SAHBA
the community builder
Southern Arizona Home Builders Association

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July 12, 2023

Mr. Eric Shepp, P.E.
Director and Chief Engineer
Pima County Regional Flood Control District
201 N. Stone Ave., 9th Floor
Tucson, AZ 85701

RE: Proposed Changes to Riparian Habitat Mitigation Guidelines

Dear Mr. Shepp:

Thank you for the opportunity to comment on the proposed changes to Pima County Regional Flood Control District's (PCRFCD) Riparian Habitat regulations and procedures. As you know, these regulations directly affect the feasibility of residential development projects and the affordability of new homes. We appreciate the outreach by PCRFCD and look forward to working with you to finalize the changes. Based on feedback from our members, we offer the following comments:

- **In-Lieu Fee Increase:** The one-time increase of 34% is significant and concerning. We estimate this would equate to thousands of dollars of an increase in additional costs per lot depending on the type of disturbance. While we understand the ordinance allows PCRFCD to adjust the fee for inflation, we would like to be better informed about how the fees are being used and how the current fee amount is insufficient in achieving those objectives. Therefore, we request an opportunity to meet with you and collaborate on an alternative solution that would bring us both satisfactory results. At a minimum, we request the proposed increase be phased over 3-5 years.

- **Submitting Mitigation Plans to the Board of Supervisors:** Allowing mitigation plans to be administratively approved would make the process easier for our members and PCRFCD. We support this proposed change.

On behalf of our members, thank you for working with us. We look forward a follow up meeting soon to discuss the in-lieu fees.

Sincerely,



Jennifer Barroso, *Government Liaison*
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