Southern Arizona Home Builders Association

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PRESIDENT & CEO
David M. Godlewski

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SENT VIA ELECTRONIC EMAIL

May 5, 2026

The Honorable Joe Winfield
Mayor, Town of Oro Valley
11000 N. La Canada Dr.
Oro Valley, AZ 85737

RE: Council Meeting 5/6/26, Town of Oro Valley General Plan

Dear Mayor Winfield:

The Southern Arizona Home Builders Association (SAHBA) representing more than 300 member businesses who take pride in providing housing for thousands of families each year and contributing to the strength of our regional economy. As an industry, we are committed to building high-quality homes and creating vibrant communities.

As the voice for that industry, SAHBA advocates for sound planning policies and a regulatory environment that supports housing development and economic growth. Providing flexibility in land use and development standards is critical to meeting the needs of current and future residents, including workforce households, young families, and retirees.

The Town of Oro Valley has long been recognized as a desirable community for homebuyers, and the General Plan Update presents an important opportunity to ensure a policy framework that supports a diverse range of housing types and price points.

We have reviewed the different drafts of the General Plan and found many of the proposed land use goals and policies directly influence the feasibility, availability, and affordability of housing. Throughout the process, SAHBA has provided substantive comments, highlighting areas of positive change and areas of concern. We are appreciative of the opportunity to engage with Town staff who responded to our comments and sought to reflect our input where it was deemed appropriate.

As the Town implements the Plan, including applying land use policies to new development, we encourage careful consideration of how it will impact housing supply and cost. A regulatory framework that is predictable, balanced, and responsive to market conditions will be essential to ensuring that housing opportunities can keep pace with demand.

SAHBA values its relationship with the Town of Oro Valley and strongly supports a continued collaborative approach. By working together, we can help ensure that the General Plan fosters a regulatory environment that enables quality development, expands housing choice, and supports the Town's long-term vitality.

We appreciate your leadership in this effort and look forward to ongoing partnership as the General Plan moves forward.

Respectfully,

David M. Godlewski
President & CEO

cc: Honorable Council Members. Ms. Milini Simms

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March 16, 2026

Milini Simms
Town of Oro Valley
1100 N. La Canada Drive
Oro Valley, AZ 85737

Dear Milini:

Thank you for the outreach to SAHBA throughout the General Plan process. Following a review of the OV Path Forward ninety percent draft, the Southern Arizona Homebuilders Association would like to share a few more observations.

- The use of words and phrases in Plan policies is important. Language that reduces barriers, increases flexibility and incentivizes development options is recommended. Language that mandates certain policies has the opposite effect. We would again request use of words that “encourage” rather than “require.”
- We are concerned that some elements of the plan such as requiring specific building colors, requiring gray water, updating or expanding design guidelines are likely to raise the costs housing, making Oro Valley a less desirable place to build. These should be removed.
- For any policy, prior to adoption or implementation, there should be an analysis to determine the cost/benefit to the builder and homeowner. If it adds costs and/or makes it harder to build, it will impede inventory and affordability and should not be implemented.
- We appreciate the policies that seek to support a variety of housing types particularly with the goal of increasing homeownership for all demographics.
- We do want to note medium density housing is what has made Oro Valley a premier destination for high-income earners to raise their families and a vibrant town. This type of housing remains important for its future and should not be discouraged.
- We still have significant concerns regarding the proposed policies under the general K.1 (Ex. 123 Limit the amount of grading on individual residential lots by updating the zoning code to add site coverage requirements for all new developments). These policies will discourage home building. We request additional information about what problem these policies are intended to solve.
- While we recognize the Arroyo Grande Special Area Policies are a carryover from the current General Plan, we ask the Town to work in collaboration with the State Land Department, and any potential applicant, to develop an approach that maximizes the utility of the land for housing and economic growth.

In closing, we would welcome an opportunity to meet with you and your colleagues to discuss these items and others to finalize the plan in a way that achieves the objectives of the Town, its residents and the home building community.

Respectfully,

David M. Godlewski
President & CEO

SAHBA
the community builder
Southern Arizona Home Builders Association

General Plan Comments – June 2025

ITEM	COMMENTS	RECOMMENDATION
Policy I.1		
Require the expansion of conservation areas and other integrated open spaces in new development proposals.	Given the already limited amount of developable land within town boundaries, this would diminish land use potential resulting in fewer homes built.	Delete or replace with *"Incentivize the expansion of.."*
Action I.1.2.		
Implementing context-sensitive site designs to allow habitat corridors in new development areas with the surrounding land	To what extent? Where is this envisioned? Likely impedes development and increases housing costs.	Change to "encourage" or eliminate.
Action I.2.2.		
Protect wildlife habitats with all new developments by preserving: • Dense clusters of significant native vegetation, such as saguaros, Ironwoods, and Mesquites. • All healthy heritage saguaros (24 feet or taller with 2 or more arms) and mature Ironwood trees in place.	Is this not occurring already or egregious examples of removing these? Who determines/defines "significant native vegetation"? Could significantly reduce amount of developable land.	
Action I.3.2		
• Developing new and improving existing land use regulations that promote infill.	Additional information requested; where/how many infill opportunities? Sounds good but is it realistic?	A better approach would be to add language to express support for rezoning of low density residential to higher-density residential.
Action J.1.3		

Limit the amount of grading by updating the zoning code to add site coverage requirements for all new developments.	Please clarify. What is the intent of this policy? Very likely to increase the cost of building.	Request removal.
Policy M.1		
Encourage new development and redevelopment projects to utilize energy efficient, green and sustainable building materials.	Adds expense. Allow market to determine. Builders are already exceeding energy efficiency standards established by Code.	Action items are too specific for a general plan. Eliminate all action items except Action M.1.3 – this is all that is needed
Action N.3.1		
Facilitate private charging stations in single-family homes by: • Updated building codes • Promoting and distributing information	Insufficient market adoption of EV's to warrant this requirement.	Delete this action and allow individual home buyers to determine.
Action O.2.1		
Underground (utilities) to protect mountain views.	Clarification needed; who will absorb these costs?	
Action O.3.2		
Provide information about the benefits, options and rebates available to increase energy efficiency in homes, such as converting gas to electric	Rebates are going away. Consumers prefer having choices. Natural Gas is less expensive than electric.	Remove.
Policy P.1		
Reduce residential and commercial outdoor water use.	How do you intend to do this? Metrics? What is the reduction goal? What's not working today?	Unless reasonable standards based on industry input can be established, remove.

Action P.1.4		
Review and potentially update PASSIVE AND ACTIVE rainwater harvesting requirements for subdivisions and non-residential developments to reflect best practices.	What has not worked w/ current requirements?	There are already requirements in place, this is unnecessary and should be removed.
Action P.1.5		
Support community pools in-lieu of individual pools in residential subdivisions during the development review process.	Please clarify how this would be implemented.	The Town should not be interfering with property rights of home owners.
Action P.3.2		
Update building codes to ensure new development is gray water ready.	Our experience w/ similar City of Tucson ordinance showed very households actually used gray water systems despite added costs of construction.	Delete
Action S.1.1		
Regularly CONTINUE TO update impact fees AS REQUIRED BY STATE LAW to ensure developers pay their fair-share of the APPROPRIATE costs associated with expanding infrastructure and public services, such as transportation, water, and emergency services.	This is currently covered by State requirements. Is this statement needed in the General Plan?	Delete

Action S.1.2		
Negotiate development agreements and explore other cost-sharing mechanisms to fund major infrastructure and public facility improvements that provide necessary community benefit.		Support
Action V.3.4		
Continue to require developers to provide pedestrian and bicycle access to schools, parks, shopping and employment opportunities.	Why this specific? To what distance are builders responsible?	
Policy Y.3		
~~The Town will~~ Explore opportunities to reduce housing costs without providing local subsidies.	Many of the other proposed policies increase costs of building housing and therefore directly conflict with this goal.	Remove policies that will add costs.
Action Y.1.2		
Review development proposals for affordable ATTAINABLE housing to ensure: • High-quality design • Compatibility to the surrounding area • Safety	Clarification needed. How will this be defined? Will “attainable” housing be an expectation for every new development?	

Action Y.5.1		
Develop zoning incentives to encourage the development of housing types like townhomes, duplexes, condos, or other similar products.		Support
Action Y.5.2		
Evaluate and identify vacant commercially ZONED land (C-N, C-1 OR C-2) where higher-density residential, like townhomes, condos, 1-2 story apartments, or other similar housing types, is appropriate to support nearby commercial		Support
Policy Y.6		
Prioritize residential development beyond the pervasive medium-density single-family housing type.	This has been OV's philosophy since it was founded.	Delete the word *"pervasive"*
Policy AA.1		
Support the development of low-rise mixed-use projects to increase OV's housing supply and support long-term economic vitality	Given the lack of available land, OV should consider height to allow for increased density along appropriate major corridors.	

Policy AA.3		
Limit 2-3 story apartment communities to targeted sites along major roads that are near commercial areas and significantly distant from single-family residential.	Appears to conflict with other stated policy objectives. Best addressed through zoning code and not in the General Plan.	Delete
Separated from existing single-family subdivisions by: • Enhancing setbacks unless a physical barrier, such as topography, washes, roadways, etc. Exist.	Conflicts with other stated goals of compact development and infill.	Delete
Goal BB		
Support diverse land uses that meet the Town's overall needs and effectivity transition in scale and density from existing developments.		Change to: *" Support diverse land uses that meet the Town's overall needs in scale and density."*
Policy BB.1		
Identify specific areas for targeted growth to support a variety of housing types, mixed use or employment.	This policy appears to severely limit the Town's options.	Delete

Action BB.1.1		
Update standards for new Planned Area Developments and Planned Residential Districts to reflect resident priorities for mixed use, a greater variety of multi-family and single-family housing, and employment areas.		May support but need more details.
Action BB.1.2		
Facilitate the development of a greater variety of multi-family and single-family housing types, mixed use and employment USES by: • Identifying suitable locations	Developers are best suited to make location decisions.	Delete *"Identifying suitable locations"*.
Action BB.3.3		
Incorporate a diverse range of housing types in large master planned communities and annexations.		Replace the word *"Incorporate" w/ "Encourage"*
Policy CC.1		
~~Maintain~~ REQUIRE high quality design standards that reflect Oro Valley's character and views.	This makes housing LESS affordable.	Delete

Action CC.1.1		
Update and enforce design standards that ensure compatibility to surrounding areas, blend with the natural environment and protect views.	Would make housing less affordable.	Delete

David Godlewski

From: Brendan Lyons
Sent: Wednesday, March 5, 2025 5:03 PM
To: Simms, Milini
Cc: David Godlewski
Subject: Oro Valley 10-Year Plan – Housing & Development Stakeholder Process

Hi Milini,

Thank you for including SAHBA in the stakeholder process for Oro Valley's 10-year plan. We appreciate the Town's commitment to engaging a broad range of perspectives, and we appreciate the opportunity to contribute to the discussions on housing and development.

Below are answers to your questions that are reflective and representative on behalf of the industry. We look forward to further discussions and engagement.

Have you been involved in residential or commercial development in Oro Valley?

Yes, on behalf of our membership, the Southern Arizona Home Builders Association actively represents home builders, developers, and industry professionals engaged in supporting responsible growth and economic development in Oro Valley.

What are some reasons why you or your clients choose to develop in Oro Valley? *(Please select all that apply)*

Oro Valley offers a high quality of life, a safe community, and access to a skilled workforce. The town's desirable location, excellent schools, and growing economic opportunities make it an attractive place to live and work. However, continued success depends on ensuring housing is attainable for working families and that businesses can thrive in a balanced regulatory environment.

What are some barriers to developing in Oro Valley? *(Please select all that apply)*

The limited availability of vacant land, restrictive zoning regulations, and high development costs—such as permitting fees and impact fees—create significant challenges. Additionally, lengthy review processes and unpredictable public decision-making can deter investment and slow project completion.

If you could change one thing about developing in Oro Valley, what would it be?

Oro Valley should take a stronger approach to housing. By proactively approving rezonings would allow for a greater variety of housing options. Streamlining the permitting and approval process would make development more predictable and cost-effective. Additionally, the Town should work with the State Land Department to annex more land, ensuring there is room for responsible growth that supports both housing and job creation.

Over the past year, residents have prioritized the need for more affordable housing in Oro Valley. How can the Town encourage the development of affordable housing?

The Town can collaborate with private sector partners to create incentives that support attainable housing for working professionals. This includes reducing impact fees, expediting approvals for housing projects, and integrating a range of housing types into zoning plans. Ensuring economic feasibility for development projects is crucial to delivering housing solutions that meet community needs.

Over the past year, residents have prioritized the need for more housing options, such as townhomes, patio homes, and duplexes in Oro Valley. How can the Town encourage development of these low-rise, higher-density housing types?

By modernizing zoning codes to support mixed-use and higher-density developments, Oro Valley can expand housing options while maintaining community character. Incentivizing these housing types through reduced fees, density bonuses, and clear approval pathways will make it more viable for builders to meet demand.

Are there noteworthy areas or other potential development opportunities Oro Valley should explore in the future?

Future development should focus on areas where infrastructure can support growth while minimizing costs to residents and businesses. The Town should work collaboratively with the private sector to identify strategic locations for mixed-use and workforce housing projects, ensuring a sustainable balance between economic vitality and community needs.

It is our sincere hop that before advancing or recommending any policy position, the Town of Oro Valley will ensure thorough consideration and evaluation of economically sound strategies that provide balanced benefits to both private and public stakeholders.

Thank you once again!!

BT Lyons

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