

May 1, 2013

Ladd Keith  
Chairperson  
City of Tucson Planning Commission  
255 W. Alameda Street  
Tucson, Arizona 85701

Dear Chairman Keith:

We thank you for the opportunity to comment on *Plan Tucson*, the 2013 General Plan for the City of Tucson. This plan takes a comprehensive look at the future direction of our community over the next 10 years. Metropolitan Pima Alliance (representing 120 members), Southern Arizona Home Builders Alliance (representing 350 members), Arizona Builders Alliance (representing 450 members), Tucson Association of Realtors (representing 4,500 members), Tucson Metro Chamber (representing 1,400 members), Tucson Hispanic Chamber (representing 1,050 members), and Tucson Utility Contractors Association (representing 100 members) have a substantial impact on the economic vibrancy of our community.

The critical role our industries play in successfully obtaining many of these shared values cannot be overstated. While our members recognize the importance of social justice and environmental issues to future sustainability, we believe it is essential for *Plan Tucson* to prioritize business initiatives, private investment advocacy, job creation and economic sustainability.

The recent improvements in the development, real-estate, and housing industries and our local economy are not coincidental. As the local business market had begun to improve, the effects of such can be seen in the broader community in our region. As such, any future plan which understands and promotes this correlation will contribute greatly to ensuring many of our community values are achievable and indeed realized. Conversely, any plan which hinders development in our community has the potential for the unintended consequence of threatening many of the values outlined in the proposed *Plan Tucson* document.

It is imperative that *Plan Tucson* not only recognize the roles the development, real estate, homebuilding, and business communities will play in our future success but include specific, tangible goals and objectives ensuring commerce is valued, promoted and realized in our community; now and in the future. As the Plan is currently written, we cannot support it because there are too many inconsistencies.

As such, we offer the following comments for your consideration:

## General Comments:

1. The City of Tucson should be cognizant that the current economy is extremely price sensitive. Costs of doing business should not increase without a direct, short-term benefit to the user/applicant. Business requirements by this plan add costs and only marginal benefits to the incurring party.
2. In comparison to previous General Plans adopted by the City of Tucson, this one is drastically more specific and detail oriented, which contrasts with the goal of a general plan to provide broad policy direction.
3. In general, the individual elements of this plan seem to have been put together in silos with purposes that are sometimes in competition with one another. We believe it best the Plan Tucson document be reviewed to prioritize these goals and to understand how the individual elements interact with one another and how they contribute to the overall goals as previous City of Tucson General Plans historically have done.
4. As in previous recessions, development in the housing industry will once again lead the economic recovery necessary to realize many of the goals and objectives outlined in *Plan Tucson*. Removing and/or reducing any regulatory obstacles to increased development, both commercial and residential affordability will expedite our local economic recovery. We encourage this be considered and integrated where possible in the final document.
5. Accomplishing desired growth area goals will be most successful when accompanied with proper incentives. Restrictive, inflexible growth boundaries which promote sprawl further complicate infrastructure planning, and reduce affordability of building for the commercial and residential development industries.
6. The Water Service Area Policy is not a regional planning effort for our water resources. The conflict between this policy and the regional approach called for in the plan highlight the need for a return to a policy that manages our valuable water resources without respect to municipal boundaries. The plan also suggest we should work regionally on water planning (WR7) and similarly suggest a regional approach to long and short term planning efforts (G8).
7. We see serious negative consequences to the plan by suggesting the adoption of Pima County's Conservation Land System as suggested in LT20 and LT21. The inducement to annex into the City in exchange for water could be significantly weakened as there would be little difference in development policy between the City and County. It could also encourage development to move to communities

like Oro Valley, Sahuarita and Marana and away from Tucson as a result of these new requirements.

8. The plan calls for the City to assist neighborhoods to obtain historic status (HP2). There needs to be discussion however about what areas are truly historic and how that designation impacts our community and property rights; separating out age versus architectural value of structures. Designations should not be obtained to limit certain types of development. We have already seen how historic designations placed limits on the type of development along certain sections of the modern streetcar route. Tucson must be sensitive to the necessity and limitations that these historic designations create and must balance their impact on our economy and property rights.
9. The Opportunity Areas map must be removed from the plan. As currently drawn, the map is inaccurate, confusing, is not user friendly and may discourage future economic attraction and expansion in our region. The text regarding the map does not give clear direction for implementation. Additionally, interpretation and conflict resolution are not addressed.
10. The plan does not take into account the economic impact of our military bases and installations (Davis Monthan Air Force Base and the Air National Guard). DMAFB, the third largest employer in Southern Arizona, has over a billion dollar impact on our local economy and as such should be addressed separately from other areas of commerce listed in the plan.

Given the detailed nature of this document in comparison to previous City of Tucson General Plans we urge the Commission to direct staff to provide insight on how this plan varies in comparison to its predecessors in addition to which areas have been added, removed, or altered significantly. It is our concern this document has an unnecessary amount of detail and information and is no longer within the scope of being considered "general". Collectively, as representatives of thousands of local businesses and their employees, we cannot support this document without significant document changes, clarifications, and additions to genuinely support the business community and promote economic vitality and vibrancy as opposed to promoting the status quo.

Sincerely,



Amber Smith  
Executive Director  
Metropolitan Pima Alliance



Thomas Dunn  
Arizona Builders' Alliance



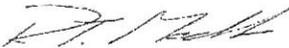
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