

The Tucson Association of REALTORS® appreciates the opportunity and consideration of its review of the draft General Plan.

With stagnant housing permit production and a persistent lack of diverse housing options, Tucson is falling far short of meeting the projected demand for tens of thousands of new housing units. Simply put, the city will not solve this crisis by repeating the policies of the past. This is an opportunity which requires bold action—drafting a General Plan that prioritizes actual housing production, not just process-driven rhetoric that stalls development.

Key Concerns:

1. Lack of Emphasis on Housing Production & Affordability

- While **A.6** supports income-restricted housing for residents below 80% AMI “when feasible,” this language is too weak. The plan should include stronger commitments to increasing the housing supply at all income levels.

Suggested change: "Support income-restricted housing options and actively implement policies that expand affordable and workforce housing opportunities across all income levels."

- Missing are explicit policies to reduce development costs, streamline approvals, or incentivize a greater range of housing types (e.g., duplexes, townhomes, micro-units, and missing middle housing).

Suggested change: "Encourage regulatory reforms to allow for a diverse mix of housing types, streamline permitting processes, and reduce development costs."

2. Regulatory & Zoning Barriers

- **A.3** suggests Planned Area Developments (PADs) or overlay districts but does not explicitly address reducing zoning barriers that limit housing density or mixed-use development.

Suggested change: "Expand the use of zoning reforms, including by-right development approvals, reduced parking mandates, and increased density allowances in appropriate areas to promote housing affordability."

- There is no mention of reforming restrictive zoning (e.g., minimum lot sizes, parking mandates) or expediting permitting, which would make housing development more efficient and cost-effective.

Suggested change: "Implement fast-track permitting and by-right approvals for projects that include affordable housing or mixed-use developments."

3. Economic Growth & Wages

- A.7 supports existing businesses, but there is no direct strategy to attract higher-wage industries or address the city's reliance on low-wage jobs.

Suggested change: "Encourage economic development policies that align with housing growth to attract higher-wage industries and ensure workforce housing is available near job centers."

- The plan should link economic development with housing growth to ensure that workforce housing is available near job centers.

4. Development Costs & Feasibility

- Policies like A.4 (limiting drive-throughs) and A.20 (sensitivity to site conditions) could unintentionally increase costs for developers by imposing additional design constraints.

Suggested change: "Balance urban design and pedestrian safety goals with policies that maintain financial feasibility for new developments."

- A.17 references "Vulnerable Populations" data, but without clear policy actions, it lacks meaningful impact. The plan should include direct strategies for reducing fees, offering tax incentives, or implementing fast-track permitting for workforce and affordable housing.

Suggested change: "Implement direct incentives such as fee reductions, density bonuses, and fast-track approvals for projects that include workforce housing."

5. Redevelopment & Infill Challenges

- A.8 and A.20 support adaptive reuse and infill, but there are no specific policies addressing the cost barriers of redeveloping older properties or underdeveloped sites.

Suggested Change: "Establish financial incentives such as density bonuses, fee reductions, or infrastructure investments to make infill development more viable."

General recommendations for the Plan:

- **Stronger commitment to housing growth** across all price points, not just income-restricted units.
- **Reduce zoning and permitting barriers** to allow more housing types and faster project approvals.
- **Tie economic development to housing production** by ensuring housing is built where jobs are located.
- **Implement financial incentives for housing construction** to offset the costs imposed by environmental, historic, and infrastructure policies.

The draft Plan's goal of inclusivity won't be achieved if policies only focus on one end of the housing continuum or if we continue to promote the planning efforts and policies of the past several decades. This is a pivotal opportunity for the City of Tucson to align its policy decisions with its public commitments to increasing housing supply, ensuring that all Tucson residents—not just those who participate in the planning process—benefit from a city that is growing, inclusive, and affordable.

We appreciate the efforts of planning staff in developing this draft Plan.

Thank you for your consideration of our comments.

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