

## **SAHBA Comments on Pima Prospers 2025 Comprehensive Plan**

These comments aim to offer constructive recommendations with a focus on increasing housing affordability, streamlining the development process, and ensuring market-responsive policies that balance conservation, infrastructure, and economic growth.

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### **SECTION 1: INTRODUCTORY COMMENTS**

#### **1.A: Introduction**

**Comment:** The introduction recognizes regional planning efforts but underplays residential development's role in economic growth and housing.

**Recommendations:**

- Explicitly recognize homebuilding's role in job creation and housing affordability.
- Promote streamlined permitting and zoning flexibility.
- Balance conservation and growth goals.

**On Housing Shortages:**

- Link housing shortages to regulatory constraints and land availability.
  - Include policies that support infill, greenfield development, and fast-track approvals.
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#### **1.C: Looking Back**

**Comment:** Historical framing is important but should not justify limiting developable land.

- Recommendations:
- Acknowledge the non-developable nature of nearly half the county's land.
- Avoid using conservation as a barrier to housing development.
- Emphasize infrastructure and sustainability to support growth.

**On Conservation Mapping (MMBCLS):**

- Allow flexibility and periodic review to adapt to housing needs.
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#### **1.D: Looking Forward – Building Better**

**Comment:** Smart growth advocacy is valuable but must recognize suburban housing demand.

**Recommendations:**

- Validate low-density housing as a legitimate option.
- Use smart growth flexibly to include infill and master-planned suburbs.
- Clarify critiques of suburban development and affirm its benefits when well-planned.

**Key Topics & Responses:**

- **Suburban Critique:** Not all low-density is inefficient. Master-planned communities meet affordability and sustainability goals.

- **Housing Costs:** Identify and address regulatory barriers like fees, zoning, and timelines.
- **Land Availability:** Infill alone cannot meet housing demand; greenfield development must be part of the solution.
- **Infrastructure Costs:** Infill can be costly—greenfield should be equally supported.
- **Diverse Housing Types:** Expand policies to encourage townhomes, duplexes, and ADUs through zoning reform and incentives.

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## **SECTION 2: BUILT & SOCIAL ENVIRONMENT**

### **2.A: Land Use Element**

#### **GOAL 2.A.1 – Population Density:**

- Identify causes of housing shortages and expand development-ready land.
- Better align long-range planning with real-time permitting.

#### **GOAL 2.A.2 – Smart Growth:**

- Smart Growth and CLS reduce land supply—use flexibly.
- Avoid discouraging infrastructure in rural areas with potential.
- Incentivize mixed-use development and infill.

#### **GOAL 2.A.3 – Balanced Land Use:**

- Support flexible, market-responsive development.
- Density must be supported by clear entitlement pathways.

#### **GOAL 2.A.4 – Development Services:**

- Avoid overly strict conformance standards.
- Streamlining efforts must include timelines and dashboards.
- Stakeholder engagement should not slow approvals.
- Monitor affordability and production metrics.

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### **2.D: Housing Element**

**Comment:** The plan acknowledges housing shortfalls but lacks implementation mechanisms.

#### **Recommendations:**

- Set production targets by type and jurisdiction.
- Create a Housing Action Plan with private-sector input.

#### **Policy-Specific Feedback:**

- Reform zoning to enable faster, more diverse housing development.
- Incentives over mandates for affordability in low-poverty areas.
- Encourage missing middle and HUD-code manufactured housing.
- Restore multi-family housing production via permitting reforms.
- Streamline administrative processes and expand by-right zoning.

- Incentivize sustainable housing features.
  - Use county-owned surplus land with clear, inclusive RFPs.
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## **2.E: Neighborhoods and Communities**

- Define “suitable locations” for mixed-use clearly.
  - Avoid overuse of preservation goals.
  - Allow rural growth with infrastructure.
  - Prevent compatibility requirements from stifling redevelopment.
  - By-right density is critical in designated areas.
  - Incentivize heat mitigation and community development funding should tie to housing.
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## **2.F: Wastewater Reclamation**

- Technology use should not delay permits.
  - Proactively expand beyond current service areas.
  - Include industry in reviewing wastewater fee impacts.
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## **SECTION 3: NATURAL, PHYSICAL, AND CULTURAL RESOURCES**

### **3.A: Environmental Planning**

- CLS mitigation ratios (4:1, 2:1) restrict land—allow flexibility and off-site mitigation.
  - Don’t tie transportation changes to development approvals.
  - Avoid rural development limits based on water provider size.
  - Incentivize rather than mandate heat mitigation.
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### **3.B: Open Space**

- Avoid overusing Smart Growth and conservation to restrict land.
  - Clarify mitigation expectations.
  - Coordinate with stakeholders without delaying approvals.
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### **3.C: Water Resources**

- Don’t limit growth in groundwater areas—invest in infrastructure.
  - Keep WSIR advisory.
  - Balance water conservation with economic needs.
  - Land-use water protections must avoid blanket bans.
  - Use peer-reviewed science.
  - Don’t delay projects in the name of coordination.
  - Avoid burdensome conservation mandates.
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### **3.D: Flood Control**

- Don't over-preserve minor washes.
  - Share responsibility for regional drainage.
  - GI/LID should be incentivized.
  - Provide clear resolution for zoning/floodplain conflicts.
  - Restoration should be voluntary or allow fee-in-lieu.
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## **SECTION 4: ECONOMIC ENVIRONMENT**

### **4.A: Business Retention & Expansion**

- Streamline permitting with metrics.
  - Avoid excessive buffers near job hubs.
  - Support entrepreneurship through zoning and infrastructure.
  - Offer predictable, automatic incentives.
  - Balance maker space with broader infrastructure needs.
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### **4.B: Business Attraction**

- Ensure land use readiness and shovel-ready sites.
  - Simplify incentives and streamline development processes.
  - Align marketing with economic impact.
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### **4.C: Infrastructure & Workforce Development**

- Evaluate water policy by economic return.
  - Link broadband with housing/employment.
  - Align transportation with growth areas.
  - Keep sustainability efforts incentive-based.
  - Entitle county land transparently.
  - Prioritize development readiness in land sales.
  - Use market analysis to support investment.
  - Avoid quality-of-life standards that restrict growth.
  - Tie workforce initiatives to housing.
  - Be cautious about influencing private labor practices.
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### **4.D: Attractions and Tourism**

- Ensure zoning flexibility for visitor-serving uses.
  - Balance preservation with adaptive reuse.
  - Streamline reviews for tourism-related projects.
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SAHBA urges the County to:

- Embrace flexibility in implementing Smart Growth and environmental goals.
- Reform zoning and permitting to promote affordability.
- Collaborate continuously with industry partners.
- Ensure that housing, infrastructure, and economic growth policies reflect the real-world development landscape.