compliance with specific plans policies.

Rezoning - Whenever a property owner proposes a new use not permitted by current zoning for a property, the *General Plan* and the appropriate land use plans are consulted for policy guidance in evaluating a proposed use. If the change of use is supported by these plans the proposal may proceed through the rezoning process for an eventual decision by Mayor and Council.

Special Exception - A special exception land use is one that is permitted by meeting certain special conditions and often requires a public hearing review process. The specific plans are consulted for support with City land use policies.

Note if a proposed use is not supported by the affected land use plan, a plan amendment may be required prior to the proposal moving forward in its given process.

Board of Adjustment Variance - The plans are also used to determine staff support for Board of Adjustment cases.

Other Items - The plans are also consulted for guidance on other applications regarding land use changes, including sale of city-owned property, proposed annexations, certain design review applications, development plan reviews, sign applications, and other legislative actions. In addition, adopted plans are used to explain to the general public where existing land use will be maintained and where land use changes in intensity will be supported. Neighborhoods may refer to plans when applying for certain types of grants, such as Transportation Enhancement or Neighborhood Reinvestment grants. Additionally, they may be used by homeowners and businesses considering reinvestment or relocation within the City.

CHARACTER OF THE LAND USE PLANS

As noted at the beginning of this report, the City of Tucson currently has three types of land use plans, e.g., Sub-regional Plans, Area Plans, and Neighborhood Plans. These specific plans are intended to implement the General Plan for a specific geographic area or at the parcel level. Since 2001 there have been 31 amendments to the three types of plans. Most of these amendments revised land use boundaries for specific parcel-by-parcel maps. Below is a brief description of each type.

Sub-regional Plans

In the 1990s, three Sub-regional Plans were adopted along the edges of the city to provide land use direction for future annexations and rezonings through a series of Map Details using Pima County Comprehensive Plan terms. The thought was that property owners would be encouraged to annex into the City if the City's land use direction was similar to the County's. This approach, however, has not been used since 2003. Today, land use direction for annexations and any follow up rezonings tend to be guided by *General Plan* policy. Some annexations are rezoned as Planned Area Development zones.

Area Plans

The land use coverage for Area Plans ranges from the eleven-square mile *Esmond Station Area Plan* to the 4.3-square mile *Arroyo Chico Area Plan*. In comparison Neighborhood Plans normally cover approximately one square mile.

Area Plans are generally structured to include an introduction (plan purpose, goals, definitions), land use and development policies, design guidelines, community policies, transportation policies, storm water management and flood control policies, and plan administration guidelines sections.

The *Grant-Alvernon Area Plan* is an example of an Area Plan within the 2001 *General Plan's* Mid-City growth area providing land use direction for existing neighborhoods through a series of parcel specific conceptual land use maps. The *Grant-Alvernon Area Plan* was adopted in 1999 and has been amended five times since its adoption. The *Grant-Alvernon Area Plan* calls out specific land use direction for two subareas; however, there are no adopted neighborhood plans within its boundaries.

The *University Area Plan* is an example of an Area Plan within the 2001 General Plan's Central Core growth area. This area plan provides land use direction for existing neighborhoods not through parcel based land use maps, but through land use policies that assign density, height, and massing based on adjacent land uses and Major Streets and Routes Plan (MS&R) street hierarchy (arterial-collector-local). The *University Area Plan* was adopted in 1984 and has been amended four times since adoption. The *University Area Plan* contains four neighborhood plans within in its boundary, and three of these neighborhood plans provide specific land use policies and direction through detailed land use maps.

The *Pantano East Area Plan* is an area plan in the 2001 General Plan's Evolving Edge growth area. The plan does not provide policy direction through conceptual land use maps, but through a series of land use policies that reference the General Plan and MS&R street hierarchy. The *Pantano East Area Plan* was adopted in 1982 and was amended to reflect an annexation in 1984. The *Wrightstown Neighborhood Plan* lies within the *Pantano East Area Plan* boundary and provides land use direction for its area though a Conceptual Land Use Map and associated policies.

Neighborhood Plans

Neighborhood Plans usually cover approximately one square mile and are typically structured similar to area plans with sections such as an introduction (plan goals, boundary, definitions, how to use the plans), land use and development (conceptual land use map), design guidelines, transportation policies, neighborhood programs, and plan administration. The *Blenman Vista Neighborhood Plan* was adopted in 1986 and has been amended four times since adoption. It is within the *University Area Plan*, and includes a historic preservation section referencing two sites: Potter Place and the Arizona Inn. The *Blenman Vista Neighborhood Plan* also includes a Capital Improvement Section related to the widening of Speedway and Campbell and to a future traffic light at Elm/Campbell intersection.

The *Wrightstown Neighborhood Plan* was adopted in 1980 and has been amended three times since its adoption. The *Wrightstown Neighborhood Plan* is located within the boundaries of the *Pantano East Area Plan*, however this neighborhood plan is only four pages, covering specific land use direction for its area through a map and policies.

The three most recently adopted Neighborhood Plans, *Jefferson Park*, *Miles*, and *Miramonte* have veered away from providing specific land use direction through

conceptual land use maps by defaulting to the area plan conceptual land use maps in which they are embedded. Historically, area plans have provided general land use direction with the neighborhood plans providing more specific land use direction. While the *Miramonte Neighborhood Plan* includes within its plan document the *Alvernon-Broadway Area Plan* land use map, *Jefferson Park NP* defaults to the *University Area Plan* and its policies (but no map), and the *Miles NP* defers to the *Arroyo Chico Area Plan* land use map. These three Neighborhood Plans have taken a different direction using a combination of strategies and guidelines to discuss land use change, while deferring to Area Plans to provide future land use direction.

KEY PROBLEM AREAS

While the apparent goal of the land use plans has been to individualize each plan area to meet a range of different conditions and community concerns, the outcome has been an overall inconsistent strategy of various approaches to policies and mapping that occurred within the individual plans' time frame. Over the 35-year time frame, the complexity grew as new General Plans were adopted and replaced and three different zoning codes occurred. The current list of land use plans has tended to reflect the plans and ordinances of its era. A re-evaluation of land use plans would provide an opportunity to establish a process to consolidate, update, and make consistent common land use plan elements, including addressing the following key problem areas:

1. Redundant administrative and definition components;
2. Outdated and obsolete land use designations;
3. Inconsistent and vague mapping boundaries;
4. Outdated infrastructure references.

Redundant Components

Most plans were created to stand alone. This approach has created significant redundancy in the plan documents over the past decades. Each plan has components such as Definitions, Design Guidelines, and Plan Administration Guidelines that vary from plan to plan. Creating some consistency and consolidation among these components is one task that an update process could address.

University Area Plan (UAP) (1989): **Definitions** - Within the boundaries of the University Area Plan are four adopted Neighborhood Plans: West University Neighborhood Plan (WUNP)(1981), Sam Hughes Neighborhood Plan (SHNP) (1985), Blenman-Vista Neighborhood Plan (BVNP) (1986), and Jefferson Park Neighborhood Plan (JNP) (2008). UAP and BVNP contain definition sections. SHNP and JPNP do not have definition sections.

Examples -

BVNP - “HIGH DENSITY: densities over 14 units per acre, including multi-family developments, such as townhouses, apartments, and condominiums.”

UAP – “High Density - Density of 15 or more units per acre. High density housing generally includes multi-story or densely developed apartments, condominiums, and townhomes.”

University Area Plan (1989): Design Guidelines - Within the boundaries of the University Area Plan are four adopted neighborhood plans; West University Neighborhood Plan (1981), Sam Hughes Neighborhood Plan (1985), Blenman-Vista Neighborhood Plan (1986), and Jefferson Park Neighborhood Plan (2008). UAP and BVNP have General Design Guidelines, Defensible Space Guidelines, and Compatible Design sections. JPNP, SHNP, and WUNP provide design direction within individual policies.

Examples -

BVNP - “Encourage the use of drought-tolerant landscaping, including trees and understory vegetation that are proportional in scale with the building(s).”

UAP - “Use drought-tolerant landscaping - Encourage the use of drought-tolerant, and low pollen-producing plants in new landscaping projects. Landscaping should be compatible in scale, character, and use pattern with established neighborhood landscape/streetscape themes (see Environment, Policy 3).”

University Area Plan (1989): Plan Administration Guidelines - Within the boundaries of the University Area Plan are four adopted neighborhood plans; West University Neighborhood Plan (1981), Sam Hughes Neighborhood Plan (1985), Blenman-Vista Neighborhood Plan (1986), and Jefferson Park Neighborhood Plan (2008). UAP, JPNP and BVNP have the same and therefore, redundant Plan Administration Guidelines. SHNP and WUNP have no Plan Administration Guidelines.

Examples -

BVNP - RESIDENTIAL POLICY I: Preserve the residential integrity of the established neighborhoods.

UAP - Recognize distinct neighborhoods in the University Area, and support those changes which protect and enhance the character, identity, and residential quality of life in these neighborhoods.

Outdated Terminology

Land Use Designations - Land use designations for a similar intensity vary across the plans. For instance, “medium density residential” appears to mean the R-2 zone and “neighborhood commercial” has been interpreted to refer to the C-1 zone. However, there is no guidance across the plans for a consistent interpretation.

In the case of residential designations, one plan may use the term “medium density residential” while another uses the term “mid-urban residential” for similar intensities (see Table 1 for examples). These plans may include information about the allowable zones and intensity ranges (i.e., residences per acre or floor area ratio values), which aide in determining the appropriate specific use when projects are submitted to the City for compliance reviews. Yet, even if this information is listed, it is not consistent across all the plans.

Staff has estimated that there are about 264 different land use designations across the 50 current land use plans. As a consequence, each plan must be carefully reviewed by staff for correct interpretation of the land use designation (e.g., determining what a plan will allow in “medium density residential” areas). Comparisons across plans, such as calculating how much land is “community commercial” throughout the City, present a challenge since the terminology and associated definitions are often unique to each plan.

Table 1. A sample of residential land use designation terminology used in different adopted plans.

Residential Designation Terminology	
“Low Density Residential”	“Multi-Family”
“Medium Density Residential”	“Possible Apartment Location (R-3)”
“High Density Residential”	“Residential Resubdivision (R-1)”
“Low-Med. Density Residential”	“Single-Family Residential”
“Maintain Moderate Density Residential (15-40 Units Per Acre)”	“Suburban Residential”
“Mixed Residential”	“Low Density Townhouse - one unit per 5000 square feet of lot area”
“Higher Density Residential”	“Low Intensity Urban”

Three similar but different versions of “Campus Industrial”

This term has been interpreted to refer to the PI Park industrial zone.

Esmond Station Area Plan (1986): **Campus Industrial** - “Campus industrial projects are comprehensively planned industrial developments which contain clean, low intensity uses, and which are controlled by design and performance standards to be compatible with surrounding uses. Design considerations may include low building height, substantial building setbacks, screening, and extensive landscaping, among others. Performance standards may include stringent regulation of noise, odors, and other emissions in addition to the restriction of heavy truck traffic. Campus industrial could be used to buffer or provide a transition for uses of varying intensity.”

Arroyo Chico Area Plan (1986): Campus Industrial - “Campus industrial projects are comprehensively planned industrial developments which contain clean, low intensity uses, and which are controlled by design and performance standards to be compatible with surrounding uses. Design considerations may include low building height, substantial building setbacks, screening, and extensive landscaping, among others. Performance standards may include stringent regulation of noise, odors, and other emissions in addition to the restriction of heavy truck traffic. Campus industrial could be used to buffer or provide a transition for uses of varying intensity.”

Pantano East Area Plan (1982): Campus or Park Industrial - “Comprehensively planned industrial developments which are compatible with surrounding residential communities. They contain clean uses which are generally not objectionable because of noise, heavy truck traffic, fumes, or any other nuisances. The intention of this land use is to provide attractive locations for employment centers close to residences so as to reduce travel time between home and work.”

Different versions of “Commercial”

12th Avenue – Valencia Road Area Plan (2001) :

- **“Residentially-Scaled Neighborhood Level:** commercial uses that are intended to primarily serve a local neighborhood market, and that are similar in scale with the surrounding residential area. Associated structures may consist of either converted residential structures or new structures limited to a building height of 16 feet. For example, commercial uses for which architectural and site design are guided by criteria outlined within the NC commercial zone.”
- **“Neighborhood Level:** commercial uses intended to primarily serve a local neighborhood market, such as those typically provided for in the NC or C-1 zones.”
- **“Community Level:** commercial uses intended to primarily serve an area-wide market, such as those typically provided for in the C-2 and C-3 zones.”

Alvernon-Broadway Area Plan (1995) :

- **“Community Level:** commercial uses intended primarily to serve an area-wide market; for example, those uses allowed in the City C-2 and C-3 zone.”
- **“Neighborhood Level:** commercial uses intended primarily to serve a local neighborhood market; for example, those allowed within the City C-1 zone.”

Arcadia-Alamo Area Plan (1992) :

- **“Community Level:** commercial uses intended primarily to serve an area-wide market.”

- “**Neighborhood Level:** commercial uses intended primarily to serve a local neighborhood market; found primarily in the City B-1 zone.”

Arroyo Chico Area Plan (1986):

Does not contain a definition for “commercial.”

Bear Canyon Neighborhood Plan (1984):

- “**Commercial:** retail business use or any commercial use permitted by B-1 zoning districts, or community commercial uses.”
- “**Community Commercial:** retail business uses and services permitted in the second most restrictive zone that do not include outside storage or display.”

Pantano East Area Plan (PEAP) (1982):

Does not contain a definition for “commercial.” However, the PEAP calls out that regional, community and neighborhood level commercial uses should be located at the intersection of arterial streets; and neighborhood and community level commercial uses may be appropriate at the intersection of arterial and collector streets.

University Area Plan (1989):

- “**Neighborhood Commercial Service:** business which provides goods and/or services oriented to local neighborhood residents. Examples include small grocery markets, cafes, and specialty retail shops.”
- “**Pedestrian Commercial District:** concentrated area of commercial development in which pedestrian-oriented shopping and related activity is facilitated and encouraged, while auto circulation and parking is generally restricted.”
- “**Activity Center (Regional):** Identified in the City of Tucson General Plan as an area where mixed use development is permitted and/or encouraged. The purpose of activity center development is to combine housing, shopping, recreation, and other activities in a compact arrangement which serves to reduce auto dependence, air pollution, and the cost of public service delivery while providing interesting and exciting places in which to live, work, and play.”

Use of a policy as a land use designation

Example -

Houghton East Neighborhood Plan (1985) “Locate nonresidential uses only at the intersections of Houghton Road with Broadway and 22nd Street.”

Use of the outdated term, “Residential Cluster Project”

With adoption of the UDC the Residential Cluster Project (LUC) and Planned Unit Development (ZC) has replaced by the Flexible Lot Development.

Examples -

Alvernon/Broadway Area Plan (1995) - “Residential Cluster Project (RCP): development option in the residential zones that provides for greater flexibility and creativity in design. Use of the RCP may result in higher densities than conventional development in the same residential zone.”

University Area Plan (1989): “Residential Cluster Project (RCP): The RCP provision of the City of Tucson Zoning Code provides flexibility in the development of residential projects which include consolidated open space and support community goals such as historic and archaeological preservation, the development of barrier-free or low income housing, and urban infill. The RCP may exceed standard residential densities subject to compliance with a number of specific development criteria, as outlined in Section 23-461 of the Zoning Code.”

Different policy versions of access to an arterial street

Examples -

Pantano East Area Plan (1982) (for industrial proposal) - “...arterial street access to industrial properties;”

Northside Area Plan (1987) (for non-residential development proposal) - “Direct access can be provided from an arterial street.”

Houghton East Neighborhood Plan (1985) - “Require nonresidential uses to provide access exclusively onto arterial streets.” (See Illustration 6.)

Mapping Vagueness

The existing adopted plans reflect many different approaches to mapping land use direction, i.e., from amorphous areas to parcel-based maps. Many maps include outdated parcel information due to parcel combinations or splits over the years. This problem makes it more difficult for the City to participate in any regional land use modeling exercise.

To reduce the need for interpretations and improve readability, land use maps could be standardized with consistent land use designations that would simplify current and future designations. Land use designation lines should follow property lines or street boundaries. This approach will also assist in the collection and manipulation of data for both City and regional analysis.

Examples -

Pullman Neighborhood Plan (PNP) (1971) - The PNP Generalized Land Use Plan map is a bubble map that does not follow parcel boundaries and could lead to different boundary interpretations.

Greater South Park Plan (GSSP) (1984) - The GSSP Subarea map is a bubble map that does not follow parcel boundaries and could lead to different boundary interpretations.

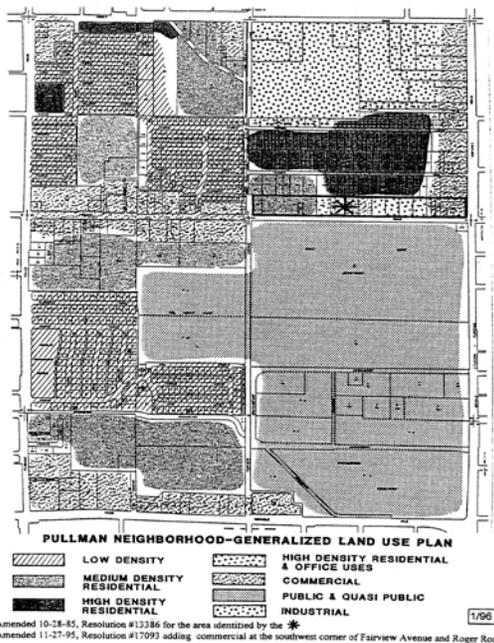
Santa Cruz Area Plan (SCAP) (1983) - The SCAP Key Parcel maps are bubble maps that do not follow parcel boundaries and could lead to different boundary interpretations.

Kino Area Plan (1980) - The Commercial section identifies Site 1 as Little America Corp and that it is to be developed as a tourist-oriented commercial center, when this site has now been developed as the Bridges PAD.

Mapping inconsistencies across plans

Other inconsistencies involve the way in which land use designations have been, and currently are, mapped. For example, some plans have boundaries that follow streets or parcels while others include wavy, hand-drawn sketches that bisect parcels (see fig. 2). As a consequence, where the boundary is a wavy line, it is difficult to determine whether or not some lands are within the boundary. While the rationale for such loosely generalized mapping had a purpose at the time they were originally drawn, these maps can now create confusion not only for City planners, but also members of the community.

Examples -



Miramonte Neighborhood
Conceptual Land Use



Different mapping approaches and land use designations used at the time the plans were adopted or amended. The map on the left incorporates a freehand sketch approach while the map on the right uses parcel lines as land use designation boundaries.

Infrastructure References

One of the most out-of-date components of the plans deals with various infrastructure improvements references. Many of the proposed improvements have been completed or have been reprioritized. An update would help to confirm whether the action anticipated occurred and whether it should be retained or not.

Infrastructure changes that may be completed or their status is inconclusive

Examples -

Kroger Neighborhood Plan (1979) - “When 22nd Street is widened to arterial standards, provide for pedestrian paths and crossings:

- build median islands between Farmington and the river (estimated \$50,000);
- install traffic signal at intersection of Kroeger Lane and 22nd Street (estimated \$40,000).”

Alvernon/Broadway Area Plan (1995) - “Encourage the Doubletree Hotel to work with San Gabriel Neighborhood to limit vehicular access points from local streets, in particular Hayne Street (see Transportation Policy 5.d.).”

Groves Neighborhood Plan (1976) - “The parcels delineated as A, B, and D on the accompanying exhibit (Land Use Map) should retain a natural vegetative state for the near future and be minimally developed at a later date as the City Parks and Recreation Department budget and priorities allow.”

Groves Neighborhood Plan (1976) - “Footbridges should be constructed where (1) Dogwood Avenue crosses the drainageway and (2) Prudence Road crosses the drainageway.”

Sam Hughes Neighborhood Plan (1985) - Existing Traffic Control Signs map was never implemented. Bike Routes map was never completely implemented.

North Stone Neighborhood Plan (1986) - Maps and text does not reflect that Stone Avenue extension to River Road has been completed.

Northside Area Plan (1987) - The Swan/Ft. Lowell Map still shows the proposed Fort Lowell and Alvernon Way Extensions which have been completed.

Conclusion and Recommendations

The City is made up of a quilt-like pattern of approximately 50 land use plans covering about 80% of the City. Many of the 50 plans have their own administration section, policies, and definitions. While it is appropriate for some items to be unique in land use plans, there are others that should be consistent across the entire City.

Further, there is no stated over-riding strategy of how the land use plans are related, and there is no stated goal to eventually have the entire City covered by specific plans. Currently, approximately 20% of the City relies on only policies of the General Plan.

This preliminary report highlights several problem areas that should at a minimum be reviewed for improvement. Such improvements could include:

1. Addressing redundant administrative and guidelines components;
2. Updating and making consistent outdated and obsolete terms and land use designations;
3. Updating mapping boundaries to reduce inconsistencies due to parcel changes, and vague boundaries; and
4. Deleting or updating out-of-date infrastructure references.

There are potentially several approaches: (1) revise all 50 plans individually; (2) create an overlay through the General Plan that applies a set of special policies affecting the underlying plans; and (3) prepare a diagnostic report of strengths and weaknesses of the plans, and make recommendations to improve their policies and boundaries in a manner that provides more consistency, but at the same time retains policy that addresses residents' concerns, such as neighborhood protection and historic preservation.

The first approach is an impractical expenditure of resources. The second may be too general an approach or result in unintended consequences. The third approach allows for a more strategic and rationale problem solving approach that is more about comprehensively listing deficiencies along with strengths and focusing on improving an inefficient process that has become more inefficient over time.

The third approach would provide an opportunity to clarify the terms, boundaries, and vague policies and to take steps to create appropriate geographical areas that make sense for the City in setting land use policy and allowing for occasional updating as needed over time. It would also allow land use policy to be considered in relation to infrastructure policy. Finally, it would enable City land use planning to become a more reliable data source for regional modeling or City growth trends by providing consistent land use data.

The Final Draft of Plan Tucson provides a policy that proposed the development of "planning and service areas" that could be a vehicle to consolidate some of the 50 land use plans to assure more consistency across the City. Such a project can continue to assure that neighborhood protection policies apply to the areas to which they currently apply. In a "planning and service area" format, there could be a hierarchy of city-wide sectors that contain neighborhood plan sectors and special policy sectors where specific and unique neighborhood policies continue to apply.

This project would allow for a consistent treatment of boundaries, for sectors, designations, and special policy areas in a geographic information system (GIS) format that would be available on-line to the City for use in service area analysis and to the members of the public for their use. Our current 50 plans can be shown in GIS format but with inconsistent boundaries because they have never been comprehensively integrated. To depict these plans with consistent boundaries would require a series of plan amendments approved by Mayor and Council.

Whether the Mayor and Council wants to take steps based on such a study, doing a study is worth consideration as an improvement in City processes, public transparency, and an improvement in delivering customer service.

Below is a set of preliminary recommendations that could help improve the City's land use plans. A more comprehensive study envisioned as part of the "planning and service area" project would expand on the list below:

Terms and References

- Replace and/or remove outdated terminology and references, including terms such as "Residential Cluster Project" and other references to the obsolete "Zoning Code."
- Develop planned land use designation and definition standards that list the allowable zones and land use intensity ranges (e.g., "low density residential" could be more systematically spelled out with one or more designations that could be applied city-wide)).
- Re-word spatially explicit policies so that they consider the established library of GIS data layers and can be easily mapped. For example, when referring to "established residential neighborhoods," ensure that the policy specifies that registered neighborhood associations are intended (if that is the case) since a GIS layer is maintained for these areas.
- Specify in the plan what changes can be made administratively (e.g., references to the address and phone number of the planning department for questions requiring Spanish language interpretation) without a full notice procedure.

Mapping

- Correct unintentional plan boundary overlaps.
- Use the GIS data from an in-house 2010 project to update the exhibits in the adopted plans so that the GIS data becomes the official source of amending plans. Note this would require plan amendments to revisit and correct problem boundaries.

- Use consistent mapping standards. This may include requiring that all boundaries are immediately adjacent to one another and that boundary lines are coincident with established and well-maintained GIS data layers, such as street centerlines.
- Create a symbology consistent across all plans to facilitate visual comparison of the planned land use designations on the web map. That is, instead of the symbology for the new GIS data layer mimicking the unique cross-hatching from the maps in the adopted plans, a second symbology could be created for the web map that uses hues to distinguish general categories (e.g., earth tones for “residential”) and shades of hues to distinguish sub-categories (e.g., light brown for “low density residential”).

Policies

- Remove policies that are redundant with the mapped land use or clarifying that these policies are reflected in the map, if not done so already. Some plans contain policies that appear to be reflected on the map, however, it is unclear if these should be considered one and the same or, in the case of inconsistency, which takes precedence.
- Consider the removal of outdated infrastructure policies and other dated language that has no further use in the typical processes involving land use plans.

Staffing

- Maintain a sufficient level of GIS staffing within the Planning and Development Services Department. With the loss of the GIS Analyst/Planner position earlier in the year, it will be difficult for existing staff members to maintain and manipulate this new GIS dataset, address any of the above recommendations, or perform various geospatial analyses for planning purposes (e.g., creating specific plan boundaries and analyzing existing conditions within these boundaries).