



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Road
Tucson, Arizona 85716
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President

Jessica D. Whyde

2010 Executive Officers

Chairman

Ed Castelhana
Becklin Construction

1st Vice Chairman

Charlie Bowles
Diamond Ventures

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Al LeCocq
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Fennemore Craig

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SENT VIA ELECTRONIC MAIL

November 3, 2010

Honorable Board of Supervisors
Pima County
130 W. Congress
Tucson, AZ 85701

RE: City/County Water Study Action Plan

Dear Chairman Valadez and Members of the Board:

SAHBA has been engaged in the City/County Water Study from its inception. Our primary focus has been, and remains, ensuring an appropriate framework for managing the region's water resources in a sustainable and financially sound manner to the benefit of current and future residents.

As it relates to the Action Plan, while there are a number of sound proposals we support, we urge you to deliver a strong message to local businesses that the Board of Supervisors is sensitive to current economic circumstances and will not advance action items that impose additional regulatory burdens or costs.

Local businesses, including development and construction companies, are the key to economic recovery. They are the job creators, sales tax generators and impact fee generators. Additional encumbrances would hamper turn-around.

To that end, we ask the following questions:

- 1) Will the action items be vetted by stakeholders and "signed-off" by the Board prior to implementation especially those related to new development and construction?
- 2) How will the Board evaluate or determine the costs/benefits associated with planned activities and will those that lead to additional costs for businesses be put on hold or eliminated?

On behalf of the 400+ SAHBA member companies, I look forward to your response and working with you on these important issues. Together we can move our community forward on issues of regional importance such as water.

I've attached a list of action items where our professional input would be valuable to the process and would like your support of our participation. Finally, I've also attached the specific comments SAHBA submitted during the public comment period. If you have any questions, I can be reached at 795-5114.

Sincerely,

David Godlewski
Government Liaison, SAHBA

cc: Mr. Chuck Huckelberry, Mr. John Bernal, Ms. Melaney Seacat

Attachment A

SAHBA asks to be part of the process for evaluating and implementing the following Action Items with the City/County Water Study Action Plan:

Comprehensive Integrated Planning Action Plan (pg. 11):

- Program 2 - Action Item #'s: 10-18

Respect for Environment Activities (pg. 17):

- Program 1 – Action Item #'s: 1, 2, 3
- Program 2 – Action Item #'s: 8, 9, 10, 12, 13, 17, 18

Water Supply Activities (pg. 23)

- Program 3 – Action Item #'s: 17, 22

Demand Management Action Plan (pg. 28)

- Program 1 – Action Item #'s: 2, 4
- Program 2 – Action Item #'s: 5, 6, 7



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ATTACHMENT B

SENT VIA ELECTRONIC MAIL

October 7, 2010

Ms. Nicole Ewing-Gavin & Ms. Melaney Seacat
City/County Water Study
Tucson, AZ

RE: Action Plan for Water Sustainability

Dear Ms. Ewing-Gavin and Ms. Seacat:

Thank you for the opportunity to comment on the City of Tucson/Pima County Action Plan for Water Sustainability. Attached you will find SAHBA's input on the Draft. As you will see, the primary focus of our comments is in regards to plan activities that increase the cost of development. Given the current economic circumstances and importance of the residential development industry in a recover, additional development costs would have adverse economic consequences. We look forward to your response and the opportunity to work collaboratively on this important matter.

Sincerely,

David Godlewski

Government Liaison, SAHBA

SAHBA Comments on Draft Action Plan for Water Sustainability

October 7, 2010

- Going from the first opportunity for public review (September 16) to the City Council for approval (October 26) in less than 6 weeks is rushed. In addition to a longer comment period, large stakeholder organizations like SAHBA deserve separate briefings/Q&A sessions.
- A truly regional plan or action plan for ensuring our community's sustainable water future requires direct participation of business representatives, private water providers and the other jurisdictions. The business community did not have a seat at the table crafting the Action Plan. It is our hope we play an integral role going forward on developing the activities and implementation.
- The content of the Draft Action Plan is, as previous Water Study documents, very professional. However, the formatting and layout is somewhat a "clunky." In many areas it's hard to read and difficult to follow. Why are the 'Introduction' and 'Action Plan Overview' separate sections separated by 3 pages? What's the difference between "Interconnected Elements," "Programs" and "Goals"? The various sections are not marked or noted as reflected by the Table of Contents. Additionally it's confusing that some of the pages of the different Action Plan Elements have graphics/pictures and some do not. It makes it hard to tell where a section starts and stops. There are some easy fixes that would improve the "readability" of the document.
- The primary concern SAHBA, and our members, have with the Action Plan is the associated increased costs of development with several proposed activities. New development in the Tucson region results in: local economic investment, jobs, sales tax, property taxes and corresponding school funding, permit fees and impact fees. Increasing the cost of development can only go up so much before the cost to develop is no longer economically viable. This is especially true in the price sensitive market conditions we face today. We ask that activities in the report that will, or could, increase costs be postponed. They should not be considered again until the carefully analyzed to ensure the benefits outweigh the costs and the residential and commercial markets return to normal levels. It would be counterproductive if the increased development costs associated with the Action Plan result in less economic investment, less job creation and less revenue from fees and taxes.
- There should be an analysis of the increased costs for public projects, identification of funding sources and a determination of impact on taxpayers.
- Partnership Opportunities Stemming from Action Plan
 - P.5, Economic Collaboration - It's encouraging to see the reference of "Economic Collaboration" and a few Comprehensive Integrated Planning Activities (such as P.10, Program 2, #13) that recognize the importance of a healthy economy and aligning water policies with economic goals. We request a greater emphasis on economic collaboration

and partnership with the business community to craft and implement associated activities.

- P.6, Scenario Planning – It is premature to consider Imagine Greater Tucson is capable of scenario planning especially related to climate change preparedness and drought planning. One of the primary purposes of IGT is to determine our community values. Those values may not align with what is proposed by the Action Plan. We ask that the reference of IGT for this partnership to be removed.

- Comprehensive Integrated Planning
 - Pg. 10, Program 1: General and Comprehensive Plan Updates:
 - #2 – What are the associated costs of “Smart Growth”? If there are increased development costs, this should be taken off the table.
 - #6 – We are encouraged by the recognition to add employment and job centers in the updates to the Plans. However we would discourage an overly prescriptive approach that discourages job creation and economic development such as Tucson’s Water Service Area Policy and maps.

 - Pg. 10, Program 2, Smart Growth Tools and Incentives
 - #10 – We are encouraged by activities that promote mixed uses, well-designed density. SAHBA requests to be part of these discussions and activities.
 - #11 – Revisions to the County’s Cluster Ordinance should only be done if it does not increase development costs and fully vetted by stakeholders and approved by SAHBA. The Action Plan should be modified to reflect this.
 - #12 – The evaluation of improvement districts and potential purchase of natural/riparian areas must include cost/benefit analysis.
 - #13 – We support working with TREO to advance public/private collaboration toward economic base creation and ensuring water resource policies are aligned with economic goals. SAHBA requests to be part of this process.
 - #14 – We support a Land Use Code sustainability audit and request to be part of that process which include identifying opportunities to encourage sustainable form. Based on the professional input of our members, we feel fairly certain, the LUC itself is an impediment to sustainable growth.
 - #15 – New subdivision requirements would almost certainly add costs. This activity should be removed or tabled.
 - #16 - We are encouraged by an activity that would identify and address barriers to infill. SAHBA requests playing a role in this activity going forward.
 - #17 – It’s unclear as to what a “fiscal sustainability model” is. Requiring this for new development projects would likely add costs to development or be implemented to stop growth. We ask this item be removed.

 - P. 10, Program 3, Linking Water and Land Use Planning

- #19 – We support continuing wheeling agreements between Tucson Water and other water providers to provide water outside of the current water service area.
- Respect for the Environment
 - Pg. 12, Introduction – What are the costs and who pays when reservations are made for water for the environment?
 - Pg. 15, Program 1, Collaboration for Environmental Restoration
 - #1 – What are the replacement costs for water dedicated to the CEP? What are the opportunity costs associated with using water in this way? Will the public and/or stakeholders have an opportunity to comment on the CEP?
 - #2 – We ask there is a SAHBA representative on the Regional Restoration Working Group.
 - #3 – Will an inventory of land for riparian restoration be limited only to public lands? SAHBA can not support an inventory of private lands.
 - Pgs. 15, Program 2, Preservation and Protection of Riparian Areas
 - #8 – Adopting and implementing the Lee More Basin Management Plan was presented as an engineering and hydrologic based plan and was not represented as a riparian habitat protection measure. We ask for clarification on this matter.
 - #9 – The revised County riparian mitigation guidelines should only be adopted following thorough stakeholder vetting and a cost/benefit analysis is completed. The Action Plan should be modified to reflect this. If it is determined there are additional development costs associated with the new guidelines, this item should be tabled. Costs to taxpayers should be identified as well.
 - #10 – the sentiments of the comments for item #9 apply for this activity as well.
 - #12 - the sentiments of the comments for item #9 apply for this activity as well.
 - #13 - the sentiments of the comments for item #9 apply for this activity as well.
 - #18 - the sentiments of the comments for item #9 apply for this activity as well.
 - Pg. 16, Program 3, Incorporation of multiple benefit features into capital improvement projects
 - #19 – Costs, funding sources and impact to taxpayers should be identified.
 - #21 - Costs, funding sources and impact to taxpayers should be identified.
 - #22 - Costs, funding sources and impact to taxpayers should be identified.
 - Pg. 16, Program 4 – Refinement of Lower Santa Cruz River Management Plan
 - #23 - Costs, funding sources and impact to taxpayers should be identified.
 - #25 - Costs, funding sources and impact to taxpayers should be identified.
- Water Supply Activities
 - Pg. 21, Program 1, Water Supply and Water Quality

- #1 – We are encouraged by the recognition of the need to acquire new water supplies and recommend identifying costs and financing structures promptly.
- Pg. 21, Program 2, Effluent Management
 - #12 – SAHBA supports an assessment of graywater on sewer systems and would expect that the City’s residential graywater ordinance be repealed if it is document there is a negative impact on the sewer system.
 - #’s 18 and 19 – The feasibility studies associated with these activities should include a cost/benefit analysis, identification of costs, funding sources and impact to taxpayers.
- Pg. 22, Program 3, Regulatory/policy advocacy for effluent/reclaimed water, stormwater and graywater.
 - #22 – SAHBA cannot support any regulations that impose greater development costs related to graywater requirements for residential projects. Any references to graywater requirements should be removed from the Activity Plan.
- Demand Management
 - Pg. 26, Program 1, Planning and Evaluation
 - #2 - SAHBA supports an analysis of the City’s water harvesting ordinance as well as the overall potential for expanded water and stormwater harvesting. This analysis should consider and quantify costs and benefits. We would expect that the City’s rainwater harvesting ordinance be repealed if it is document there the costs exceed the benefits.
 - Pg. 26, Program 2, Consistent standards and guidelines
 - #7 – Neighborhood guidelines for stormwater harvesting would add significant costs to development. We ask this item be tabled or eliminated.