SAHBA
the community builder
Southern Arizona Home Builders Association

Southern Arizona Home Builders Association

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

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SENT VIA ELECTRONIC MAIL

September 5, 2023

Mr. Jacob Herrington
Chair, Planning & Zoning Commission
Town of Oro Valley
11000 N. La Cañada Drive
Oro Valley, AZ 85737

RE: Proposed Changes to Private Recreation Area Requirements

Dear Mr. Herrington:

The Southern Arizona Home Builders Association (SAHBA) represents more than 300 member companies in all segments of the planned residential community development industry. Our developer and builder members have contributed to the growth and prosperity of Oro Valley through the construction of some of the premier master planned communities and subdivisions in the region. While we support the Town's desire to improve the level and amount of park amenities for future residents, we have several comments and concerns on the proposed changes to the Private Area Recreation Requirements that we ask you to consider.

- **Increased Size Requirement:** The change in size required for private recreation areas internal to a subdivision (going from 512sf/unit to 900sf/unit) is costly and strips developers of developable land which could provide additional homes in a housing market where inventory is desperately needed. *We ask the Commission to reduce the park area size requirement.*
- **Relationship Between Impact Fees & Recreation Area Requirements**: We understand the Town's intent in raising the area requirement to be closer to that of Pima County, but the County, nor Sahuarita, charges park impact fees. *We would like to better understand the relationship between the intent of park impact fees and the recreation area requirements as it appears the home buyer is effectively paying twice for park amenities.*
- **Required Park Amenities:** Selecting the type of park amenities for a subdivision depends on the target buyer segment for the particular community. It is a marketing decision best left to the builder. *We request the process of choosing amenities be made as simple and as flexible as possible. The applicant should have an opportunity to work with Town staff on determining the appropriate type of amenity and not the prescribed approach of the current draft.*
- **Clean Up and Clarification on Certain Code Changes:** We have identified areas in the proposed language where there seem to be inconsistencies or questions about meaning/intent. For example:
  - Section 26.5.B.1, 'Pre-plats' are referenced and then the terms 'construction plans' and 'development plans' seem to be used interchangeably when they are in fact different things.
  - Section above Table 26-1 and section below are duplicate "C"s.

  We ask for an opportunity to work with Town staff to address these issues.
- **Review and Approval Process:** There are many approval requirements in different parts of the process (i.e. staff approval, Town Council approval, Planning and Zoning Administrator approval , Parks and Recreation Advisory Board approval, Parks Director approval, etc). These different layers make the process complex and likely increase time. *We ask the Commission to recommend staff streamline the process to make it simpler and easier to understand for all involved.*

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- **Increased Shade Requirements:** Doubling the size of shading required will add tens of thousands of dollars in cost. It would also result in extremely large monolithic structures. *We ask the Commission to reduce the proposed amount of required shade to be more in line with what is currently required.*
- **Housing Affordability:** As the demographics of the Town evolve, and more and more families choose to call Oro Valley home, the reduction of land available for homes in a subdivision and added costs will price many families out of the market. *We encourage the Commission to take into consideration the impact on housing affordability.*
- **Additional Credit for Trails/Paths**: Walking on trails and paths is a popular means of exercise and recreation. *Therefore, we ask that walking paths and trails are counted towards the required square footage of the neighborhood's private recreation area regardless of width or size so long as they include trash receptacles, benches, etc.*
- **Use of In-lieu Fee Option:** The proposed changes reduce flexibility in the use of an in-lieu fee. *We request that the in-lieu fee option remain the same*.
- **Consolidating Recreation Areas:** While in concept consolidating recreation areas within a subdivision may seem to be the most practical approach, in most cases there is a preferred location strategy for a particular subdivision. It is also extremely difficult to consolidate parks between two subdivisions and would not support this being a requirement. The proposed changes are too prescriptive and should be more carefully developed. *We request the opportunity to work with staff on this provision and that allowing two or more rec areas be an administrative decision.*

In conclusion, we thank you and Town staff for hearing from stakeholders on the proposed changes. We offer these comments with the goal of working together to reach the objectives of the Town while providing flexibility to builders and maintaining affordability for home buyers. We look forward to the continued conversation on this topic and stand ready to work with you on finalizing the new requirements.

Sincerely,



Jennifer Barroso, *Government Liaison*
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CC: Daniel Sturmon, Vice Chair
Skeet Posey, Commissioner
Kimberly Outlaw, Commissioner
Phil Zielinski, Commissioner
Joe Nichols, Commissioner
Anna Clark, Commissioner
Milini Simms, Principal Planner