

**DRAFT**

**WILDCAT  
SUBDIVISION  
STUDY**

*1998*

**PIMA COUNTY, ARIZONA**

County Administrator's Office



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# MEMORANDUM

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Date: April 10, 1998

To: The Honorable Chairman and Members  
Pima County Board of Supervisors

From: C.H. Huckelberry  
County Administrator 

Re: Wildcat Subdivision Study

On February 24, 1998, in my report to the Board on urban growth, I indicated that one of the most pressing growth related problems was the proliferation of wildcat subdividing. The attached report documents several areas in Pima County where this problem persists.

Wildcat subdivision, or lot splitting, is generally defined as the proliferation of new residential parcels without the benefit of subdivision regulation. Often these areas are devoid of any basic infrastructure, standard environmental regulation, subdivision standards, or infrastructure requirements. Such items are commonplace in the regulation of subdivided land.

### Major Contributor to Urban Sprawl

Wildcat subdivision is a major contributor to urban sprawl. In 1997, 41 percent of all new residential dwelling units in Pima County were permitted for properties not subject to subdivision development standards. Unregulated lot splitting generally occurs in the periphery of the community. As indicated in the attached study, within each section of land, which comprises one square mile, regulated development contained 458 parcels per square mile. In unregulated development there was an average of 179 parcels. Stated another way, there was almost three times the land consumed per residential parcel in unregulated development as opposed to regulated subdivisions.

### Enforcement of Environmental, Floodplain and Grading Requirements - Difficult, If Not Impossible

Glancing at the aerial photography in the report that contrasts regulated development with unregulated lot splitting, it is easy to see that certain parcels of property that contain unique and sensitive Sonoran desert vegetation have been cleared from border to border. Floodplains and washes have been encroached upon. In essence, development occurs without regard to the natural environment. There is a huge contrast between the sensitivity of regulated development to the natural environment as opposed to lot splitting.

### Areas that Lack Basic Infrastructure

Basic infrastructure such as paved roads, adequate drainage, utilities, water, and sewage disposal are essentially absent in wildcat subdivisions. The residents of these areas often expect the County to provide services similar to subdivided areas. They want their roads maintained; they want adequate and safe water supplies. However, to provide such, significant investments in infrastructure must be made in these areas, often at the expense of every other taxpayer in Pima County.

**Tax Base Implications**

The attached report also indicates that the taxable value of property in lot split areas is usually significantly less than that in regulated subdivisions. In essence, the taxable value of property is significantly less. Therefore, it is probable that governmental expenditures to provide services to these areas are significantly greater than any tax receipts. As has been discussed in previous debates on urban growth, the question has risen, does growth pay for itself? The answer has often been that in the area of regulated growth it may not pay for itself. Posing the same question of growth in unregulated areas, or wildcat subdivisions, it is obvious that growth by lot splitting or wildcat subdivisions does not pay for itself.

**Summary**

While there has been, and will continue to be, considerable discussion and debate on the issue of growth, any attempt to increase growth restrictions and regulations, whether they be initiative, referendum, ordinance, or policy, will be grossly incomplete unless they address this problem.

CHH/jj

Attachment

**WILDCAT  
SUBDIVISION  
STUDY**

*1998*

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# **WILDCAT SUBDIVISION STUDY**

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**PART I:  
INTRODUCTION**

*Wildcat Subdivision Study*

**INTRODUCTION**

Pima County grows by about 6,000 new residential dwelling units each year. While many of the new units are constructed within planned subdivisions in the immediate Tucson metropolitan area, County staff reviews as many as 15 to 70 new proposed subdivisions for the unincorporated area on an annual basis. The regulated process of subdivision development creates as few as 300 residential lots, and as many as 3,000 such lots each year. The staff review ensures compliance with County standards for infrastructure and land development requirements.

At the same time the regulated process of subdivision development occurs, the region experiences tremendous growth of another type: unregulated lot splitting. This is sometimes called "wildcat" subdividing. Such lot splitting results in the creation of entire residential communities with little or no infrastructure or services provided. The legal loophole which facilitates this phenomenon is discussed below.

Permit data provides what is probably a conservative estimate of the magnitude of wildcat lot split activity. In 1997, a total of 3,729 new residential dwelling units received permits in unincorporated Pima County. Of this, 1,525 -- or 41% -- of the new units were not part of platted subdivisions. Furthermore, in 1994 and 1995, Pima County reviewed over 1,700 permit applications for septic systems each year. This volume of septic system review tends to confirm other permit data which indicates that a significant number of new dwelling units are created in unregulated lot split areas.

This report (1) addresses legal and practical aspects of lot split activity through a question and answer format; (2) identifies some of the trends and underlying data related to this dimension of growth; (3) compares density in regulated and unregulated development and thereby begins to quantify the impact that each activity has on sprawl; (4) compares the full cash value of the land and improvements to measure tax base implications of both forms of development; (5) examines unregulated and regulated subdivisions in case studies of impacted areas; (6) summarizes these findings; and (7) includes provisions from past memoranda which reveal the longstanding nature of this problem.

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**PART II:  
QUESTIONS & ANSWERS  
UNREGULATED LOT SPLITTING**

*Wildcat Subdivision Study*

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**QUESTIONS & ANSWERS:  
UNREGULATED LOT SPLITTING**

- #1. WHAT IS THE CURRENT LAW WHICH FACILITATES UNREGULATED LOT SPLITTING?
- #2. HOW DOES THE UNREGULATED LOT SPLITTING PROCESS REALLY WORK?
- #3. WHAT IS THE BASIC PROBLEM WITH UNREGULATED LOT SPLITTING?
- #4. WHAT INCENTIVES LEAD TO UNREGULATED PRACTICES?
- #5. WHAT PROBLEMS RESULT FROM LOT SPLITTING?
- #6. WHAT IS THE IMPACT OF LOT SPLITTING ON SPRAWL?
- #7. WHAT IS THE IMPACT OF LOT SPLITTING ON THE TAX BASE OF PIMA COUNTY?

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QUESTION #1:

WHAT IS THE CURRENT LAW WHICH  
ALLOWS UNREGULATED LOT SPLITTING?

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- **A.R.S. 32-2101(41):**

“‘Subdivision’ or ‘subdivided lands’ means improved or unimproved land or lands divided or proposed to be divided for the purpose of sale or lease, whether immediate or future, into **six or more lots**, parcels or fractional interests.”

- **A.R.S. 11-809(A):**

“For purposes of this chapter, land or lands that are proposed to be divided for purposes of sale or lease into five or fewer lots, parcels or fractional interests, which do not result in a subdivision or subdivided lands as defined in section 32-2101, shall result in lots, parcels or fractional interests each of which comply with the minimum applicable county zoning requirements and have legal access. If no legal access is available, the legal access does not allow access by emergency vehicles or the county zoning requirements are not met, the access or zoning deficiencies shall be noticed in the deed. ... If the legal access does not allow access to the lots, parcels or fractional interests by emergency vehicles, neither the county nor its agents or employees are liable for damages resulting from the failure of emergency vehicles to reach such lot, parcel or fractional interest.”

- **A.R.S. 11-809(B):**

“A county may adopt ordinances and regulations pursuant to this chapter for staff review of land divisions of five or fewer lots, parcels or fractional interests **but only** to determine compliance with minimum applicable county zoning requirements and legal access, and may grant waivers from the county zoning and legal access requirements of subsection A. **The county may not deny approval of any land division that meets the requirements of this section or where the deficiencies are noticed in the deed.** A county may not require a public hearing on a request to divide five or fewer lots, parcels or fractional interests, and if review of the request is not completed within thirty days from receipt of the request, the land division shall be deemed approved.”

- **A.R.S. 11-809(C):**

“It shall be **unlawful for a person or group of persons acting in concert to attempt to avoid the provisions of this section or the subdivision laws of this state by acting in concert to divide a parcel of land into six or more lots or sell or lease six or more lots by using a series of owners or conveyances.** This prohibition may be enforced by any county where the division occurred or by the state real estate department pursuant to title 32, chapter 20.”

- **Conclusion:** The effect of these laws is that divisions of land of five or fewer lots are not reviewed by counties since they are excluded from the definition of subdivision. A plat and the related improvements that are required for subdivisions are not required for lot splits that occur under these circumstances.

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QUESTION #2:

**HOW DOES THE UNREGULATED  
LOT SPLITTING PROCESS REALLY WORK?**

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- **Policy and Practice Differ**

A rationale forwarded in support of unregulated lot splitting rests on the logic that a land owner who would like to make minimal divisions to his or her property should be able to do so without incurring infrastructure costs associated with platted developments. In theory, allowing minor divisions of land is reasonable and protects individual rights without apparent excess cost to the community. In practice, however, unregulated lot splitting occurs on such a large scale that the cumulative result is the creation of residential communities with little if any basic infrastructure or services.

- **Extensive Family Trees**

The scenario of a landowner who surrounds himself with family members in adjoining parcels through the minor lot split practice is not nearly as prevalent as the fact of extended *land genealogies* created by multiple minor lot split transactions. The unregulated lot splitting process in many instances continues within full sections of land -- 640 acres -- until parcels are created that meet the minimum lot size for the effective zoning district.

One property owner splits a parcel five times; the five subsequent owners split their parcels five times; and this can continue until the minimum allowable lot size is reached for that zone. Entire residential communities have been created that resemble subdivisions in terms of population and number of lots created. These subdivisions, however, unbeknownst to many of the buyers, do not contain infrastructure and the other services necessary to serve that population.

Over 8,000 residents live in one community created through the unregulated lot splitting process that has spread over 14 adjoining sections of land. This community is characterized by one acre lots with vehicular access provided by dirt roads along a series of private easements, rather than private right of ways. In the absence of public sewers, the area contains a very high concentration of septic systems.

- **Runaway Lot Split Activity and the Visible Hand of the Wildcat Market**

At its most visible state, multiple transactions of minor lot splitting activity have been carried out between a few parties, who pass increasingly divided parcels back and forth, and sometimes record numerous transactions on the same date. The Arizona Revised Statutes prohibit persons from acting in concert to avoid subdivision law, and this motivates most wildcat speculators to leave a less visible trail. However, Assessor maps and aerial photos of unregulated lot split activity tell the story as it unfolds over the years. Contrary to policy which supports minor lot splits on the ground that the impact is small on the community, few land parcels undergo one time divisions.

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**QUESTION #3:**

**WHAT IS THE BASIC PROBLEM  
WITH UNREGULATED LOT SPLITTING?**

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- **Short List of Troubles**

Unregulated lot split activity adversely impacts the property buyer, local government service delivery, local government tax payers, school districts, emergency service providers and utility providers. Wildcat subdivisions contribute to the problems of sprawl. They also have a negative impact on the tax base. These impacts are discussed in greater detail later in the report.

- **Falling Through the Cracks**

The rezoning and subdivision platting processes are the traditional methods used to review new development projects. The regulated process allows all affected parties the opportunity to examine the impact of the proposed development.

In a regulated process, the local government can ensure that adopted code requirements are met and the impact of the development is mitigated to the extent allowed.

The regulated process also ensures that public facilities exist to serve the new development, including wastewater capacity, roadway capacity, flood control improvements, school capacity, etc....

No such requirements are in place for unregulated lot splitting.

- **Limited Effectiveness of Caveat Emptor as a Remedial Measure**

Developments which result from multiple minor wildcat conveyances often lack paved roadways for access, dedicated rights-of-way, and flood control improvements.

Residents often request the county and other agencies to provide missing services, such as street construction, maintenance, drainage improvements, bridges, utilities, parks, and other facilities that are normally planned for and provided through the rezoning or subdivision review process.

Residents are often surprised to learn that such services are not provided by previous property owners who initiated the lot splitting process, and that the county is not obligated to provide such services to unregulated lot split communities.

Political pressure is then exerted on the Board to stand in the shoes left empty by the wildcat developer. Costs that should have been incurred by the developer are passed on to the taxpayer.

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**QUESTION #4:**

**WHAT INCENTIVES LEAD TO  
UNREGULATED LOT SPLITTING PRACTICES?**

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**1. Unregulated Lot Splitting Requires Less Up Front Money from the Speculator**

Platted subdivision development involves high up-front costs that are avoided by a lot split developer. Local governments require certain improvements in subdivision projects, including roadway construction and right-of-way dedication, flood control improvements, water and sewer line extensions, fire hydrants, and so on. Other costs associated with preparing subdivision plats include engineering fees, fees associated with obtaining 100 year water supply certification, and plan review fees. Such costs are passed on to the customers and residents of the improved, subdivided lots.

In contrast, lot split activity involves minimal up-front costs, such as well drilling and installing a water line distribution system, grading (but not paving) roadways, and extending electrical service.

**2. Unregulated Lot Splitting is Relatively Hassle Free**

A February 26, 1985 memorandum from Flood Control Planning states that: "Typically, any development which occurs in Pima County goes through the regular Planning and Zoning, Tentative Plat, Final Plat/Development Plan process. Within this process certain facility needs such as roadways, drainage, sewers, etc, are identified and brought to the attention of the developer. For the development to legally continue, these requirements must be addressed."<sup>1</sup> This process is avoided by the lot split developer.

**3. Unregulated Lot Splitting is Obligation Free**

The same memorandum goes on to describe: "Examples of common subdivision requirements are as follows: rights of way acquisitions, paving of access roads and the installation of a culvert system under an access road to comply with the all-weather access regulations. Depending on the specific situation of each development, the developer must incur all, or his 'fair share' of the cost to provide such improvements. The cost incurred by the developer is then spread equitably between the future beneficiaries. Because of inadequate regulations governing GR zoning, rural developments have occurred unchecked and unregulated."

**4. Does the Net Profit Margin of Unregulated Development Rival Regulated Development**

Despite the cost savings in infrastructure improvements to the lot split owner, lots in unregulated subdivisions have been sold at similar prices as subdivided lots, often because the sites are larger than those of a subdivided homesite.

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<sup>1</sup> February 26, 1985 Memorandum by Thomas Helfrich, Flood Control Planning

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**QUESTION #5:**

**WHAT PROBLEMS RESULT FROM  
UNREGULATED LOT SPLITTING?**

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Over the decades, a number of documents have described the problems that result from unregulated lot splitting and the lack of proper infrastructure creation during the development phase. Sections of these documents are compiled below, reflecting the persistence of dilemmas related to roads, water, drainage problems, sanitation and development standards.

**1. "Lack of basic right-of-way and/or easement reservations.**

The uncontrolled and unregulated division of real property over time does not provide for consistent or uniform dedication of right-of-way for streets and highways. Very often minimal, if any, right-of-way reservations are made on such parcels for roadway purposes. When made, the reservations are generally no more than 30 feet in width, are easements rather than simple dedication, and the roadways may not be constructed within the property reserved and/or set aside for the roadway itself. In addition, the reservations for roadway easement and/or right-of-way may be discontinuous over the length of the roadway. For example, one parcel may reserve 30 feet, while the parcel immediately adjacent may reserve nothing for roadway purposes."<sup>2</sup>

- "Inadequate access in most rural developments. Legal access does not exist in most rural developments. Access to individual parcels is usually through a series of private easements. These easements are generally of substandard width, often go through washes and frequently are not located where recorded. As a result, the County is either unable to take over these easements, when requested, because of the substandard widths or it costs an inordinate amount to acquire the necessary additional right-of-way. Further, access become difficult for emergency vehicles, while school buses will not use private easements."<sup>3</sup>

**2. "Street continuity and designation of major highways.**

Planning and rudimentary engineering are completely absent from the street or highway development from the uncontrolled division of property. Streets appear mainly because of the need to provide access to additional parcels of property being created within some artificial property boundary rather than from the perspective of what is the optimal street location which minimizes environmental and economic impact and maximizes the highway service function. Long range planning for streets and highways does not exist when new parcels of property are created at random, making the implementation of future highway improvements costly in terms of right-of-way acquisition and displacement of improvements."<sup>4</sup>

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<sup>2</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>3</sup> July 17, 1985 Memorandum; Robert Johnson to the Planning and Zoning Commission

<sup>4</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

3. **"Method of construction.**

Almost all access created from parcels which are not regulated by subdivision statutes are unimproved dirt roads constructed by parties unknown. They are not constructed to any engineering or construction standards for highways. They have no drainage improvements and very often create drainage and flooding problems in themselves for surrounding property. Since 1976, Pima County has required that all streets and highways created by subdivision be paved to certain engineering standards; yet uncontrolled parcel splitting is creating more and more dirt roadways while at the same time, Pima County has been sued by environmental interests and threatened with the withholding of federal funds because we still do not meet federal air quality standards for particulates."<sup>5</sup>

- "The next major factor concerning the roads is their engineering. Because drainage systems are ignored, sooner or later the roads deteriorate to the point that they become impassable or the natural drainages are flowing during the rainy season cutting off the landowners from a public road. The landowners in a quandary petition the Board of Supervisors for assistance, who then direct the Department of Transportation to assist in alleviating the problem. This is done at tremendous taxpayer expense."<sup>6</sup>

4. **"Maintenance or maintainability.**

The roadways created to serve the parcels described previously are also very difficult and costly to maintain. When they are constructed in the bottom of an arroyo, people wonder why they are flooded. When the fences are constructed only thirty feet apart, people wonder why the motor grader has a hard time missing the electric poles, gas meters, water meters, and mail boxes. Without a doubt, roads of this nature are the most costly to maintain in Pima County. In talking to many people who desire road maintenance, they are literally shocked when we tell them we cannot maintain their road due to lack of right-of-way, lack of establishment, or lack of construction to any minimum standard. They invariably tell us that they relied upon the information of 'someone' who said Pima County would maintain the road adjacent to their property or leading to it."<sup>7</sup>

5. **"All-weather accessibility.**

With the flood of October 1983, access to property became an important fact of life. The need to travel daily to work, school, shopping, and for other reasons, was very apparent; yet many residents in areas of Pima County were isolated. As stated previously, these roadways are constructed without any drainage improvements such as ditches, culverts or bridges."<sup>8</sup>

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<sup>5</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>6</sup> May 28, 1985 Citizen's Letter to Planning and Zoning.

<sup>7</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>8</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

6. **"Financing of improvements.**

Over an extended period of time as the population increases in areas where parcel splitting is occurring, there is growing pressure to accept substandard roads into the County Maintenance System, in order to provide general improved access, school bus service and the like. Pima County has always born the full cost of making such improvements. While the statutes of Arizona provide for improvement districts whereby residents in the area would be allowed to form an improvement district to pay for such improvements, never has such an improvement district been formed. Therefore, the general taxpayer bears the full burden of making improvements to roadways which are taken over by Pima County for maintenance and improvement. "<sup>9</sup>

7. **"Tort Liability.**

Because these roadways are substandard in their initial construction, they are more hazardous than other roadways in Pima County. Once accepted by Pima County for maintenance, they increase our tort liability exposure. "<sup>10</sup>

8. **"Flooding and flood control problems related with these areas are as follows.**

No identification of flood hazards associated with property: since no studies are performed on properties which are divided to determine whether or not they are susceptible to flood hazards, the purchaser is unaware if the property is encumbered by a flood hazard and what is the extent and nature of the flood hazard. "<sup>11</sup>

- "Development in floodplains. Residences (as well as 'roads') are often placed in floodplains. The result is that roads are washed out, isolating residences, and the floodwaters are diverted, thereby endangering other residences. "<sup>12</sup>

9. **Water supply and system problems.**

- "Inadequate water supply. Some areas are served by inadequate wells. Either there is insufficient water in an area for small lot development and/or too many residences are hooked up to only one well. The results are inadequate supply, inadequate water pressure and other related problems. "<sup>13</sup>
- "The community water system. Usually, the speculator installs a substandard system and problems do not show up until he has sold all the parcels and disappears, leaving the remaining owners stuck with a huge bill to renovate the system. In most instances, nobody monitors the water quality of the well that is now providing drinking water to approximately one hundred fifteen people. "<sup>14</sup>

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<sup>9</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>10</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>11</sup> July 18, 1985 Memorandum; C.H. Huckelberry to the Planning and Zoning Commission

<sup>12</sup> July 17, 1985 Memorandum, Robert Johnson to the Planning and Zoning Commission

<sup>13</sup> July 17, 1985 Memorandum, Robert Johnson to the Planning and Zoning Commission

<sup>14</sup> May 28, 1985 Citizen's letter to Planning and Zoning

## 10. Health hazards.

- "Potential for septic failure. All septic systems eventually fail as the soil becomes saturated. This is true whether the system is on an acre lot and is legal or not. In many areas, soils are not capable of handling one acre developments. Whether a septic system fails or not, a potential for groundwater pollution exists in those areas where the percolation rate is very fast or which have a high water table. Because the effluent from a septic system is filtered by the soil, if the water table is too high, or if the percolation rate is too fast, the effluent does not have sufficient time to be treated, thereby threatening the water supply. Clearly, the potential for contamination increases with increased density."<sup>15</sup>
- "Inadequate Emergency Vehicle Access: Emergency vehicle access (e.g., police, fire and ambulance) is difficult to parcels that have been split, but which are not considered as subdivisions. In addition to the access problem, these areas have no addresses. It is impossible for emergency vehicles to respond within a reasonable period if locations are not known. This is a very serious problem for both the emergency services people and the people requiring assistance."<sup>16</sup>

### Arizona County Planning Director's Impact Categories in Assessing Lot Split Activity:

1. **Road and traffic hazards** (wash board surface, wash-out, earth settling, flood and erosion damage, powdered surface, standing water and muddy streets after rains).
2. **Substandard and poorly designed roads** (inadequate width and shoulder; poor drainage; no flood control devices; grades of roads and curve radius don't meet minimum safety standards).
3. **Access** (lots access onto heavily traveled streets).
4. **Emergency services** (fire trucks and ambulances don't have safe access to lots).
5. **Dedications** (the jurisdiction must purchase required dedications for road expansion from property owners).
6. **Liability** (the jurisdiction, not the lot split developer, is liable for flood control and safe streets).
7. **Access** (not adequate for travel in a storm and / or evacuation in an emergency).
8. **Flood damage and erosion** on private property.
9. **Settling earth and foundations** on private property.
10. **Pollution** (distress and discomfort created by air borne dust and particulates).
11. **No 100 year water certification.**
12. **Private wells** (drilling of private wells allowed without requiring a hydrology study to determine the characteristics of the underlying aquifer).
13. **Water deficiencies** (reported occurrences of water shortages, inadequate water pressure, and poor water quality).
14. **Over pumping aquifer** (no assurance that the underlying aquifer is being over pumped by others at the expense of local water companies or private wells).
15. **Legal access and physical access** are not the same.
16. **Physical access** involves trespasses over private or public land.
17. **Legal recourse is not available** for infrastructure and site engineering deficiencies.
18. **Bonding** (lot split developer did not bond for water improvements).
19. **No deed restrictions** to protect and preserve the nature, quality and lifestyle of the community.
20. **No mortgage release protection** to protect lot purchaser from lands encumbered with multiple mortgages.
21. Related traffic accidents.
22. Related infrastructure, health and safety complaints
23. Response time complaints for fire, ambulance and law enforcement."

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<sup>15</sup> July 17, 1985 Memorandum, Robert Johnson to the Planning and Zoning Commission

<sup>16</sup> Parcel Splitting in Arizona, Its Problems and Consequences, Arizona Association of County Planning Directors, July 1977

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**QUESTION #6:**

**WHAT IS THE IMPACT OF  
UNREGULATED LOT SPLITTING ON SPRAWL?**

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- The problems associated with sprawl are exacerbated by lot split activity. This report examines the development of 20 areas, both regulated and unregulated, and finds:
  1. At least for the study group areas, the average number of parcels within largely regulated development sections is much higher than the average number of parcels in areas where development is unregulated.
  2. Stated another way, the planned process achieves density levels that are not matched in unregulated developments.
  3. Within each section of regulated development studied, there is an average of 485 parcels.
  4. In contrast, within each section of the study where unregulated development occurs, there is an average of 179 parcels.
- Documents written about the relationship between unregulated lot split activity and sprawl include these insights:

*"Increased cost of services.* Because there is no control over urban growth in the GR areas, the potential for both sprawl and wildcat development is increased. This in turn requires increased services, including roads, bridges, fire and police protection, flood control, social services and the like - services which become more costly to provide as development sprawls."<sup>17</sup>

*"No control in majority of County.* The rurals are essentially out of control. The result is that the future direction of the County's growth and development is not planned, but can occur without any consideration of the problems described above. This in turn may have serious repercussions for the County in future years."<sup>18</sup>

*"The character of the neighborhood.* In most of the some 160 thirty six acre GR splits I have encountered, the single family detached residence is almost non-existent. A lot of these owners dreamed of moving a mobile home onto the acreage with the hope of someday building a home and selling the mobile home. After a few years of looking at other mobile homes in various states of appearance around them, together with the junked cars, rutted dirt roads, choking dust, the smelly stable two hundred feet from their mobile home, they come to realize it would be foolish to invest in a home that would depreciate in value because of the character of the neighborhood. This whole pervasive attitude prevails in these developed areas encouraging a vicious cycle of neighborhood decline. I have had many owners tell me this is why they will not build a home or improve their property."<sup>19</sup>

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<sup>17</sup> July 17, 1985 Memorandum from Robert Johnson to the Planning and Zoning Commission

<sup>18</sup> July 17, 1985 Memorandum from Robert Johnson to the Planning and Zoning Commission

<sup>19</sup> May 28, 1985 Citizen's Letter to Planning and Zoning

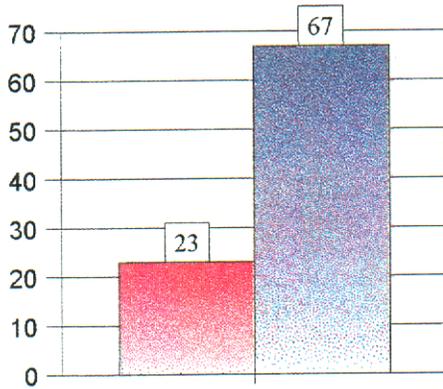
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## DENSITY COMPARISON - 1998

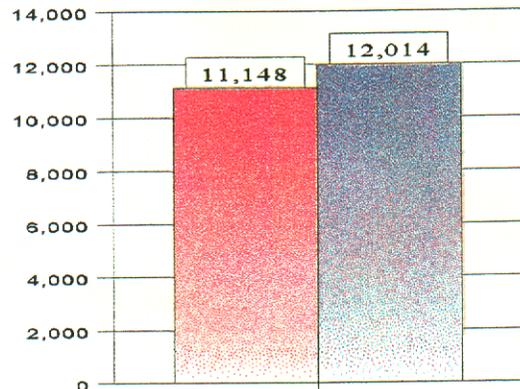
### Regulated Subdivision and Unregulated Lot Splits

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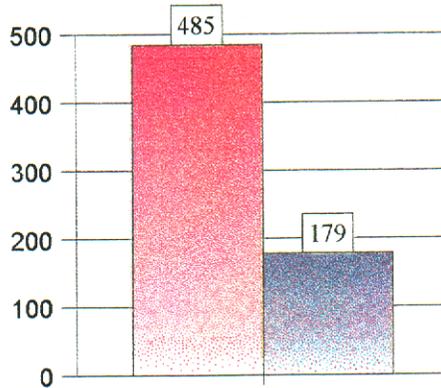
Number of Sections



Number of Parcels



Average # Parcels/Section



Regulated



Unregulated

**Regulated subdivisions within the study group experience greater density of parcels within each section. Unregulated lot splitting practices contribute more to the problem of sprawl.**

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**QUESTION #7:**

**WHAT IS THE IMPACT OF UNREGULATED LOT SPLITTING  
ON THE TAX BASE OF PIMA COUNTY?**

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- **Foregone Tax Revenue**

Many lot split sites are occupied by mobile homes. These mobile homes are not included in the ad valorem taxes on real property. (Op. Attny Gen. No. 71-7). A.R.S. 42-642(A) provides that "Each mobile home with respect to which an affidavit of affixture has not been recorded pursuant to 42-641.01 shall be subject to ad valorem property tax to be assessed and collected in the same manner and at the same time as other personal property taxable under this chapter."

For reasons such as this, the improved full cash value of unregulated lot split land (which contains a high concentration of mobile homes) is much less than comparable regulated development. This report examines the development of 20 areas, both regulated and unregulated, and finds:

1. At least for the study group areas, the average Improved Full Cash Value per section of regulated development is higher than the average of parcels in unregulated areas. Land Full Cash Value is also higher in regulated areas.
2. Stated another way, the planned process built a tax revenue base for the County that is not matched in unregulated developments.
3. Within each section of regulated development studied, the average Improved Full Cash Value per section is \$38.5 million. The average Land Full Cash Value is \$17.2 million.
4. In contrast, within each section of unregulated development studied, the average Improved Full Cash Value per section is \$8.1 million. The average Land Full Cash Value is \$4.7 million per section.

- A 1977 document written about the relationship between unregulated lot split activity and implications to the tax base includes this insight:

"Another cost to the public is the failure to tax all parcels. Since the parcels are difficult to detect, it is virtually impossible to tax all of them. In an April 18, 1975 OEPAD memorandum, this problem was illustrated. A total of 290 parcels had been created in a township, and 282 parcels had been sold. The assessor is taxing only 22 of 282 parcels, evidently due to the fact that the other parcels did not have a deed recorded. As a result, it may be assumed the county is taxing the remaining 260 parcels as grazing land, even though they were sold for a price much higher than grazing land would bring."<sup>20</sup>

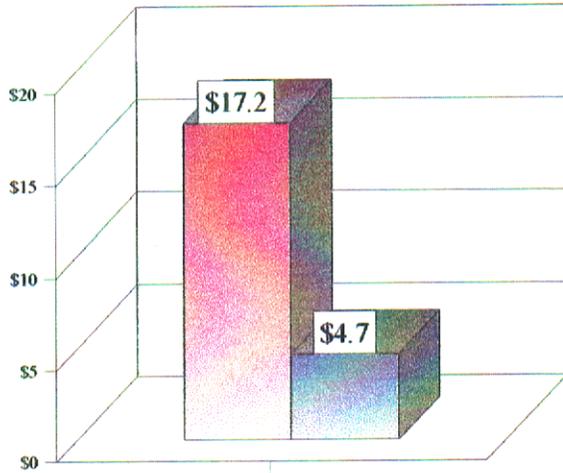
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<sup>20</sup> Parcel Splitting in Arizona, Its Problems and Consequences, Arizona Association of County Planning Directors, July 1977

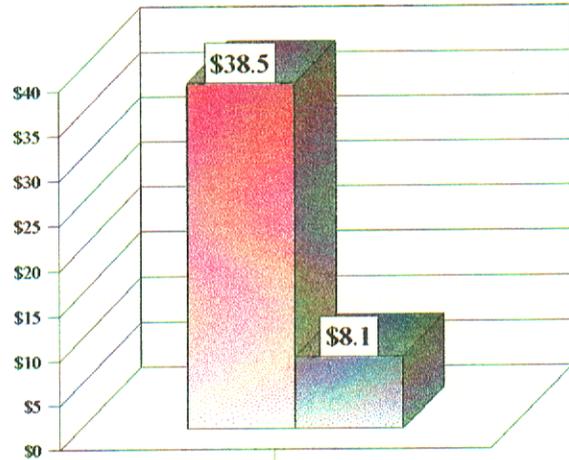
## VALUE PER SECTION - 1998

### Regulated Subdivision and Unregulated Lot Splits

**Average Land Full Cash  
Value Per Section\***



**Average Improved Full Cash  
Value Per Section\***



(Amounts shown in millions)



Regulated



Unregulated

	Number Sections	Land Full Cash Value	Average Per Section	Improved Full Cash Value	Average Per Section
<b>Regulated Subdivision</b>	23	\$396 M	\$17.2 M	\$885 M	\$38.5 M
<b>Unregulated Lot Splits</b>	67	\$318 M	\$4.7 M	\$541 M	\$8.1 M

\*Average of sections included in study group

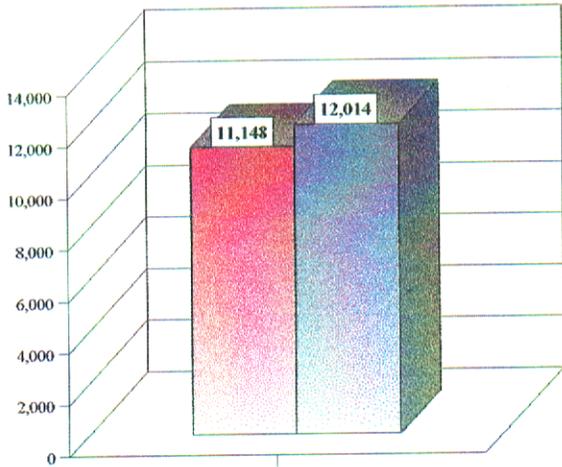
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## FULL CASH VALUE COMPARISON - 1998

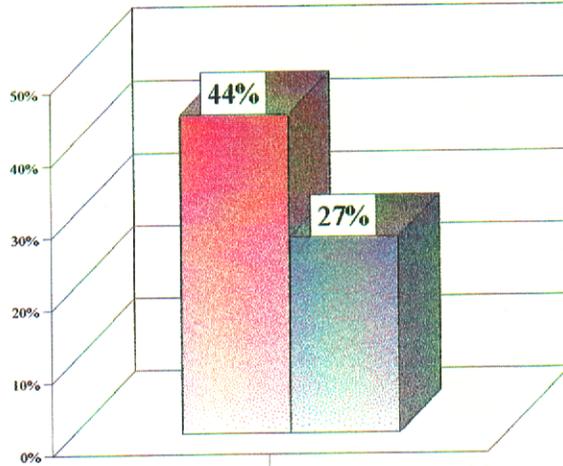
### Regulated Subdivision and Unregulated Lot Splits

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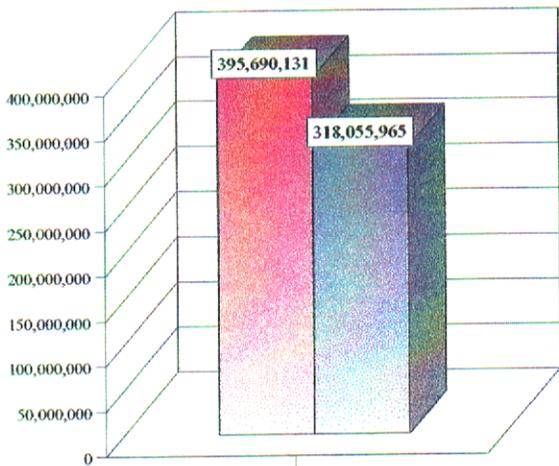
**Number of Parcels**



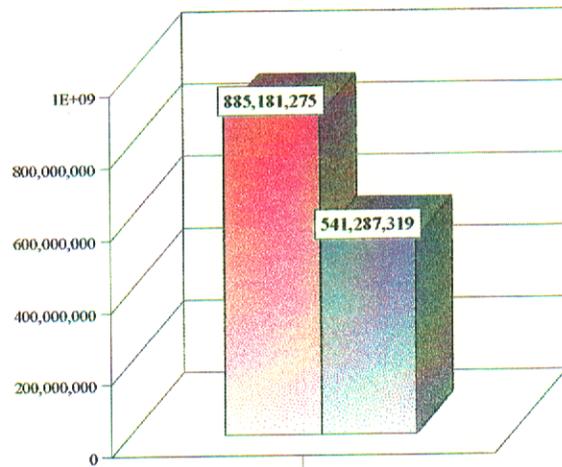
**Percent Vacant Parcels**



**Land-Full Cash Value**



**Improved-Full Cash Value**



Regulated



Unregulated

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1998

**PART III:  
LARGER CONTEXT  
& UNDERLYING TRENDS**

*Wildcat Subdivision Study*

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**LARGER CONTEXT  
AND UNDERLYING TRENDS**

1. TRENDS IN CITY OF TUCSON AND PIMA COUNTY POPULATION GROWTH
  2. INDICATORS OF SUBSTANTIAL UNREGULATED RESIDENTIAL DEVELOPMENT
  3. EXISTING LAND USE IN EASTERN PIMA COUNTY
-

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**TREND #1:**

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**TRENDS IN CITY OF TUCSON AND  
PIMA COUNTY POPULATION GROWTH**

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**Statement of the Obvious**

Pima County and the City of Tucson have grown at a tremendous rate. During 1997, Pima County was the 34th fastest growing County in the United States. Between 1990 and 1997, housing units grew from 107,989 to 128,851 in the unincorporated area of Pima County, and the total county number jumped from 298,207 to 343,332. This rate of growth translates to approximately 17,000 new residents and 6,000 new units per year. Based on future projections, new residents may number as many as 18,000 per year, requiring 7,000 new units on an annual basis.

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**POPULATION ESTIMATES AND PROJECTIONS<sup>21</sup>**

<b>YEAR</b>	<b>CITY OF TUCSON</b>	<b>UNINCORPORATED</b>	<b>TOTAL PIMA COUNTY</b>
1870	3,224		5,716
1880	7,007		17,006
1890	5,150		12,673
1900	7,531		14,689
1910	13,191		22,818
1920	20,292		34,680
1930	32,506		55,676
1940	35,752		72,838
1950	45,454		141,216
1960	212,892		265,660
1970	262,933		351,667
1980	330,537	191,216	531,443
1985	369,007	202,913	582,600
1990	405,390	247,540	666,880
1995	445,299	288,178	766,172
2000	474,467	328,192	854,329
2005	508,521	358,226	943,795
2010	540,307	388,083	1,031,623
2015	565,736	424,255	1,119,342
2020	589,899	462,689	1,206,244
2025	612,051	504,785	1,290,966
2030	631,889	550,413	1,372,319
2035	649,135	594,727	1,449,232
2040	663,542	639,082	1,522,615
2045	674,899	692,797	1,595,221
2050	683,037	753,432	1,671,182

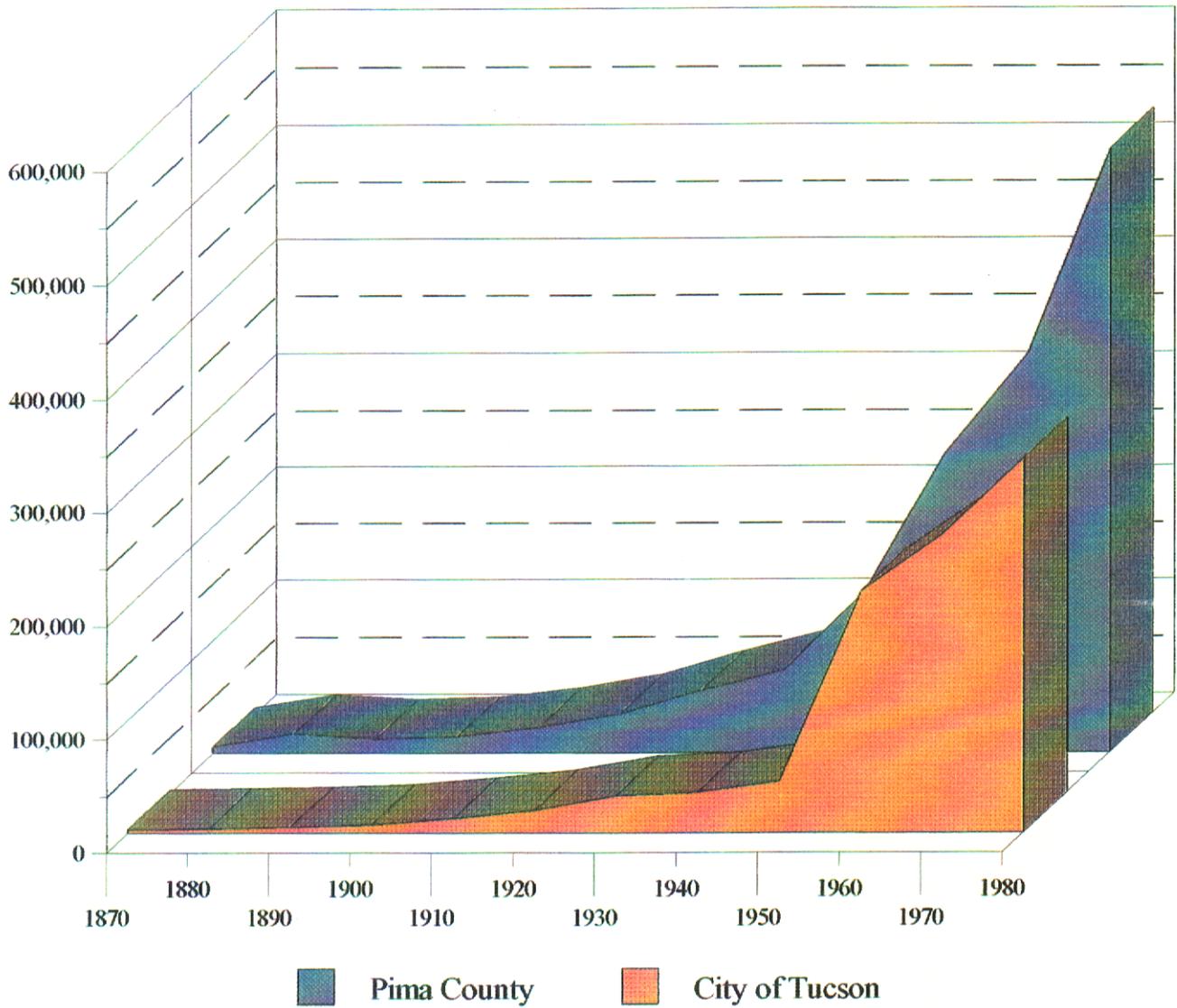
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<sup>21</sup> 1870-1980 data -Tucson Planning Department; 1980-2050 data - Pima Association of Governments

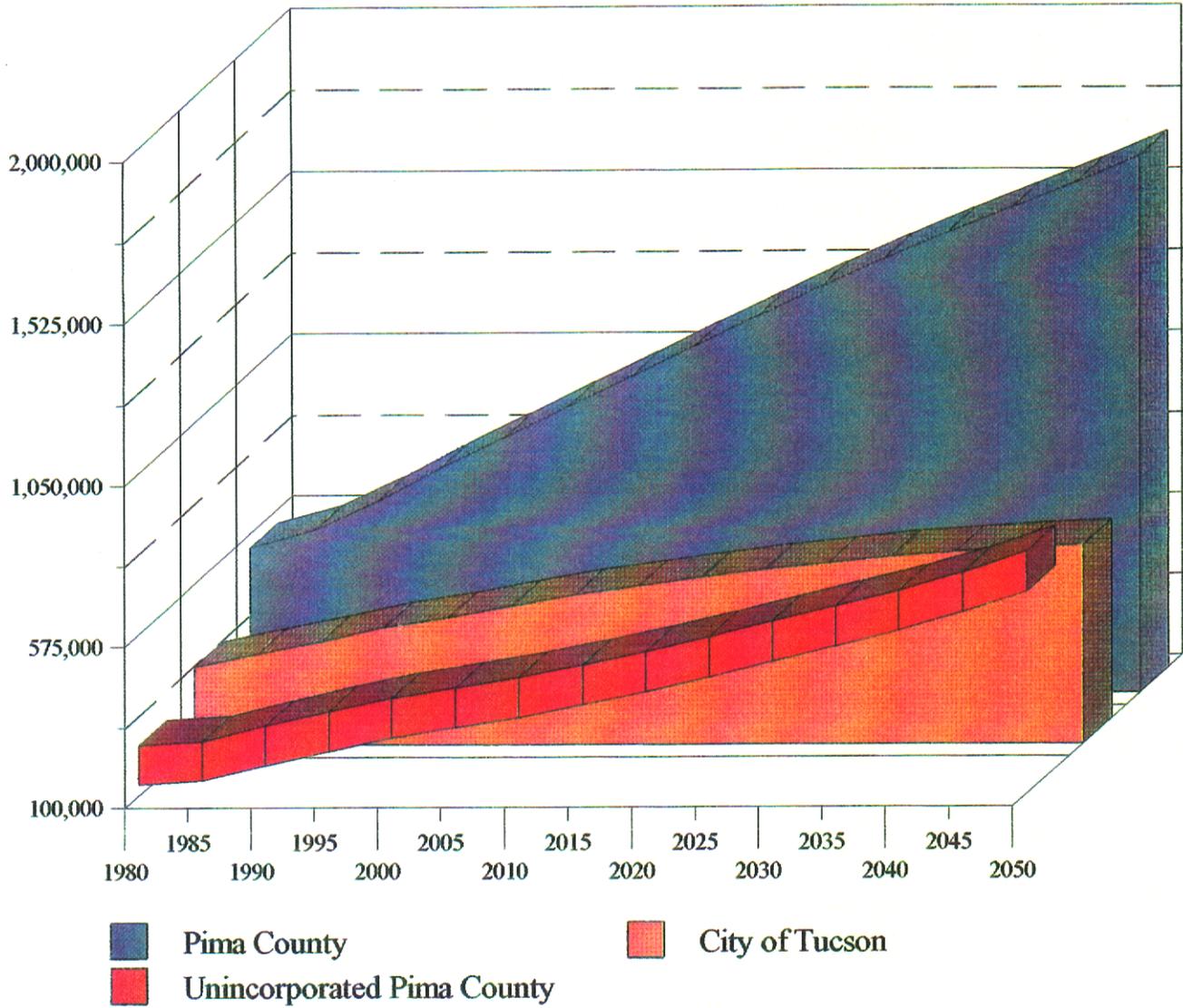
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POPULATION 1870 - 1980

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POPULATION PROJECTIONS 1980 - 2050 \*



\* Source = Pima Association of Governments

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TREND #2:

**INDICATORS OF SUBSTANTIAL  
UNREGULATED RESIDENTIAL  
NEW DEVELOPMENT**

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**Regulated Process**

Pima County grows by about 6,000 new residential dwelling units each year.

While many of the new units are constructed within planned subdivisions in the immediate Tucson metropolitan area, County staff reviews as many as 15 to 70 new proposed subdivisions for the unincorporated area on an annual basis.

The regulated process of subdivision development creates as few as 300 residential lots, and as many as 3,000 such lots each year.

The staff review ensures compliance with County standards for infrastructure and land development requirements.

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**Unregulated Process**

At the same time the regulated process of subdivision development occurs, the region experiences tremendous growth of another type: unregulated lot splitting.

Permit data provides what is probably a conservative estimate of the magnitude of wildcat lot split activity.

In 1997, a total of 3,729 new residential dwelling units received permits in unincorporated Pima County.

**Of this, 1,525 -- or 41% -- of the new units were not part of platted subdivisions.**

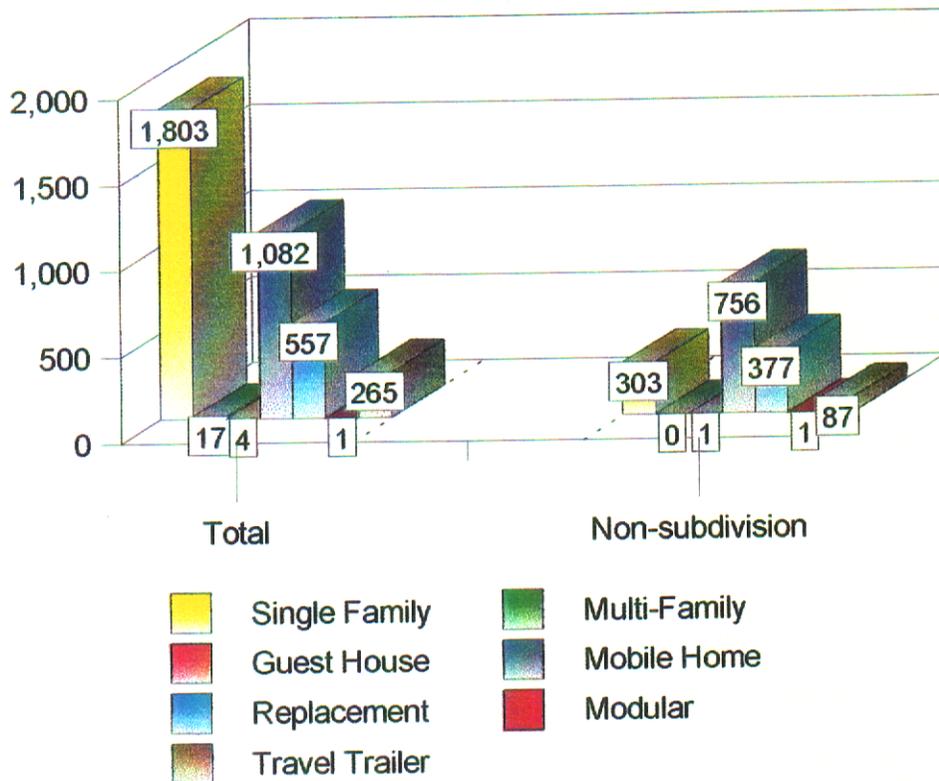
Furthermore, in 1994 and 1995, Pima County reviewed over 1,700 permit applications for septic systems each year.

This volume of septic system review tends to confirm other permit data which indicates that a significant number of new dwelling units are created in unregulated lot split areas.

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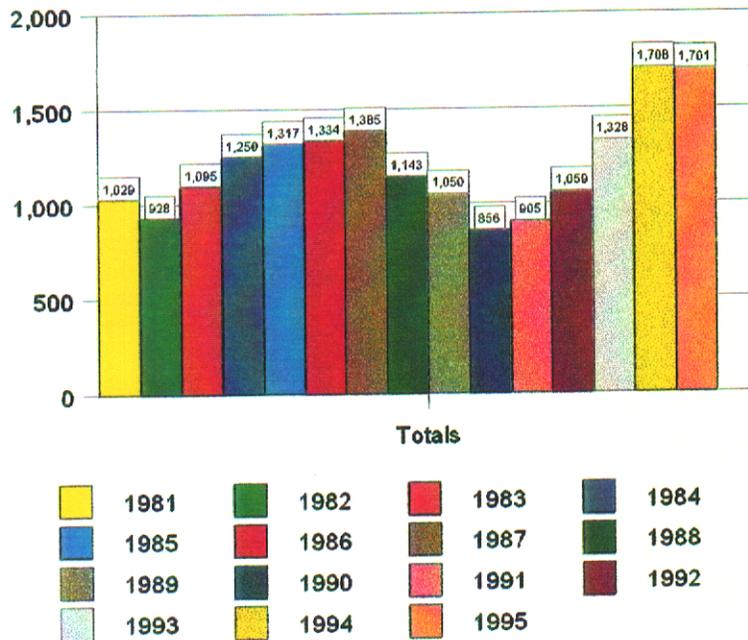
**NEW RESIDENTIAL CONSTRUCTION - 1997  
REGULATED vs. UNREGULATED**

	Total	Non-Subdivision / Unregulated	Percent Unregulated
Single Family	1,803	303	17%
Multi-Family	17	0	-0-
Guest House	4	1	25%
Mobile Home	1,082	756	70%
Replacement	557	377	68%
Modular	1	1	100%
Travel Trailer	265	87	33%
	3,729	1,525	41%



**Year End Status Report  
DEQ, Designs - Septic**

Year	Total
1981	1,029
1982	928
1983	1,095
1984	1,250
1985	1,317
1986	1,334
1987	1,385
1988	1,143
1989	1,050
1990	856
1991	905
1992	1,059
1993	1,328
1994	1,708
1995	1,701



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**TREND #3:**

**EXISTING LAND USE  
IN EASTERN PIMA COUNTY**

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**Overview of Existing Land Use**

The map on the following page reflects existing land use within Pima County.

Single family dwellings (yellow) dominate the areas north and northwest of the City of Tucson. Town homes and multi-family dwellings (orange) appear to be scattered throughout this area, and clusters of mobile homes (purple) are visible close to the city line itself.

Conversely, four areas blocked for purposes of this study reflect a higher concentration of mobile homes (purple) located on the periphery.

These areas include Picture Rocks, an area identified as "Southwest" study area, Sahuarita Road, and Rincon Valley.

Other land use identified by the map includes:

- Lodging
  - Office
  - Commercial
  - Institutional
  - Government
  - Parks
  - Resort
  - Golf course
  - Agriculture
  - Industrial
  - Transportation facilities
  - Utilities and telecommunications
  - Military
  - Vacant
-

# Existing Land Use

## Eastern Pima County Study Area Key Map

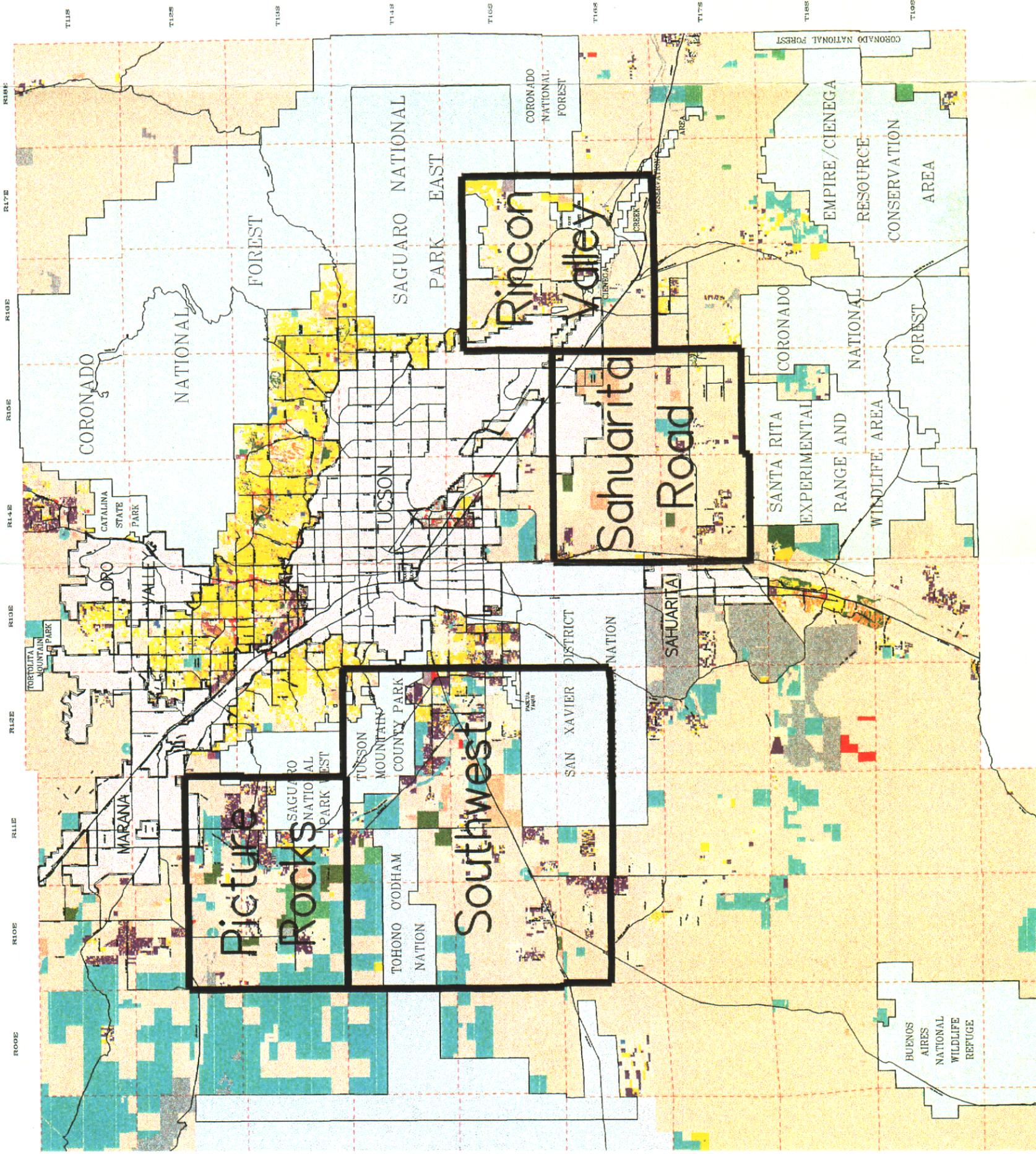
- Cities and Towns
- Public Preserves
- Tribal Nations
- Townships
- Major Roadways
- Public Preserves and Tribal Lands Boundaries

- VACANT
- SINGLE-FAMILY
- TOWNHOUSE/CONDO
- MULTI-FAMILY
- MOBILE HOME
- LODGING
- OFFICE
- COMMERCIAL
- INSTITUTIONAL
- MISC. GOVERNMENT
- PARK
- RESORT
- GOLF COURSE
- AGRICULTURE
- INDUSTRIAL
- TRANSPORT FACIL
- UTILITIES/TELECOMMUNICATIONS
- OTHER
- MILITARY
- MILITARY/ST. POLICE
- STATE-VACANT
- VACANT-SCHOOL PROP
- VACANT-COUNTY
- VACANT-TRIBAL

**Pima County Comprehensive Plan**  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800



02-APR-1998



MapInfo/MapInfo.com

1998

**PART IV:  
CASE STUDIES IN  
UNREGULATED LOT SPLITTING  
AND REGULATED SUBDIVIDING**

*Wildcat Subdivision Study*

**CASE STUDIES IN UNREGULATED LOT SPLITTING  
AND REGULATED SUBDIVIDING**

**A. CATALINA / RANCHO VISTOSO STUDY AREA**

1. Catalina
2. Rancho Vistoso

**B. SOUTHWEST STUDY AREA**

1. Herman's Road / Taylor Lane
2. Gates Pass

**C. PICTURE ROCKS AREA**

1. Picture Rocks areas

**D. SAHUARITA ROAD STUDY AREA**

1. Old Nogales Highway
2. Sahuarita Road
3. Sahuarita Road

**E. RINCON VALLEY STUDY AREA**

1. Rincon Creek
2. Calle Rinconado

**F. NORTHEAST STUDY AREA**

1. Agua Caliente

## A. CATALINA / RANCHO VISTOSO STUDY AREA

1. *Catalina*
2. *Rancho Vistoso*

### THE CATALINA AND RANCHO VISTOSO STUDY AREA

In the far north reach of Pima County there are two locations which have developed in different ways, and this difference has had consequences for the environment: the Catalina area (which has experienced lot split activity), and Rancho Vistoso (which developed under a regulated process). Four sections in Catalina (T11S, R14E, Sections 3-4, 9-10) and six sections of Rancho Vistoso (T11S R13E Sections 23-26, 35-36), were analyzed for this study.

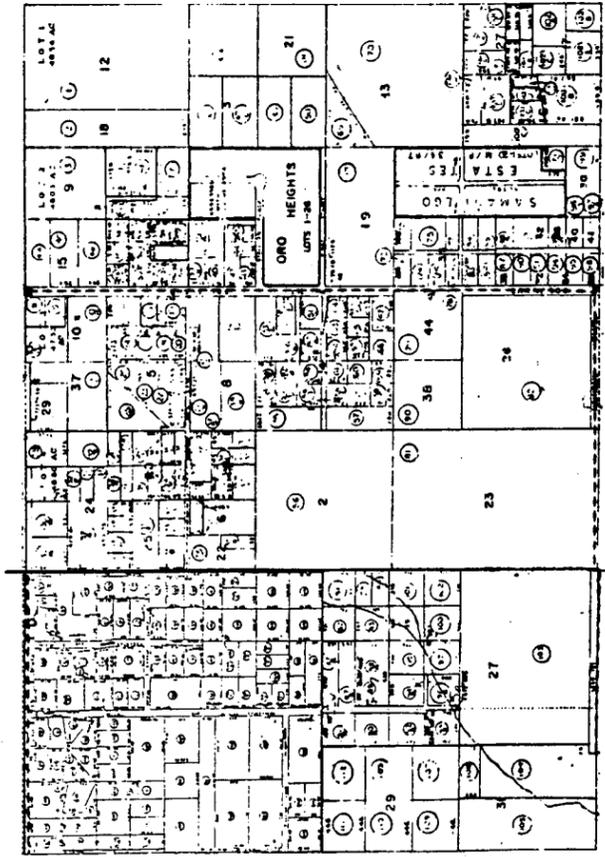
#### **CATALINA (an area which has experienced lot split activity)**

- *Number of Parcels and Relative Density:* In 1991, four sections were divided into 1,497 parcels; in 1995 there were 1,693 parcels; currently there are 1,851 parcels. Compared to 12 other areas which have experienced unregulated development, Catalina has developed with a greater density. Specifically, the average number of parcels per section in 1998 is 463. This is a higher density than 12 of the 13 areas under study which have experienced lot split activity. Four such areas average less than 50 parcels per section, which contributes to the problem of sprawl.
- *Environmental Consequences:* In the pages that follow, Assessor's maps for one section of Catalina are displayed, reflecting three time periods: 1985, 1995, and 1998. The evolution of parcel dividing is apparent. Aerial photographs from 1970, 1985, and 1996 also show the division and development of land that has taken place. In **contrast to a nearby area which developed under the regulated process, Catalina development has encroached on floodplains and destroyed riparian areas.**

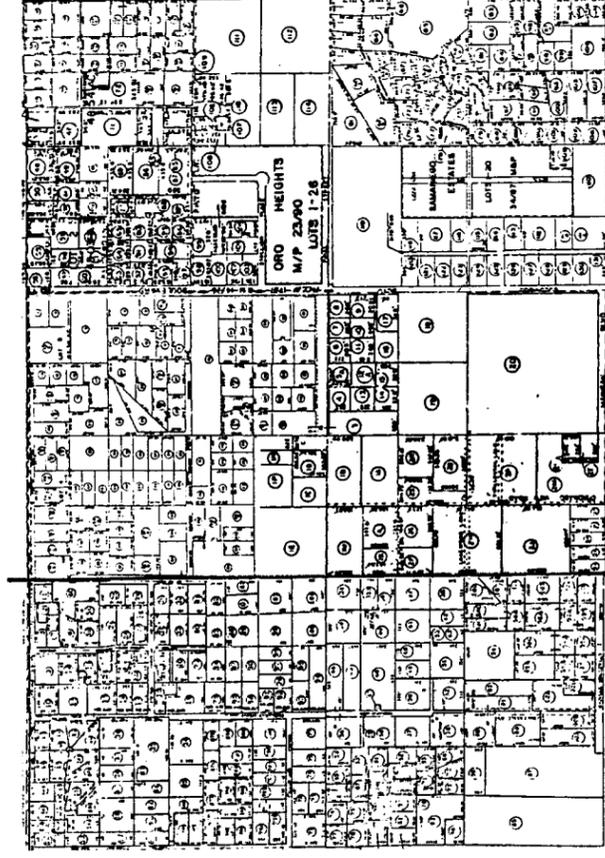
#### **RANCHO VISTOSO (an area which developed under the regulated process)**

- *Environmental Consequences:* Just to the southwest of Catalina, Rancho Vistoso developed under a regulated process. An aerial photograph from 1996 reflects preservation of flood plains and more orderly housing and roadway patterns.
- *Number of Parcels and Relative Density:* In 1991, six sections in this area were divided into 369 parcels; in 1995 there were 860 parcels; currently there are 2,017 parcels. The density of parcels within this study area is somewhat less than the Catalina parcel density; however, at an average of 336 parcels per section, this developed area is less dense than others. Of the 7 planned areas in the study group, the average number of parcels per section is 485; the range is 217 to 954.
- *Assessed Value:* The Land Full Cash Value and Improved Full Cash Value of the area which developed under a regulated process exceed such values in nearby areas which have experiences lot splitting. This is true despite that 1,178 of 2,017 parcels in Rancho Vistoso are currently vacant.

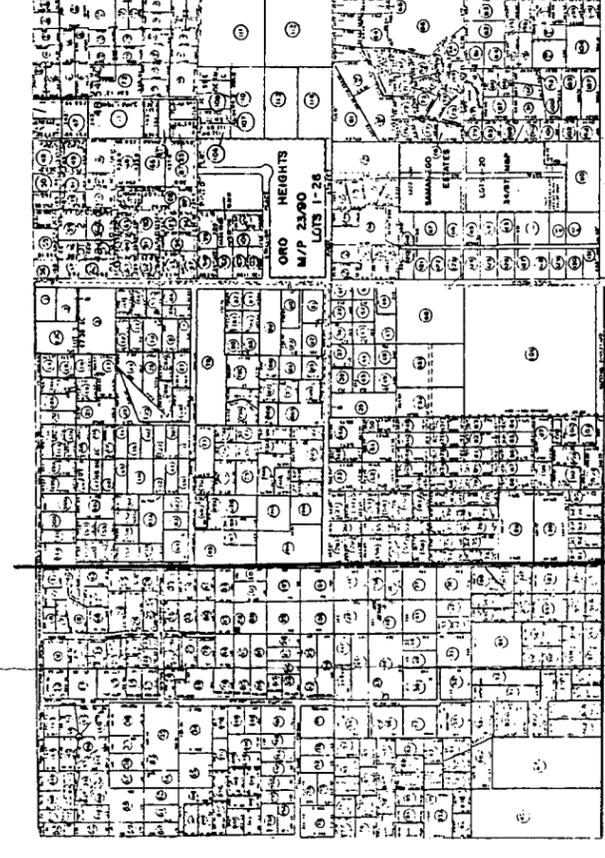
CATALINA  
T11S R14E  
Section 3, E1/2 S4



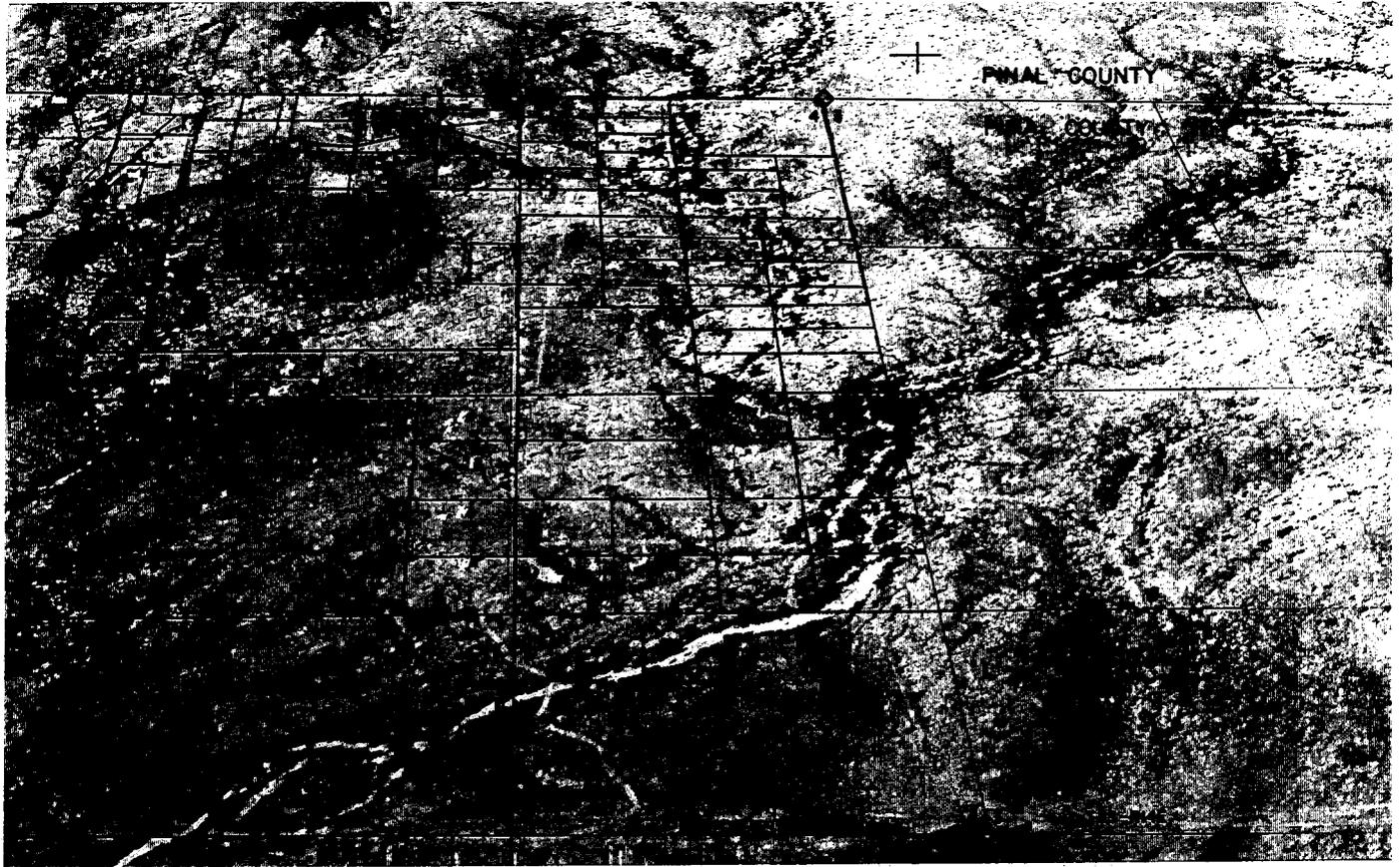
1985



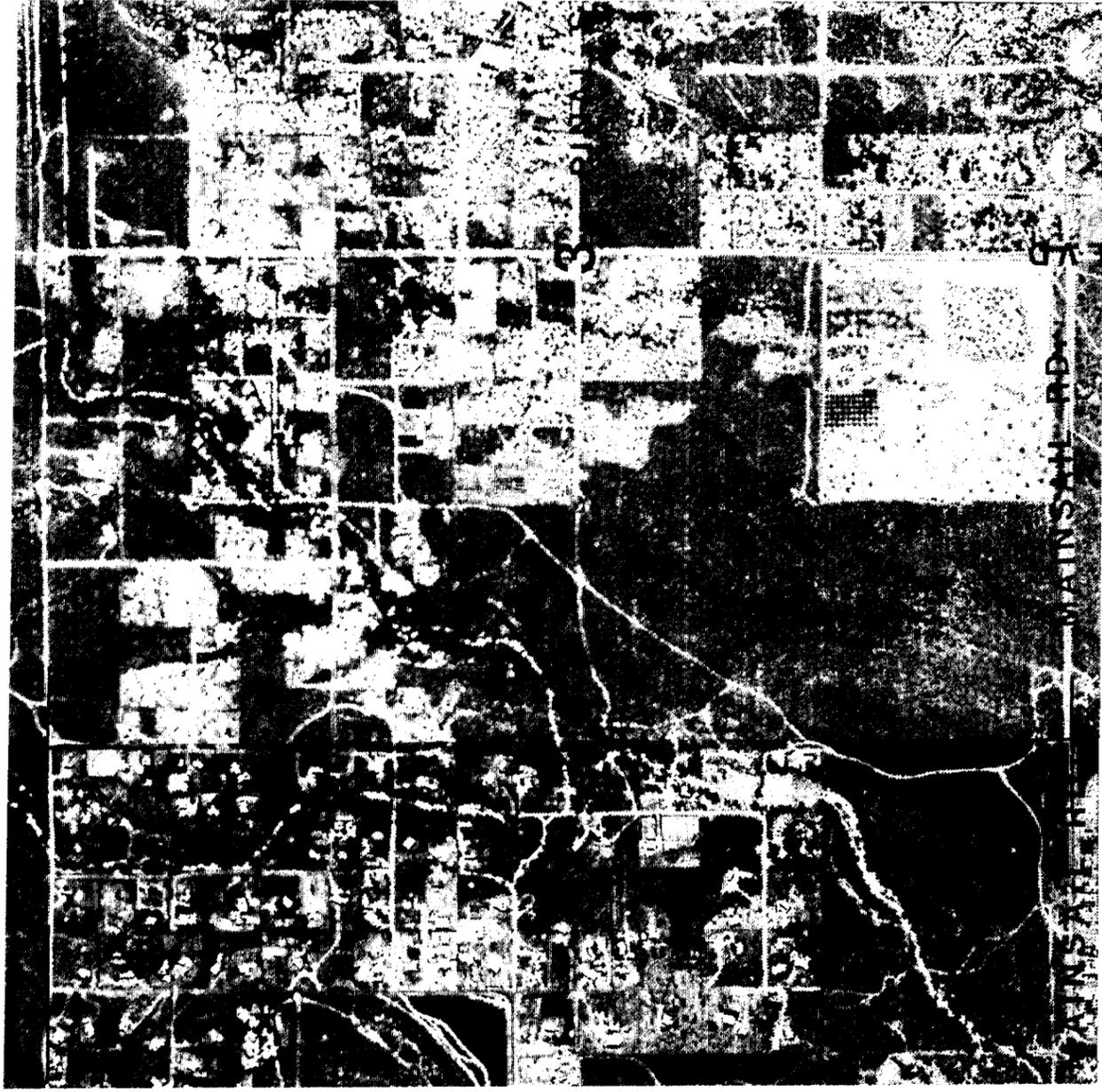
1995



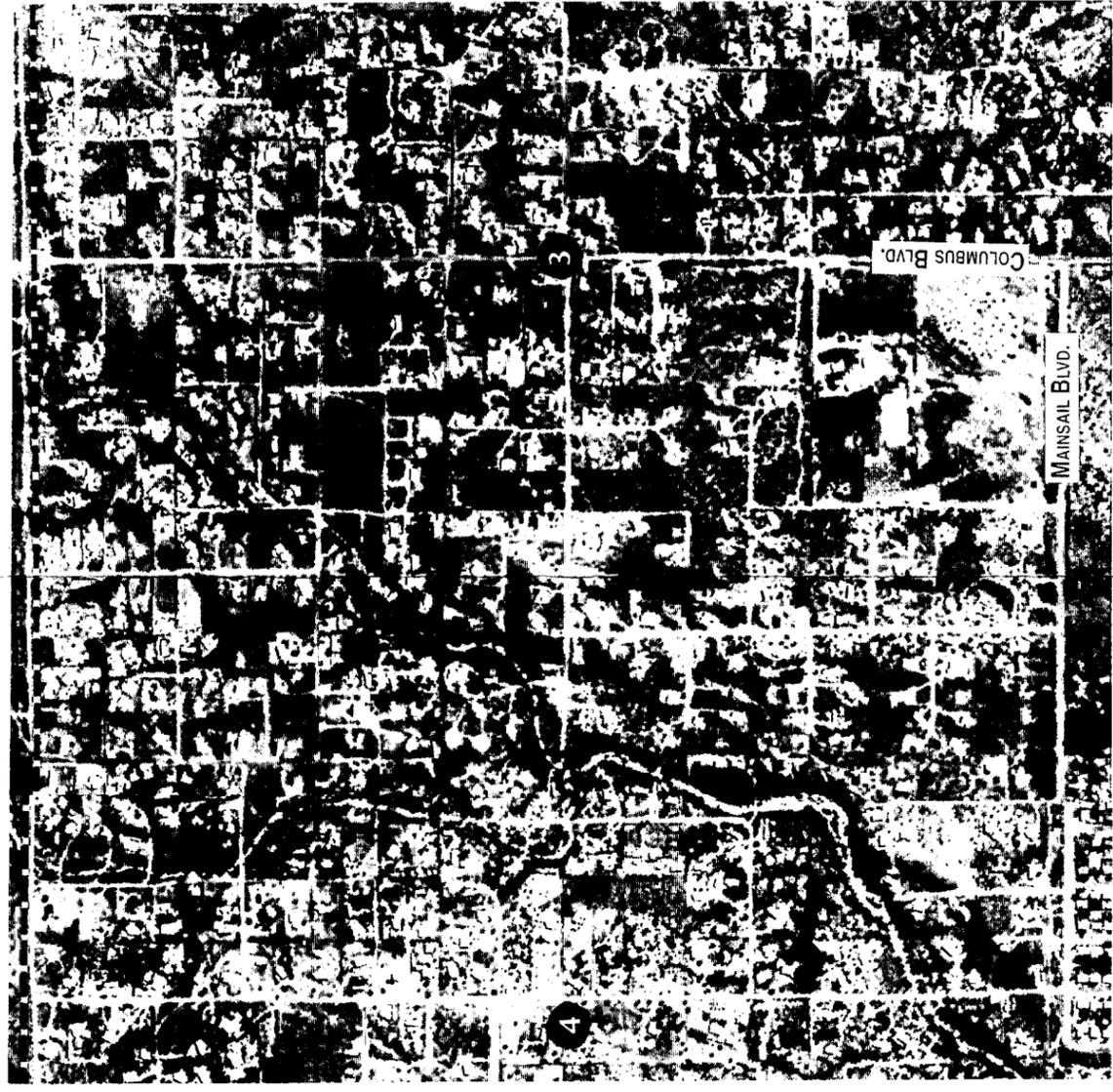
Current



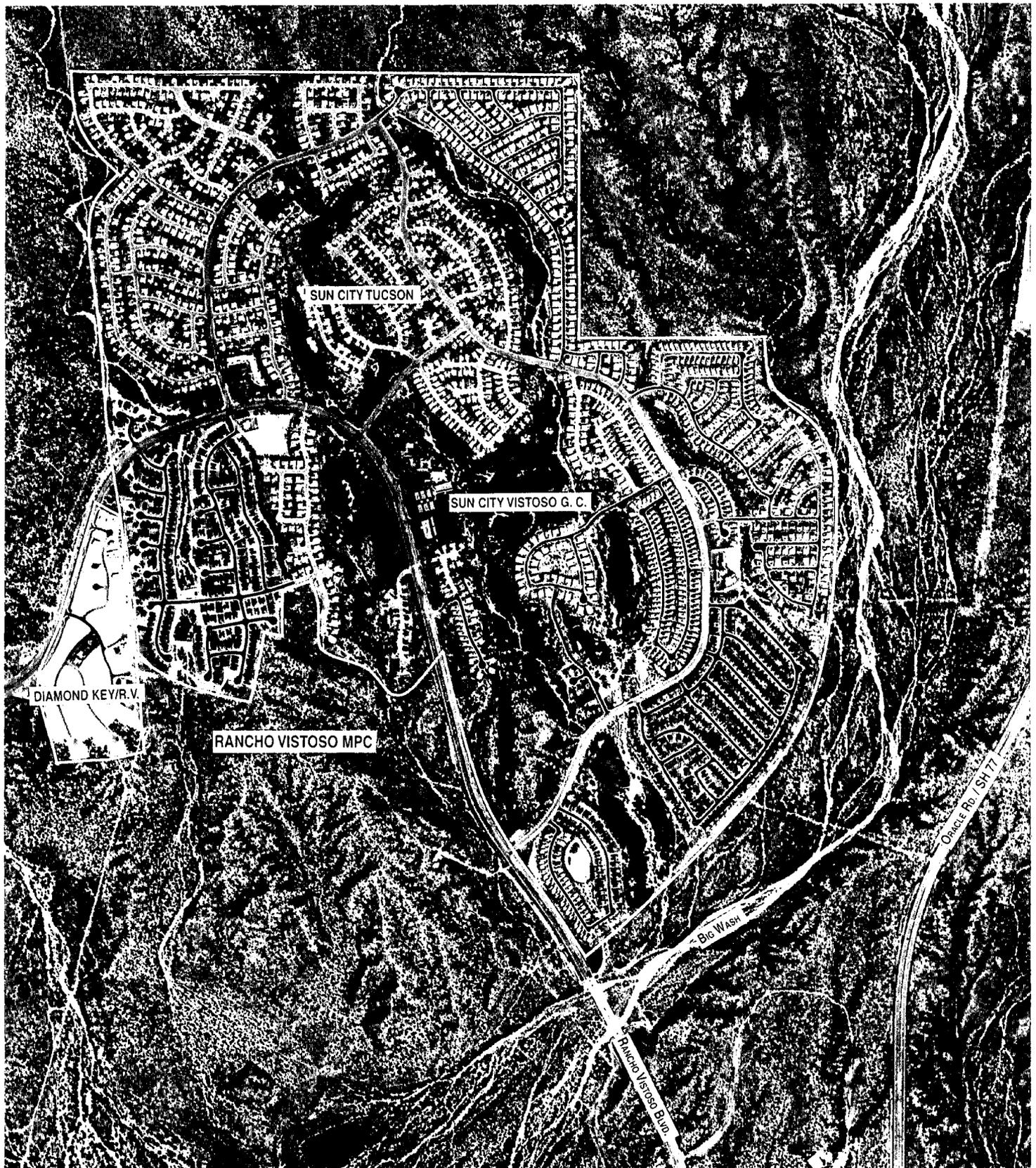
CATALINA 1970  
T11S R14E



CATALINA 1985  
T11S R14E S3, E1/2S4



CATALINA 1996  
T11S R14E S3, E1/2S4



RANCHO VISTOSO 1996  
T11S R14E

## B. SOUTHWEST STUDY AREA

### 1. Herman's Road / Taylor Lane

### 2-3. Gates Pass

## THE SOUTHWEST STUDY AREA

In the area of Pima County to the southwest of the City of Tucson, there are pockets of wildcat developments, including the neighborhoods around Herman's Road, Taylor Lane, and areas near Gates Pass.

### OVERVIEW OF THE SOUTHWEST STUDY AREA: ZONING AND EXISTING LAND USE

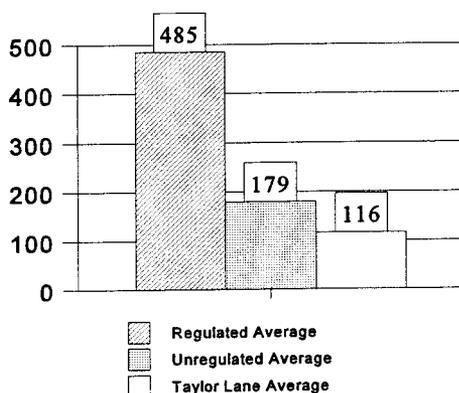
- The maps on the next two pages show both how the Southwest Study Area is *zoned*, and how the land is actually being *used*. There is a strong correlation between the location of GR-1 Zoning, shown in yellow on the first "Zoning" map, and mobile home sites, shown in purple on the following "Land Use" map. The economic and environmental impacts are discussed below.

### TAYLOR LANE / HERMAN'S ROAD (T15S R11E SECTIONS 28-29, 31-33)

- Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Section 28 and show the extensive genealogy of lot splitting in the Taylor Lane / Herman's Road area, particularly in the lower portion of the Section.

#### Average Density in the Taylor Lane / Herman's Road Study Area:

There are currently 582 parcels in the five section Taylor Lane / Herman's Road study area, which results in a density of 116 parcels per section. This is a very low density, sprawling growth pattern.



#### Average Density in Unregulated Area:

Even within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is 179.

#### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of 485 parcels per section.

**TAYLOR LANE / HERMAN'S ROAD continued ...**

- **Environmental Consequences:** Like Catalina, aerial photographs from 1985 and 1996 reflect the division and development of land that has taken place, including flood plain encroachment.
- **Health and Welfare Consequences:** The residents of the Taylor Lane area gathered signatures in order to petition the Board of Supervisors to make road improvements. These improvements should have been handled by the developer, but were neglected in the flurry of lot splitting and selling to residents, who later discovered that they bought less than they thought.

A May 20, 1997 letter from a representative of the Taylor Lane area includes the following statements:

"As you know poorly planned subdividing (whom we feel should be held accountable for their role in our road dilemma, which should be brought to an end) has led to unacceptable health and safety conditions for the children and adults of this community. The dust from the overflow traffic and speeding motorist of Taylor Lane, Easter Place and Alice Vale intensifies with our rapidly growing community, making visibility poor and broadening the number of respiratory ailments."

"Last year there was a total of 29 known chronic allergy and 11 asthma cases in the primary school. The elementary and middle school had a total of 88 chronic allergy and 55 asthma cases. [The school nurse] believes the dust to be a high contributing factor in the percentage of students who are inflicted with these respiratory problems. This puts our children at a health risk."

"Another problem that our children and adults face are the safety hazards of speeding motorist, and those who ignore safety laws for loading and unloading of children at bus stops. Not only are clouds of dust being thrown in the air making visibility poor but rocks and debris as well. It is unsafe for residents to walk to and from the school bus stop."

"As tax payers of this community it is our belief an increased amount of those tax dollars should be spent on more efficient and safe emergency access to our homes. Clearly stated and designated roads are also needed for the previously mentioned access, for our law enforcement and ambulance's have had to stop for directions and/or permission to cross an owner's property to achieve access to their destination."

"Enclosed is the petition ... [to] request the Board of Supervisors to immediately act upon road improvements and maintenance, traffic dispersion and traffic control in our community."

As the number of abandoned lot split purchasers increases, the lack of proper infrastructure will also become an increasing dilemma on the political and practical level.

**TAYLOR LANE / HERMAN'S ROAD continued ...**

• **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

The Taylor Lane study area presents the worst ills of lot split activity. At 116 parcels per section (on average), the lot split development sprawls across the land, and the land itself is lacking in comparative value.

Land Full Cash Value Per Section

1. Within the five section study area, the current total Land Full Cash Value *per section* is **\$2.1 million**.
2. This compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**.
3. In the 7 planned areas, the same average is **\$17.2 million**.

Land Full Cash Value Per Parcel

1. Within the five section study area, the current total Land Full Cash Value *per parcel* is **\$18,470**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value *per parcel* is **\$26,474**.
3. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

1. Within the five section Taylor Lane study area, the current total Improved Full Cash Value *per section* is **\$783 thousand**.
2. This compares very unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**.
3. In the 7 planned areas, the same average is **\$38.5 million**.

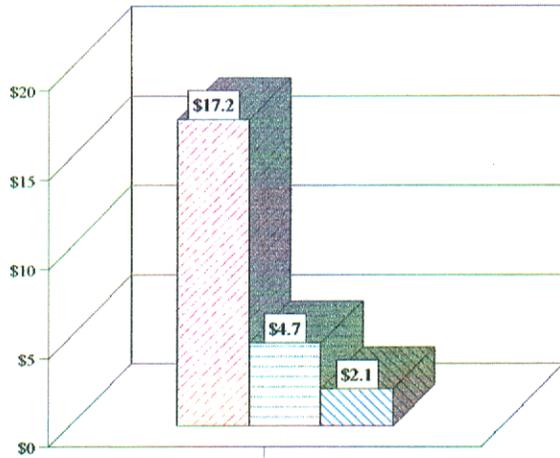
Improved Full Cash Value Per Parcel

1. Within the five section study area, the current total Improved Full Cash Value *per parcel* is **\$6,726**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**.
3. In the 7 planned areas, the same average is **\$79,403**.

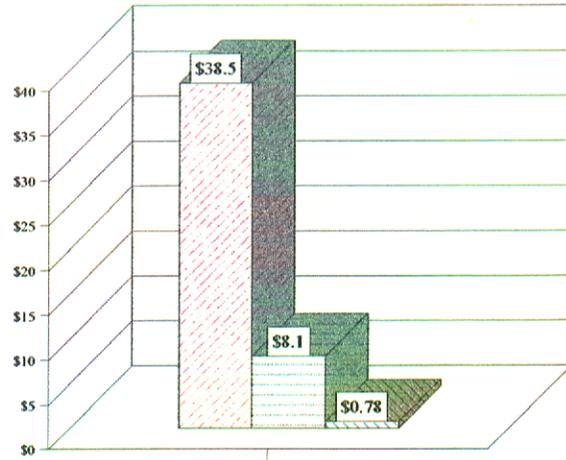
- **Conclusion re Taylor Lane / Herman's Road Study Area:** The use of land which results from unregulated lot splitting not only contributes to the problem of sprawl and creates an expectation or demand on Pima County to supply missing infrastructure and service needs to the buyers, but it also depletes the tax base for Pima County.

# TAYLOR LANE AREA FULL CASH VALUE COMPARISONS - 1998

**Land-Full Cash Value Per Section**

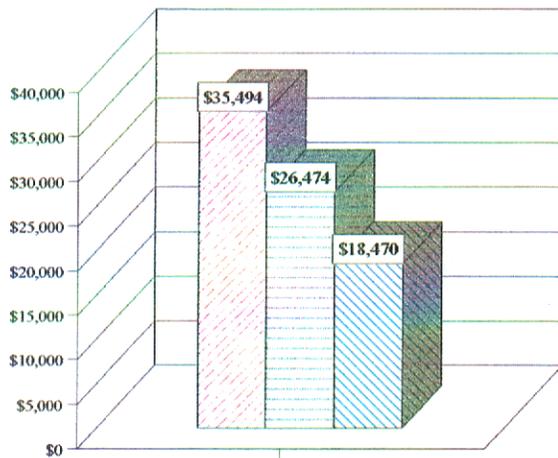


**Improved-Full Cash Value Per Section**

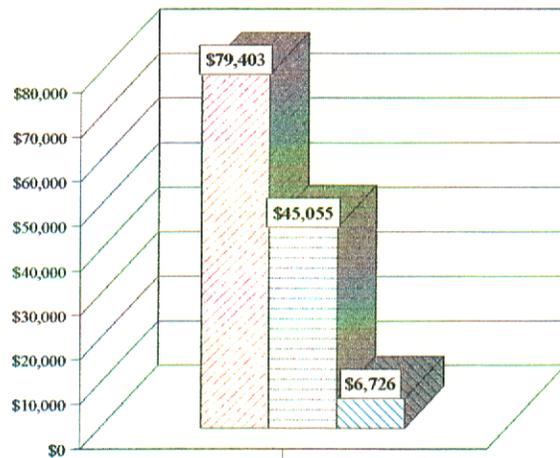


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



Unregulated  
Average



Taylor Lane Area  
Average

## GATES PASS / TUCSON MOUNTAIN PARK AREA

Land areas outside the Tucson Mountain Park were analyzed for the impact minor unregulated parcel splits, including (1) T14S R13E Sections 7 and 18; and (2) T14S, R12E, Sections 11-14. Both areas are characterized by low density, low value (land and improvements) on a section by section basis, and flood plain encroachments.

- Environmental Consequences:

Aerial photographs from 1985 and 1996 show the overlay of roads across and onto floodplains in Sections 7 and 12.

- Number of parcels and Relative Density:

(1) T14S R13E Sections 7 and 18:

Between 1991 and 1998, the aggregate number of parcels has stayed about the same: 86 to 89 per section. **This results in very low density: 44 parcels per section.**

- The average density among the areas of the study group that escaped the regulated development process is 179 parcels per section.

- The average density among the areas of the study group that were subject to the regulated development process is 485 parcels per section.

(2) T14S, R12E, Sections 11-14.

Between 1991 and 1998, this area also maintained aggregate parcels of 160 to 173. This total divided across 4 sections **also results in a very low density of 43 parcels per section.**

- Assessed Value:

(1) T14S R13E Sections 7 and 18:

Current Land Full Cash Value is around **\$3 million per section**. This is lower than the \$4.7 million per section average for unregulated areas within the study. It is much lower than the \$17.2 million per section average of regulated areas within the study.

Current Improved Full Cash Value is approximately **\$2.75 million per section**; which is lower than the \$8.1 million per section average among unregulated areas and much lower than the \$38.5 million per section average among areas subject to a regulated process.

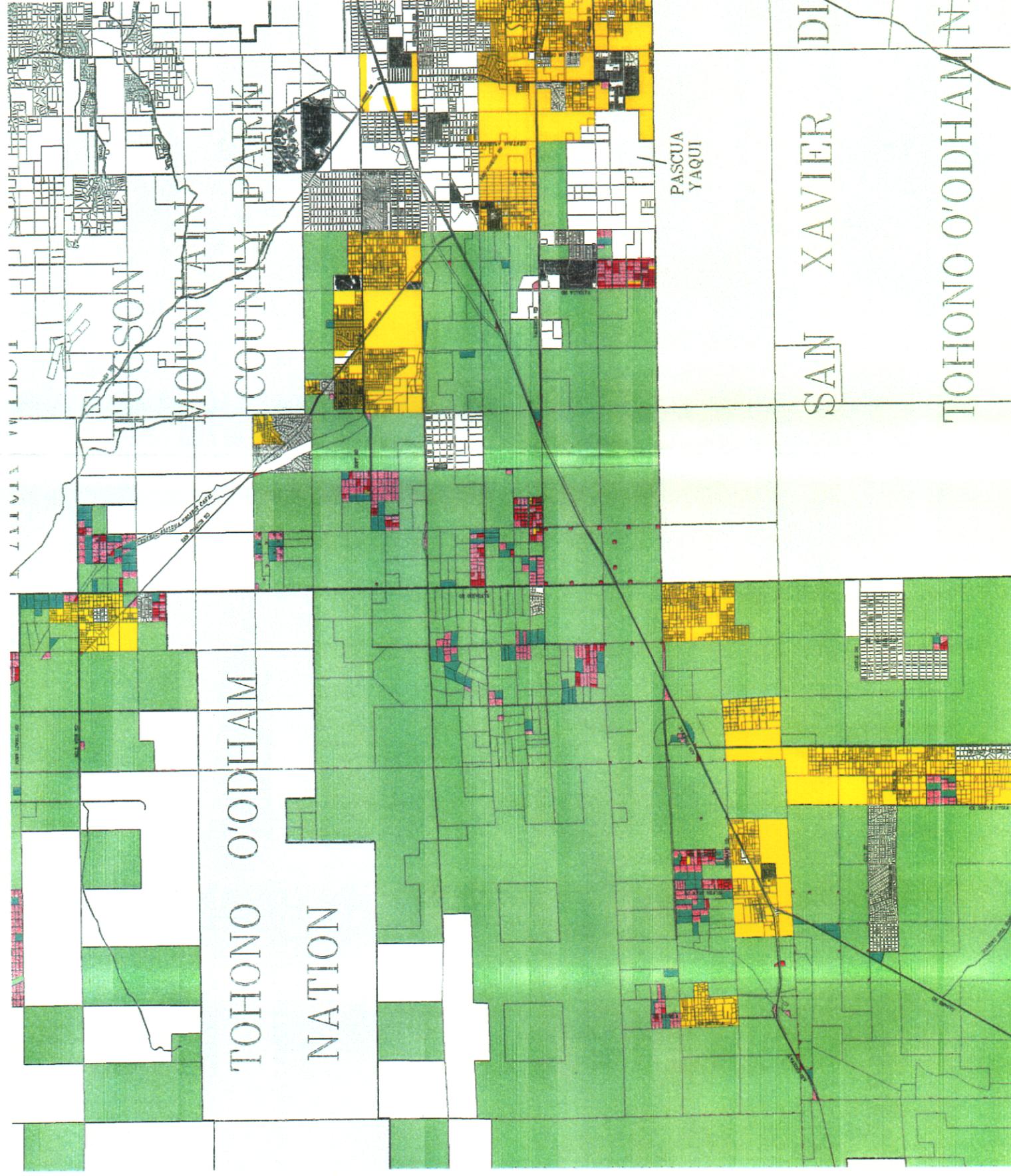
(2) T14S, R12E, Sections 11-14:

Current Land Full Cash Value is about **\$2.3 million per section**, even lower than the values described above.

Current Improved Full Cash Value is **\$2.6 million per section** -- a low value.

# RH and GR-1 Zoning

Southwest Study Area



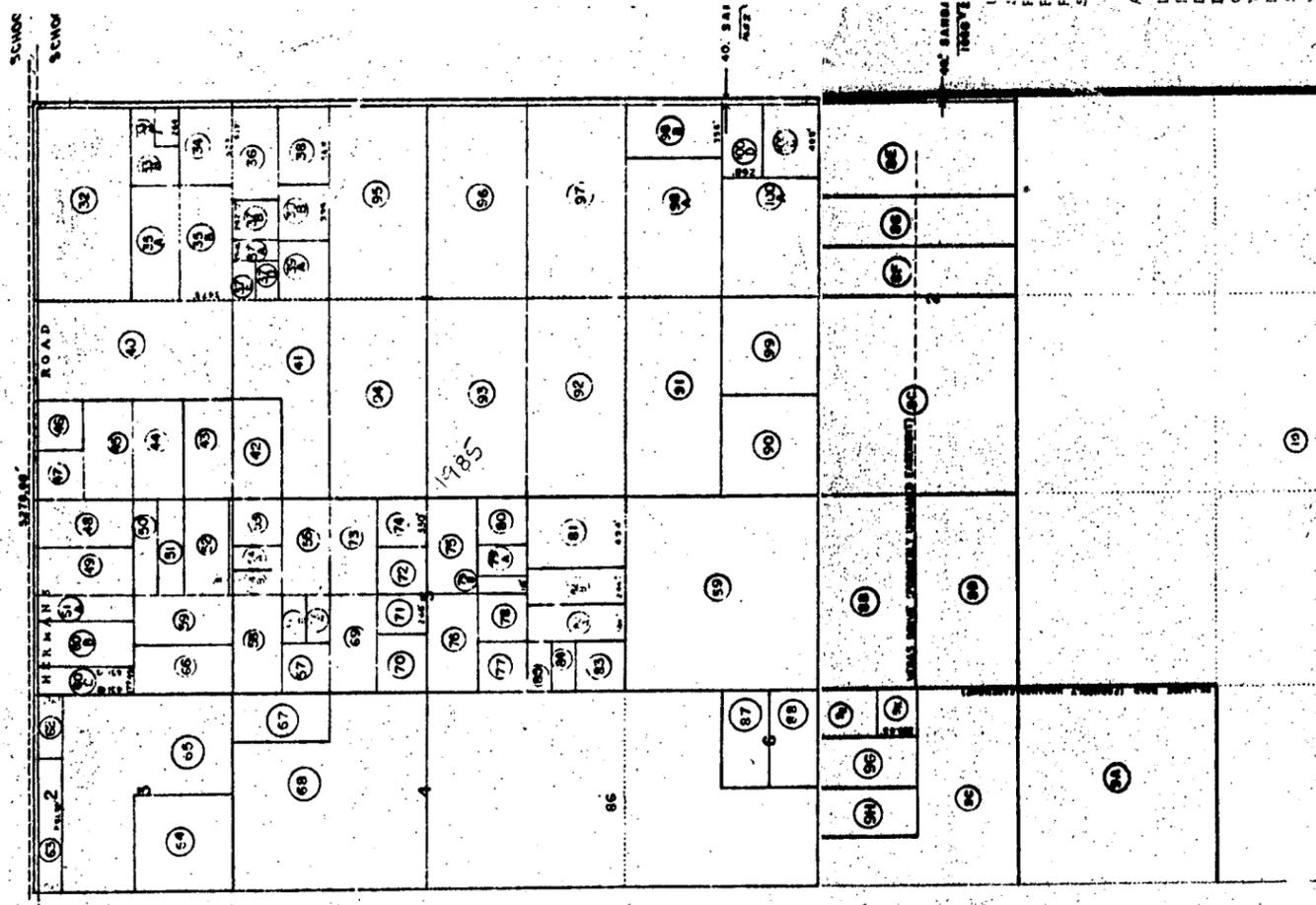
- Cities and Towns
- Public Preserves
- Tribal Nations
- Townships
- Major Roadways
- Public Preserves and Tribal Lands Boundaries
- All GR-1 Zoning
- RH Zoning less than 4.13 acres
- RH Zoning 4.13-10 Acres
- RH Zoning 10-20 Acres
- RH Zoning greater than 20 acres
- Parcels - Other Zoning



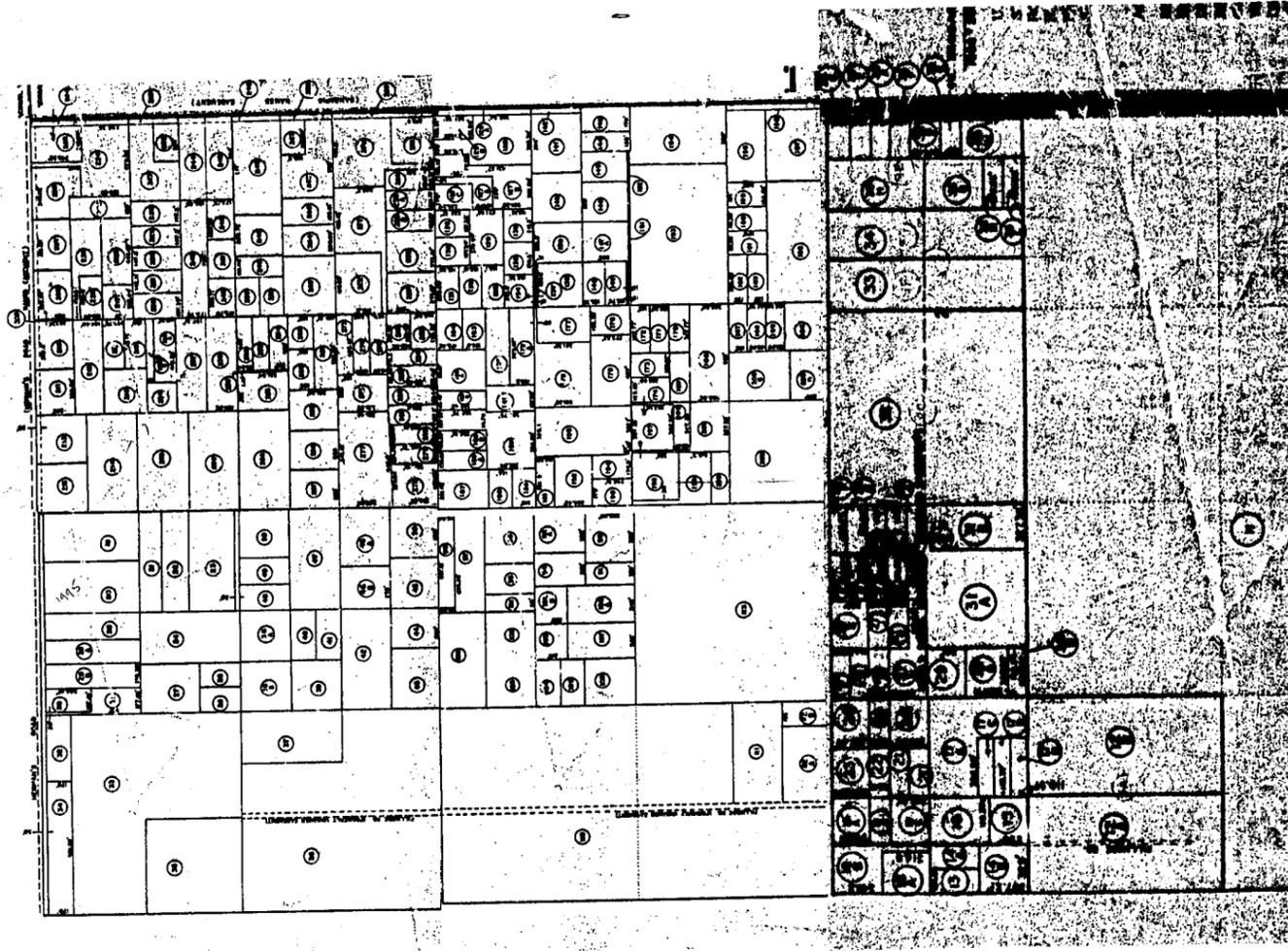
Pima County Comprehensive Plan  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800



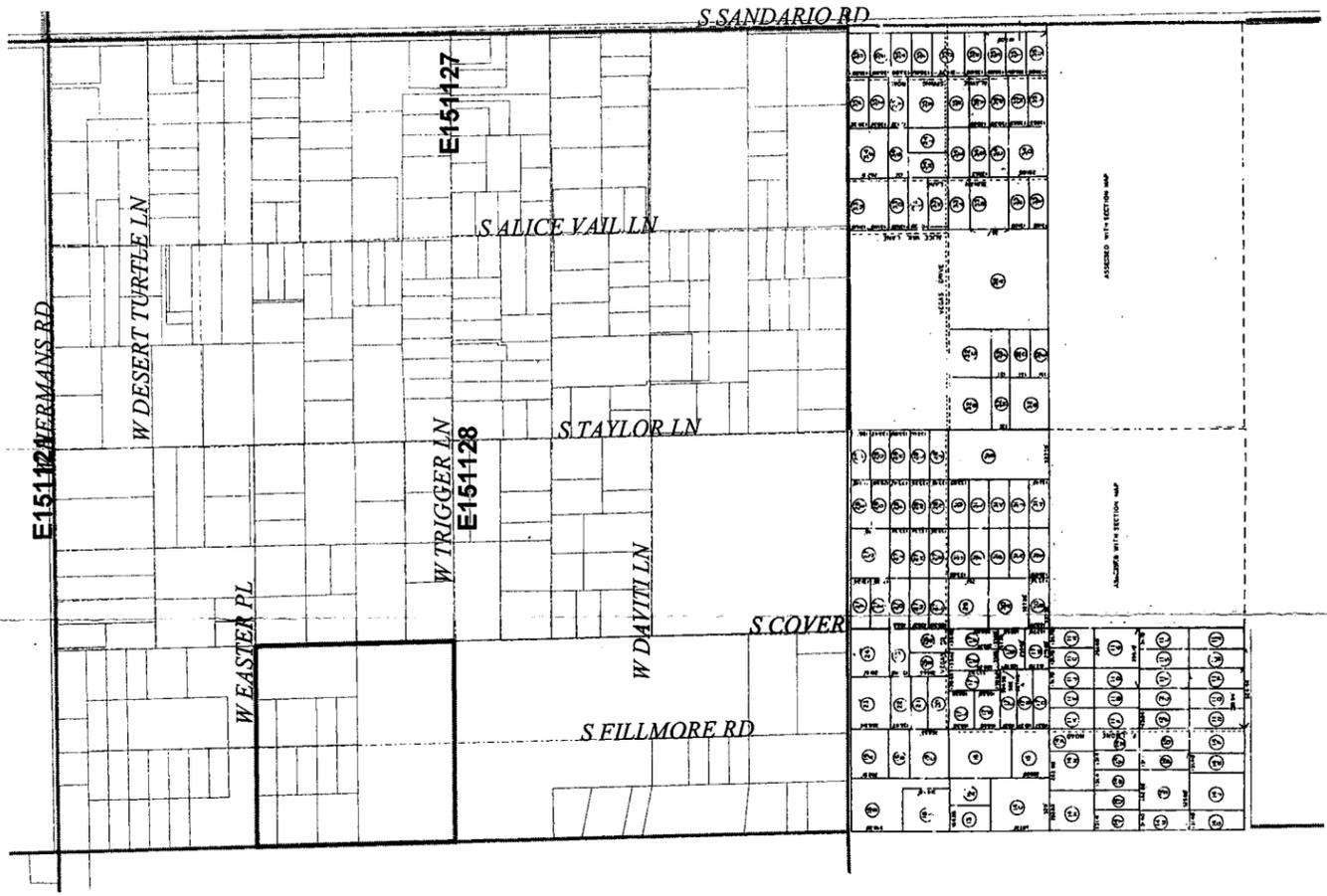
HERMANS ROAD  
 T15S R11E  
 Section 28  
 N1/2 S 33



1985



1995



Current

HERMANS ROAD

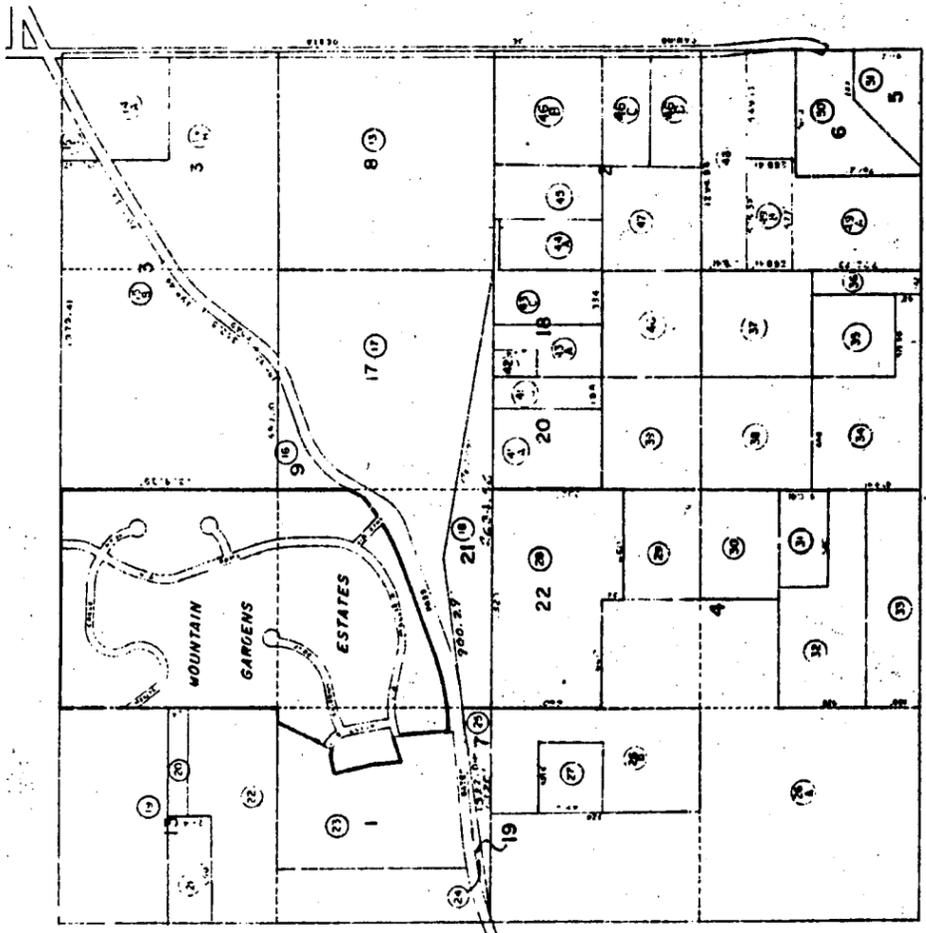


HERMANS ROAD / SOUTHWEST 1985  
T15S R11E S28,33

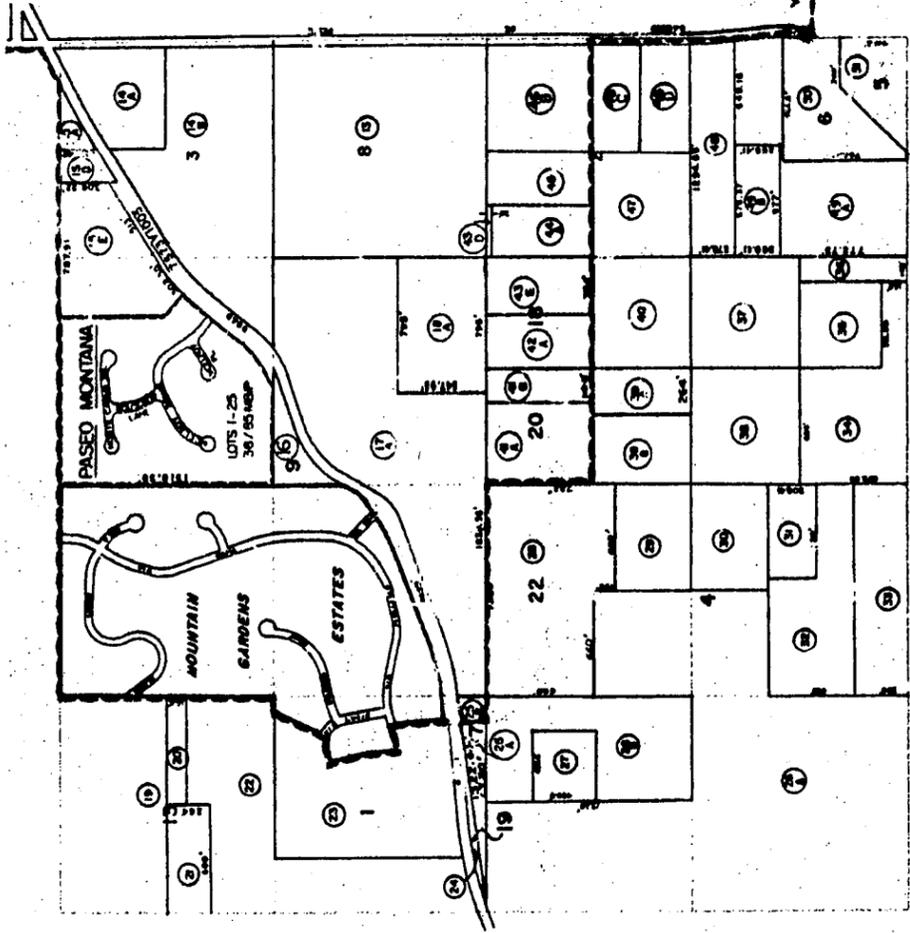


HERMANS ROAD / SOUTHWEST 1996  
T15S R11E S28,33

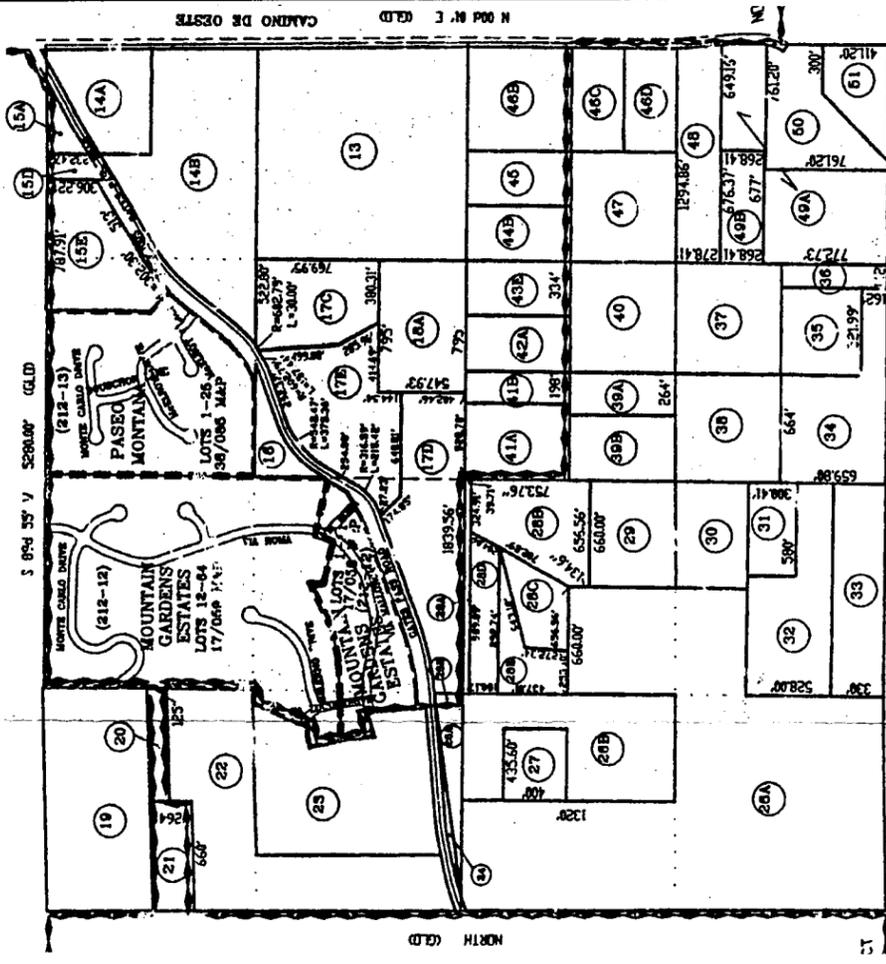
GATES PASS ROAD  
T14S R12E  
Section 12



1985



1995



Current



GATES PASS RD. 1996  
T14S R12E S12  
T14S R13E S7



GATES PASS RD. 1985  
T14S R12E S12  
T14S R13E S7

## C. PICTURE ROCKS STUDY AREA

### THE PICTURE ROCKS STUDY AREA

In the area of Pima County to the northwest of the City of Tucson, there are pockets of wildcat developments, denominated for purposes of this report as the Picture Rocks Study Area.

#### OVERVIEW OF THE PICTURE ROCKS STUDY AREA: ZONING AND EXISTING LAND USE

- The maps on the next two pages show both how the Picture Rocks Study Area is *zoned*, and how the land is actually being *used*. There is a strong correlation between the location of GR-1 Zoning, shown in yellow on the first "Zoning" map, and mobile home sites, shown in purple on the following "Land Use" map. The economic and environmental impacts are discussed below.

#### PICTURE ROCKS STUDY AREA (T13S R11E SECTIONS 3-10)

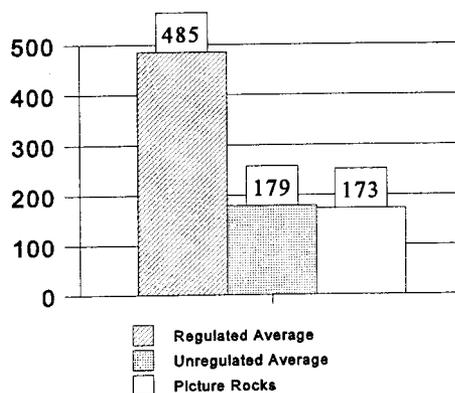
- Number of Parcels and Relative Density:* Assessor's maps on the following pages show the magnitude of lot split activity that took place from 1985, 1995, and 1998, in Sections 3, 9, 10 and 34. Aerial photography confirms the level of activity across the region.

##### Average Density in the Picture Rocks Study Area / Sections 3-10:

There are currently 1,386 parcels in the eight section Picture Rocks study area found at T13S R11 Sections 3-10, which results in a density of **173** parcels per section. This is a very low density, sprawling growth pattern.

##### Average Density in Unregulated Area:

Within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is **179**.



##### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of **485** parcels per section.

**PICTURE ROCKS STUDY AREA *continued* ...**

- **Environmental Consequences:** Like Catalina and the Taylor Lane study areas, aerial photographs from 1985 and 1996 reflect the division and development of land that has taken place, including flood plain encroachment.

- **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

Land Full Cash Value Per Section

- 1-2. Within the eight section Picture Rocks study area (T13S, R11E, Sections 3-10), the current total Land Full Cash Value *per section* is **\$2.8 million**. Within the three section Picture Rocks study area (T12S, R11E, Sections 33-35), the current total Land Full Cash Value *per section* is **\$6.7 million**.
3. The first compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**. Both are well below the average in the 7 planned areas, which is **\$17.2 million**.

Land Full Cash Value Per Parcel

- 1-3. Within the eight section Picture Rocks study area (T13S, R11E, Sections 3-10), the current total Land Full Cash Value *per parcel* is **\$15,950**. Within the three section Picture Rocks study area (T12S, R11E, Sections 33-35), the current total Land Full Cash Value *per parcel* is **\$20,335**. Both compare unfavorably among the other 12 unregulated lot split areas of this study, where the average Land Full Cash Value *per parcel* is **\$26,474**. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

- 1-3. Within the eight section Picture Rocks study area (T13S, R11E, Sections 3-10), the current total Improved Full Cash Value *per section* is **\$2.8 million**. Within the three section Picture Rocks study area (T12S, R11E, Sections 33-35), the current total Improved Full Cash Value *per section* is **\$4 million**. Both compares unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**. In the 7 planned areas, the same average is **\$38.5 million**.

Improved Full Cash Value Per Parcel

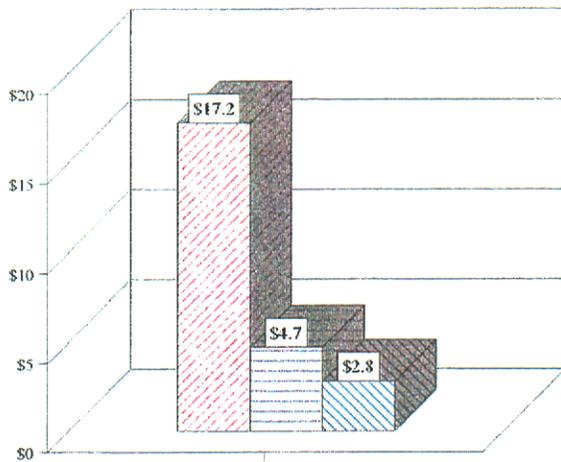
- 1-3. Within the eight section Picture Rocks study area (T13S, R11E, Sections 3-10), the current total Improved Full Cash Value *per parcel* is **\$15,921**. Within the three section Picture Rocks study area (T12S, R11E, Sections 33-35), the current total Improved Full Cash Value *per parcel* is **\$12,030**. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**. In the 7 planned areas, the same average is **\$79,403**.

- **CONCLUSION -- Picture Rocks:**

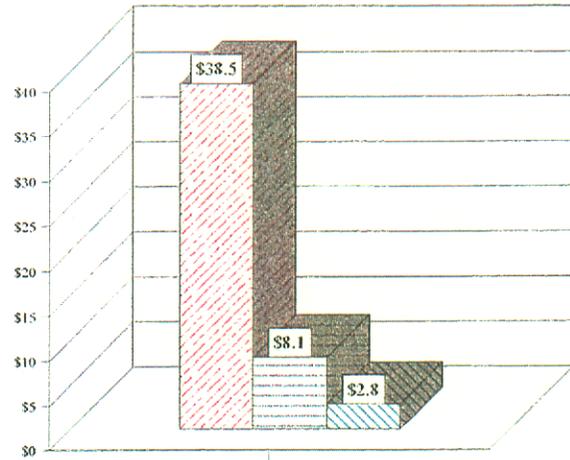
The use of land which results from unregulated lot splitting contributes to the problem of sprawl and depletes the tax base for Pima County.

**PICTURE ROCKS (T13S, R11E, SECTION 3-10)  
FULL CASH VALUE COMPARISONS - 1998**

**Land-Full Cash Value Per Section**

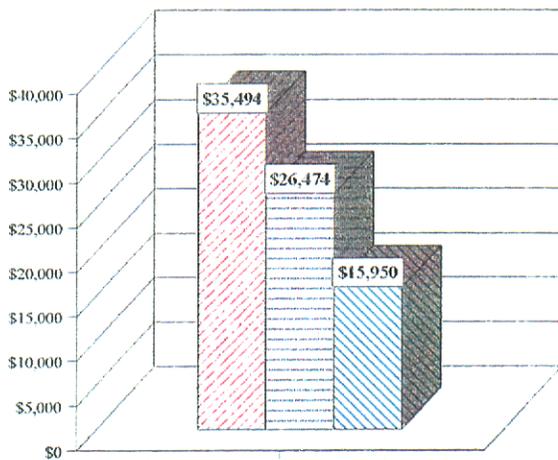


**Improved-Full Cash Value Per Section**

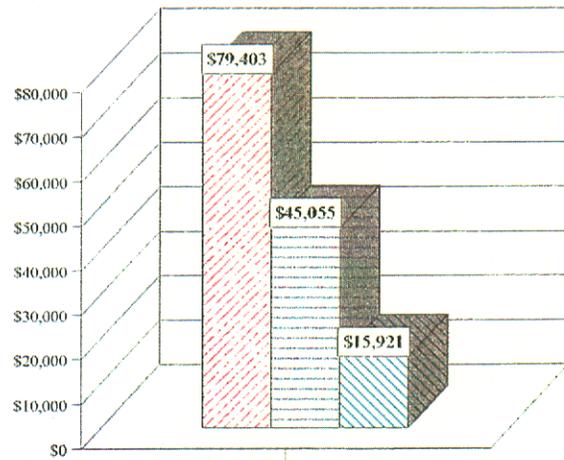


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



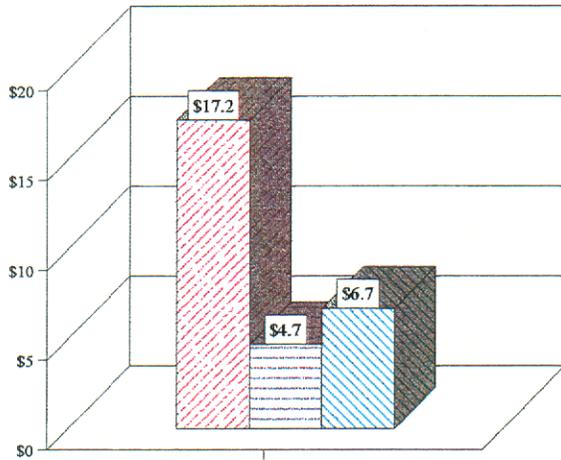
Unregulated  
Average



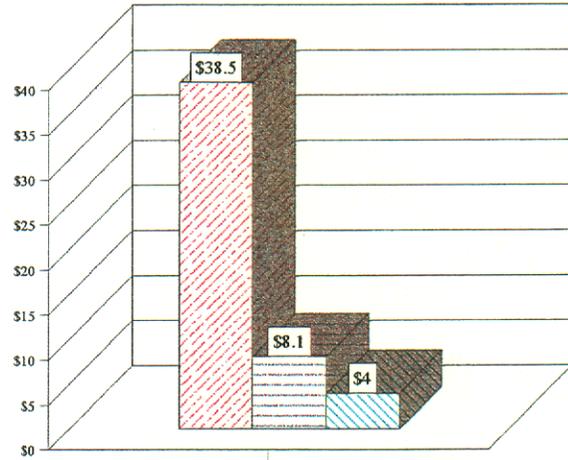
Picture Rocks  
Average

**PICTURE ROCKS (T12S, R11E, SECTION 33-35)  
FULL CASH VALUE COMPARISONS - 1998**

**Land-Full Cash Value Per Section**

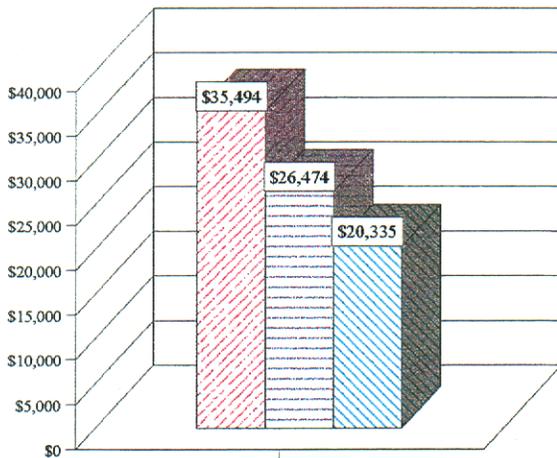


**Improved-Full Cash Value Per Section**

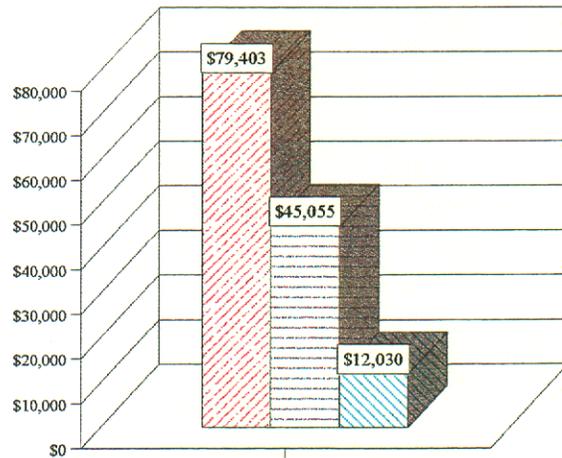


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



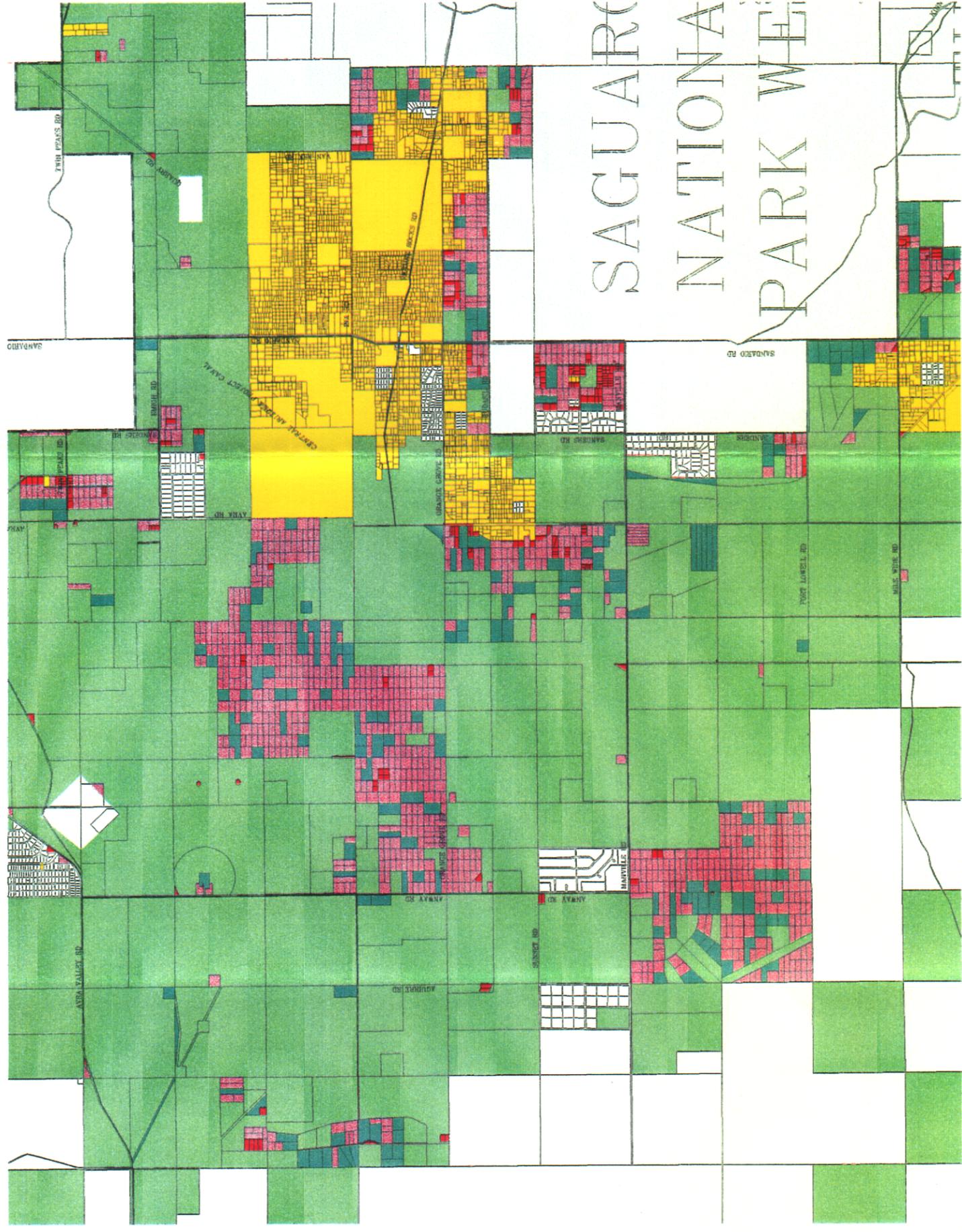
Unregulated  
Average



Picture Rocks  
Average

# RH and GR-1 Zoning

## Picture Rocks Study Area



- Cities and Towns
- Public Preserves
- Tribal Nations
- Townships
- Major Roadways
- Public Preserves and Tribal Lands Boundaries
- All GR-1 Zoning
- RH Zoning less than 4.13 acres
- RH Zoning 4.13-10 Acres
- RH Zoning 10-20 Acres
- RH Zoning greater than 20 acres
- Parcels - Other Zoning

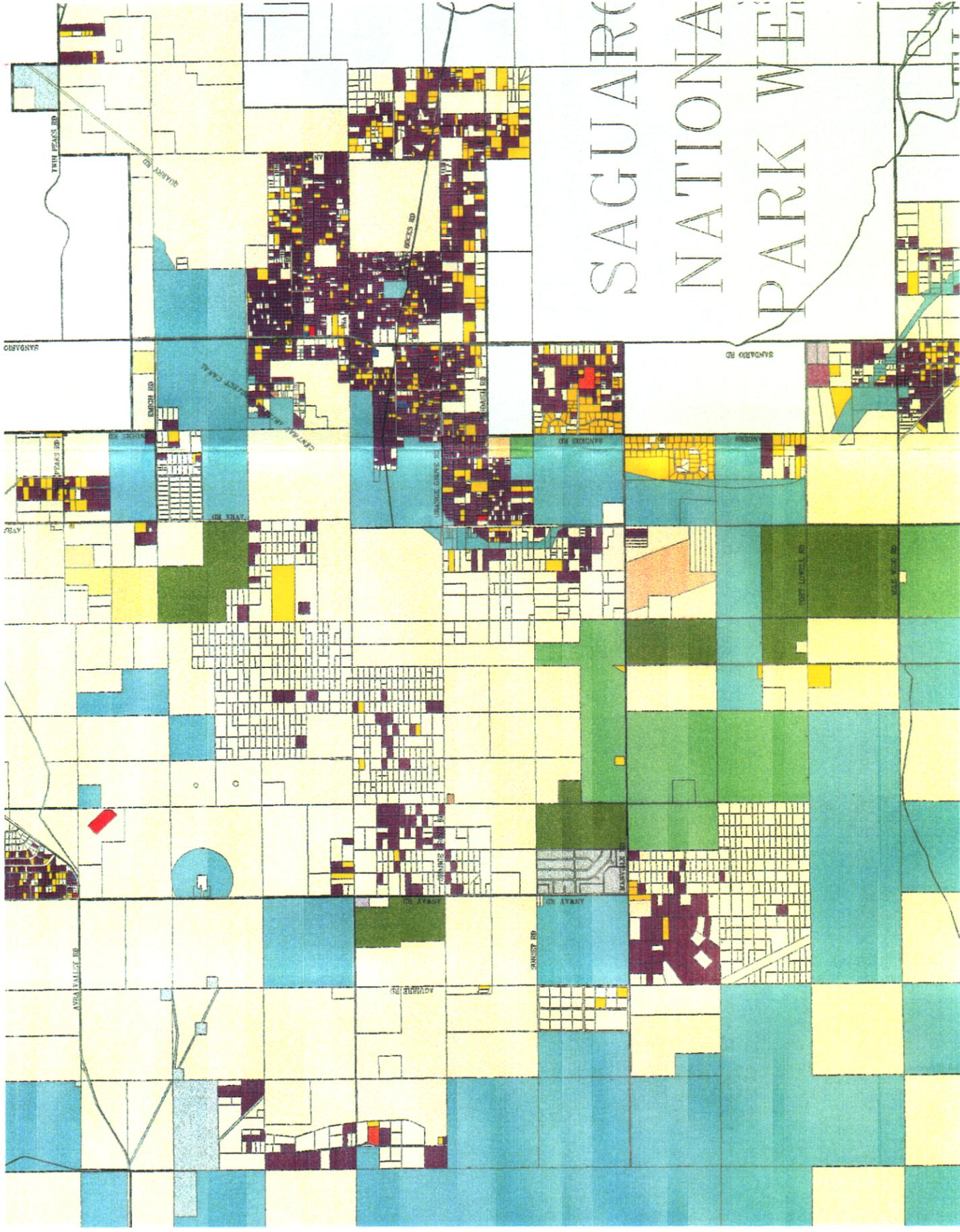


**Pima County Comprehensive Plan**  
 Pima County Development Services Department  
 Planning Division  
 201 N. San Bernardino Ave., 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800

# Existing Land Use

## Picture Rocks Study Area

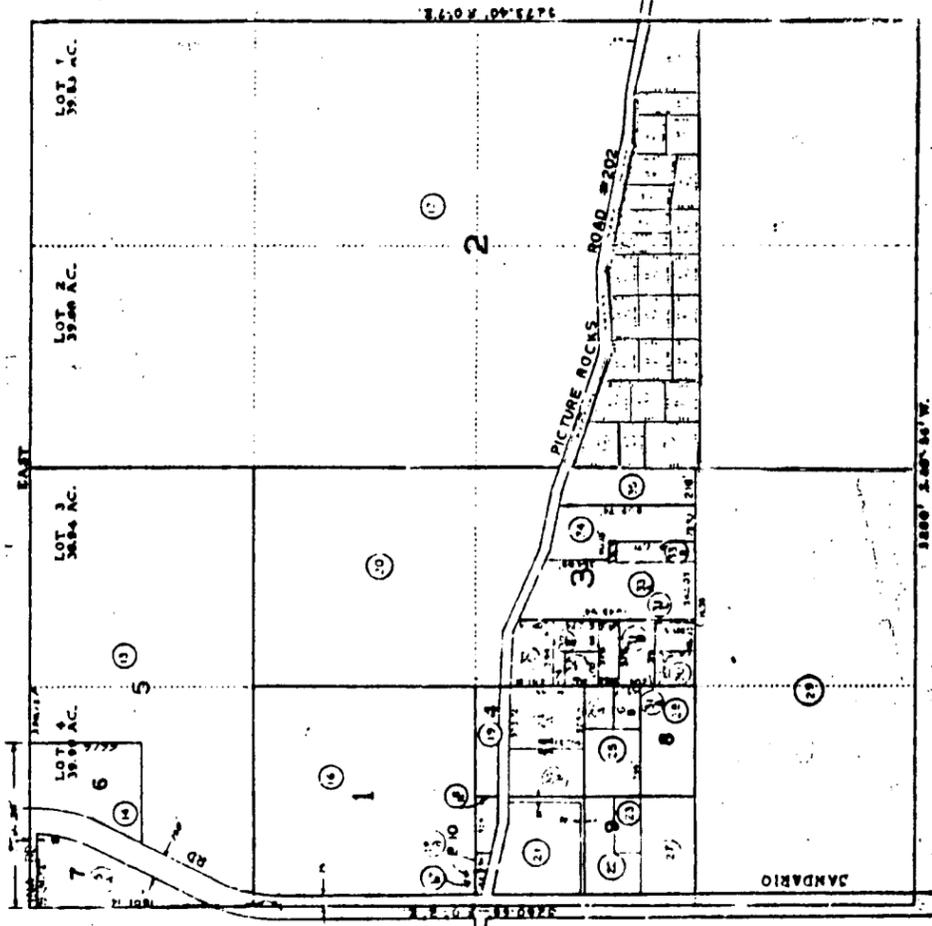
	Cities and Towns		VACANT
	Public Preserves		SINGLE-FAMILY
	Tribal Nations		TOWNHOUSE/CONDO
	Townships		MULTI-FAMILY
	Major Roadways		MOBILE HOME
	Public Preserves and Tribal Lands Boundaries		LODGING
	Parcels		OFFICE
			COMMERCIAL
			INSTITUTIONAL
			MISC. GOVERNMENT
			PARK
			RESORT
			GOLF COURSE
			AGRICULTURE
			INDUSTRIAL
			TRANSPORT FACIL
			UTILITIES/TELECOMMUNICATIONS
			OTHER
			MILITARY
			MILITARY/ST. POLICE
			STATE-VACANT
			VACANT-SCHOOL PROP
			VACANT-COUNTY
			VACANT-TRIBAL



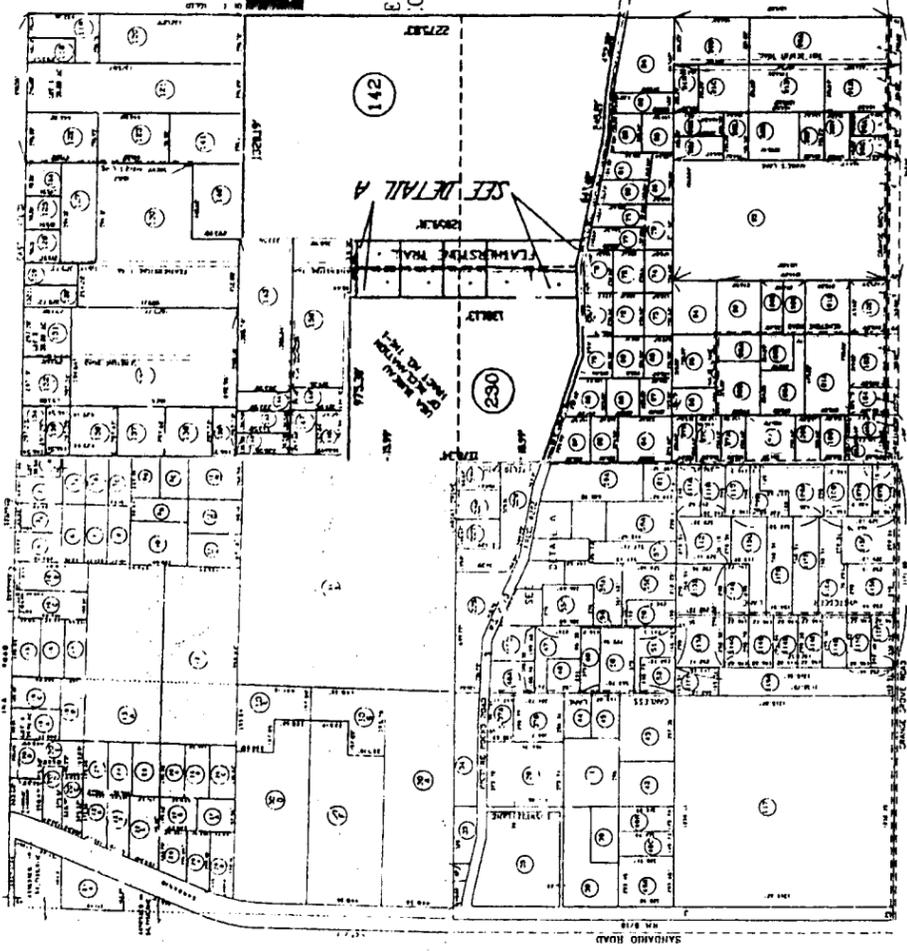
**Pima County Comprehensive Plan**  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800



PICTURE ROCKS RD.  
T13S R11E  
Section 3



1985

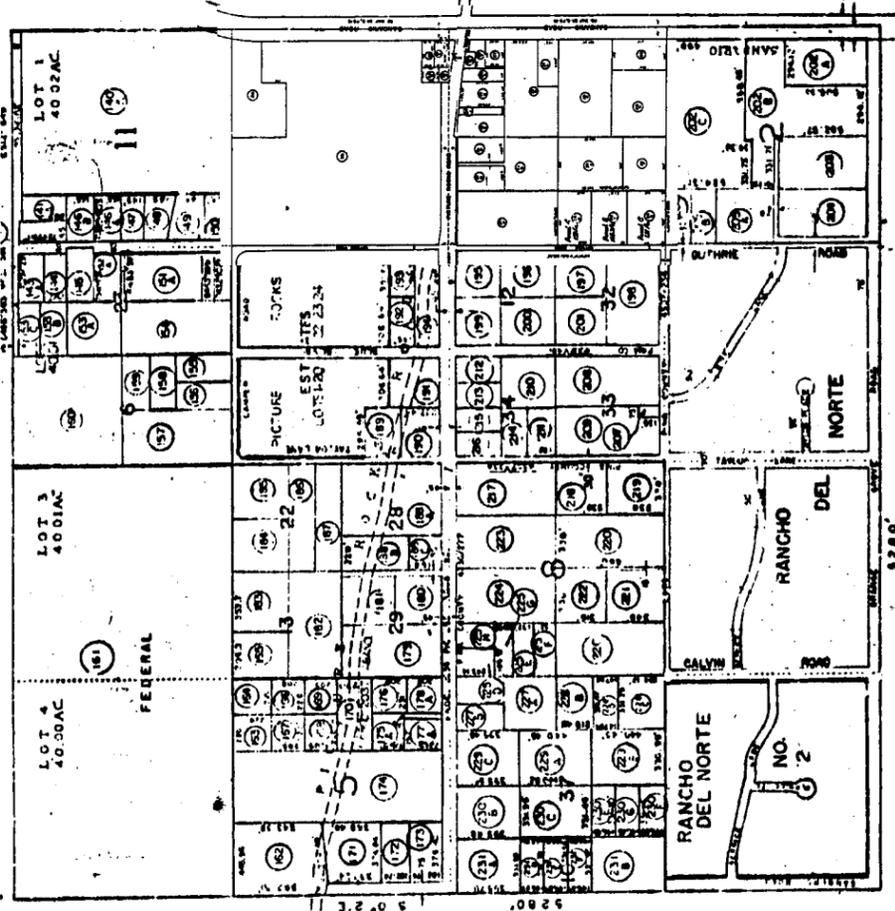


1995

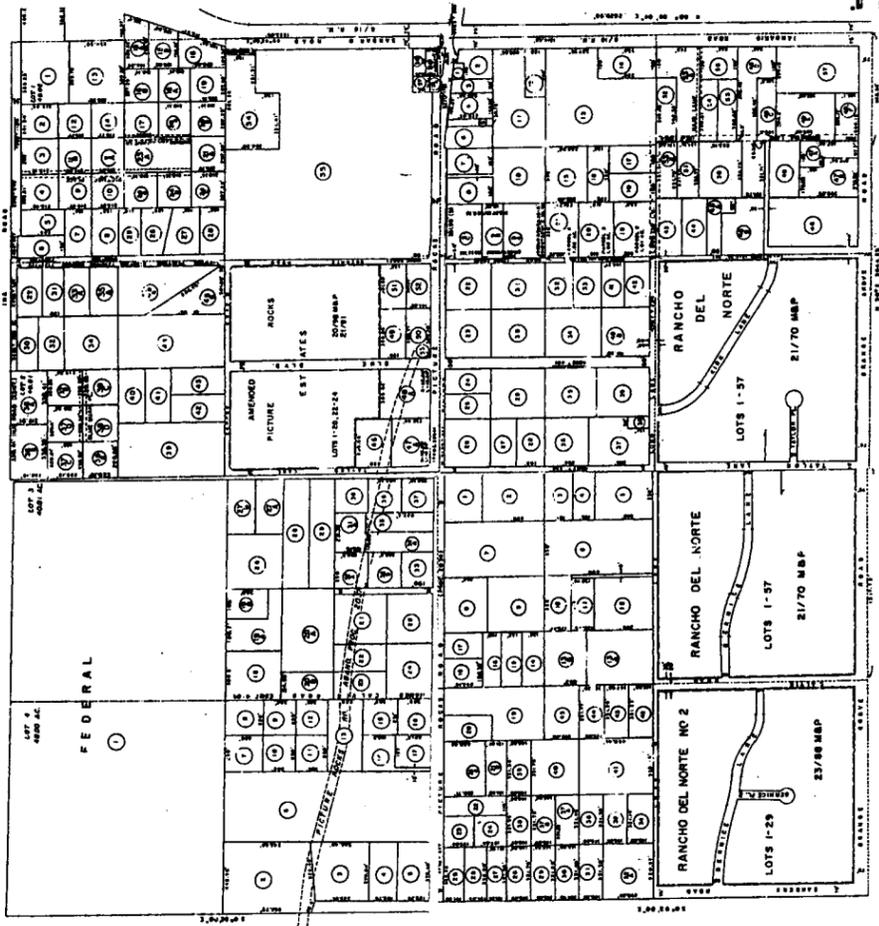


Current

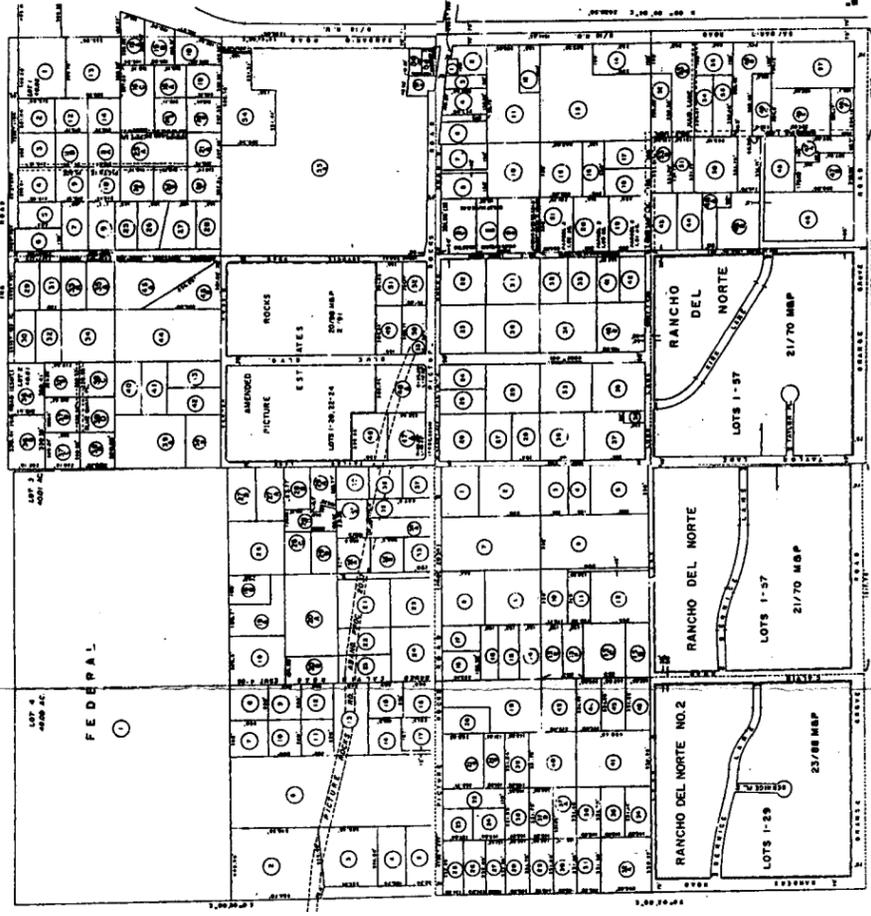
PICTURE ROCKS RD.  
T13S R11E  
Section 4



1985

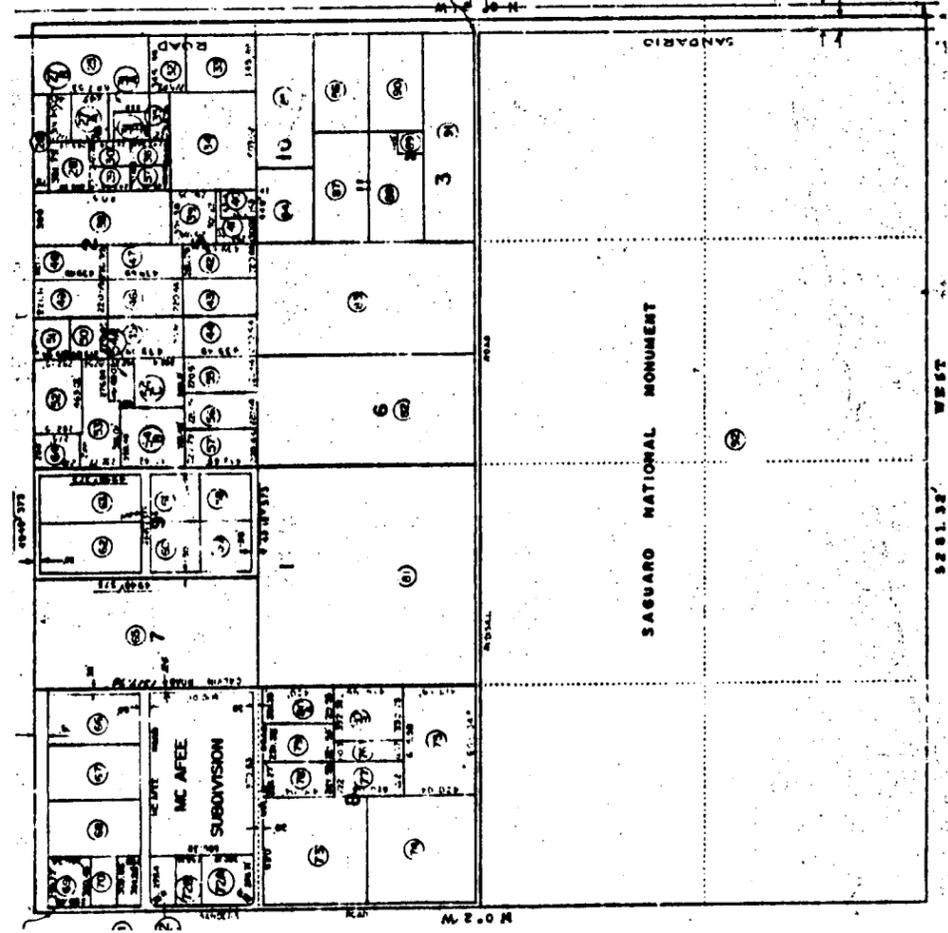


1995

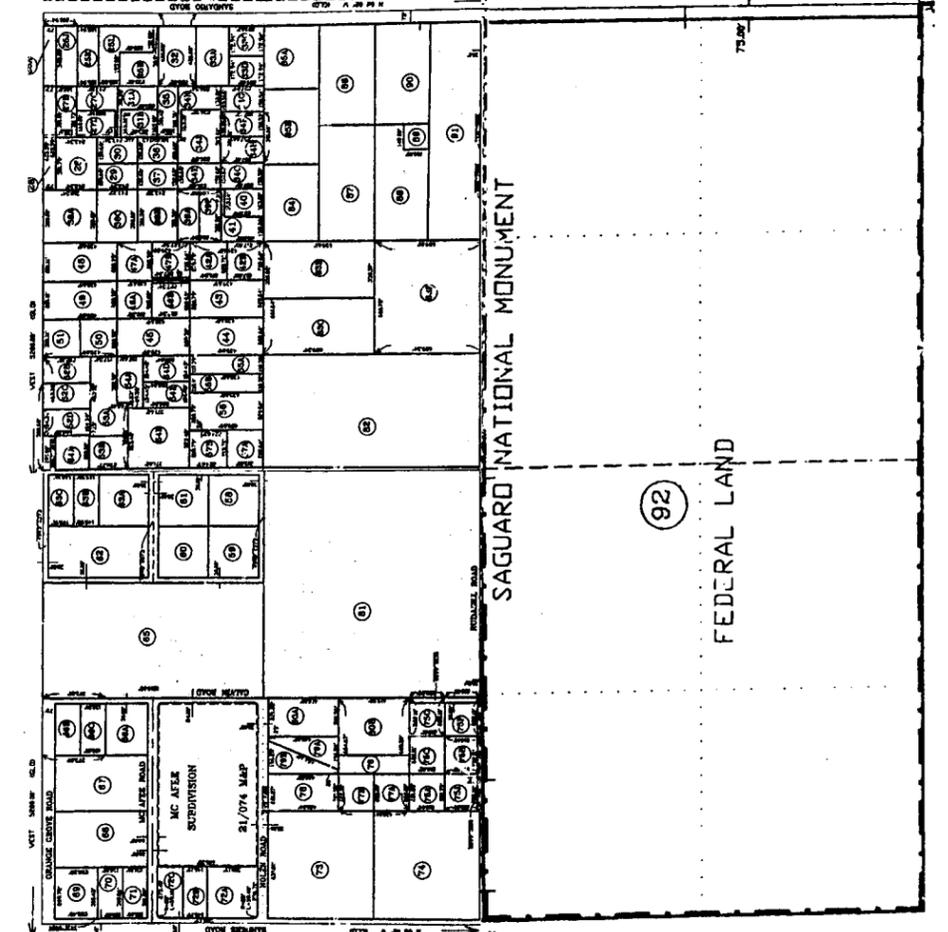


Current

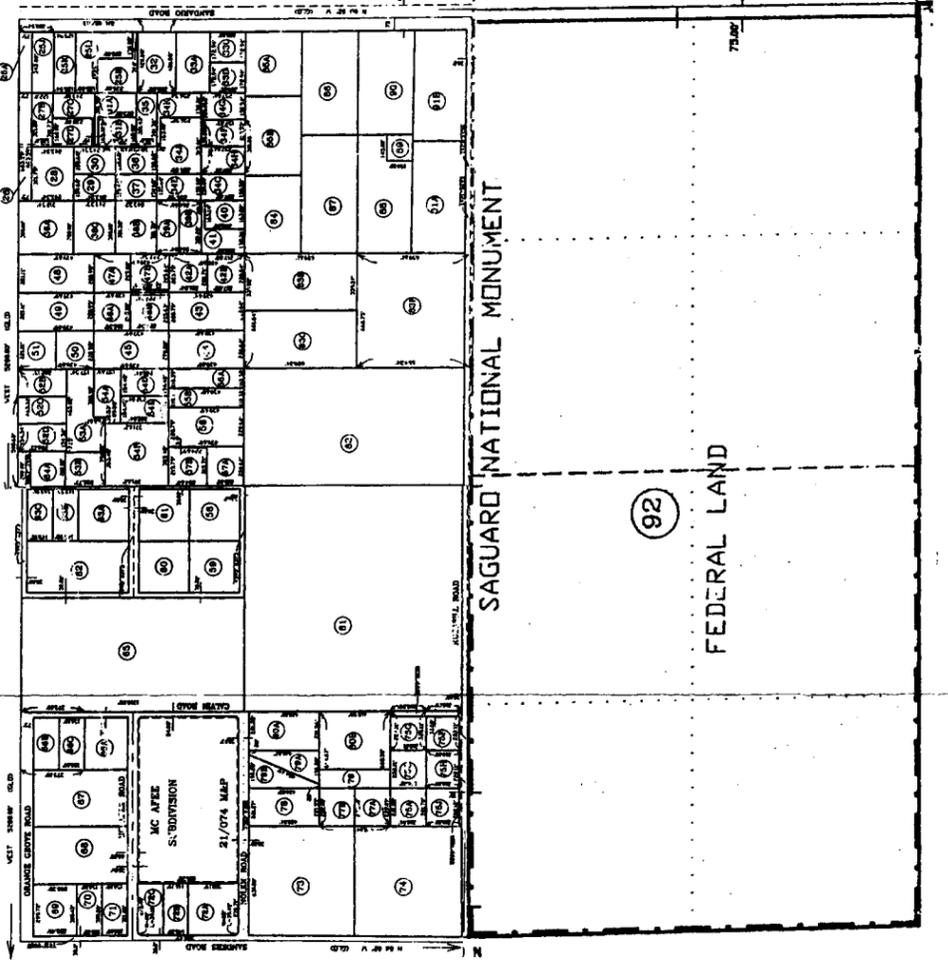
PICTURE ROCKS RD.  
T13S R11E  
Section 9



1985

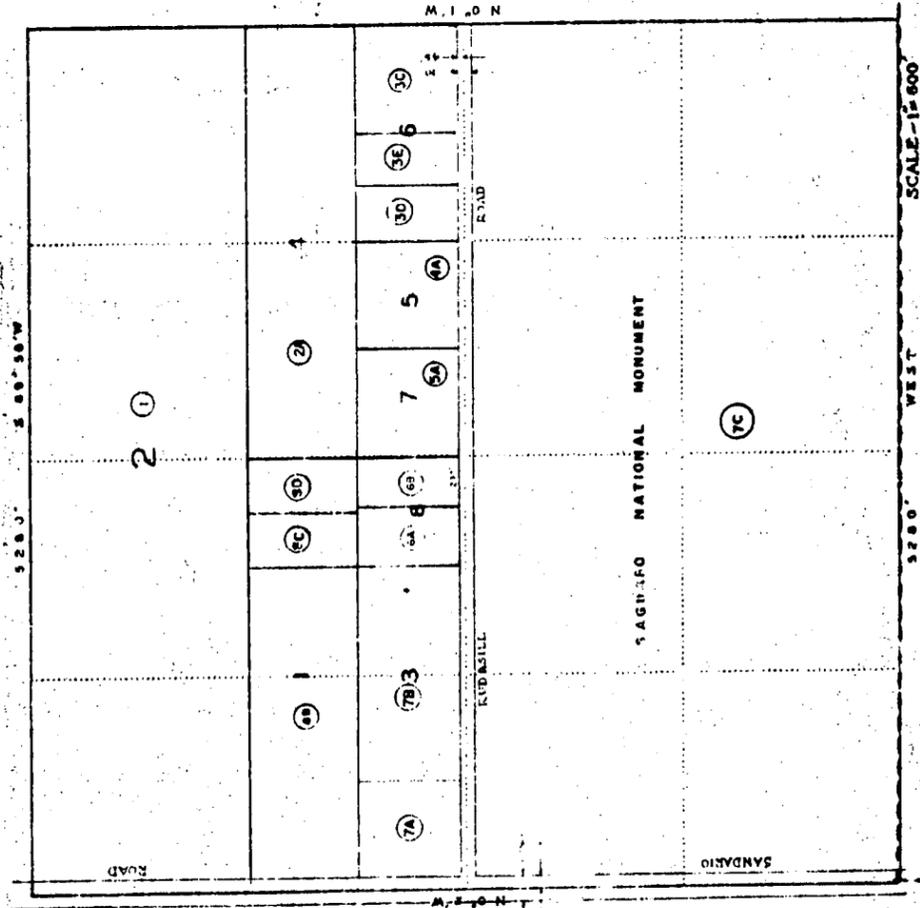


1995

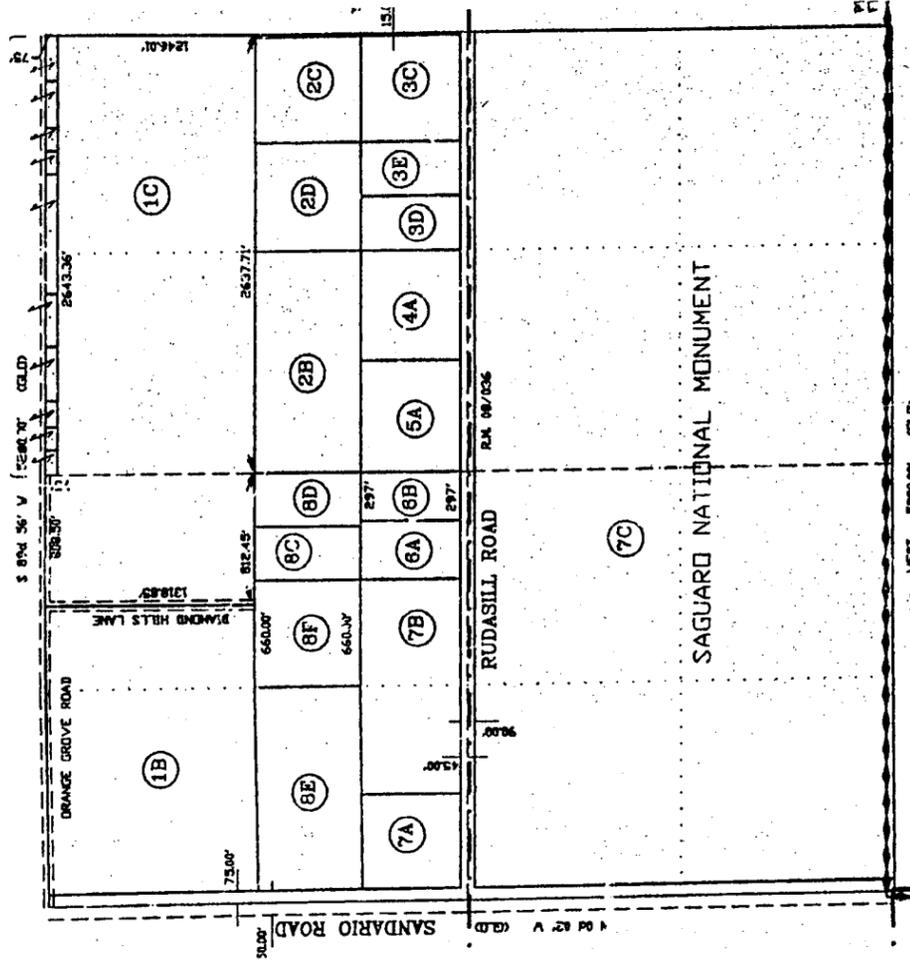


Current

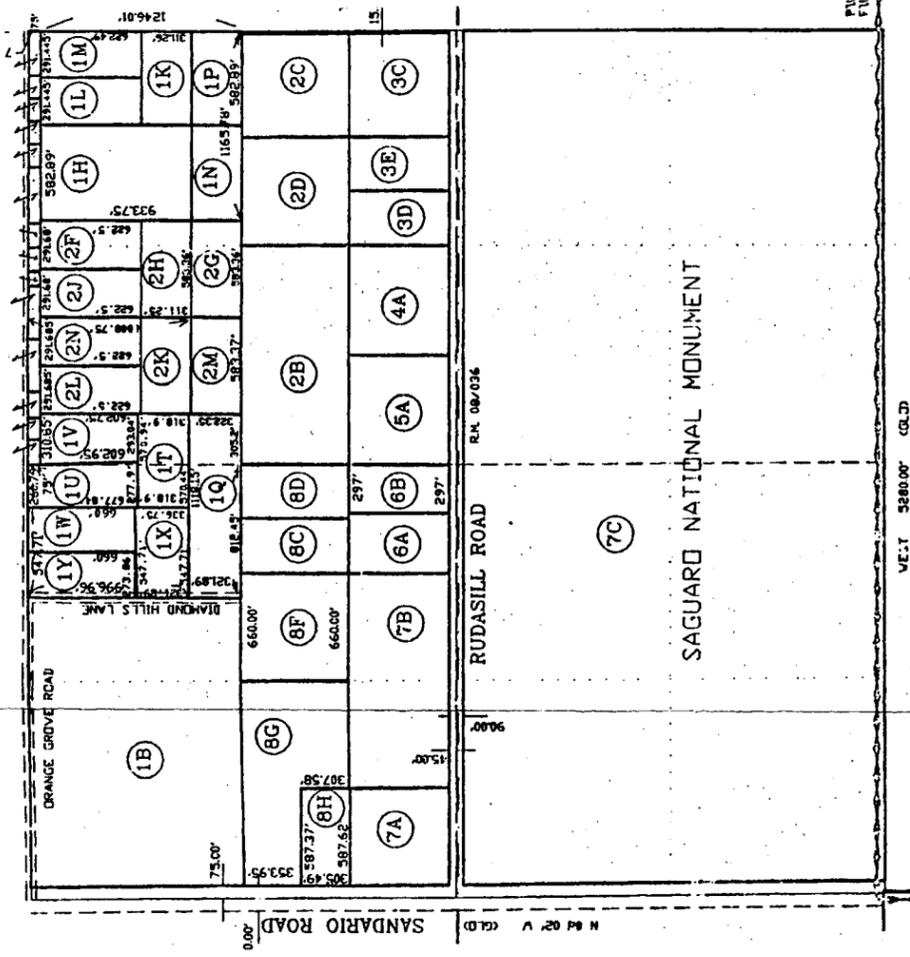
PICTURE ROCKS RD.  
T13S R11E  
Section 10



1985

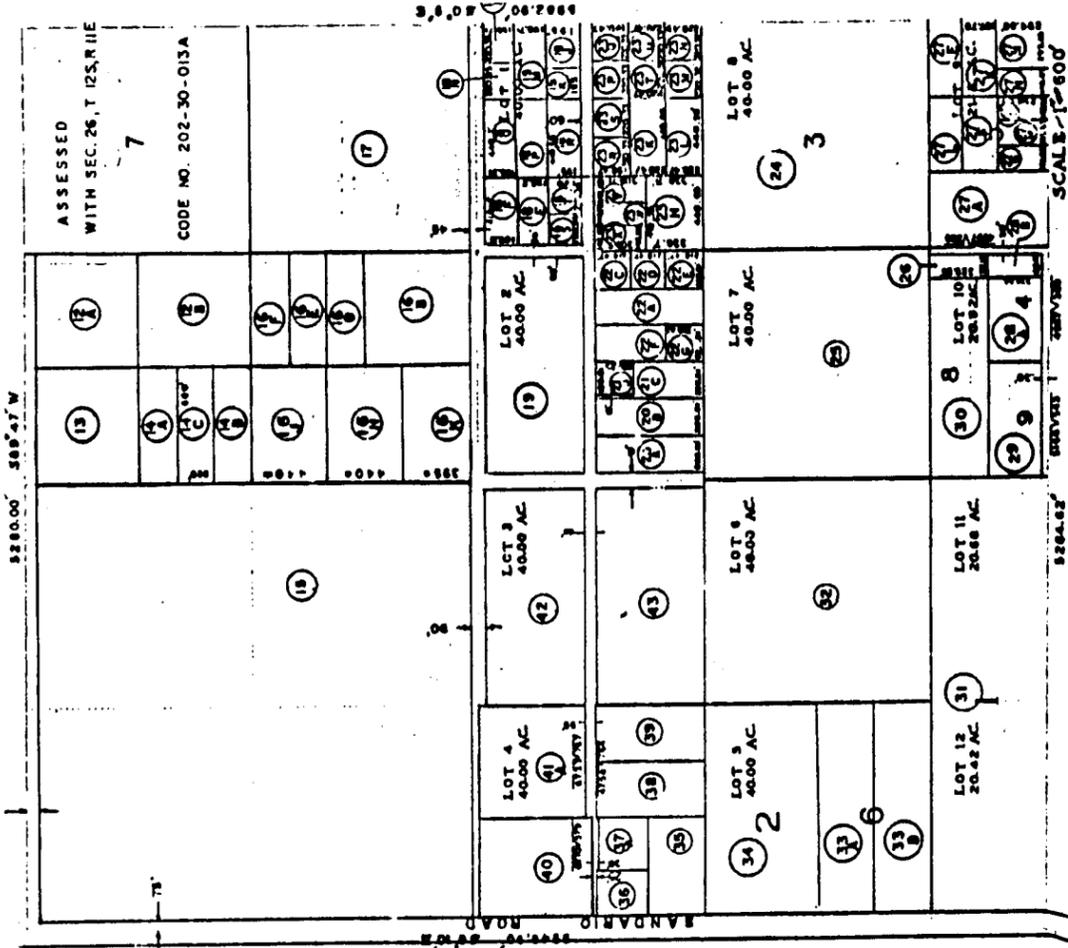


1995

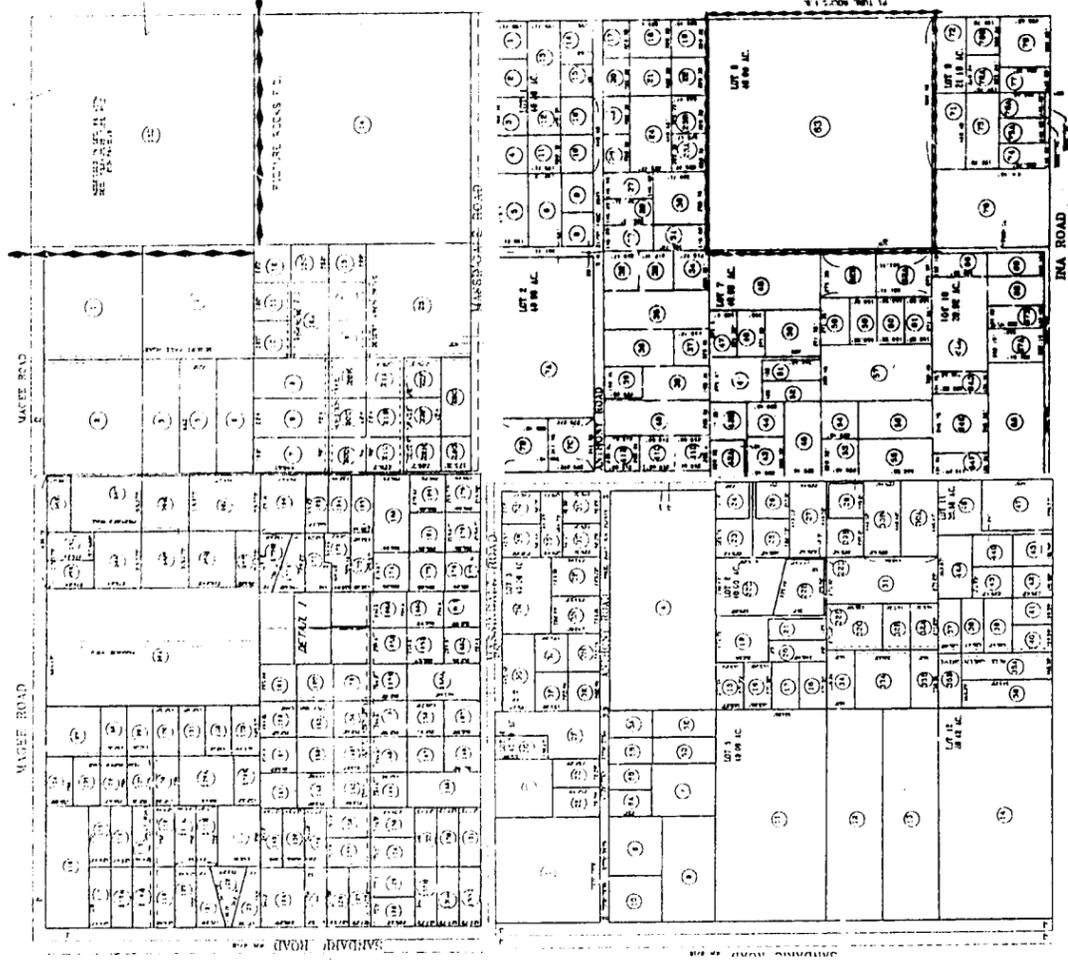


Current

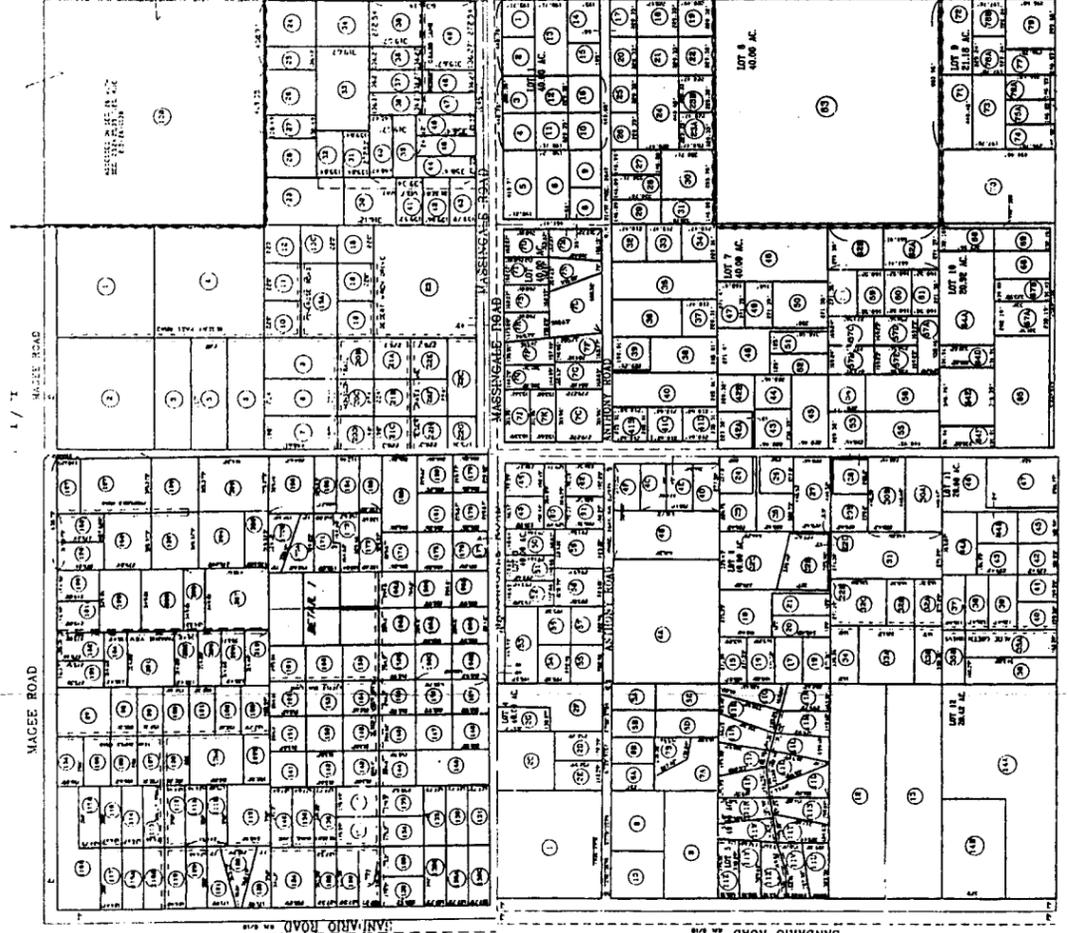
PICTURE ROCKS RD.  
T12S R11E  
Section 34



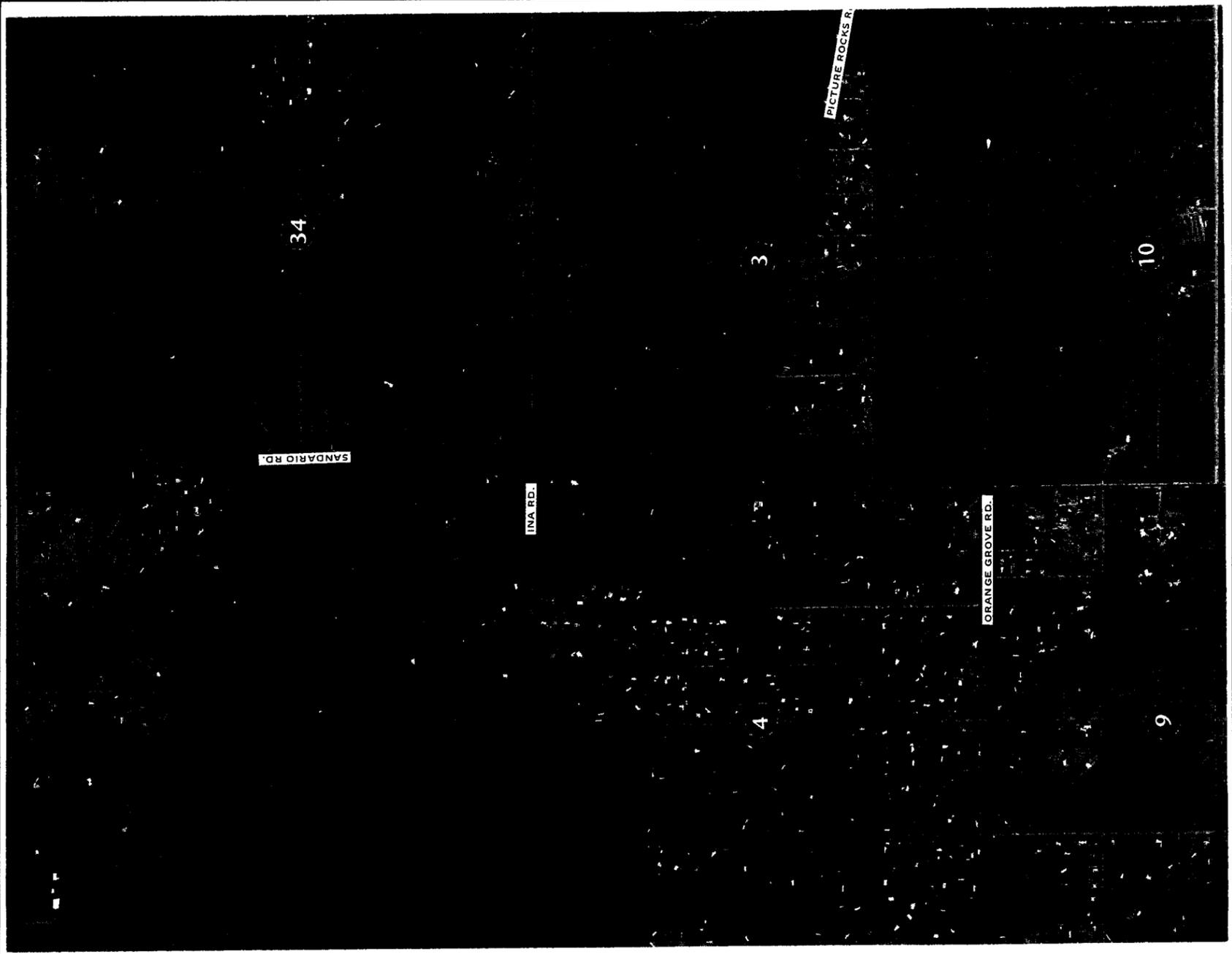
1985



1995



Current



PICTURE ROCKS 1985  
 T12 R11E S34  
 T13S R11E S3,4,9,10



PICTURE ROCKS 1996  
 T12S R11E S34  
 T13S R11E S3,4,9,10

## D. SAHUARITA ROAD STUDY AREA

1. Nogales Highway
- 2-3. Sahuarita Road

### THE SAHUARITA ROAD STUDY AREA

In the area of Pima County to the southeast of the City of Tucson, there are pockets of wildcat developments, including the neighborhoods east of the San Xavier District, designated as Old Nogales Highway in this study, and areas further east and south, designated as the Sahuarita Road study area.

#### OVERVIEW OF THE SOUTHWEST STUDY AREA: ZONING AND EXISTING LAND USE

- The maps on the next two pages show both how the Southwest Study Area is *zoned*, and how the land is actually being *used*. There is a strong correlation between the location of GR-1 Zoning, shown in yellow on the first "Zoning" map, and mobile home sites, shown in purple on the following "Land Use" map in the Old Nogales Highway area. RH Zoning of less than 10 acres also corresponds with heavy mobile home representation on the land use map.

#### OLD NOGALES HIGHWAY (T16S R14E SECTIONS 4-9)

- *Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Section 5 and show the extensive lot splitting in the Old Nogales Highway area, particularly in the lower portion of the Section.

##### Average Density in the Old Nogales Study Area:

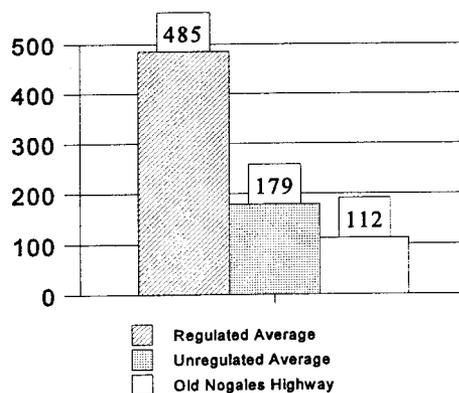
There are currently 671 parcels in the six section Old Nogales Highway area, which results in a density of 112 parcels per section. This is a very low density, sprawling growth pattern.

##### Average Density in Unregulated Area:

Even within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is 179.

##### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of 485 parcels per section.



**OLD NOGALES HIGHWAY continued ...**

- **Environmental Consequences:** Aerial photographs from 1985 and 1996 reflect the division and development of land, along with substantial flood plain encroachment.

- **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

Land Full Cash Value Per Section

1. Within the six section study area, the current total Land Full Cash Value *per section* is **\$2.6 million**.
2. This compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**.
3. In the 7 planned areas, the same average is **\$17.2 million**.

Land Full Cash Value Per Parcel

1. Within the six section study area, the current total Land Full Cash Value *per parcel* is **\$23,106**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value *per parcel* is **\$26,474**.
3. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

1. Within the six section Old Nogales Highway study area, the current total Improved Full Cash Value *per section* is **\$1.2 million**.
2. This compares very unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**.
3. In the 7 planned areas, the same average is **\$38.5 million**.

Improved Full Cash Value Per Parcel

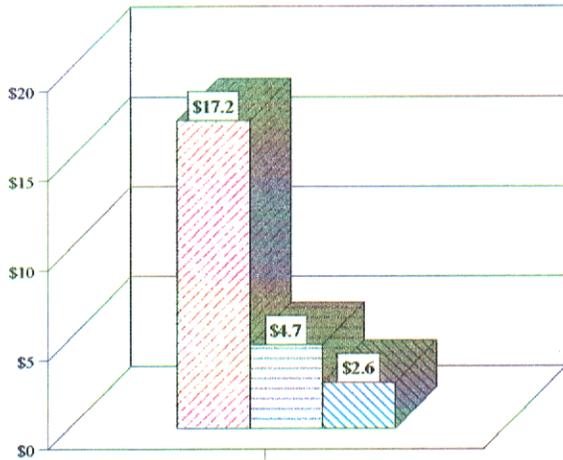
1. Within the five section study area, the current total Improved Full Cash Value *per parcel* is **\$10,776**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**.
3. In the 7 planned areas, the same average is **\$79,403**.

- **CONCLUSION - Old Nogales Highway Study Area:**

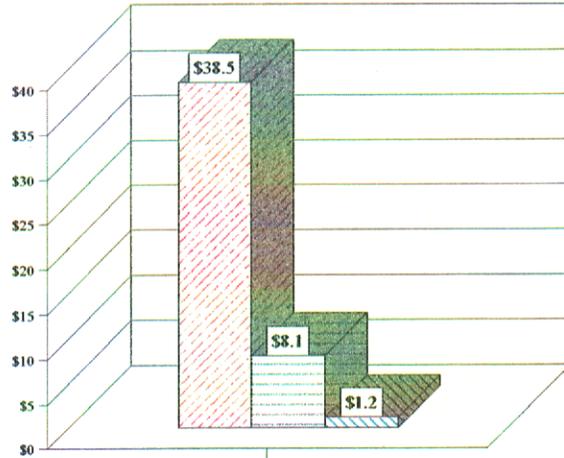
The use of land which results from unregulated lot splitting contributes to the problem of sprawl and depletes the tax base for Pima County.

# OLD NOGALES HIGHWAY (T16S,R14E, SECTION 4-9) FULL CASH VALUE COMPARISONS - 1998

**Land-Full Cash Value Per Section**

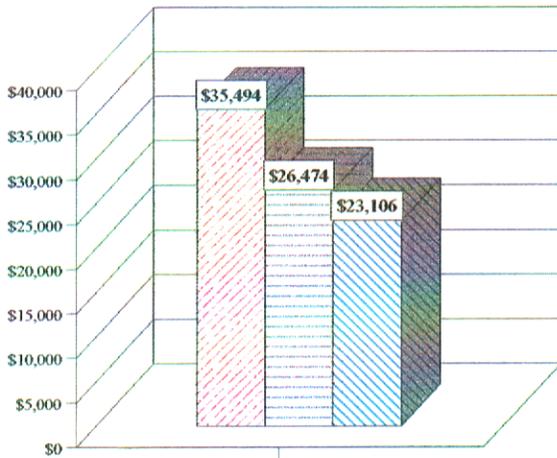


**Improved-Full Cash Value Per Section**

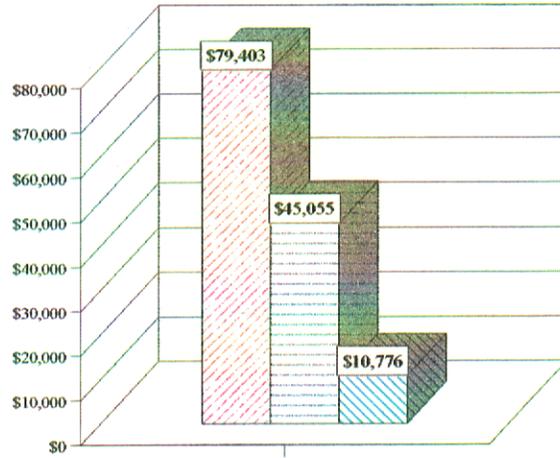


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



Unregulated  
Average



Old Nogales Highway  
Average

## SAHUARITA ROAD STUDY AREAS (T17S R15E SECTIONS 2-4, 8-10,15-17/ 7-9, 16-18)

- *Environmental Consequences:* Aerial photographs from 1985 and 1996 reflect the division and development of land, along with substantial flood plain encroachment.
- *Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Section 7 and show the extensive lot splitting in this area.

### Average Density in the Study Area:

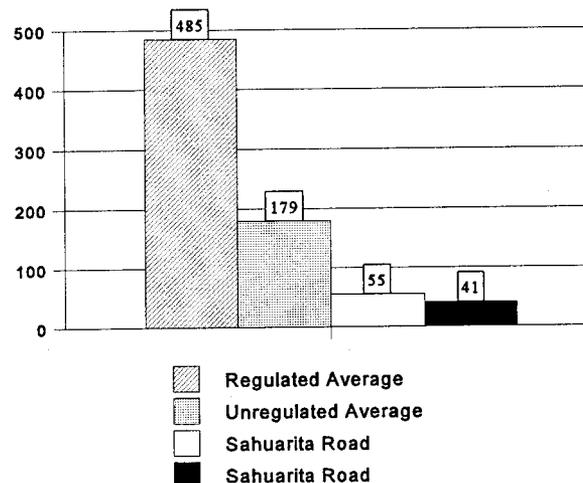
There are currently 285 parcels in the one 7 section location of the Sahuarita Road study area, which results in a density of **41** parcels per section. There are 883 in another 6 section location of the Sahuarita Road study area, which results in a density of **55** parcels per section. This is a very low density, sprawling growth pattern.

### Average Density in Unregulated Area:

Even within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is **179**.

### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of **485** parcels per section.



• **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

Land Full Cash Value Per Section

1. Within the seven section study area (T17S, R15E, Sections 2-4,8-10, 15-17), the current total Land Full Cash Value *per section* is **\$1.3 million**.
2. Within the six section study area (T17S, R15E, Sections 7-9, 16-18), the current total Land Full Cash Value *per section* is **\$1.75 million**.
3. This compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**. In the 7 planned areas, the same average is **\$17.2 million**.

Land Full Cash Value Per Parcel

1. Within the seven section study area (T17S, R15E, Sections 2-4,8-10, 15-17), the current total Land Full Cash Value *per parcel* is **\$32,908**.
2. Within the six section study area (T17S, R15E, Sections 7-9, 16-18), the current total Land Full Cash Value *per parcel* is **\$31,673**.
3. This compares favorably to lot split areas, where the average Land Full Cash Value *per parcel* is **\$26,474**. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

1. Within the seven section study area (T17S, R15E, Sections 2-4,8-10, 15-17), the current total Improved Full Cash Value *per section* is **\$.4 million**.
2. Within the six section study area (T17S, R15E, Sections 7-9, 16-18), the current total Improved Full Cash Value *per section* is **\$.2 million**.
3. These compare very unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**. In the 7 planned areas, the same average is **\$38.5 million**.

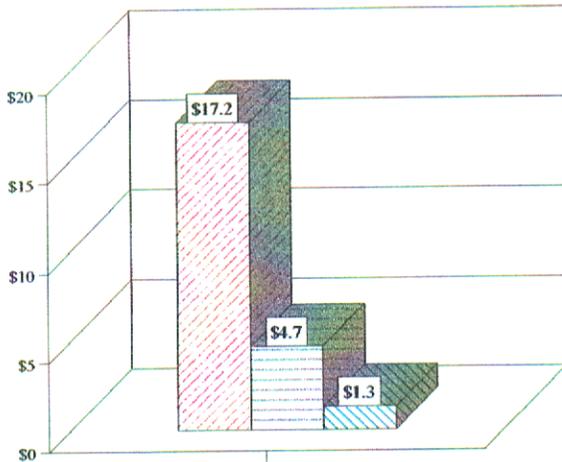
Improved Full Cash Value Per Parcel

1. Within the seven section study area (T17S, R15E, Sections 2-4,8-10, 15-17), the current total Improved Full Cash Value *per parcel* is **\$10,678**.
2. Within the six section study area (T17S, R15E, Sections 7-9, 16-18), the current total Improved Full Cash Value *per parcel* is **\$3,761**.
3. Again, these compare unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**. In the 7 planned areas, the same average is **\$79,403**.

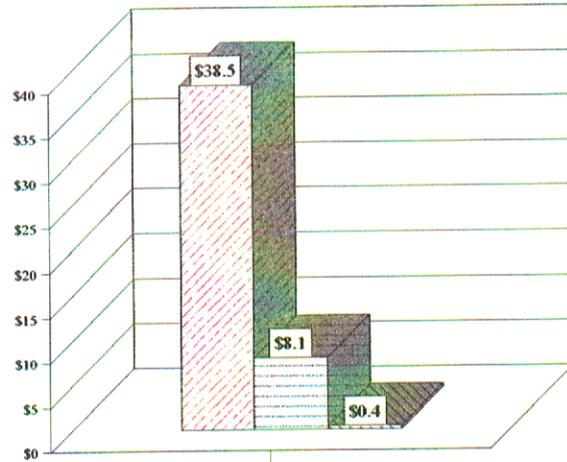
- **CONCLUSION - Sahuarita Road Study Area:** The use of land which results from unregulated lot splitting contributes to the problem of sprawl and depletes the tax base for Pima County.

**SAHUARITA ROAD (T17S, R15E, SECTION 2-4, 8-10, 15-17)  
FULL CASH VALUE COMPARISONS - 1998**

**Land-Full Cash Value Per Section**

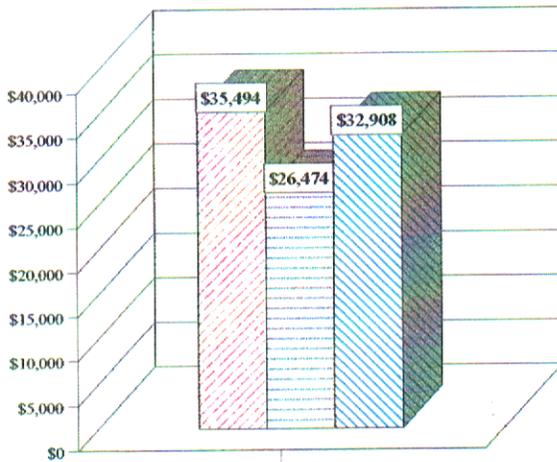


**Improved-Full Cash Value Per Section**

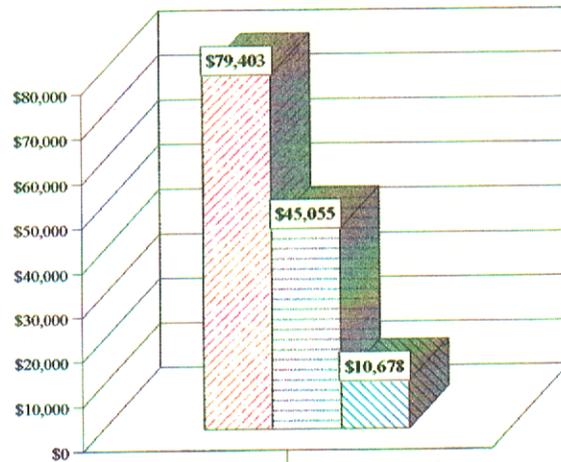


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



**Regulated  
Average**



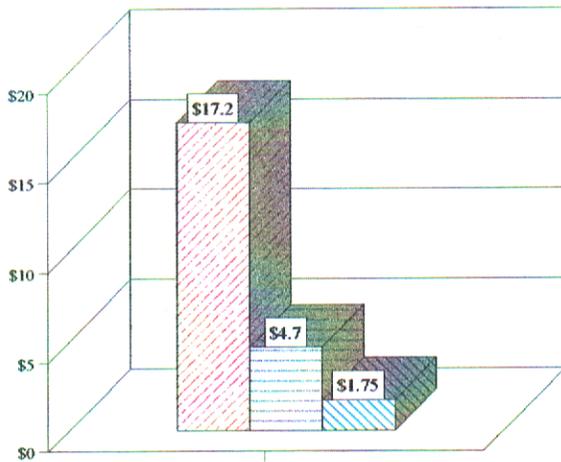
**Unregulated  
Average**



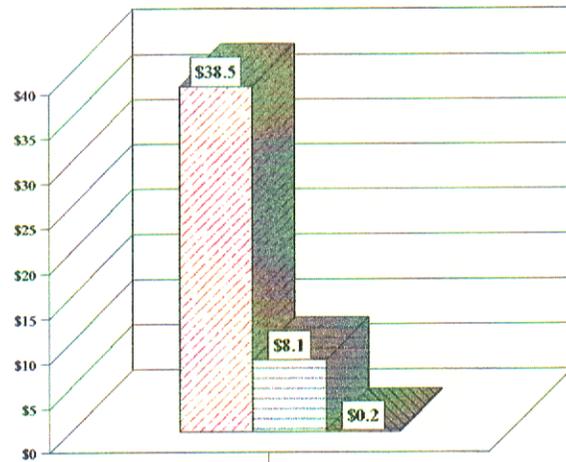
**Sahuarita Road  
Average**

# SAHUARITA ROAD (T17S, R15E, SECTION 7-9, 16-18) FULL CASH VALUE COMPARISONS - 1998

**Land-Full Cash Value Per Section**

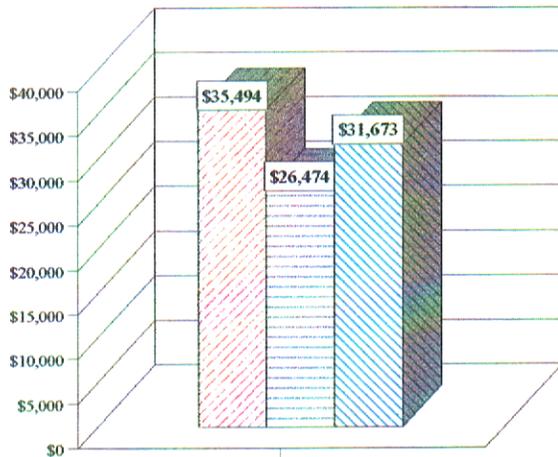


**Improved-Full Cash Value Per Section**

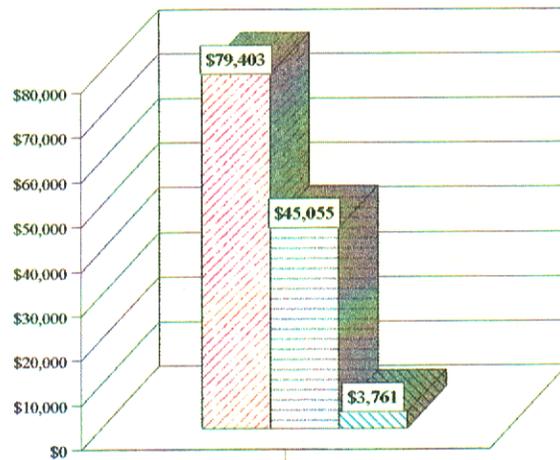


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



Unregulated  
Average



Sahuarita Road  
Average

# RH and GR-1 Zoning

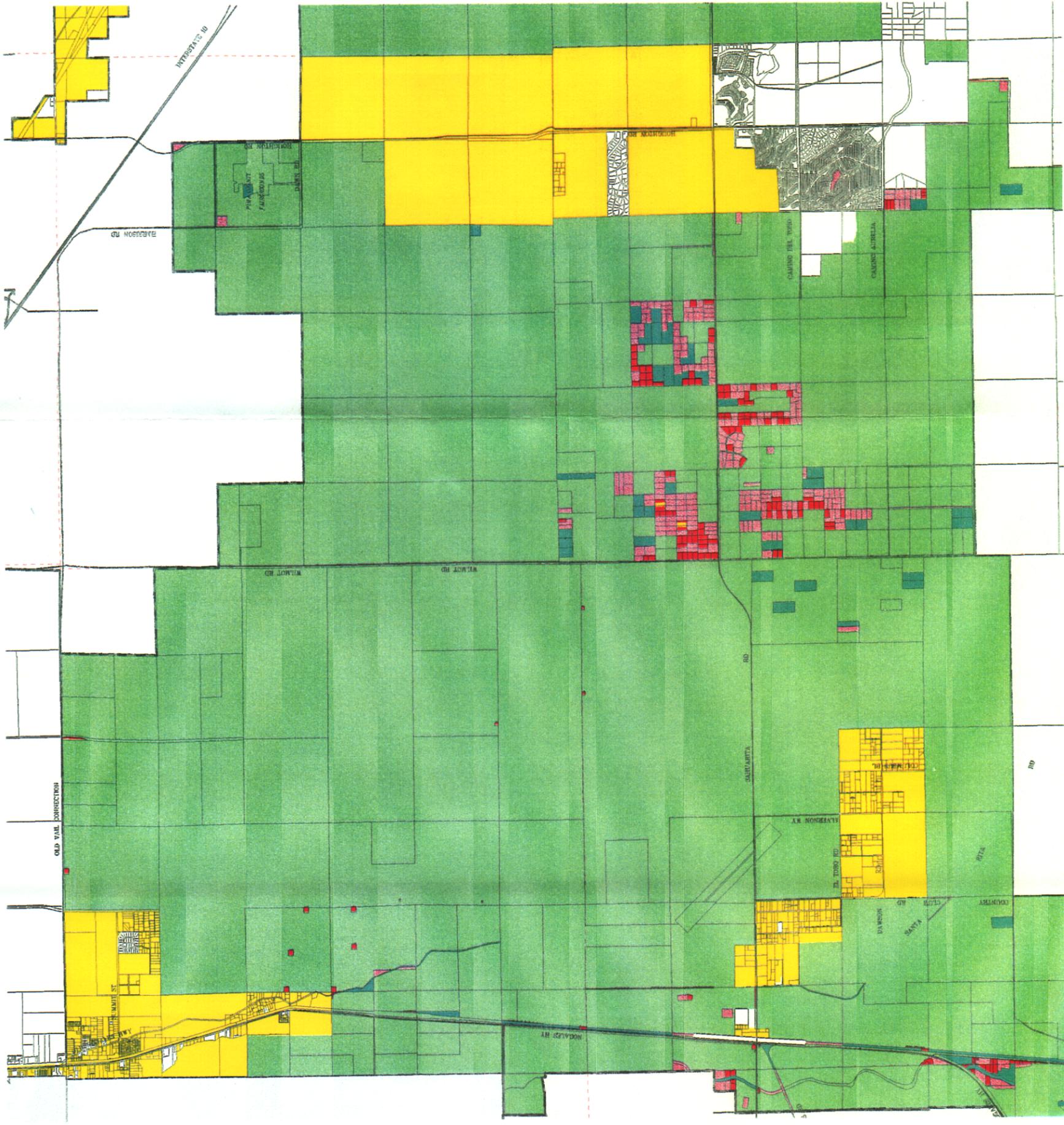
## Sahuarita Road Study Area

-  Cities and Towns
-  Public Preserves
-  Tribal Nations
-  Townships
-  Major Roadways
-  Public Preserves and Tribal Lands Boundaries

-  All GR-1 Zoning
-  RH Zoning less than 4.13 acres
-  RH Zoning 4.13-10 Acres
-  RH Zoning 10-20 Acres
-  RH Zoning greater than 20 acres
-  Parcels - Other Zoning



**Pima County Comprehensive Plan**  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800

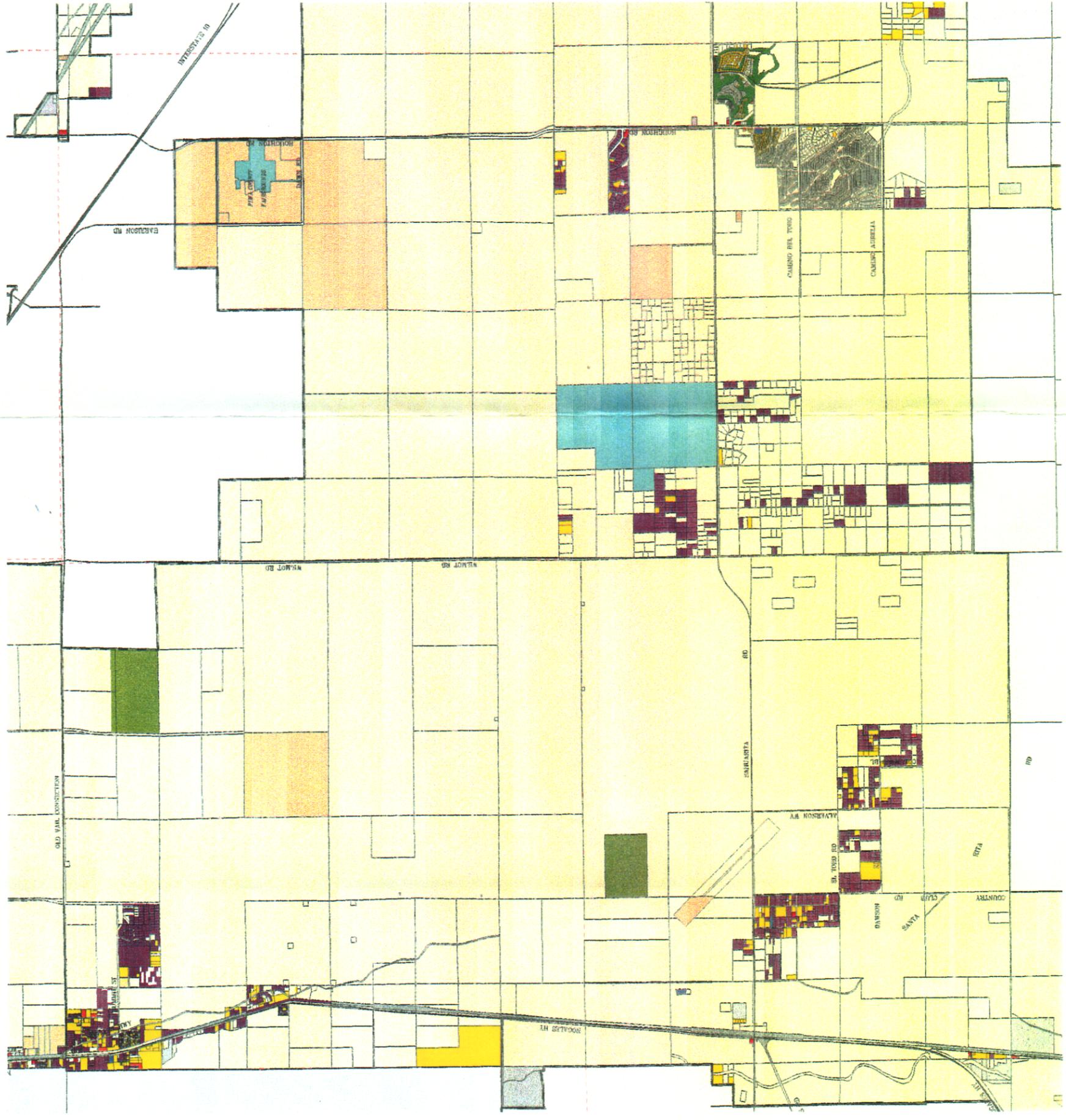


# Existing Land Use

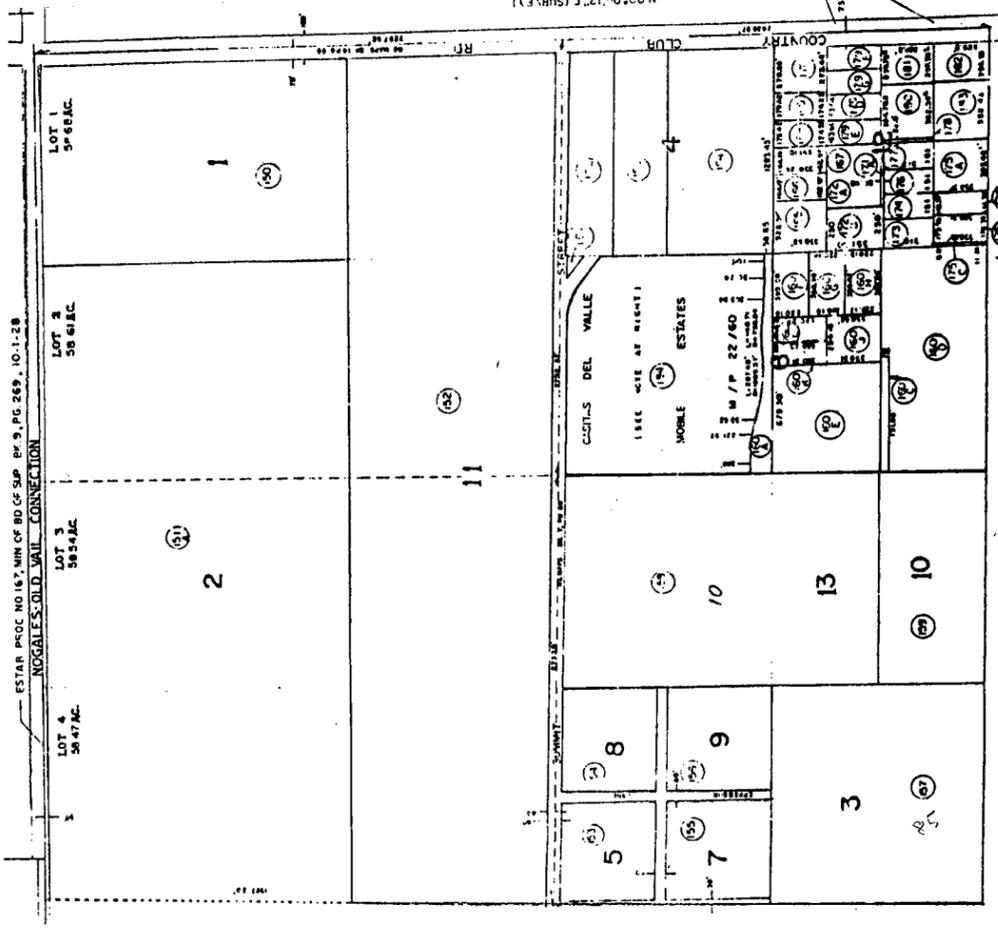
## Sahuarita Road Study Area

- |                                                                                                                                |                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
|  Cities and Towns                             |  VACANT                         |
|  Public Preserves                             |  SINGLE-FAMILY                  |
|  Tribal Nations                               |  TOWNHOUSE/CONDO                |
|  Townships                                    |  MULTI-FAMILY                   |
|  Major Roadways                               |  MOBILE HOME                    |
|  Public Preserves and Tribal Lands Boundaries |  LODGING                        |
|  Parcels                                      |  OFFICE                        |
|                                                                                                                                |  COMMERCIAL                   |
|                                                                                                                                |  INSTITUTIONAL                |
|                                                                                                                                |  MISC. GOVERNMENT             |
|                                                                                                                                |  PARK                         |
|                                                                                                                                |  RESORT                       |
|                                                                                                                                |  GOLF COURSE                  |
|                                                                                                                                |  AGRICULTURE                  |
|                                                                                                                                |  INDUSTRIAL                   |
|                                                                                                                                |  TRANSPORT FACIL              |
|                                                                                                                                |  UTILITIES/TELECOMMUNICATIONS |
|                                                                                                                                |  OTHER                        |
|                                                                                                                                |  MILITARY                     |
|                                                                                                                                |  MILITARY/ST. POLICE          |
|                                                                                                                                |  STATE-VACANT                 |
|                                                                                                                                |  VACANT-SCHOOL PROP           |
|                                                                                                                                |  VACANT-COUNTY                |
|                                                                                                                                |  VACANT-TRIBAL                |

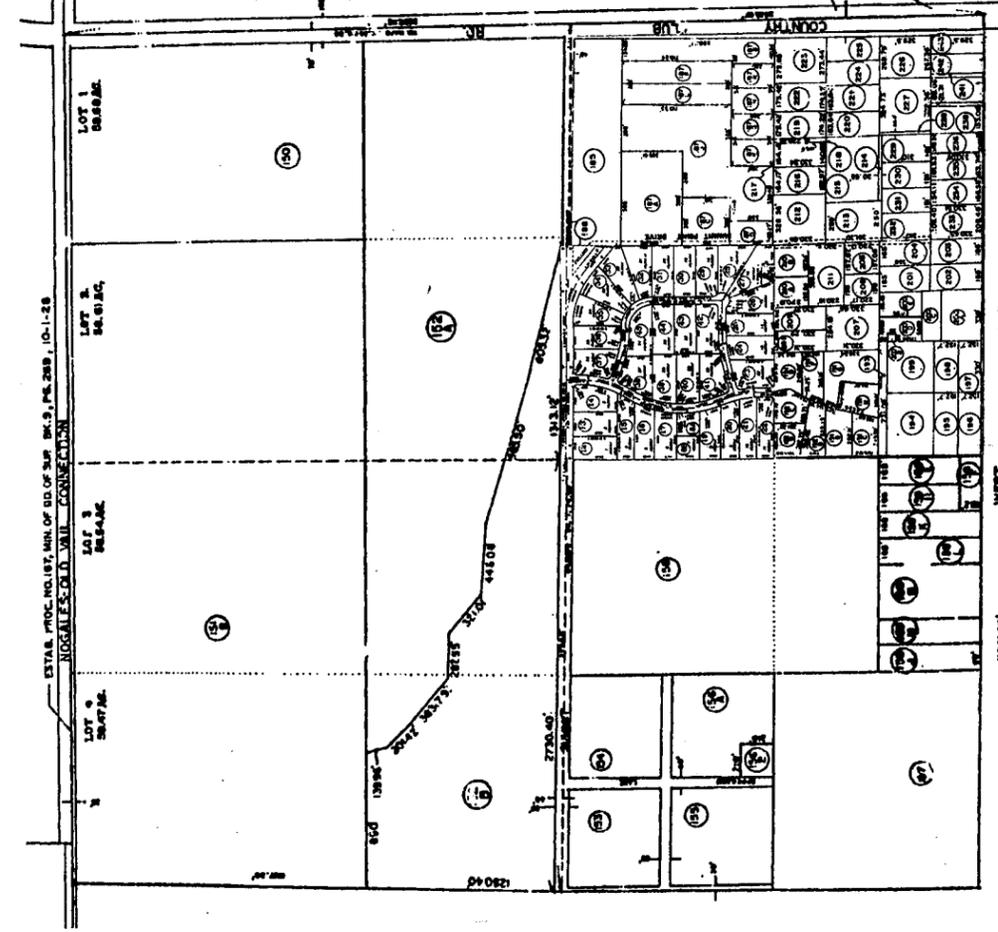
**Pinna County Comprehensive Plan**  
 Pinna County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800



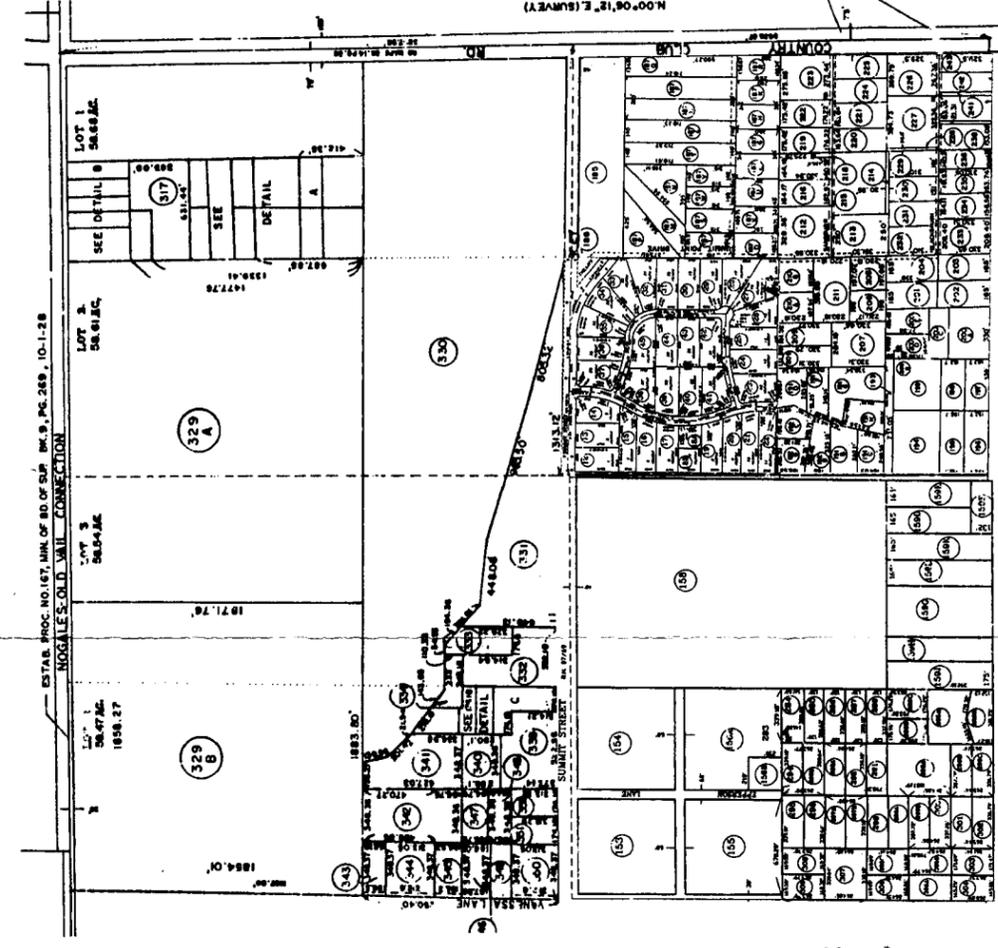
OLD NOGALES HWY.  
T16S R14E S5



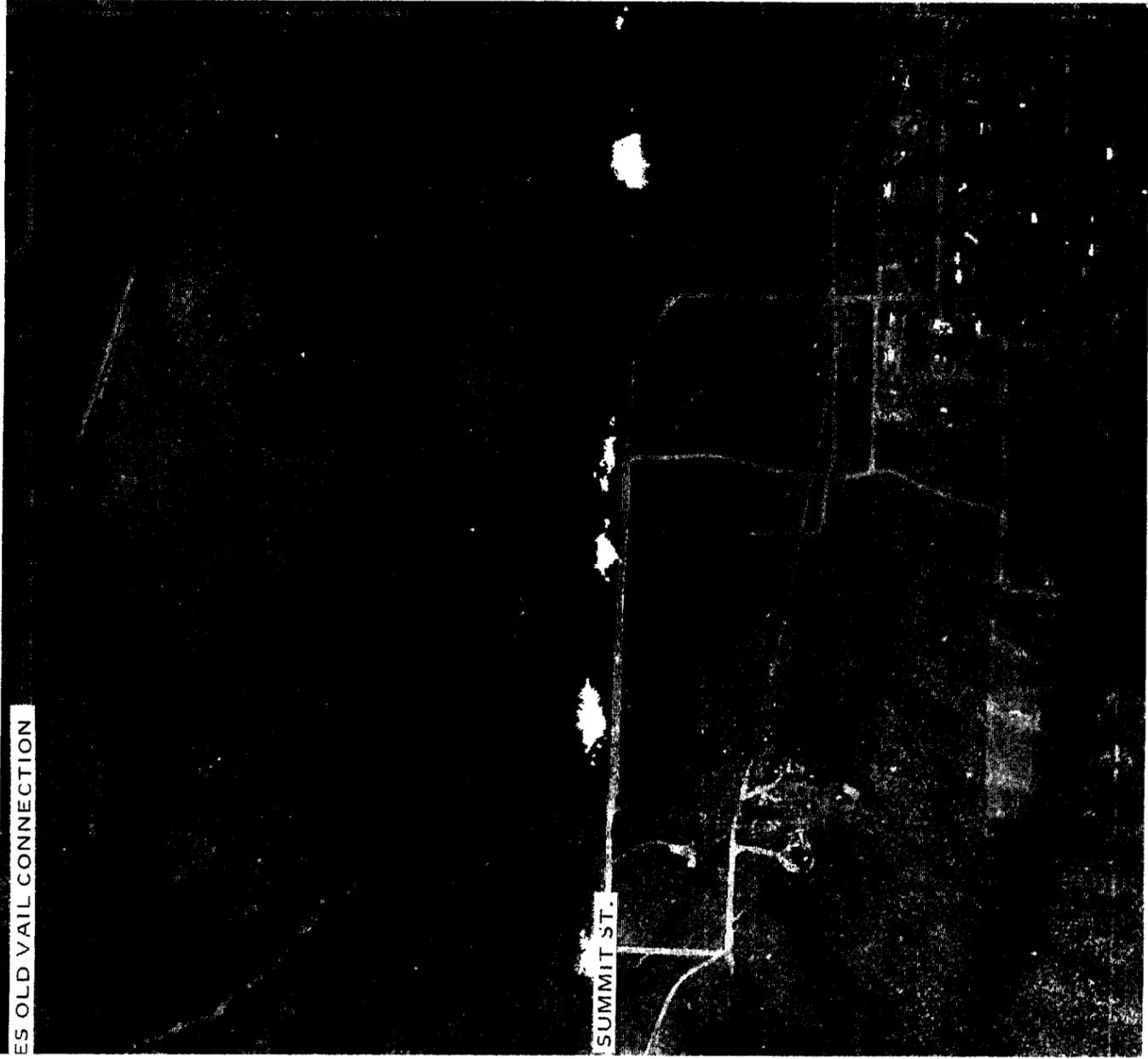
1985



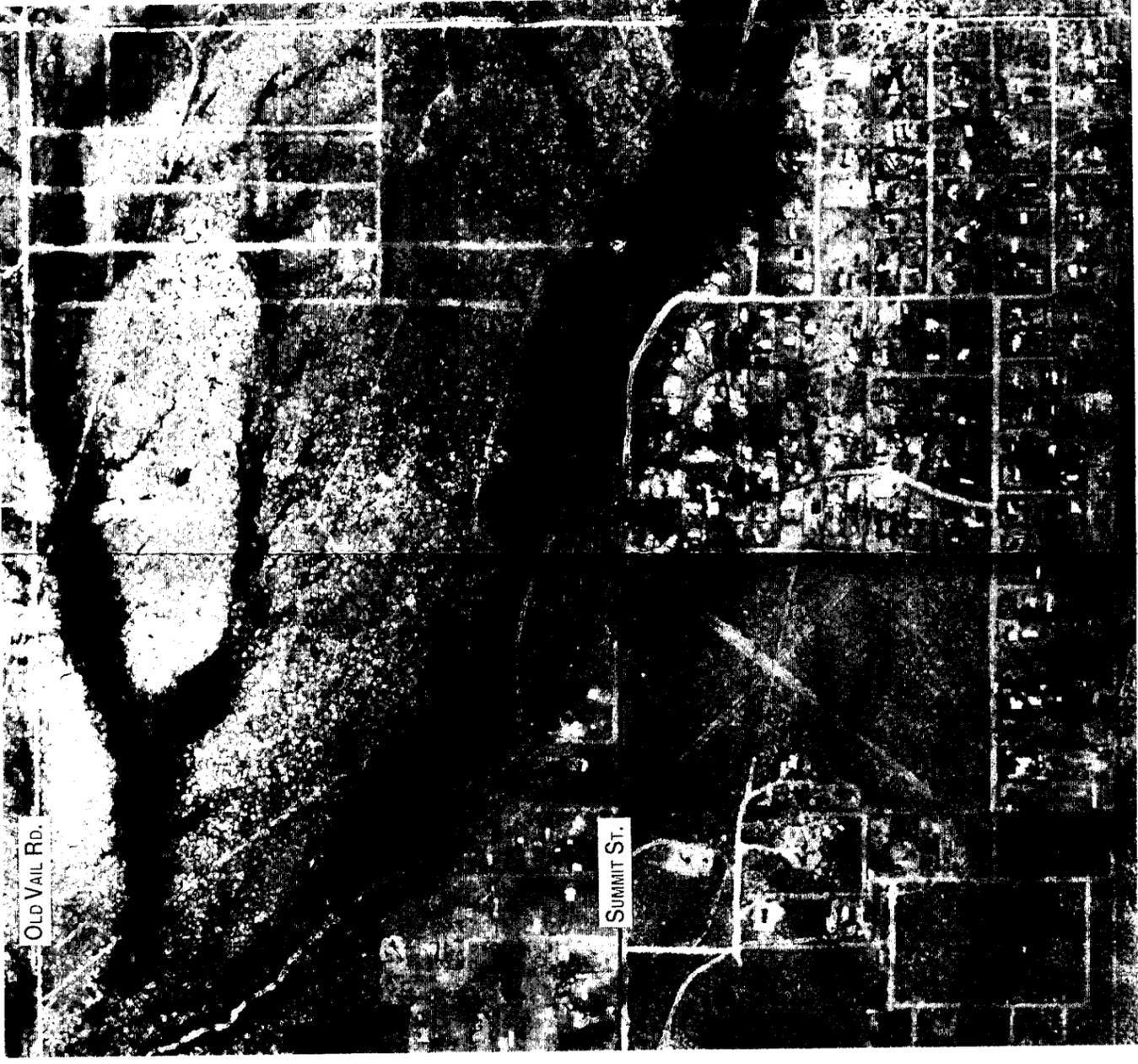
1995



Current

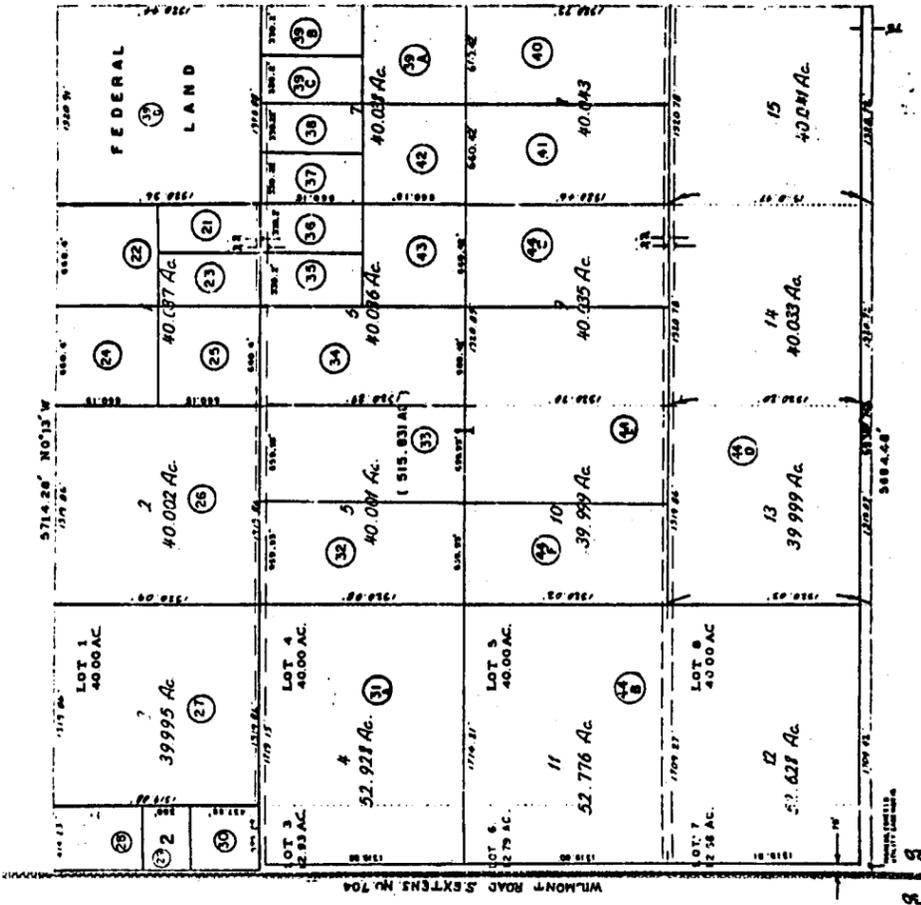


OLD NOGALES HWY. 1985  
T16S R14E S5

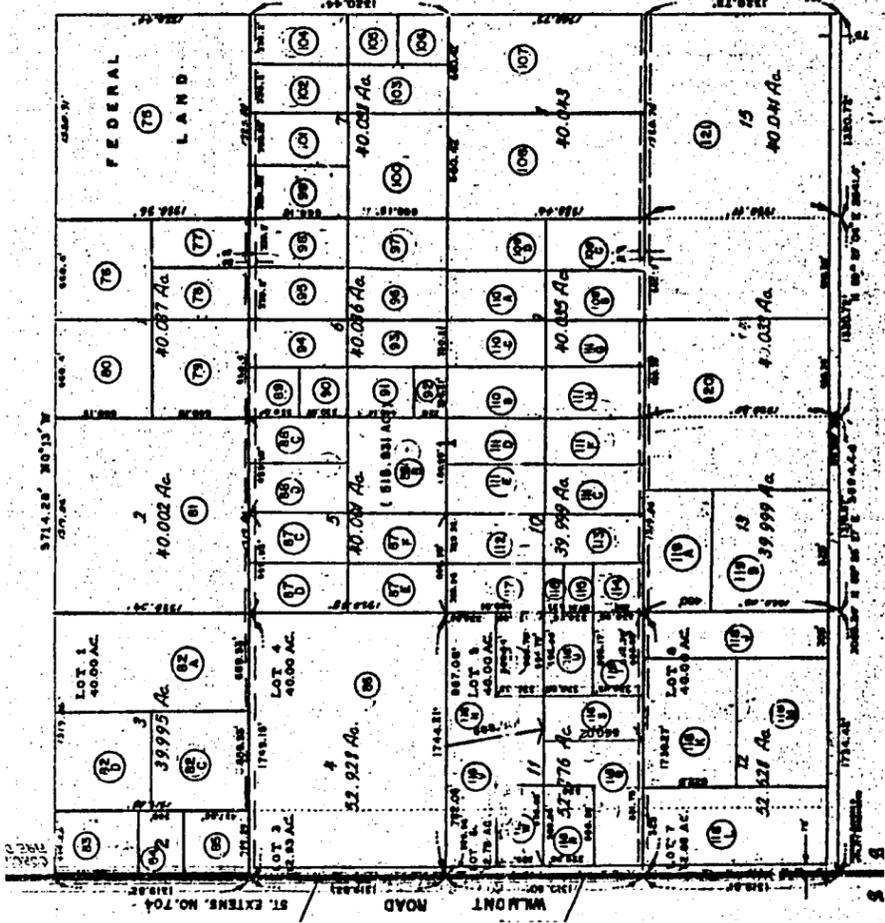


OLD NOGALES HWY. 1996  
T16S R14E S5

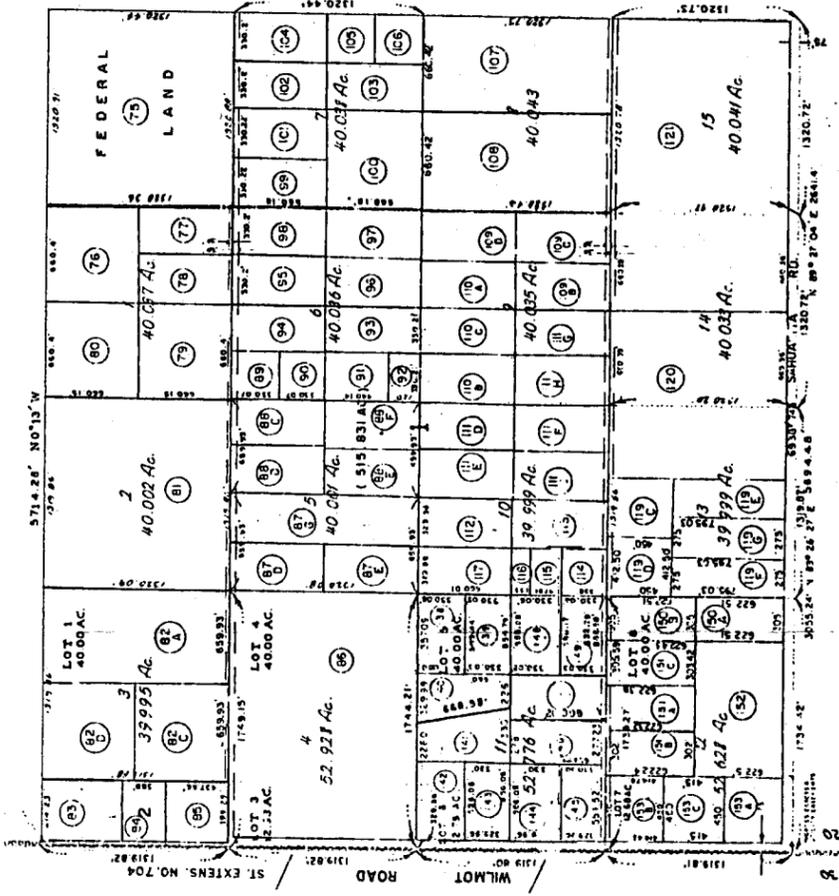
SAHUARITA ROAD  
T17S R15E  
Section 7



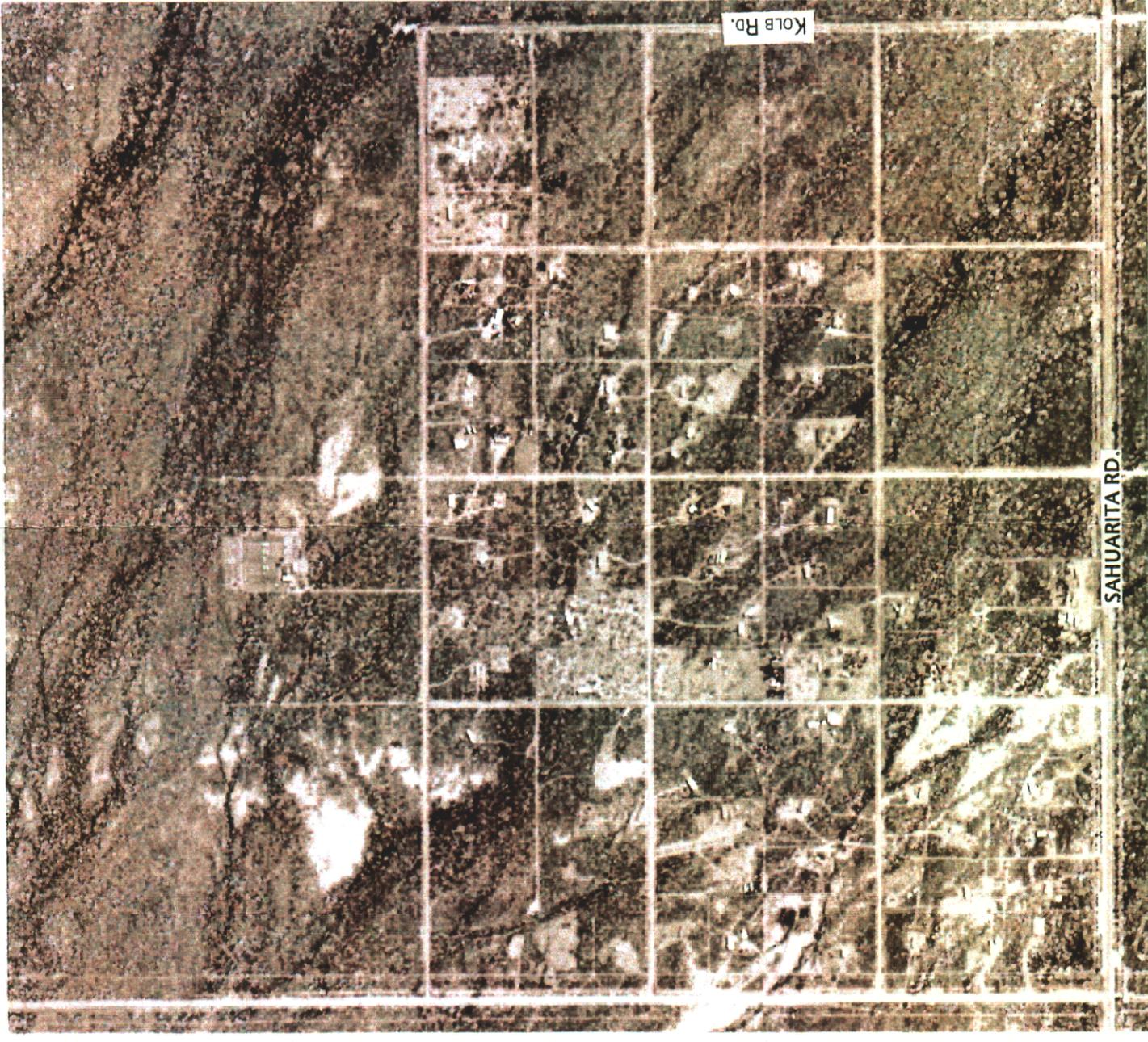
1985



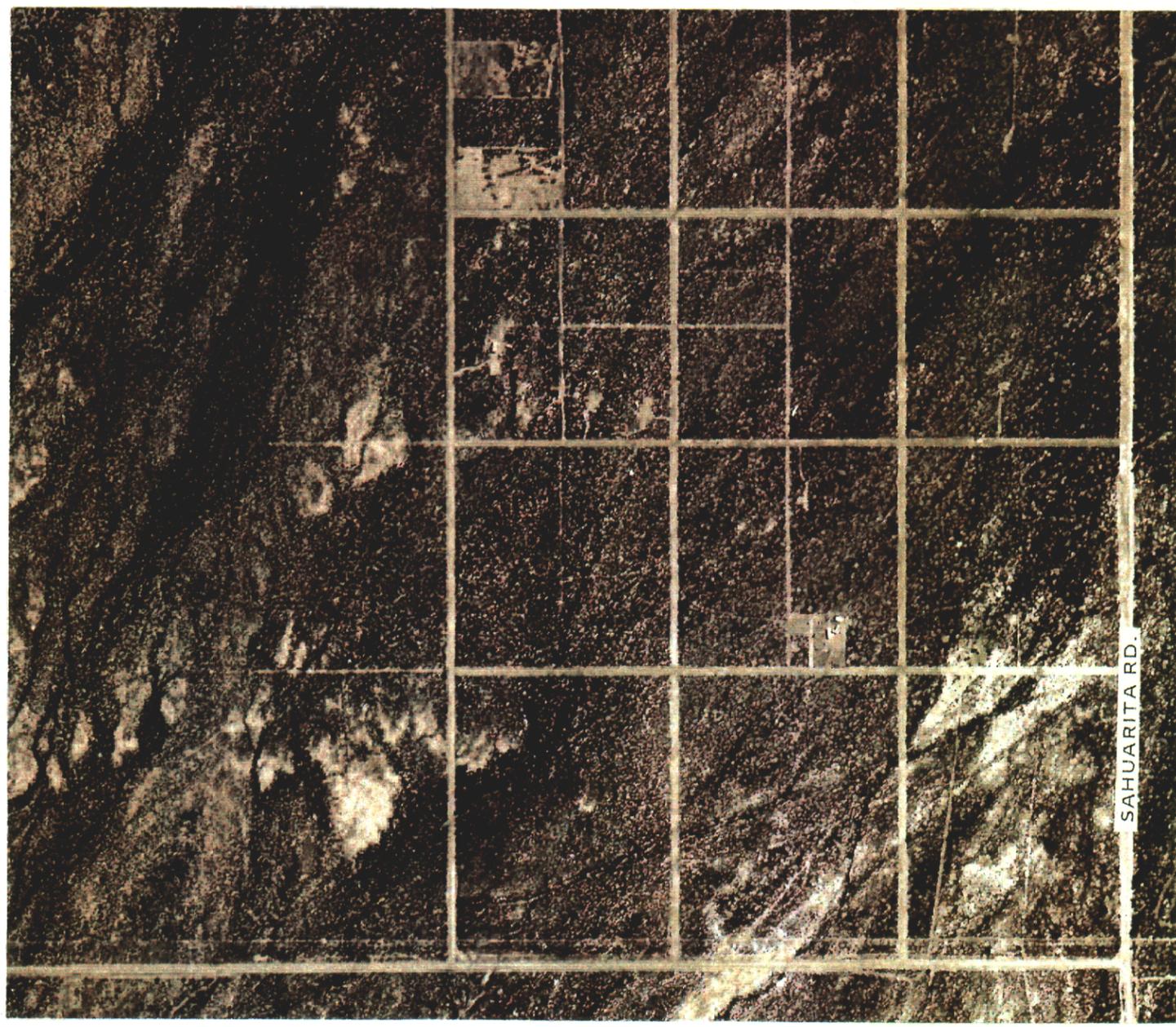
1995



Current



SAHUARITA RD. 1996  
T17S R15E S7



SAHUARITA RD. 1985  
T17S R15E S7

## E. RINCON VALLEY STUDY AREA

1. Rincon Creek
2. Calle Rinconado

### THE RINCON VALLEY STUDY AREA

In the area of Pima County to the southeast of the City of Tucson, there are a number of wildcat developments, including one of the most known areas -- Garigan's Gulch. The Rincon Valley portion of this study includes Rincon Creek and a location to the south of that, Calle Rinconado.

#### OVERVIEW OF THE SOUTHWEST STUDY AREA: ZONING AND EXISTING LAND USE

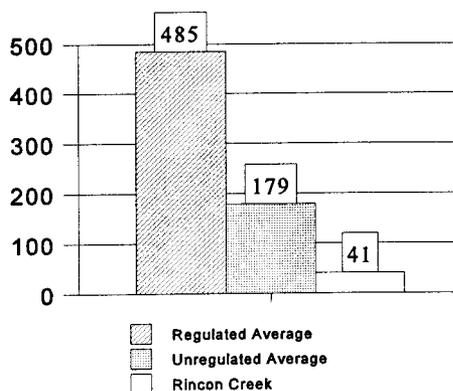
- The maps on the next pages show both how the Rincon Valley Study Area is *zoned*, and how the land is actually being *used*. There is a strong correlation between the location of GR-1 Zoning, shown in yellow on the first "Zoning" map, and mobile home sites, shown in purple on the following "Land Use" map. RH Zoning less than 10 acres also correlates with a higher density of mobile home sites.

#### RINCON CREEK (T15S R16E SECTIONS 22-27)

- *Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Section 23 and show lot splitting in the Rincon Creek area. Aerial photographs from 1985 and 1996 reflect flood plain encroachment. Although the number of parcels has not increased dramatically, problems characteristic of lot split practices -- such as sprawl and the adverse impact to the tax base -- remain.

#### Average Density in the Rincon Creek Study Area:

There are currently 244 parcels in the six section Rincon Creek study area, which results in a density of 41 parcels per section. This is an extraordinary low level of density, which contributes to sprawl.



#### Average Density in Unregulated Area:

Even within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is 179.

#### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of 485 parcels per section

**RINCON VALLEY STUDY AREA -- Rincon Creek continued ...**

• **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

Land Full Cash Value Per Section

1. Within the six section Rincon Creek study area, the current total Land Full Cash Value *per section* is **\$1.1 million**.
2. This compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**.
3. In the 7 planned areas, the same average is **\$17.2 million**.

Land Full Cash Value Per Parcel

1. Within the six section study area, the current total Land Full Cash Value *per parcel* is **\$27,618**.
2. This compares somewhat favorably to the other 12 lot split areas within this study, where the average Land Full Cash Value *per parcel* is **\$26,474**.
3. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

1. Within the six section Rincon Creek study area, the current total Improved Full Cash Value *per section* is **\$1.2 million**.
2. This compares very unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**.
3. In the 7 planned areas, the same average is **\$38.5 million**.

Improved Full Cash Value Per Parcel

1. Within the five section study area, the current total Improved Full Cash Value *per parcel* is **\$29,812**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**.
3. In the 7 planned areas, the same average is **\$79,403**.

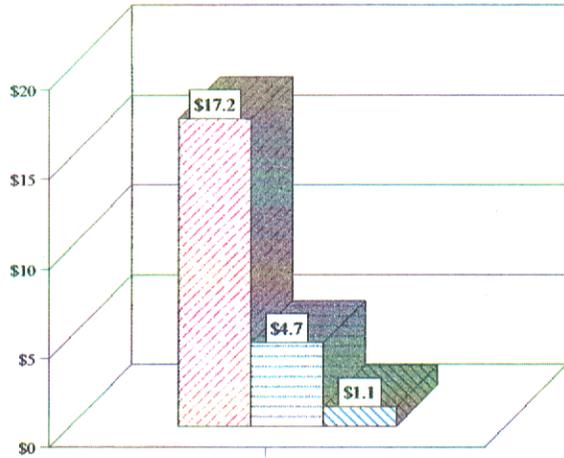
• **CONCLUSION -- Rincon Creek Study Area:**

The use of land which results from unregulated lot splitting contributes to the problem of sprawl, creates an expectation or demand on Pima County to supply missing infrastructure and service needs to the buyers, and depletes the tax base for Pima County.

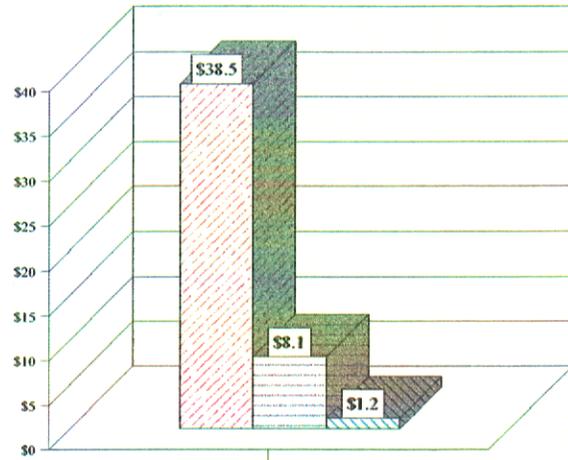
# RINCON CREEK (T15S, R16E, SECTIONS 22-27)

## FULL CASH VALUE COMPARISONS - 1998

**Land-Full Cash Value Per Section**

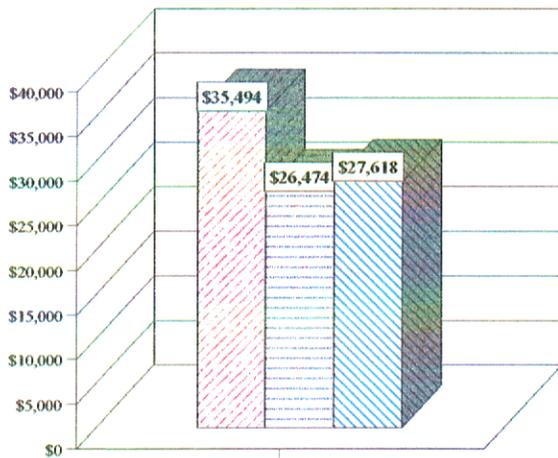


**Improved-Full Cash Value Per Section**

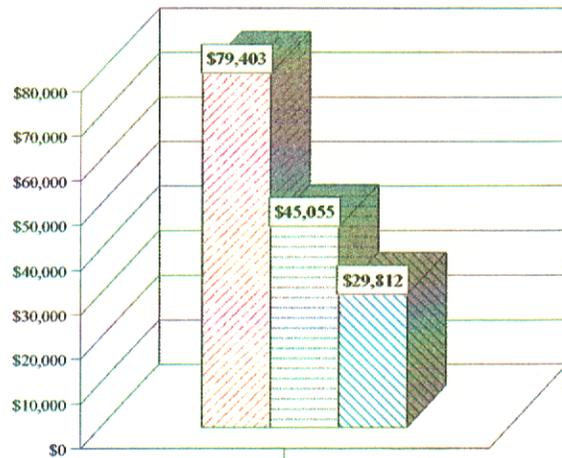


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



Unregulated  
Average



Rincon Creek  
Average

## CALLE RINCONADO STUDY AREA (T17S R16E SECTIONS 2-4, 9-11)

- *Environmental Consequences:* Aerial photographs from 1985 and 1996 reflect substantial flood plain encroachment.
- *Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Section 10 and show that lot splitting has occurred in this area.

### Average Density in the Study Area:

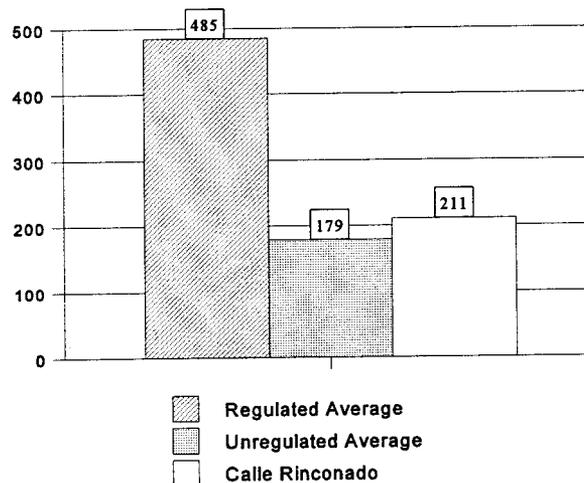
There are currently 1,265 parcels in the 6 section location of the Sahuarita Road study area, which results in a density of **211** parcels per section. This is a low density, sprawling growth pattern.

### Average Density in Unregulated Area:

Within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is **179**.

### Average Density in Regulated Area:

In contrast, the seven planned areas of the study group achieved an average of **485** parcels per section.



• **IMPLICATIONS FOR FULL CASH VALUE OF LAND AND IMPROVEMENTS:**

Land Full Cash Value Per Section

1. Within the six section Calle Rinconado study area (T17S, R16E, Sections 2-4,9-11), the current total Land Full Cash Value *per section* is **\$1.8 million**.
2. This compares unfavorably, even among the other 12 lot split areas, where the average Land Full Cash Value per section is **\$4.7 million**.
3. In the 7 planned areas, the same average is **\$17.2 million**.

Land Full Cash Value Per Parcel

1. Within the six section study area, the current total Land Full Cash Value *per parcel* is **\$8,375**.
2. This compares very unfavorably to lot split areas, where the average Land Full Cash Value *per parcel* is **\$26,474**.
3. In the 7 planned areas, the same average is **\$35,494**.

Improved Full Cash Value Per Section

1. Within the six section Calle Rinconado study area (T17S, R16E, Sections 2-4,9-11). the current total Improved Full Cash Value *per section* is **\$4.6 million**.
2. This compares unfavorably, even among the 12 other lot split areas, where the average Improved Full Cash Value per section is **\$8.1 million**.
3. In the 7 planned areas, the same average is **\$38.5 million**.

Improved Full Cash Value Per Parcel

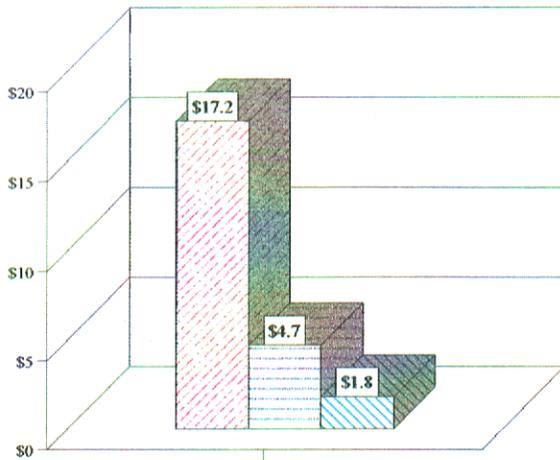
1. Within the six section Calle Rinconado study area (T17S, R16E, Sections 2-4,9-11), the current total Improved Full Cash Value *per parcel* is **\$21,784**.
2. Again, this compares unfavorably, even among the other 12 lot split areas, where the average Improved Full Cash Value *per parcel* is **\$45,055**.
3. In the 7 planned areas, the same average is **\$79,403**.

• **CONCLUSION - Calle Rinconado Study Area:**

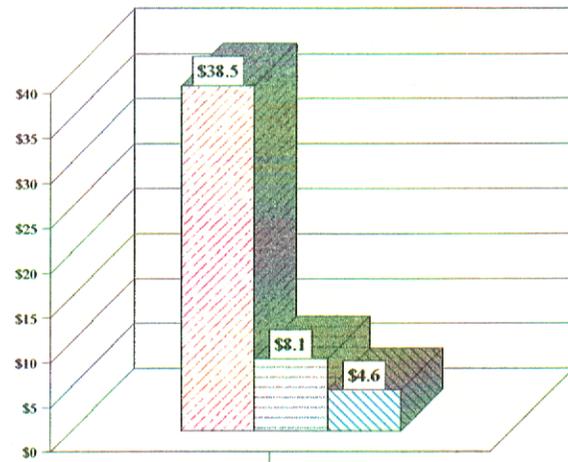
The use of land which results from unregulated lot splitting contributes to the problem of sprawl and depletes the tax base for Pima County.

# CALLE RINCONADO (T17S, R16E, SECTION 2-4, 9-11) FULL CASH VALUE COMPARISONS - 1998

**Land-Full Cash Value Per Section**

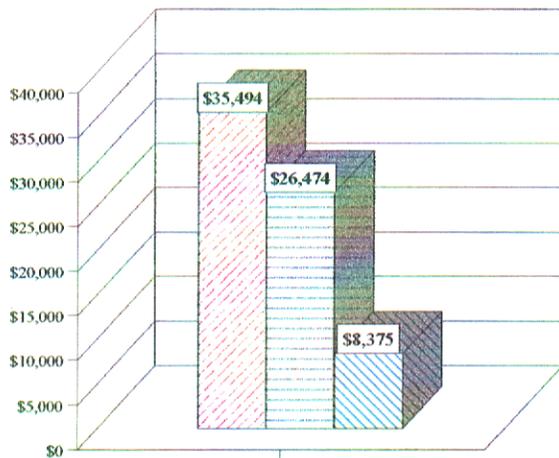


**Improved-Full Cash Value Per Section**

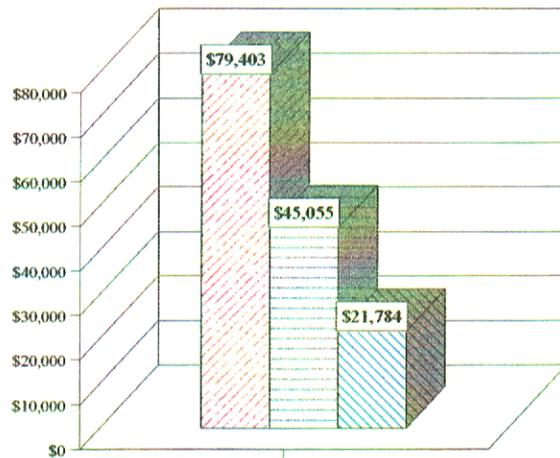


(Numbers above shown in millions)

**Land-Full Cash Value Per Parcel**



**Improved-Full Cash Value Per Parcel**



Regulated  
Average



Unregulated  
Average



Calle Rinconado  
Average

# RH and GR-1 Zoning

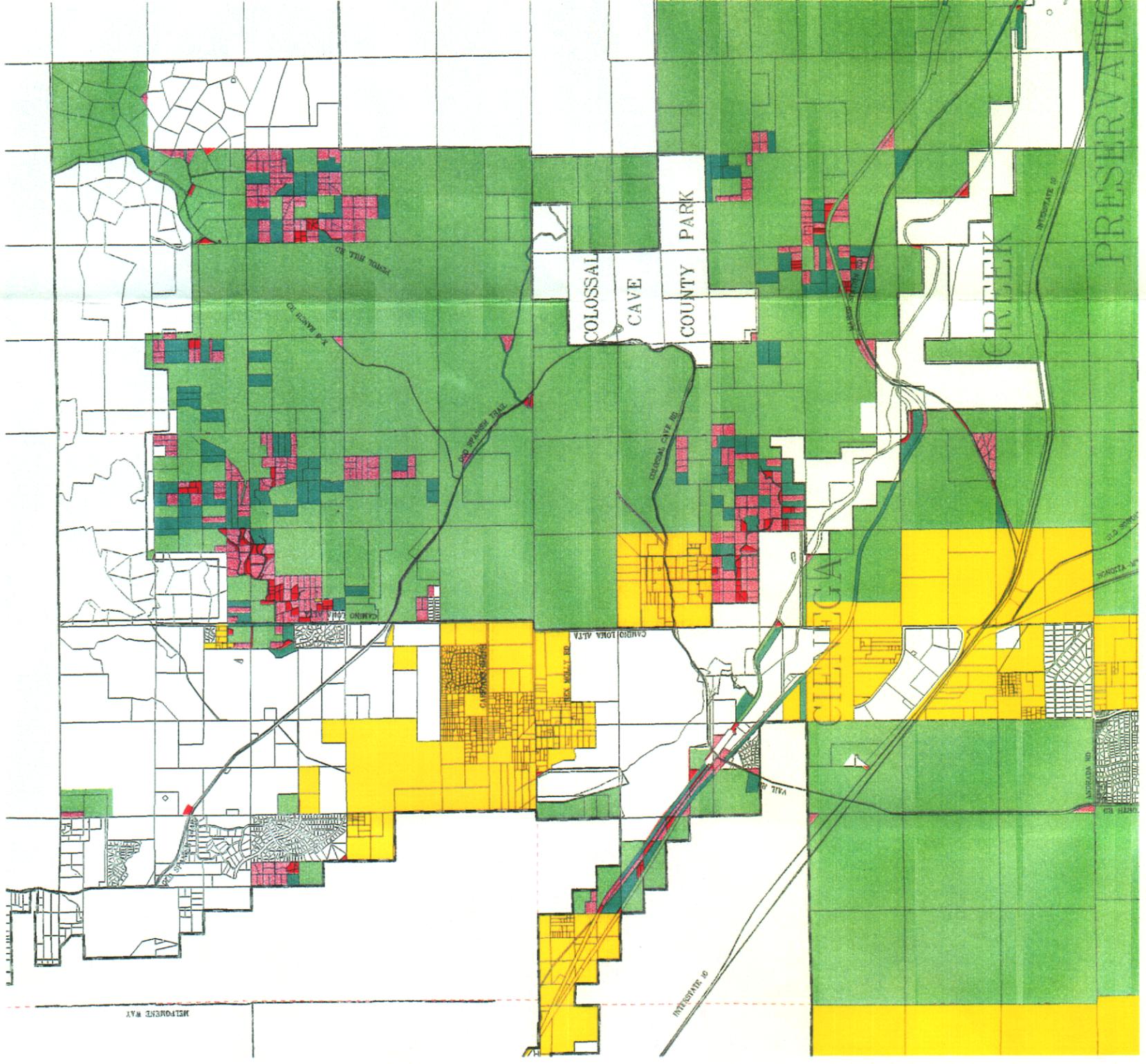
## Rincon Valley Study Area

-  Cities and Towns
-  Public Preserves
-  Tribal Nations
-  Townships
-  Major Roadways
-  Public Preserves and Tribal Lands Boundaries

-  All GR-1 Zoning
-  RH Zoning less than 4.13 acres
-  RH Zoning 4.13-10 Acres
-  RH Zoning 10-20 Acres
-  RH Zoning greater than 20 acres
-  Parcels - Other Zoning



**Pima County Comprehensive Plan**  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6800

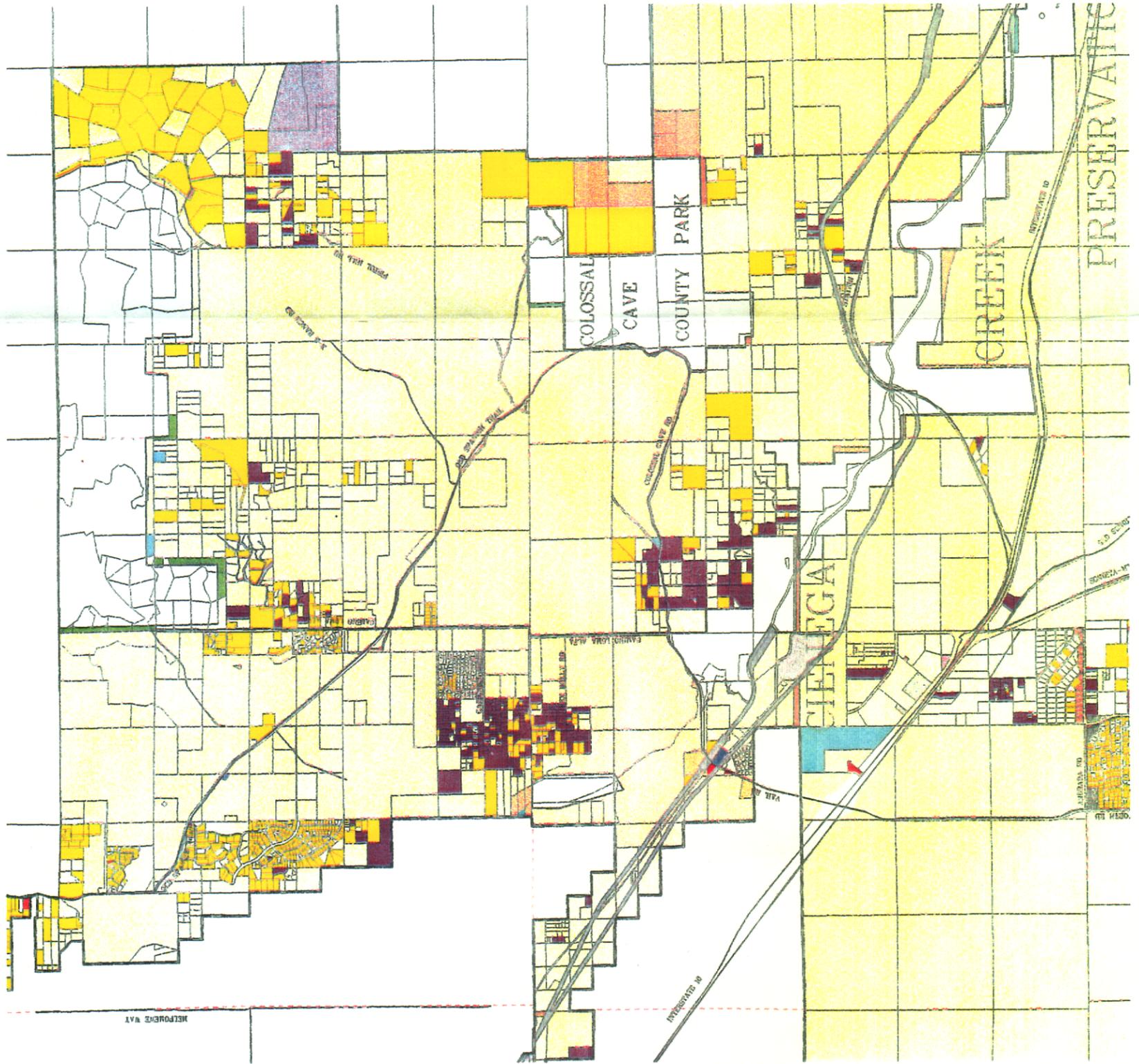


# Existing Land Use

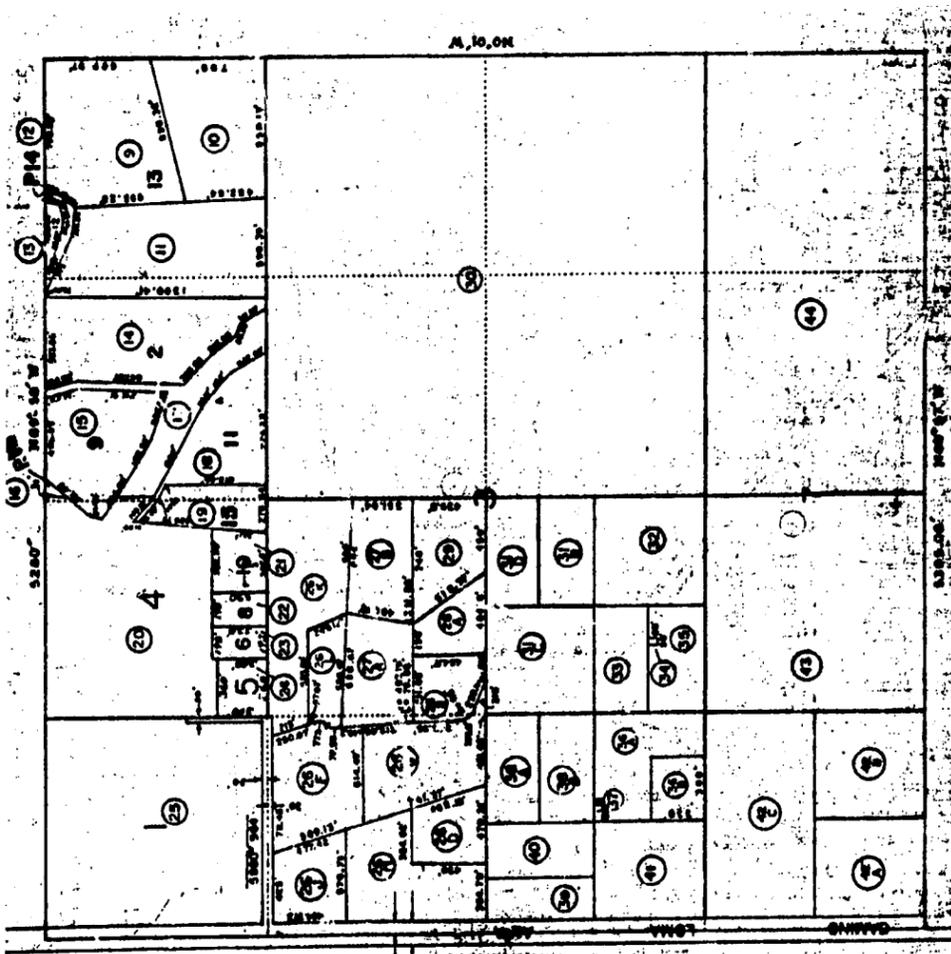
## Rincon Valley Study Area

	Cities and Towns		VACANT
	Public Preserves		SINGLE-FAMILY
	Tribal Neotoms		TOWNHOUSE/CONDO
	Townships		MULTI-FAMILY
	Major Roadways		MOBILE HOME
	Public Preserves and Tribal Lands Boundaries		LODGING
	Parcels		OFFICE
			COMMERCIAL
			INSTITUTIONAL
			MISC. GOVERNMENT
			PARK
			RESORT
			GOLF COURSE
			AGRICULTURE
			INDUSTRIAL
			TRANSPORT FACIL
			UTILITIES/TELECOMMUNICATIONS
			OTHER
			MILITARY
			MILITARY/ST. POLICE
			STATE-VACANT
			VACANT-SCHOOL PROP
			VACANT-COUNTY
			VACANT-TRIBAL

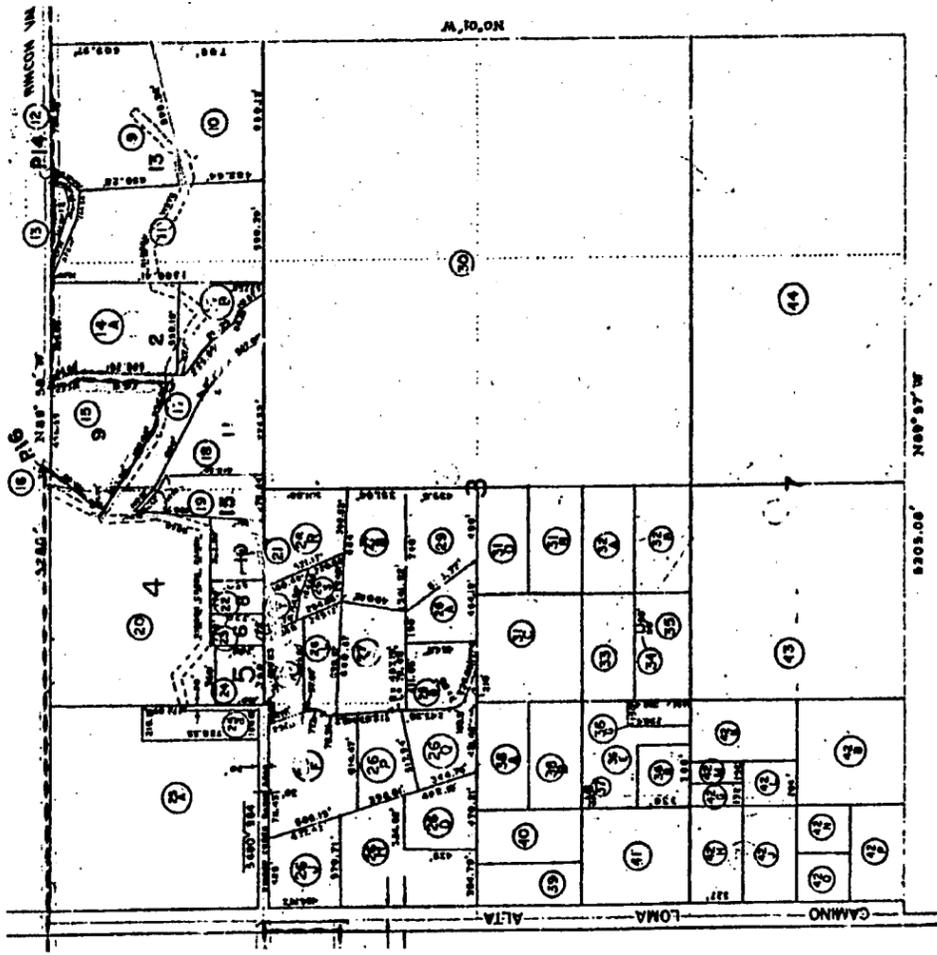
Pima County Comprehensive Plan  
 Pima County Development Services Department  
 Planning Division  
 201 N. Stone Ave 2nd Floor  
 Tucson, AZ 85701  
 520 740 6600



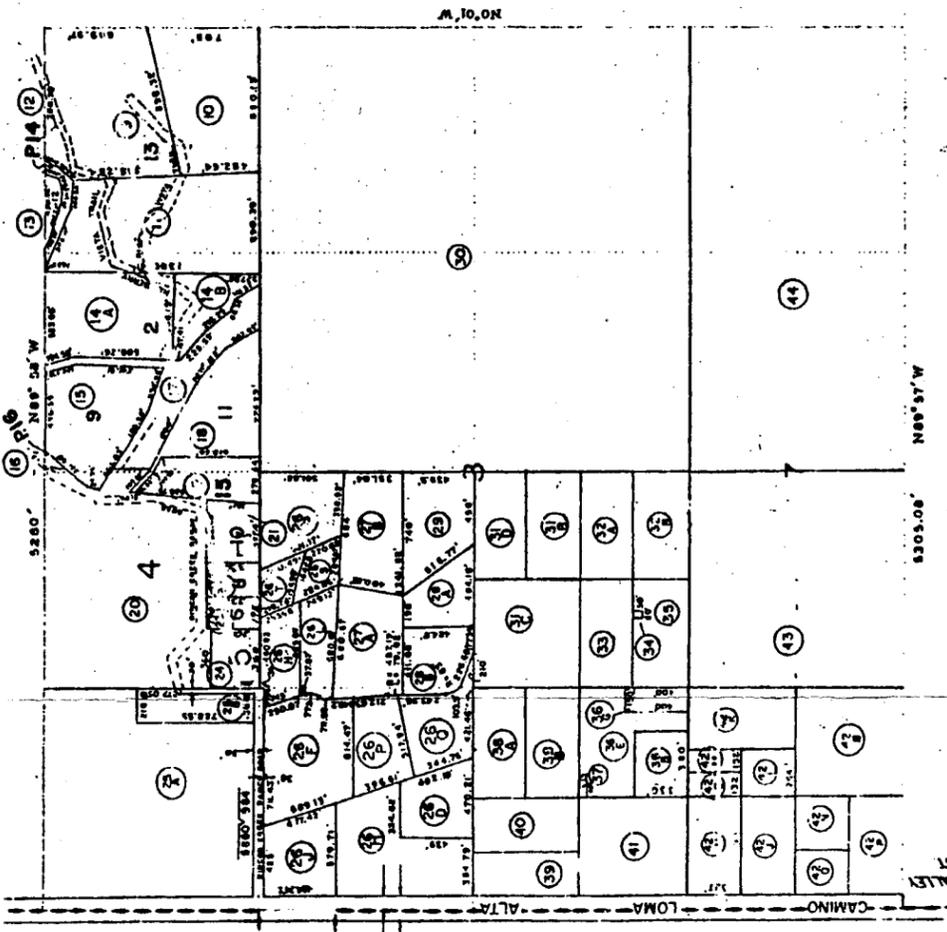
RINCON CREEK  
T15S R16E  
Section 23



1985

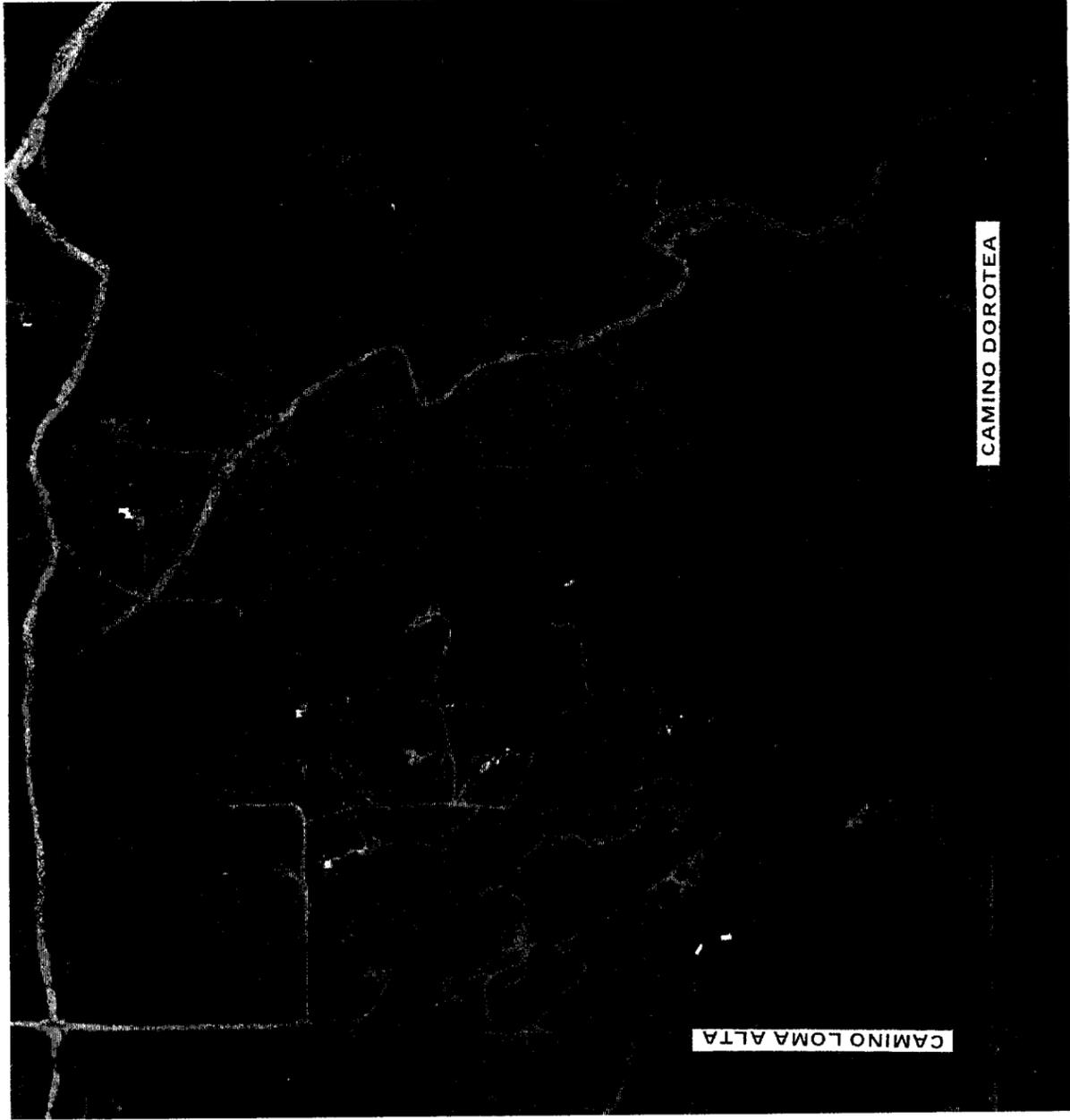


1995

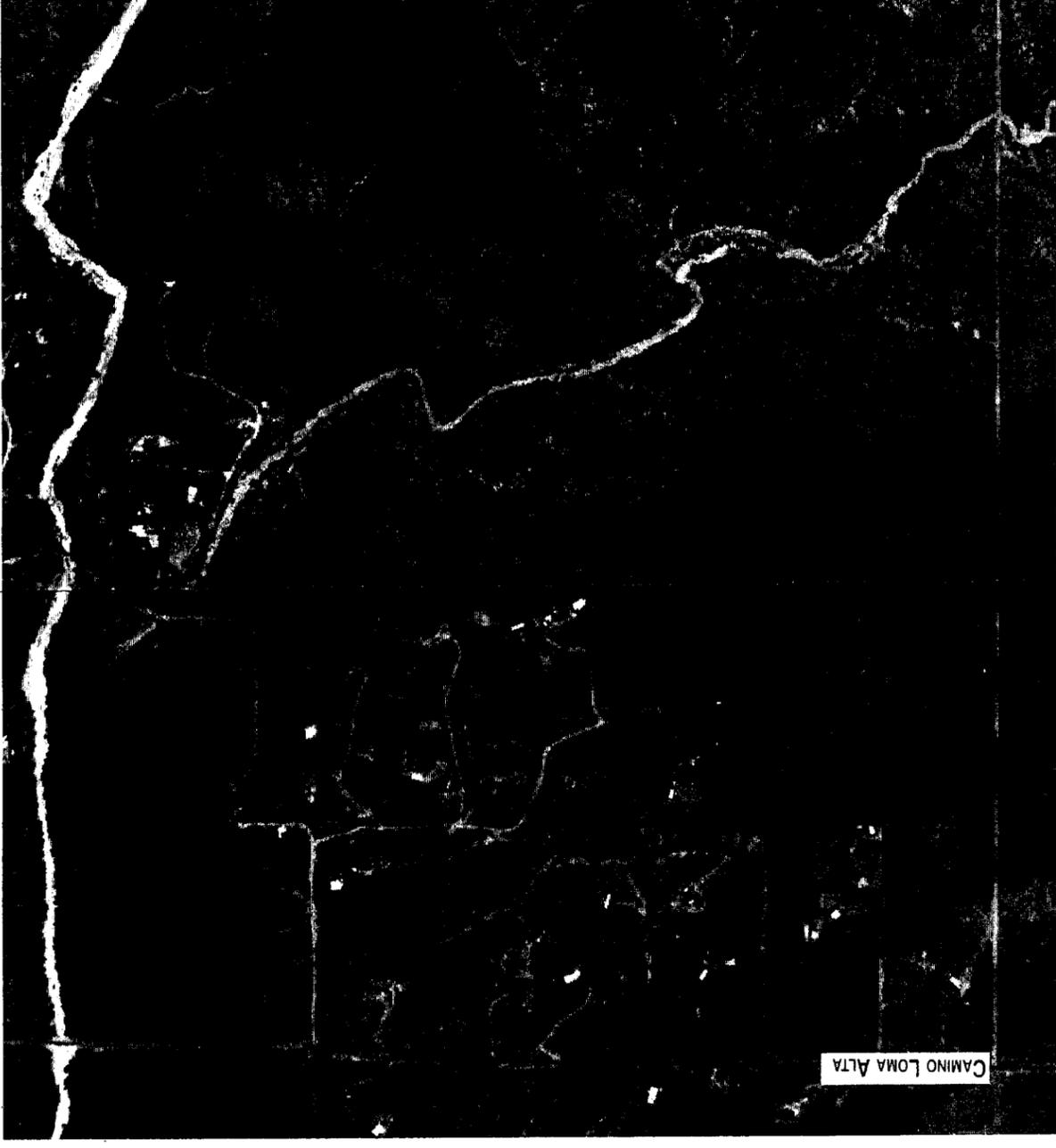


Current

RINCON CREEK

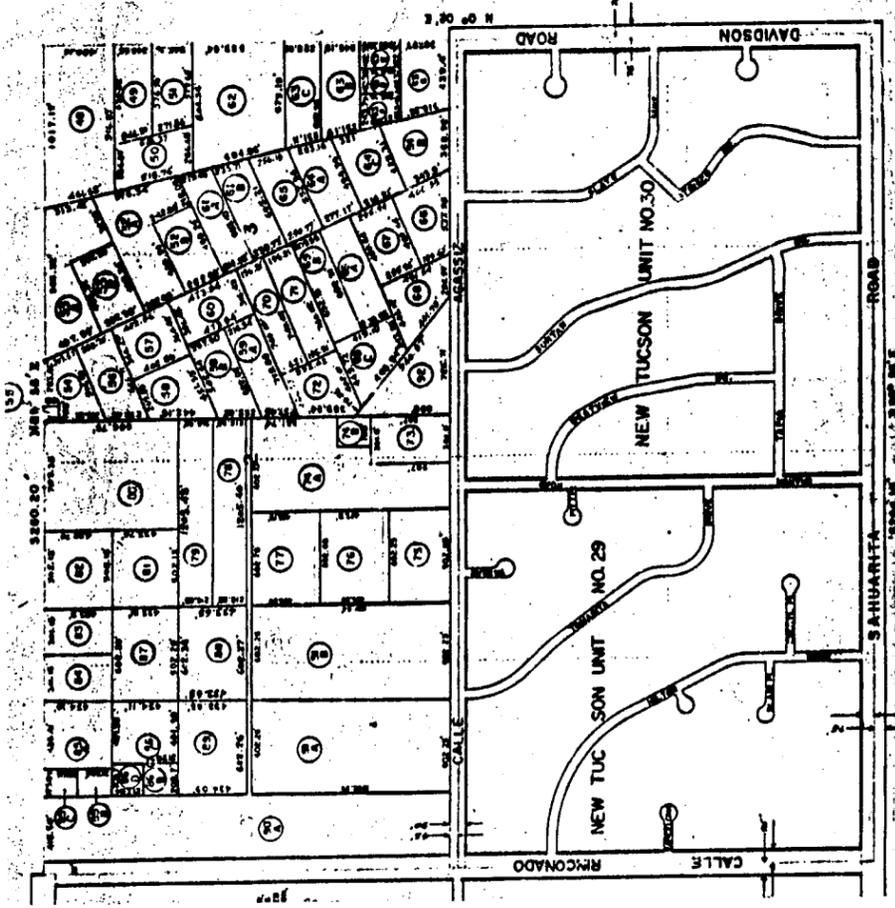


RINCON CREEK 1985  
T15 R16E S23

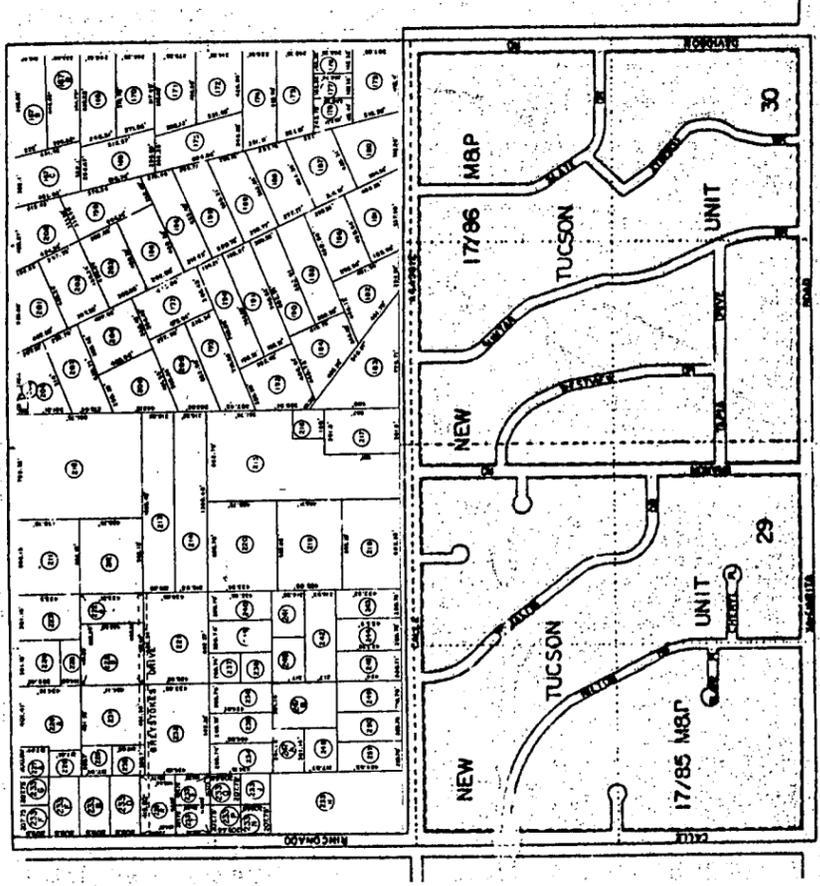


RINCON CREEK 1996  
T15 R16E S23

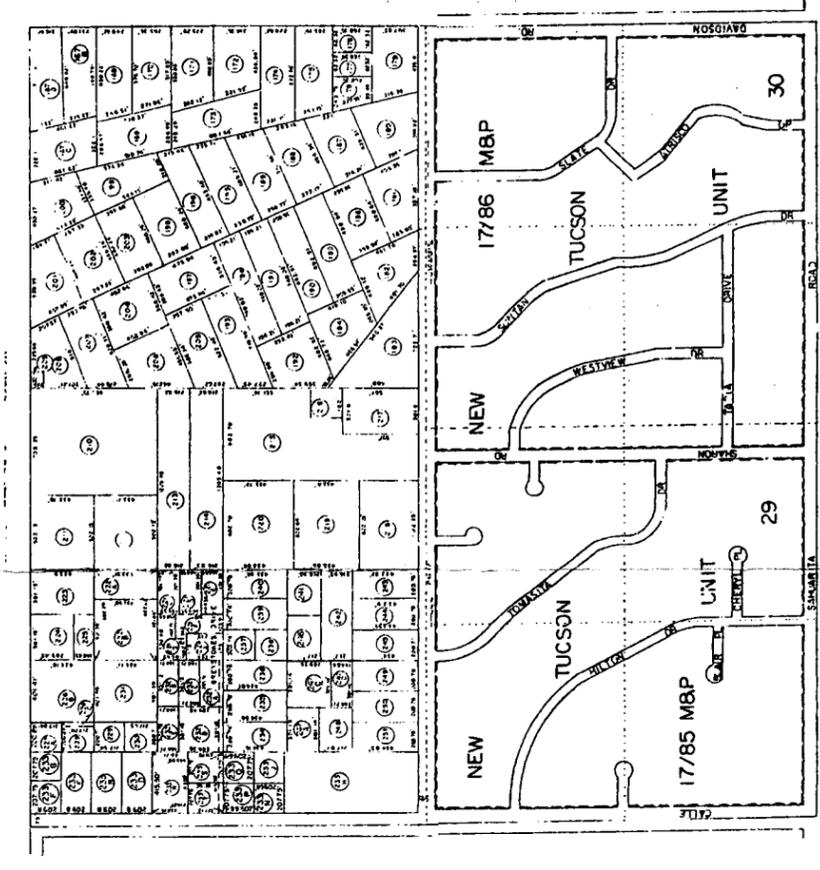
CALLE RINCONADO / SOUTHEAST  
 T17S R16E  
 Section 10



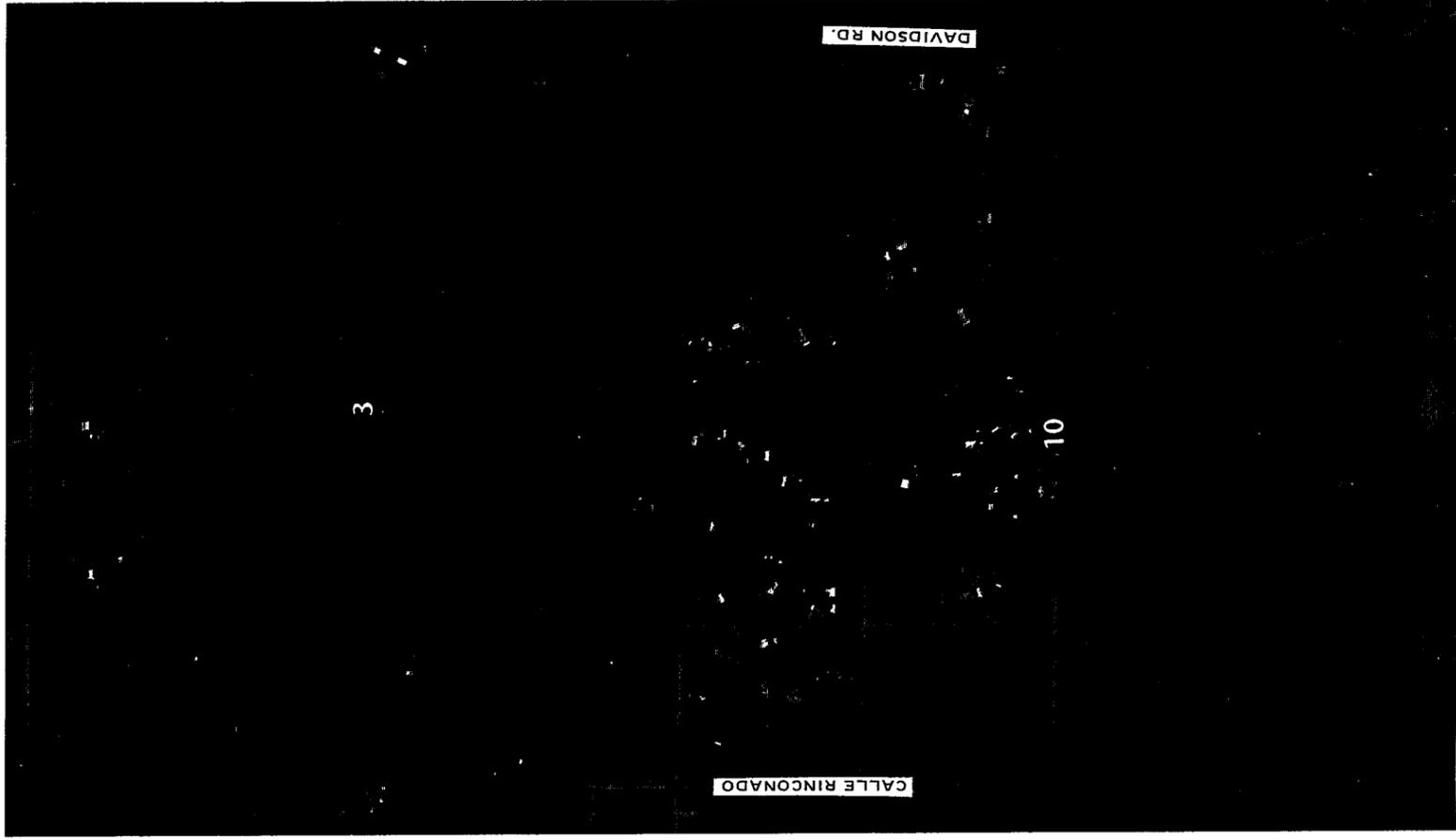
1985



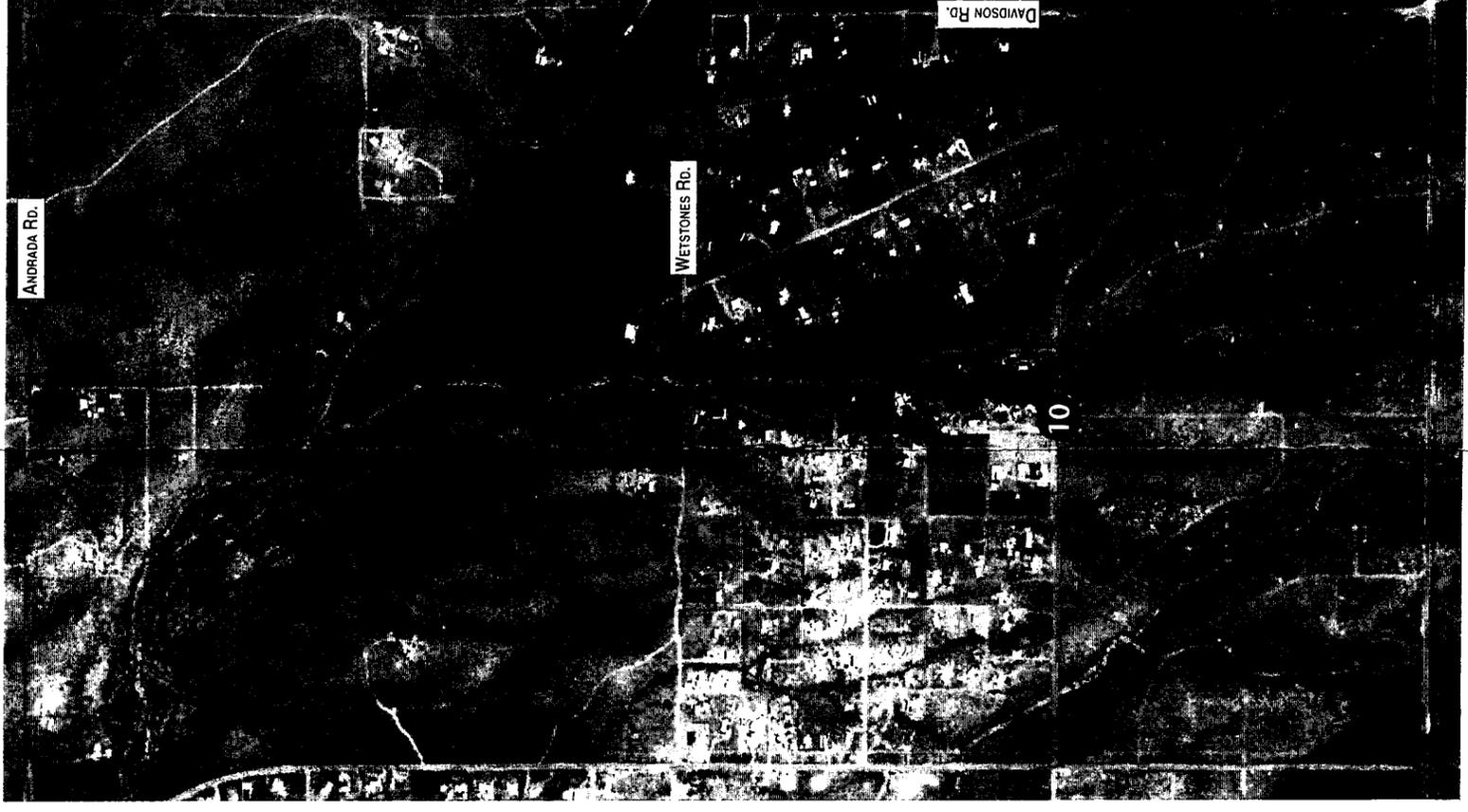
1995



Current



CALLE RINCONADO / SOUTHEAST 1985  
T17S R16E S10



CALLE RINCONADO / SOUTHEAST 1996  
T17S R16E S10

## F. NORTHEAST STUDY AREA

### *Agua Caliente*

#### THE NORTHEAST STUDY AREA

In the area of Pima County to the northeast of the City of Tucson, Agua Caliente, an area that has experienced unregulated lot splitting lends itself to comparison with a nearby development that is subject to the regulated process, Sabino Springs.

#### AGUA CALIENTE (T13S R16E SECTIONS 16-21)

- Number of Parcels and Relative Density:* Three Assessor's maps from 1985, 1995, and 1998, focus on Sections 17 and 20. These show lot splitting activity in the Agua Caliente area. Aerial photographs from 1985 and 1996 reflect flood plain encroachment. Although the number of parcels has not increased dramatically, problems characteristic of lot split practices -- such as sprawl -- remain.

#### Average Density in the Agua Caliente Study Area:

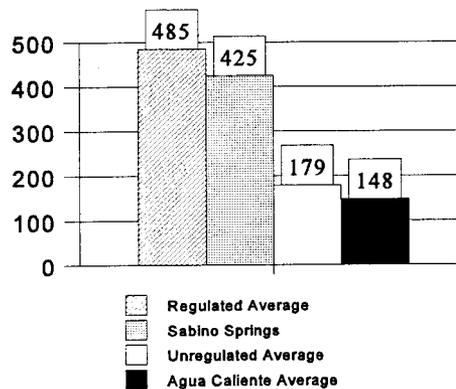
There are currently 885 parcels in the six section Agua Caliente study area, which results in a density of **148** parcels per section. This is a low density, which contributes to sprawl. Nearby Sabino Springs currently has 425 parcels in one section -- achieving greater density through a planned process.

#### Average Density in Unregulated Area:

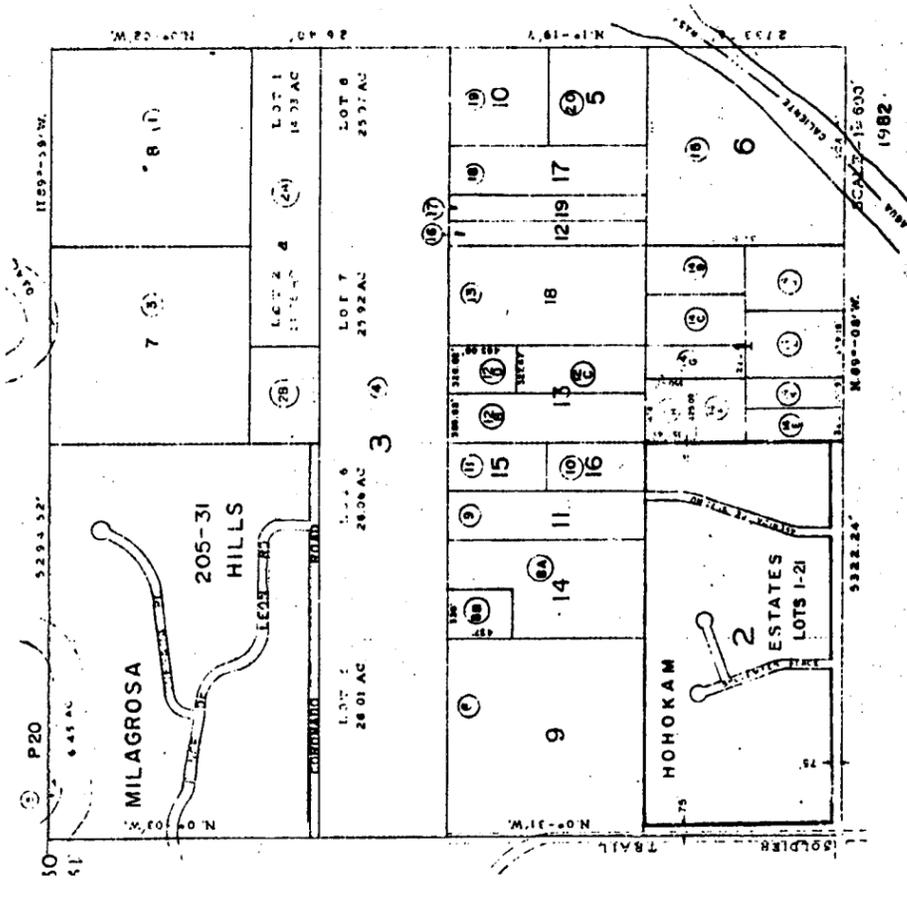
Within the 13 areas of the study which have experienced unregulated activity, the average number of parcels per section is **179**.

#### Average Density in Regulated Area:

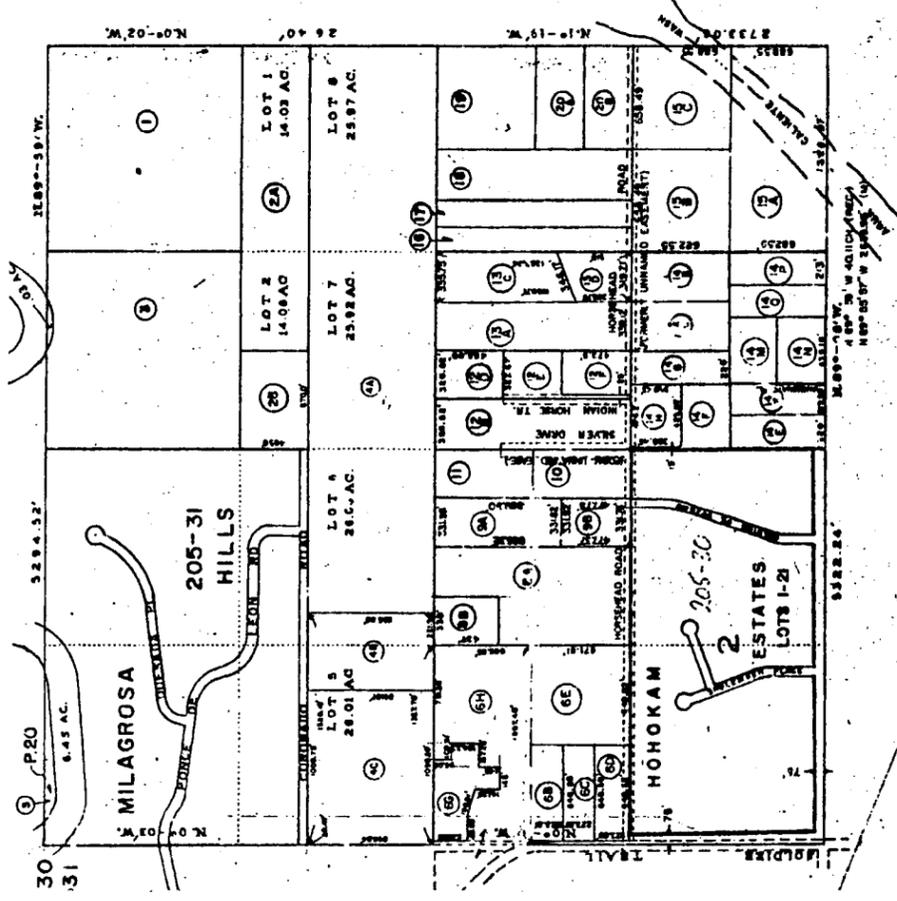
In contrast, the seven planned areas of the study group achieved an average of **485** parcels per section



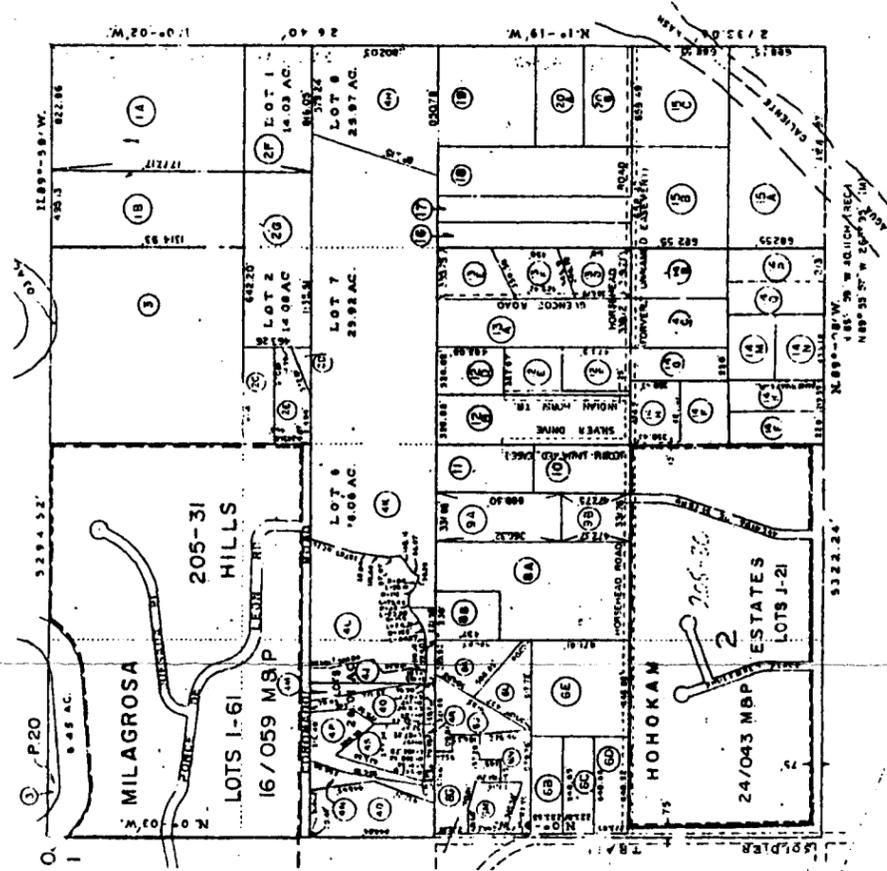
AGUA CALIENTE  
T13S R16E  
Section 17



1985

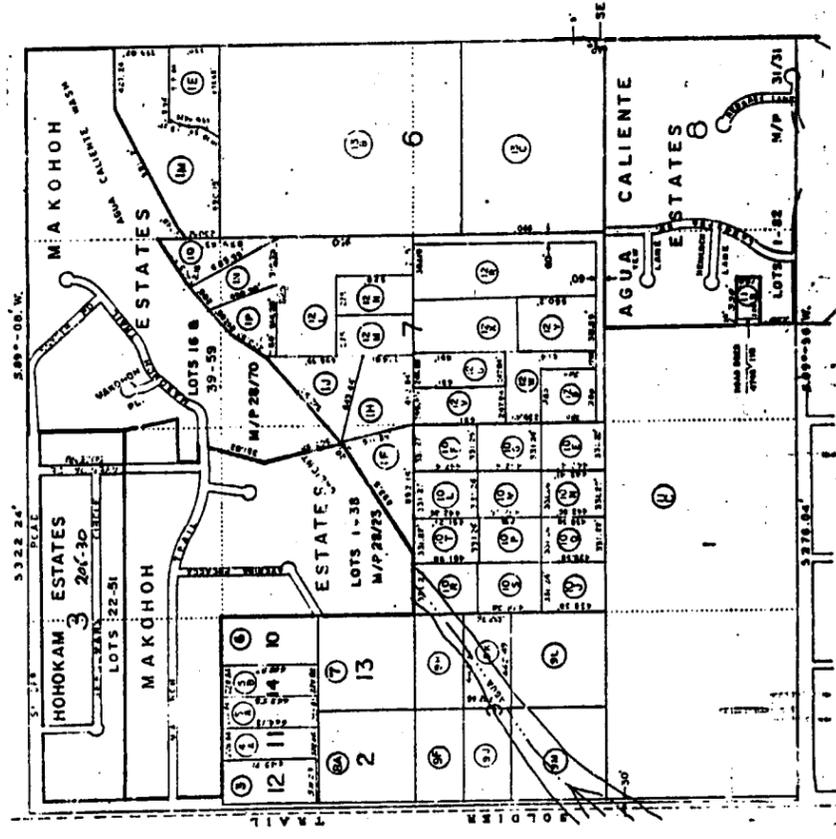


1995

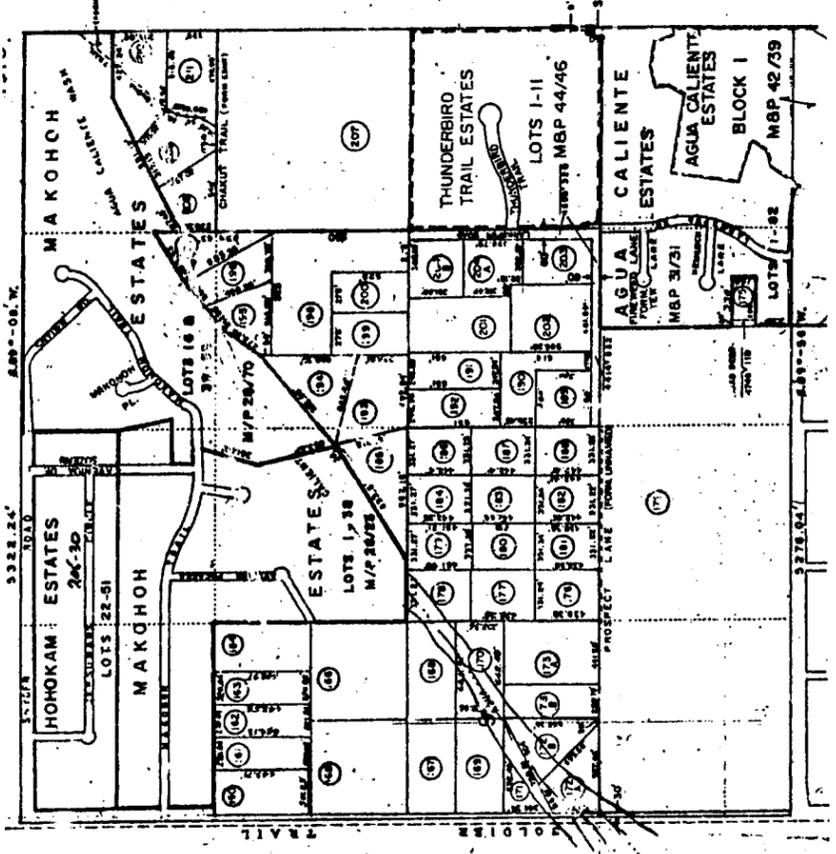


Current

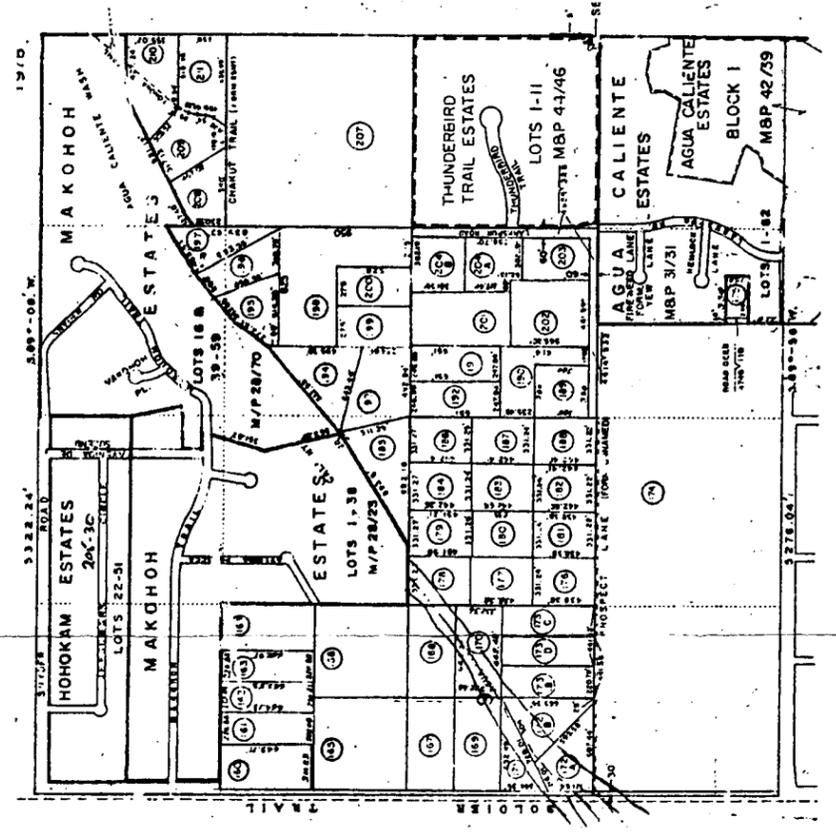
AGUA CALIENTE  
T13S R16E  
Section 20



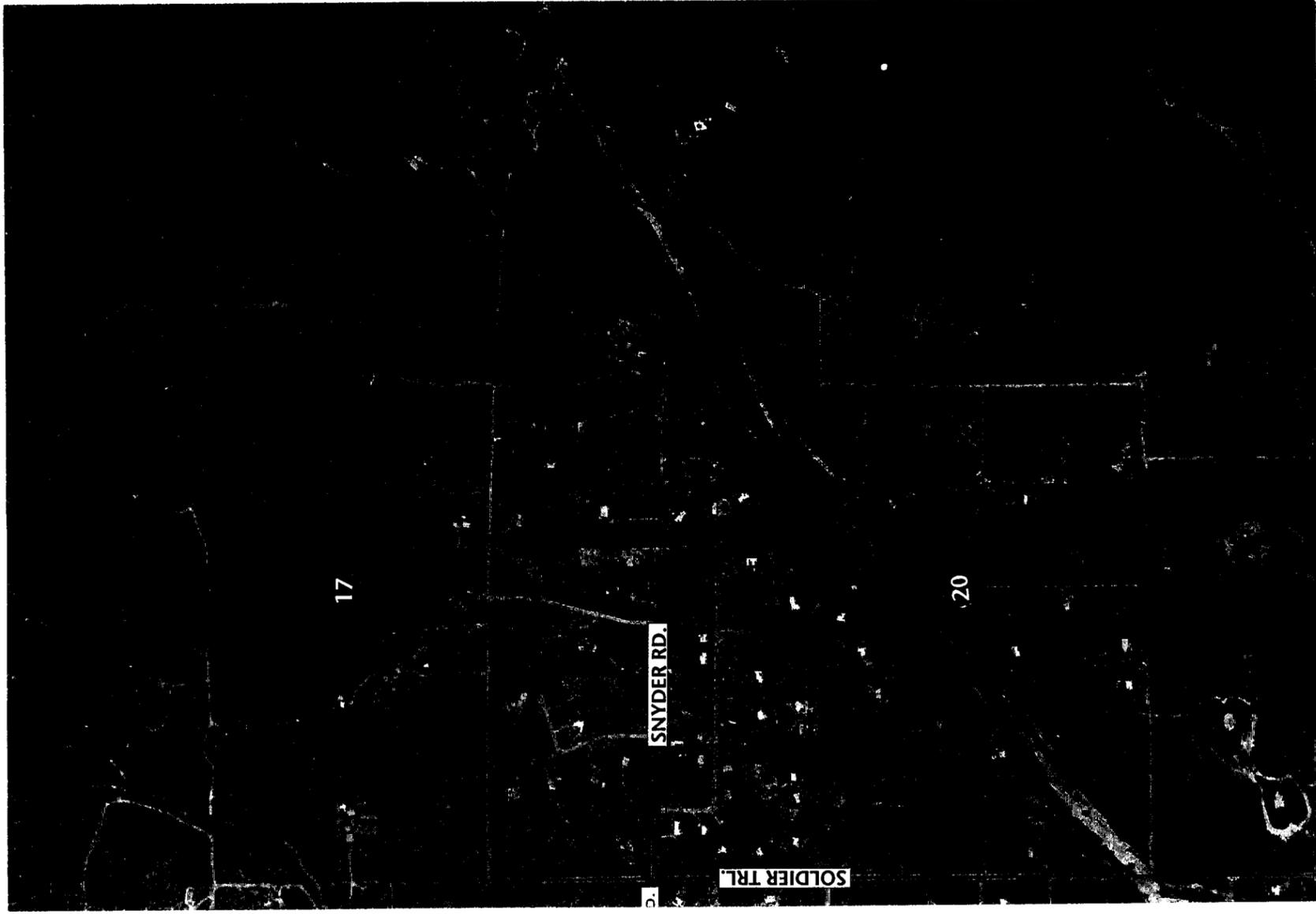
1985



1995



Current



AGUA CALIENTE 1985  
T13S R16E S17,20



AGUA CALIENTE 1996  
T13S R16E S17,20



SABINO SPRINGS 1996  
T13S R15E

1998

**PART V:  
SUMMARY  
OF FINDINGS**

*Wildcat Subdivision Study*

**SUMMARY OF FINDINGS**

1. **The law allows a certain type of unregulated development, often called "lot splitting," or "wildcat development."**

Under the Arizona Revised Statutes, a minor parcel division of less than six splits is not considered to be a "subdivision." The County may not deny approval or require a public hearing in such cases. The effect of the law is that lot splits which occur under such circumstances, no matter how extensive the genealogy becomes, are not required to produce a plat and the related improvements that are required of subdivisions.

2. **A significant number of new dwellings are created through unregulated lot split activity.**

In 1997, a total of 3,729 new residential dwelling units received permits in unincorporated Pima County. Of this, 1,525 -- or 41% -- of the new units were not part of platted subdivisions.

3. **Lot split activity contributes to the problem of sprawl.**

*Quantitative evidence:*

The problems associated with sprawl are exacerbated by lot split activity. The report examines the development of 20 areas, both regulated and unregulated, and finds:

- At least for the study group areas, the average number of parcels within largely regulated development sections is much higher than the average number of parcels in areas where development is unregulated.
- Stated another way, the planned process achieves density levels that are not matched in unregulated developments.
- Within each section of regulated development studied, there is an average of **485 parcels**.
- In contrast, within each section of the study where unregulated development occurs, there is an average of **179 parcels**.

Qualitative evidence:

**"Increased cost of services.** Because there is no control over urban growth in the GR areas, the potential for both sprawl and wildcat development is increased. This in turn requires increased services, including roads, bridges, fire and police protection, flood control, social services and the like - services which become more costly to provide as development sprawls."<sup>22</sup>

**"No control in majority of County.** The rurals are essentially out of control. The result is that the future direction of the County's growth and development is not planned, but can occur without any consideration of the problems described above. This in turn may have serious repercussions for the County in future years."<sup>23</sup>

**"The character of the neighborhood.** In most of the some 160 thirty six acre GR splits I have encountered, the single family detached residence is almost non-existent. A lot of these owners dreamed of moving a mobile home onto the acreage with the hope of someday building a home and selling the mobile home. After a few years of looking at other mobile homes in various states of appearance around them, together with the junked cars, rutted dirt roads, choking dust, the smelly stable two hundred feet from their mobile home, they come to realize it would be foolish to invest in a home that would depreciate in value because of the character of the neighborhood. This whole pervasive attitude prevails in these developed areas encouraging a vicious cycle of neighborhood decline. I have had many owners tell me this is why they will not build a home or improve their property."<sup>24</sup>

**4. Lot split activity has adverse tax implications.**

Foregone Tax Revenue

Many lot split sites are occupied by mobile homes. These mobile homes are not included in the ad valorem taxes on real property. (Op. Attny Gen. No. 71-7). A.R.S. 42-642(A) provides that "Each mobile home with respect to which an affidavit of affixture has not been recorded pursuant to 42-641.01 shall be subject to ad valorem property tax to be assessed and collected in the same manner and at the same time as other personal property taxable under this chapter." For reasons such as this, the improved full cash value of unregulated lot split land (which contains a high concentration of mobile homes) is much less than comparable regulated development. The report examines the development of 20 areas, both regulated and unregulated, and finds:

1. At least for the study group areas, the average Improved Full Cash Value per section of regulated development is higher than the average of parcels in unregulated areas. Land Full Cash Value is also higher in regulated areas.
2. Stated another way, the planned process built a tax revenue base for the County that is not matched in unregulated developments.

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<sup>22</sup> July 17, 1985 Memorandum from Robert Johnson to the Planning and Zoning Commission

<sup>23</sup> July 17, 1985 Memorandum from Robert Johnson to the Planning and Zoning Commission

<sup>24</sup> May 28, 1985 Citizen's Letter to Planning and Zoning

3. Within each section of regulated development studied, the average Improved Full Cash Value per section is \$38.5 million. The average Land Full Case Value is \$17.2 million.
4. In contrast, within each section of unregulated development studied, the average Improved Full Cash Value per section is \$8.1 million. The average Land Full Cash Value is \$4.7 million per section.
- A 1977 document written about the relationship between unregulated lot split activity and implications to the tax base includes this insight:

"Another cost to the public is the failure to tax all parcels. Since the parcels are difficult to detect, it is virtually impossible to tax all of them. In an April 18, 1975 OEPAD memorandum, this problem was illustrated. A total of 290 parcels had been created in a township, and 282 parcels had been sold. The assessor is taxing only 22 of 282 parcels, evidently due to the fact that the other parcels did not have a deed recorded. As a result, it may be assumed the county is taxing the remaining 260 parcels as grazing land, even though they were sold for a price much higher than grazing land would bring."<sup>25</sup>

5. **Unregulated lot splitting benefits the land speculator, often to the detriment of individual buyer, the local government, and the larger community.**

Unregulated lot split activity adversely impacts the property buyer, local government service delivery, local government tax payers, school districts, emergency service providers and utility providers.

6. **Buyers Fall Through the Cracks**

The rezoning and subdivision platting processes are the traditional methods used to review new development projects. The regulated process allows all affected parties the opportunity to examine the impact of the proposed development. In a regulated process, the local government can ensure that adopted code requirements are met and the impact of the development is mitigated to the extent allowed. The regulated process also ensures that public facilities exist to serve the new development, including wastewater capacity, roadway capacity, flood control improvements, school capacity, etc.... No such requirements are in place for unregulated lot splitting.

7. **Caveat Emptor is Not Effective Public Policy from the Perspective of the Buyer and Local Government**

Developments which result from multiple minor wildcat conveyances often lack paved roadways for access, dedicated rights-of-way, and flood control improvements. Residents often request the county and other agencies to provide missing services, such as street construction, maintenance, drainage improvements, bridges, utilities, parks, and other facilities that are normally planned for and provided through the rezoning or subdivision review process. Residents are often surprised to learn that such services are not provided by previous property owners who initiated the lot splitting

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<sup>25</sup> Parcel Splitting in Arizona, Its Problems and Consequences, Arizona Association of County Planning Directors, July 1977

process, and that the county is not obligated to provide such services to unregulated lot split communities. Political pressure is then exerted on the Board to stand in the shoes left empty by the wildcat developer. Costs that should have been incurred by the developer are passed on to the taxpayer.

**8. Major Incentives Drive Unregulated Lot Splitting.**

- It requires less up-front money. Platted subdivision development involves high up-front costs that are avoided by a lot split developer. Local governments require certain improvements in subdivision projects, including roadway construction and right-of-way dedication, flood control improvements, water and sewer line extensions, fire hydrants, and so on. Other costs associated with preparing subdivision plats include engineering fees, fees associated with obtaining 100 year water supply certification, and plan review fees. Such costs are passed on to the customers and residents of the improved, subdivided lots. In contrast, lot split activity involves minimal up-front costs, such as well drilling and installing a water line distribution system, grading (but not paving) roadways, and extending electrical service.
- Profitability. Despite the cost savings in infrastructure improvements to the lot split owner, lots in unregulated subdivisions have been sold at similar prices as subdivided lots, often because the sites are larger than those of a subdivided homesite.

**9. Major Problems Result from Unregulated Lot Splitting.**

Arizona County Planning Director's Impact Categories in Assessing Lot Split Activity (from survey instrument):

1. **Road and traffic hazards** (wash board surface, wash-out, earth settling, flood and erosion damage, powdered surface, standing water and muddy streets after rains).
2. **Substandard and poorly designed roads** (inadequate width and shoulder; poor drainage; no flood control devices; grades of roads and curve radius don't meet minimum safety standards).
3. **Access** (lots access onto heavily traveled streets).
4. **Emergency services** (fire trucks and ambulances don't have safe access to lots).
5. **Dedications** (the jurisdiction must purchase required dedications for road expansion from property owners).
6. **Liability** (the jurisdiction, not the lot split developer, is liable for flood control and safe streets).
7. **Access** (not adequate for travel in a storm and / or evacuation in an emergency).
8. **Flood damage and erosion** on private property.
9. **Settling earth and foundations** on private property.

10. **Pollution** (distress and discomfort created by air borne dust and particulates).
11. **No 100 year water certification.**
12. **Private wells** (drilling of private wells allowed without requiring a hydrology study to determine the characteristics of the underlying aquifer).
13. **Water deficiencies** (reported occurrences of water shortages, inadequate water pressure, and poor water quality).
14. **Over pumping aquifer** (no assurance that the underlying aquifer is being over pumped by others at the expense of local water companies or private wells).
15. **Legal access and physical access** are not the same.
16. **Physical access** involves trespasses over private or public land.
17. **Legal recourse is not available** for infrastructure and site engineering deficiencies.
18. **Bonding** (lot split developer did not bond for water improvements).
19. **No deed restrictions** to protect and preserve the nature, quality and lifestyle of the community.
20. **No mortgage release protection** to protect lot purchaser from lands encumbered with multiple mortgages.
21. Related traffic accidents.
22. Related infrastructure, health and safety complaints
23. Response time complaints for fire, ambulance and law enforcement.

## Unregulated Area Activity

Unregulated Area Activity	Number Sections	Average # Parcels/Sections	Number Parcels			Number Vacant Parcels			Total Land Full Cash Value			Total Improved Full Cash Value		
			1991	1995	1998	1991	1995	1998	1991	1995	1998	1991	1995	1998
Tucson Mt. Park T14S, R13E Sec 7, 18	2	44	89	86	88	63	53	49	7,019,340	5,851,278	5,992,079	1,927,753	2,392,530	5,506,076
Rincon Creek T15S, R16E Sec 22-27	6	41	202	216	244	78	99	107	7,156,469	5,101,504	6,738,856	2,050,159	2,425,184	7,274,220
Gates Pass/TMP T14S, R12E Sec 11-14	4	43	160	160	173	99	83	90	7,739,201	9,583,682	9,377,131	5,211,547	5,716,451	10,471,884
Sahurita Road T17S, R15E Sec 2-4, 8-10, 15-17	7	41	112	112	285	12	7	138	10,851,953	6,901,472	9,378,687	1,552,708	1,920,338	3,043,131
Sahurita Road T17S, R15E Sec 7-9, 16-18	6	55	53	85	332	30	26	225	5,745,038	3,861,750	10,515,483	67,454	309,739	1,248,508
Vail/Calle Rinconado T17S, R16E Sec 2-4, 9-11	6	211	1,228	1,241	1,265	1,033	975	859	12,504,770	10,400,929	10,594,979	6,204,826	12,132,674	27,556,347
Taylor Lane/Hermans Rd T15S, R11E Sec 28, 29, 31-33	5	116	337	454	582	139	112	186	6,150,730	9,368,019	10,749,413	1,680,599	2,896,968	3,914,536
Old Nogales Hwy T16S, R14E Sec 4-9	6	112	505	551	671	114	77	106	7,613,153	11,357,122	15,504,341	3,969,883	5,403,446	7,230,544
Picture Rocks T12S, R11E Sec 33, 34, 35	3	331	638	712	993	150	102	237	11,255,475	11,385,316	20,192,258	4,914,889	6,129,961	11,946,117
Picture Rocks T13S, R11E Sec 3-10	8	173	869	1,201	1,386	163	279	206	19,781,336	21,505,174	22,106,083	7,491,742	10,925,070	22,066,935
Catalina T11S, R14E Sec 3, 4, 9, 10	4	463	1,497	1,693	1,851	349	298		36,538,432	37,422,543	39,221,156	24,921,963	33,255,068	49,698,236
Agua Caliente T13S, R16E Sec 16-21	6	148	770	842	885	252	237	227	29,087,855	42,288,569	50,283,980	42,454,179	61,679,013	94,871,176
LaCanada/Orange Grov T13S, R13E Sec 11-14	4	815	3,182	3,174	3,259	646	236	274	96,664,404	100,588,391	107,401,519	162,890,709	222,137,508	296,459,609
	67	179	9,642	10,527	12,014	3,128	2,584		258,105,156	275,615,749	318,055,965	265,338,211	367,323,950	541,287,319

## Planned Area Activity

Planned Area	Number Sections	Average # Parcels/Sections	Number Parcels			Number Vacant Parcels			Total Land Full Cash Value			Total Improved Full Cash Value		
			1991	1995	1998	1991	1995	1998	1991	1995	1998	1991	1995	1998
Sahuarita Road T-17, S, R15E Sec 13, 14, 23	3	860	2,532	2,577	2,579	2,220	2,247	2,211	12,213,296	8,602,790	8,015,977	14,002,082	17,197,008	25,841,922
Sabino Springs T-13S, R15E Sec 14	1	425	70	168	425	29	116	340	4,894,272	4,439,131	12,010,843	13,276,529	14,791,913	18,405,318
Gates Pass T-14S, R12E Sec 23, 26	2	954	1,908	1,901	1,907	524	463	411	23,039,655	25,011,475	26,150,749	17,826,180	18,716,254	23,202,554
Pima Canyon Estates T-12S, R14E Sec 30-32	3	217	449	468	652	150	119	282	28,405,635	36,578,828	39,407,763	45,226,027	62,129,575	82,115,850
Rancho Vistoso T-11S, R13E Sec 23-26, 35-36	6	336	369	860	2,017	216	532	1,178	16,171,623	29,462,786	65,587,885	14,622	28,322,481	71,153,029
Ventana Canyon T-13S, R15E Sec 5, 6, 7, 8	4	394	1,266	1,444	1,577	572	383	322	64,093,499	96,676,848	121,720,210	116,881,498	206,847,246	312,232,977
Shadow Hills T-13S, R14E Sec 7-8, 17-18	4	498	1,941	1,973	1,991	206	173	152	107,120,421	125,112,299	122,796,704	203,335,256	255,538,239	352,229,625
	23	485	8,535	9,391	11,148	3,917	4,033	4,896	255,938,351	325,884,157	395,690,131	410,562,194	603,342,716	885,181,275

1998

**PART VI:  
PERSPECTIVE**

*Wildcat Subdivision Study*

**117 YEARS OF REQUESTS FOR IMPROVED INFRASTRUCTURE**

REPORT

ROAD VIEWS

HARSHAVY

Recorder's Office,  
TUCSON. - - Pima Co., A. T.

Filed and recorded at request of  
*Pima Co Supervisors*

*June 8<sup>th</sup>* A. D. 1881,

at *440 P* M.

Book *9 Miss Reams*

Pages *154 and 155 & 656*

*W. J. Brubaker*

County Recorder.

1881 ROAD VIEWERS REPORT

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To The Honorable  
the Board of Supervisors  
of Pima County

Gentlemen:

Pursuant to act of your Honorable Body bearing date of May 12th, 1881 relative to Board matters, the undersigned would respectfully call your attention to the following vis: we have been over the ground and thoroughly examined the route of the proposed new road between Tucson and Silver Bell District. We find the same in every way, practical. Is good ground for road-bed, and will be same 10 or 12 miles shorter than the road as now traveled. Some grading will be necessary in crossing the mountains near the Plamaso Springs; but will not in any place exceed 165 per road. After passing the first hills west of the Santa Cruz, there will be probably 16 or 18 miles of air lane, measuring but very little expense to be placed in good traveling condition. The opening of said road we believe to be a public benefit. The road should be surveyed and the grades properly established. The grades should be made not less than 16 feet wide. The brush brush should be taken out for a space of twenty feet in width. The cost of building road and of placing the same in good traveling condition will not in our judgements exceed \$1200. All of which is most respectfully submitted.

Viewers

R.N. Leatherwood  
L.D. Chillson  
Dave Gibson

*Source: Original Documents Pertaining to Financial, Educational, Legal and Political Affairs of Pima County Arizona, University of Arizona Special Collections Library*

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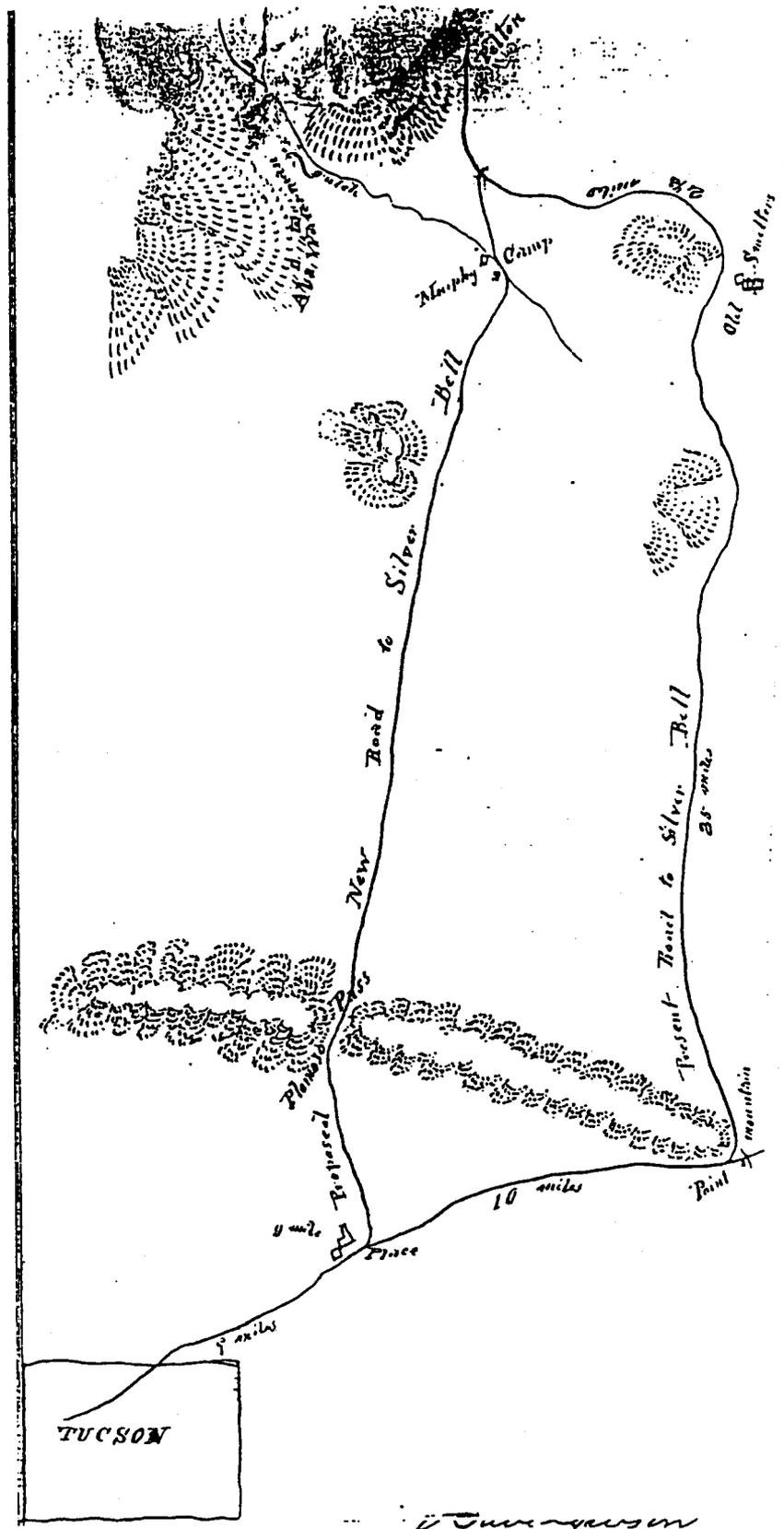
To The Honorable  
the Board of Supervisors  
of Pima County

Gentlemen:

Pursuant to act of your Honorable  
Body bearing date May 12<sup>th</sup> 1881 relative to Road  
matters, the undersigned would respectfully call your  
attention to the following viz: we have been over the  
ground and thoroughly examined the route of the pro-  
posed new road between Tucson and Silver-Bell  
District. We find the same in every way, practically  
is good ground for road-work, and will be some  
10 or 12 miles shorter than the road as now tra-  
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the mountains near The Plamaso Springs; but we  
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the first hills west of the Santa Cruz, there will be  
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little expense to be placed in good traveling condition.  
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public benefit. The route should be surveyed and  
the grades properly established. The grades should  
be made not less than 16 feet wide. The  
brush should be taken out for a space of twenty  
feet in width. The cost of building such a road  
& placing the same in good traveling condition, with  
in our judgments not exceed \$1200<sup>00</sup>. All of which is most res-  
pectfully submitted

Viewers

R. K. Weatherwood  
J. D. Chilson  
David Gibson



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EARLY CITIZEN'S PETITIONS

1879 REQUEST FOR IMPROVEMENTS  
TO ACCOMMODATE GROWTH

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Tucson A.Z.  
April 19th, 1879

To The Honorable the Members of the  
Board of Supervisors of Pima County

Gentlemen:

The undersigned Citizens of Tucson desire very respectfully to direct your attention to the very bad and dangerous state of the Yuma Road by the Novitiate and request that you will have the goodness to have it repaired. It has been recognized, previously by your Honorable Board as a County Road and is much used for traffic. The undersigned would also respectfully suggest the advisability of appointing a Road Superintendent whose duty it will be to see that the roads are kept in a good condition and rendered safe for travelling. The increasing population of our Town and its future prospects render it very desirable that the roads leading to its environs should be kept in a safe condition for transit.

The undersigned would respectfully recommend Mr. Samuel Hughes as an eligible and efficient gentleman for the office of Road Superintendent for the District.

Yours Very Respectfully

*Source: Original Documents Pertaining to Financial, Educational, Legal and Political Affairs of Pima County Arizona, University of Arizona Special Collections Library*

Tucson A. T.

April 19<sup>th</sup> 79.

To the Honorable the Members of the  
Board of Supervisors of Pima County

Gentlemen:

The undersigned Citizens of Tucson desire very respectfully to direct your attention to the very bad and dangerous state of the Puma Road by the hovitate and request that you will have the goodness to have it repaired. It has been recognized, previously by Your Honorable Board as a County Road and is much used for traffic. The undersigned would also respectfully suggest the advisability of appointing a Road Superintendent whose duty it will be to see that the roads are kept in a good condition and rendered safe for travelling. The increasing population of our Town and its future prospects render it very desirable that the roads leading to its environs should be kept in a safe condition for transit.

The undersigned would respectfully recommend Mr. Samuel Hughes as an eligible and efficient gentleman for the office of Road Superintendent for the District

---

Yours Very Respectfully  
H. W. Hanks  
Charles H. Hays  
P. Hays  
J. H. Hays  
W. B. Hays  
Santiago Ariza  
M. S. Brown  
Hugh C. Kelley  
Alp Levin  
Geoffrey P. Hays  
James A. Hays  
Lloyd Williams  
Lance Anderson  
R. A. Wilbur  
Anthony Cooney  
James Hays  
J. Hays  
James Hays  
T. S. Leon

