SAHBA
the community builder
Southern Arizona Home Builders Association

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October 17, 2023

The Honorable Joe Winfield
Mayor of the Town of Oro Valley
11000 N. La Canada Drive
Oro Valley, Arizona 85737

RE: Proposed Update to the Private Recreation Area Standards

Dear Mayor Winfield:

SAHBA appreciates the opportunity to provide input on the proposed updates to the Zoning Code with respect to the private Recreation Area standards. Our members have engaged in multiple meetings with planning staff as well as provided written comments prior to the Planning & Zoning Commission Hearing. While we appreciate that some of the ideas shared with Staff did support better clarity and functionality in the proposed update, we still have some substantive concerns about the overall effects of implementing the proposed changes.

The proposed update will negatively impact both housing supply and affordability in the Town of Oro Valley. The consolidation of the recreation areas inside of a subdivision, coupled with the increase in the required total recreation areas, will result in less land available on which to build homes in each community. Further, the increases to the number of required amenities in each park and the higher costs associated with providing these amenities will result in higher home prices as the cost burden of development increases. As home prices rise, sales paces will slow.

We would request your consideration of the following as you review the proposed update:

- The proposed update to 900 SF/unit increases the required recreational area by 76% resulting in the highest area requirement in the region and reduces the number of homes constructed in a given subdivision. Although Pima County's requirement is nearly as high at 871 SF/unit, the less urban, less dense nature of unincorporated Pima County makes County owned facilities less accessible and thereby increases the need for private neighborhood parks.

  We request the increase in required park area be limited to a 50% increase over current standards, resulting in 768 SF/unit. This is more in line with the standards in Sahuarita at 723 SF/unit, while still higher than the 200-502 SF/unit Marana requirement. There is no requirement in the City of Tucson.

- Home builders nationwide are expanding their home options to include smaller patio homes, z-lot projects, duplexes and condominiums in order to meet demand across a broader price range. While the lower recreation requirements applicable to multifamily projects may not be appropriate for these types of developments, the higher single-family requirements may also be inappropriate.

We request a separate requirement for these "hybrid" types of projects be added that splits the difference between the final amount applicable to single family residential and the final amount applicable to multifamily projects.

- The shading requirements for playground structures dramatically increased to a 100% coverage requirement. We appreciate the condition approved by Planning & Zoning to allow for secondary structures, like swing sets, to be unshaded, but are concerned about the tens of thousands of dollars the increased shading for primary structures will cost.

  We request the shade coverage percentage be reduced to 50% with the addition of flexibility given to a combination of canopy trees or other innovative shade options to account for a portion of the required shading.

- The proposed update includes revisions to the definition of Active and Passive Amenities and the list of examples that would represent each type of amenity with the requirement of one active and one passive amenity for each ½ acre. There is concern that the proposed language regarding how the credits for enhanced amenities will be determined lacks detail and creates uncertainty. For example, is there a certain dollar value associated with the proposed enhanced amenity that warrants a credit? Additionally, the proposed Code appears to provide the Mayor & Council broad discretion to dictate specific amenities (D.2.F on pg. 13).

  We request clarification on how credits for enhanced amenities will be determined and modify the language to indicate the Council may approve the use of amenities not found in Table 26.2 but not prescribe specific amenities in a specific subdivision.

- The standard of applicability for the code applies to all lot sizes smaller than what is permitted by the R1-36 zoning (except as provided for in the flexible design option). This high standard would effectively require all non-custom development to be held to the new, more stringent standard when lot sizes of 10,000 square feet or greater provide homeowners enough land to choose the types of recreational spaces that are appropriate for them on their own property.

  We request that the applicability standard be revised to add R1-10 and R1-20 to the list of excepted zoning districts.

We appreciate the commitment of the Town of Oro Valley to provide its residents with a superior living environment that includes a high standard of recreation options. We nonetheless are unable to support the proposed update to the Zoning Code in its current form given the upward pressure it will place on home prices in the Town, resulting in fewer homes being built and sold. We ask you to consider our concerns and support the proposed requests.

Respectfully,



David M. Godlewski
President & CEO

C: Town Council Members, Mr. Wilkins, Mr. Melcher, Mr. Vella, Ms. Simms, Mr. Standish