



FEBRUARY 13, 2023

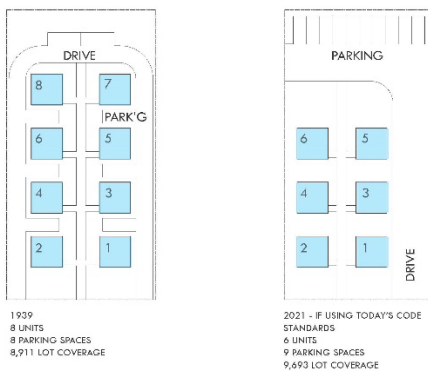
City of Tucson
Planning Commission
PlanningCommission@tucsonaz.gov

RE: PROPOSALS FOR MODIFICATION TO THE UDC

Planning Commission:

I am a Sam Hughes resident of 20 years, and since 1992 I have lived in the Rincon Heights, West University, Barrio Viejo, Ventana Canyon, and Sam Hughes neighborhoods. I am an architect and the majority of my work is in the historic neighborhoods of Tucson. I work with private developers, homeowners, and public institutions. I also have taught at the School of Architecture at the University of Arizona for the past 15 years. I am writing both as a professional and a resident who cares deeply about Tucson.

The current parking requirements for duplexes, triplexes, and fourplexes encumber development, hurt the housing mission in the city of Tucson, and negatively impact the environment. Using a site in the Rincon Heights neighborhood (image below), one sees the impact the parking requirements make on multifamily developments. Built in 1939, the site consists of 8 1BR buildings with dimensions of 20'x20' each. In between each building is a single parking space. To access the parking space, a one-way drive is placed along the perimeter of the site (making a loop). If using today's land use code standards, the site could be developed with only 6 1BR buildings, a 24' wide two way PAAL and 9 parking spaces. The consequences of this can be interpreted to be the following: 1. An increase in the heat island effect (more black asphalt), 2. Reduction in tax base for the city (less units), 3. An increase in rent for the citizens (less units), 4. A decrease in the overall income for landowners (less units), 5. An increase in the amount of impervious materials on the land. The example points out the current land use code promotion of decreasing density, increasing the number of parking spaces, and increasing environmental degradation compared to earlier Tucson development.



1939
8 UNITS
8 PARKING SPACES
8,911 LOT COVERAGE

2021 - IF USING TODAY'S CODE
STANDARDS
6 UNITS
9 PARKING SPACES
9,693 LOT COVERAGE

AN INCREASE IN THE HEAT ISLAND EFFECT
A REDUCTION IN TAX BASE FOR THE CITY
AN INCREASE IN RENT FOR THE CITIZENS OF MID-TOWN TUCSON
A DECREASE IN OVERALL INCOME FOR LANDOWNERS.

LOT COMPARISON OVER TIME

AN IRONBELL ARCHITECTS SUMMIT TUCSON
EMERGING CLIMATE SOLUTIONS TUCSON
MARCUS

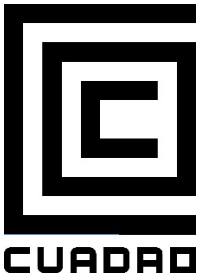
In general, the land area allocated for the design and construction of MMH is limited. The city of Tucson has 12% of its land zoned specifically (R zones) for multifamily development. For R2 zoned properties, which accounts for 9.4% of the land area, only 41.1% of R2 are eligible for duplexes, only 12% are eligible for triplexes, and only 6.8% are eligible for fourplexes. For R3 zoned properties, which accounts for 2.6% of the land area, only 37.2% can be developed into duplexes, triplexes, or fourplexes. This means there are not that many properties that even allow these small scale multifamily projects. The other zones that allow multifamily development are the O and C zones . . . they account for 7.3% of the land area in the city of Tucson and the most available zones for fourplexes are O3, C1, C2, and C3 . . . It is a question if developers would develop any of the C properties into a fourplex - I imagine there are other "higher and better" uses.

The parking required for triplexes and fourplexes requires a disproportionate amount of land area than for single family or duplex residential sites. SFR not only have more exceptions allowed (one can park 50% of the required parking on the street), but they do not require full vehicle maneuverability on the site where multifamily projects over 2 units do. SFR sites can have tandem parking and vehicles can back out into a street. Triplexes and Fourplexes require full maneuverability - a parking lot that one can back in and out of space without encroaching on the right of way. This requires an additional 24' wide area by whatever the length of the parking spaces is on the site. This can be difficult to fit on many of the midtown sites that are 50' to 66' wide.

In 2022, I had at least 4 projects that have not moved forward because of the parking requirements. All of them were either triplexes or fourplexes. They were in midtown or downtown neighborhoods. The existing on-street parking was very much underutilized. The developers were a mix of professionals and homeowners.

Should you have any questions, please do not hesitate to call.

Bill Mackey
Architect, Worker Inc.
Resident, Sam Hughes Neighborhood (825 North Norton Avenue)



sjimenez@cuadro.design

4738 S. Camino de la Plaza

Tucson, AZ 85714

Re: 2/15 Planning Commission Public Hearing

To Whom it may concern:

Hello my name is Sharayah Jimenez and I am the owner of Cuadro, an architectural drafting and design firm that specializes in small, residential projects. I also sit on the City of Tucson's Commission on Equitable Housing and Development. I am writing a letter of support for the current Code Amendments that are being proposed, especially those that will facilitate smaller scale, urban infill development. In general, I feel that most of the amendments being proposed are small steps in the right direction towards reducing urban sprawl, reducing urban heat island effect, and creating faster processes that will help save time and cost for projects. Most of the projects that I work on are remodels, additions, casitas/ADUs, and single-family urban infill projects. To say that these projects are a challenge to permit would be an understatement. Prior to starting my own business, I worked in the field of commercial architecture, and I was surprised to find that small residential projects can oftentimes take as much time or more to permit as larger projects.

Many of the development standards that are required for a project are written in a way that assumes the project is new construction. To require a development package for a small existing commercial project, like a tenant improvement, is completely excessive, adds time and cost to projects, and potentially kills an existing project that has no way to meet modern-day commercial parking standards. The same can be said for small residential projects, where parking can be a major barrier for an existing, small lot, and prevent a project from moving forward at all. I am fully in support of each of the proposed amendments that reduce barriers for small, urban infill projects, especially because most of these projects are owned by either small businesses or homeowners who actively contribute to the vibrancy and economic resiliency of our city.

The removal of setbacks for townhouses is also a good step in the right direction. The Sonoran Rowhouse typology is one of the most beloved architectural forms in our city and it has basically been made illegal with modern day zoning codes, except within a small historic district. To have the option to revive traditional planning practices is a win for our community.

The standardization of building setbacks for MS&R corridors is another step in the right direction. It is getting harder and harder to find sites large enough within the City limits for multi-family development. Commercial corridors with access to amenities and public transportation are ideal candidates for this type of housing. Allowing less restrictive setbacks will ensure that the maximum amount of housing units can be provided on a site, which is important in light of the current housing shortage that continues to be exacerbated year after year.

Finally, I would like to add an unrelated comment about development services. While I realize that this is a planning commission meeting, development services is also a part of the department. And while the planning side of the department seems to be generally on board with making processes and policy more streamlined and efficient for the built environment, as you all are loosening up on regulations, development services seems to be tightening down. As I mentioned before, I work on a lot of existing projects where we are simply adding a room or remodeling an existing space, but I am getting a lot of comments from development services about unpermitted accessory structures like sheds and porches that have nothing to do with the current scope of work. They are holding up permits for these issues and wanting the design team to take responsibility for the construction of these items even though I had nothing to do with them. In general, I think the department needs to find a faster and more efficient process to deal with existing, unpermitted

projects that will not add excessive time or cost to a project. Furthermore, this process should be separated from the new scope of work. Permitting a new structure is entirely different from trying to permit an existing structure, and the two projects cannot be held to the same building codes; the existing structure should be analyzed in terms of the international existing building code. This type of policy and policing will only continue to kill projects and scare homeowners away from permitting projects in the first place.

I appreciate your time and thank you for the opportunity to speak.

Sincerely,

A handwritten signature in cursive script, reading "Margaret Jernigan". The signature is written in black ink and is positioned to the left of the rest of the page.

[EXTERNAL] Public Comment: Planning Commission Public Hearing on the PDSD Code Update Package Feb. 15

Fernanda Quintanilla <fquintanilla@diamondven.com>

Tue 2/14/2023 4:58 PM

To: PlanningCommission <PlanningCommission@tucsonaz.gov>

Cc: Priscilla Storm <pstorm@diamondven.com>

Planning Commission Members,

Diamond Ventures, Inc., a real estate and land development local small business, has been closely following the PDSD Code Update Package, and has significant residential and commercial experience within the City of Tucson for the last 35 years.

As an organization, we support the following concepts in the updates:

- Allowing the co-location of Wireless Communication Facilities without the PDSD Director Process
- Reducing the application requirements for Development Packages for smaller projects as a concept
- Changing the timeframe for grading permits to match development packages, which is three years
- Reducing setbacks in zones that allow multifamily
- Reduction of parking spaces and more flexibility in commercial parking standards
- Allowing accessory shade structures in front yards
- Reduced and standardized front setback dimensions along major streets.

We are not in support of requiring the Zoning Examiner Legislative Procedure for Major Amendments of Conditions because many of the "Major Amendments," as defined by the City, are not substantive in terms of their impact on adjoining properties. For example, a 1,000 square foot facility that increases to 1,100 square feet or a 10-unit residential projects that increases by one additional residence both meet the City's definition of a Major Change. Additional examples that meet the City's Major Change threshold include change of design conditions and use which may be de minimus.

Comment on the EVSE Inventory in parking calculation: the commercial stakeholders are still advocating for reducing costs of installation and increasing efficiency in regard to placement.

Comment on Water Well Updates: it is difficult to ascertain the potential impacts that may occur beyond the 100-foot notice.

Thank you for dedicating the time to volunteer on Tucson's Planning Commission,

Fernanda

Fernanda Quintanilla, MPA

Director of Special Projects

Diamond Ventures, Inc.

2200 E. River Road, Suite 115

Tucson, AZ 85718

fquintanilla@diamondven.com

O: 520-577-0200 ext 108

C: 520-850-8769



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Rd.
Tucson, AZ 85716
P: 520.795.5114
www.sahba.org

PRESIDENT & CEO

David M. Godlewski

EXECUTIVE OFFICERS

Chair

Andrew Hayes
Hayes Construction

1st Vice Chair

Steve Crawford
Pepper Viner Homes

2nd Vice Chair

Andrew Gasparro
KB Home

Secretary/Treasurer

Randy Agron
A.F. Sterling Homes

Immediate Past Chair

Michael Del Castillo
Richmond American Homes

Affiliated With



February 14, 2023

Ms. Lexy Welcott, Chairperson
Tucson Planning Commission
255 W. Alameda
Tucson, AZ 85701

RE: Proposed UDC Amendments

Dear Chair Welcott:

We appreciate the effort by the City of Tucson to improve the PDSO process and begin removing barriers to infill development. It is our hope that this package is only the beginning of an overall effort to address regulatory solutions to our housing crisis.

After review of the proposed UDC amendments, the Southern Arizona Homebuilders Association has the following comments.

We support:

- Item # 4 – Reduced Development Package requirements for smaller projects
- Item # 6 – Align timing for grading permits with Development Packages
- Item # 7 – Remove setback requirements between townhouse units
- Item # 8 – Reduce parking requirements for small multifamily residential
- Item # 9 – Allow accessory structures in front yards for shade and carports
- Item # 10 – Standardize building setbacks on major streets and routes

SAHBA also supports the four minor code error clean ups.

We do not support Item # 3 to require an added Zoning Examiner review of major changes of condition. Adding an additional layer of time/costs to the process is incongruent with our communities overall goal of creating more inventory in the current housing crisis.

Finally, we encourage the commission to consider in the future adding items approved for the Infill Incentive District that would have positive impacts throughout the entire community such as allowing residential development in industrially zoned areas.

Respectfully,

David Godlewski
President & CEO
SAHBA

cc: Mr. Daniel Bursuck