

City of Tucson Planning and Development Services (PDS) conducted early outreach for suggestions to improve the City’s development codes including the Unified Development Code, Technical Standards Manual, Administrative Manual, and other related codes and standards. Additionally, an online survey was available from July to October 2022. Over 130 responses were recorded as suggested updates to the development code. Although not all suggestions will be part of this initial proposal, they may be considered in a future proposed update.

1. What suggestions do you have to improve City of Tucson development codes? Please provide any examples of specific projects/situations where this aspect of our code presented a barrier.
2. Do you know what sections of our codes this pertains to?
3. What benefits do you believe this will have?

See a list of responses organized by benefit area below.

- Shorter Processing Time
- Improved Climate Resiliency
- Fewer Unnecessary Steps
- Health, Safety and Quality of Life
- Increased Transparency and Clarity in Process
- Two or More Benefit Areas
- Reduced Construction Costs and Improved Housing Affordability
- All Benefit Areas
- Higher Quality Built Environment and Urban Design
- Other

Shorter Processing Time	
1	• Find a way to NOT require a development package for a minor building expansion that has little or no impact on the parking or other site access design. Zoning can simply review architectural site plans and details included in the building plan set. Example: DP20-0200. The building expansion amounted to 4%, and the site was overparked. In the first submittal, no changes were being made to the parking lot or site access. It took 6+ months to get a 1-page DP approved. A waste of time and money.
2	• Landscape Reviews - Required trees in parking lots. The new landscape reviewer has some new code interpretations - especially trees in parking lots. If there are new interpretations, it should be reviewed/discussed with a stakeholder group and not be left to a reviewer's point of view. I worked with Joe Linville and Andy Connor for years and all of a sudden there is a new point of view.... makes no sense and wastes a lot of time.
3	• Lot Line Adjustments and Splits - Process for COT lot line adjustments and splits are extremely difficult and time consuming. COT should review Pima County's policies and be more aligned with their process to save staff time and the public's time.
4	• Make Development Approvals “By Right” Streamline review processes and eliminate discretionary approvals to the greatest extent possible. This can be accomplished by incorporating resident and stakeholder feedback into clear and objective community planning documents rather than individual projects.
5	• Solar canopies on city owned land trigger special exception; Solar companies not adept / familiar Hearing from procurement in city - there’s a lot in the pipeline - similar to water well 100s of hours into SE that makes little difference on the ground Broaden to all government uses?

That would cover Tucson Water - that's going to get approved with waste of staff hours  
Streamline process needed due to the quantity,  
solar canopies on public property are common, consider how solar for private properties might need their own  
there hasn't been opposition from neighbors as long as there is landscaping and screening  
well site upgrades to modernize equipment  
can we develop design standards for those? for the well sites, as long as there is screening, landscaping, buffering from neighbors, if we can have it in the code to make it an allowed use

6 · The biggest issue that I face right now are the immensely slow turnaround times and inaccessibility to city reviewers. The approach the county takes seems completely opposite to the COT - but I think their approach is not wrong, effectively putting the trust into the registrants. It presents an issue when people try to submit drawings who are not drafters, architects, or engineers. Perhaps there can be a person dedicated to reviewing those types of submittals more closely. Easing up on review check items and putting the faith back on the registrants also means building inspectors have to be more diligent in looking at drawings and inspecting field work - no more zoom inspections! This seems like a more appropriate way to do things. And there really needs to be an expedited zoning review process for residential projects. For two reasons, First, it can answer feasibility questions for homeowners before they spend money hiring someone to draw for them. There needs to be a letter issued that this process has occurred, and the plan or intentions are acceptable given specific stipulations. Second, it opens up a process for model plan units that are constructed off-site and permitted through the state.

7 · The certificate of occupancy process seems to have a lot of confusion. Amongst the issues, people have come to my department, stating they need us to do an inspection in order to get their certificate of occupancy. I'm not sure why they think this, I assume they have been directed to. However, since this is incorrect, perhaps a step-by-step guide can be developed to help them along the process and help the city avoid any licensing or permitting issues.

#### Fewer Unnecessary Steps

8 · administrative manual is from a pre-digital era so there are unnecessary items like submitting paper copies and including location information that's available on MapTucson, development packages 2-06

9 · ask customer for third party review as optional review time 20 days

10 · Correct accounting of permit and impact fees - had a 5500 SF building and was sent a \$200,000 permit/impact fee - math was way off. In addition, had a tenant reach out about the high cost of their permit fees and it turns out COT was charging them for impact fees that we had already paid. This wastes staff's time and the public's time.

11 · Eliminate all but the most essential for health and safety. The rest is just control freak nonsense

12 · Far less "codes"!! Tucson intentionally makes building anything as complicated and expensive as possible, especially commercial. Your "codes" are overbearing and completely out of line.

13 · Increase the allowable number of commercial lot line adjustments from 3 to five before a more robust review process is required.

14 · Rezoning Process - eliminate the need to bring the rezoning Ordinance back to Mayor and Council after all conditions have been met and DP is approved. This delays start of construction by 6-8 weeks depending on Council calendars. (These approvals have never been denied for conditional rezonings because all conditions are met before it is scheduled.)

- 15 · TEP requests that current development rights related to utilities be maintained. We appreciate being included in this survey and look forward to any stakeholder updates related to code amendments that might impact TEP.

#### Fewer Unnecessary Steps & Increased Transparency and Clarity in Process

- 16 · Eliminate the requirement for separate submittals for DP & CM for smaller projects (<\$1M?). Most applicants are used to having one set of plans for the entire project and it's problematic (& costly) to create separate packages for each. This is most often learned only when they submit and it can cause delays.  
Separate submittals could still be optional if desired and mandated for more expensive and/or complicated projects.  
As both submittals often contain the same information for certain aspects of the project, this duplication creates a potential for errors between the two. Also, having separate plan sets can often be confusing to contractors for bidding, constructing and inspections. Working with just one set of plans is highly desirable. It would also be helpful to provide a single 'job card' showing all inspections for both permits.
- 17 · Hello:  
Two technical/ spelling errors in the Technical Standards Manual, section 6-01.0.0., based on what is posted at Am legal (at -- [https://codelibrary.amlegal.com/codes/tucson/latest/tucson\\_az\\_udc/0-0-0-11577](https://codelibrary.amlegal.com/codes/tucson/latest/tucson_az_udc/0-0-0-11577) --). (a) Esquer Park is on Fourteenth Ave (not Fourth). (b) Miramonte Pocket Park is at 901 North Richey Blvd (not 701).  
Also, will Palo Verde Neighborhood Pocket Park at 3330 East Fairmount Street be added to this list? (Not advocating either way, just curious.)  
Thanks!
- 18 · Simplify the water harvesting and NPPO codes - you will likely see far better participation/results.

#### Increased Transparency and Clarity in Process

- 19 · Dimensional standard tables  
P1 I1 I2 - mislabeled... as P1 I2 and I2
- 20 · Dimensional standards table  
residential  
We use MF counts towards duplex..  
Density measured more than one way
- 21 · Make the FLD easier (good luck!)  
Maybe less open space requirements  
No - exception about the open space if you're near a regional park  
Maybe Reid park is the only one that qualifies  
Different version of the FLD for infill  
Original is for greenfield, cluster - residential cluster project  
Standards for large scale infill development  
But for INFILL  
Something on the radar for some time - big project  
  
Hesitate to open up when bigger discussion, goals involved

22	<ul style="list-style-type: none"> <li>Repeat of resources</li> </ul> <p>Make it part of the use standards if people want to see those steps</p>
23	<ul style="list-style-type: none"> <li>a better definition of Design Grade</li> </ul> <p>a lot of applications get sent back</p>
24	<ul style="list-style-type: none"> <li>A definition of bedroom would be nice</li> </ul> <p>That's one of those determinations that would be good to codify (people would love to see that because it helps enforce student housing)</p>
25	<ul style="list-style-type: none"> <li>Acupuncture and acupressure</li> </ul> <p>When you review business licenses, it comes up a lot it should be included in a list of examples in the definition of medical services</p>
26	<ul style="list-style-type: none"> <li>Alcohol distillation is Not in the code</li> </ul> <p>It's Under perishable goods manufacturing - but we have to tell people where to find it</p>
27	<ul style="list-style-type: none"> <li>Arizona's Groundwater Management Act (GMA) says that for an "Assured Water Supply" that cities must be able to prove that they have enough water of satisfactory quality to meet their needs of projected growth and development for the next 100 years. Obviously, Tucson does not have 100 years of water. Developers in Pima County do not have to show how they can provide 100 years of water prior to developing. The GMA is not a true practice, is it? Increased density of tacky tract homes is decimating Tucson's natural biodiversity that it's known for and killing off Saguaros; meanwhile, urban decay and an excess of crappy unlivable houses are on the rise, because why fix decaying homes when you can buy brand new cheaply built homes?</li> </ul>
28	<ul style="list-style-type: none"> <li>As a community land use advocate, I cannot address how to "streamline" PDSD processes. I am well aware that engaging the public takes time. However, I do believe that PDSD has an obligation to the entire community, not just the applicants. Impacted residents should be seen as City "customers" also.</li> </ul> <p>I find the current public engagement in the PAD approval process to be misleading. The applicant submits a "concept" to the public, zoning examiner, and Mayor/Council to obtain the rezoning. Only after that public process is completed is the project's design finalized and approved by PDSD. A specific problem: Benedictine Monastery changed the total design of the SW corner of the project AFTER having the PAD rezoning approved. Miramonte neighbors learned of this as the mature oleanders (guaranteed to be preserved as part of the PAD rezoning) were being bulldozed out to implement a new entrance design. Perhaps having the representative neighborhood committee continue to be involved POST-rezoning, such surprising misunderstandings could be avoided.</p> <p>PDSD's foot-dragging on the formation of the Sign Design Review Committee, supposedly put in place when the Sign Code Master Plan became part of the revised UDC, illustrates another instance where the City movement toward form-based code and away from numerical parameters has left the impacted residents out of the decision-making. When the final draft of that revision was written, PDSD staff put into the code a loophole which allows staff to process without Committee involvement.</p> <p>I find that type of code writing to be deceptive, not worthy of a City advocating for equity of all residents. I would ask that any proposed action taken as a result of this survey be transparent, open, and respectful of everyone in the community.</p>
29	<ul style="list-style-type: none"> <li>Cases where traffic impact will be significant should require full review and neighborhood participation in review regardless of whether a rezone is required or not. Development at Camilla x Pima is a prime example.</li> </ul>

30	<ul style="list-style-type: none"> <li>Codes and Variances: It seems for every code there is a variance work-around for those with the right land lawyers (Lazarus &amp; Silvyn). If a variance work-around isn't available, the city can create one (FLD changes, ADU's and TEP undergrounding along GCZ and SCZ), or even change the annexation condition promise (36th &amp; La Cholla).</li> </ul>
31	<ul style="list-style-type: none"> <li>commercial rainwater harvesting - it was adopted without looking at other sections of code to see how there may be conflicts - if we require infill to have CRWH, they may not be able to meet parking/bike ped facilities</li> <li>WH Manual suggests groundcover in some basins that aren't allowed in landscape standards</li> </ul>
32	<ul style="list-style-type: none"> <li>Definitions of commercial, automotive, service and repair have 2 definitions not in the use tables at all</li> <li>11.3.4 commercial services use definition</li> <li>there's 4 uses in auto, and only 2 are used</li> <li>Other 2 only used to reference back to use specific standard</li> <li>Those could be combined somehow...</li> </ul>
33	<ul style="list-style-type: none"> <li>fences - inspectors are capricious. I was told my pool fence was half an inch too high off the ground. It didn't matter in terms of a baby crawling through, so why did I have to do it over? the code should be streamlined and be practical.</li> </ul>
34	<ul style="list-style-type: none"> <li>Food service with alcoholic service as accessory use</li> <li>In the permitted use tables</li> <li>Says it's not allowed in C2, But in practice we do allow rest with alcoholic beverage use as accessory use</li> </ul>
35	<ul style="list-style-type: none"> <li>Have had a hard time getting fence height code. Also, it would be nice to be able to enter something like "fences", or "fence height" into a search box and pull up the applicable code.</li> </ul>
36	<ul style="list-style-type: none"> <li>Have staff return calls and emails. Multiple calls were made. No return calls or email replies.</li> </ul>
37	<ul style="list-style-type: none"> <li>Home Occupation Regulations</li> <li>When you go through the Home Occupancy regulations - the maximum of 5 customers a day, 1 at a time.. (issue for home hair salons)</li> <li>Related to health department regs</li> <li>Selling cookies, even if no one visits to shop (on site baking/requires a second commercial kitchen)</li> <li>But that kicks in requirement of second dwelling unit..</li> <li>any creative ways to address that - it comes up a lot in code violations</li> <li>in order to support home-based entrepreneurs</li> </ul>
38	<ul style="list-style-type: none"> <li>I am supposed to gather this specific data in 4 days? AND know what sections of the massive code it applies too?</li> <li>Enforce what you have. Stop trying to sacrifice the old sections of town for progress. ADU's, FLU, They are open lands for places to plant the million trees. Can't plant them in concrete.</li> <li>Stop the bizarre ways staff and developers can get waivers i.e., Fry's and Mt View Project. I have no trust in the department.</li> </ul>
39	<ul style="list-style-type: none"> <li>inconsistencies in appeal processes in timing, materials sent to whom, and order of operations</li> <li>a chart that might be helpful when addressing this</li> </ul>
40	<ul style="list-style-type: none"> <li>interpretations and determinations over the years, many of these could be minor clarifications or determined to be no longer relevant</li> <li>example - there's one about what constitutes a sleeping quarter that conflicts with ADU text amendment</li> </ul>
41	<ul style="list-style-type: none"> <li>is inconsistent across different sections, its referenced about 8 times across the code, hard to understand and apply correctly</li> <li>clarity on where the engineer standards intersect because it's unclear which expansion std apply in retention/detention and other common items</li> </ul>

42	<ul style="list-style-type: none"> <li>It is almost impossible to get a Certificate of Occupancy in a timely manner for any use from PSD. That needs to be fixed. The power of the Zoning Administrator should be limited so that they only get to touch zoning compliance for any project ONLY once during a set timeline and should not be involved in the CofO process.</li> </ul> <p>Marijuana manufacturing is not allowed in the C2 &amp; C3 zones, even though cultivation is. I believe that Mayor &amp; Council as well as the public and most stakeholders voted to allow manufacturing with the same restrictions as cultivation in C2 and C3, but it was not added to the UDC. I think this was just an oversight because I remember everybody agreeing on manufacturing being fine in C2 &amp; C3 with same restrictions as cultivation.</p> <p>The other aspect of the UDC relating to marijuana that is less relevant today is the 25% waiting area for medical marijuana. The medical marijuana patient count in Arizona has dropped from over 315,000 in early 2021 to just over 144,000 in August as per the latest reports from ADHS. The 25% waiting area is no longer relevant as it is a holdover code from the early days of medical marijuana (2013 &amp; 2014).</p> <p>Marijuana establishments that were licensed on April 8, 2022 under the social equity program should only be allowed within city limits if the majority of the ownership is controlled by (51%) the Principal Officer or Board Member who met social equity qualification standards, have resided in the City of Tucson for at least 5 years, and if the remaining 49% is owned only by individuals or entities registered in states where marijuana is legal for recreational use. Several of the licenses issued by ADHS in April went to entities that hold ownership by shell companies registered in Wyoming where marijuana is illegal both medically AND recreationally. Allowing these companies to open in Tucson could potentially violate the Interstate Commerce Act. Please have CoT legal counsel look at <a href="#">Gonzales vs Raich (U.S. Supreme Court - 2005)</a>.</p>
43	<ul style="list-style-type: none"> <li>Make them clearer so the average homeowner can understand them. Too often even the people we contact in the city give very incorrect information (although this might be a training issue). One example are swimming pool barriers. After weeks of research and attempts at gaining specific answers, I have been unsuccessful getting a concrete answer. When I contacted the planning department, I was told information that didn't even bear similarity with what I read on the website. One example is whether our gate on our driveway will be adequate to meet the barrier rule (our property is completely surrounded by a 6' black wall, except for the driveway gate.). It seems like it should be a very clear, yes or no answer for a pretty common problem, but to date I haven't found a firm answer. I've found Pima County is generally much more clear communicating and interpreting their codes.</li> </ul>
44	<ul style="list-style-type: none"> <li>old code sections like grading technical standards are outdated and difficult to adhere to (1980s) - need engineering support, some have agreed to assist</li> </ul> <p>Not requisites to other standards</p>
45	<ul style="list-style-type: none"> <li>Options for modification outside of IID and lengthy process</li> </ul> <p>shading of sidewalks in IID,    how can we extend this more broadly for an equity lens - what are the main pedestrian corridors, communities that have more need for walking    goal is to increase shade in those corridors as development occurs    not sure if these key corridors are mapped</p>
46	<ul style="list-style-type: none"> <li>protective service (police and fire) is not permitted in RHNO in use table (carry over mistake from the LUC)</li> </ul> <p>breweries in commercial zones are not shown as permitted in any use except as an accessory use to a bar in C2 but not as a restaurant    roof drainage into sidewalks - minimum area that that goes into effect</p>

· Start by actually enforcing the codes that are on the books. In my neighborhood, the city ignored the codes related to drainage and fill. The following occurred.

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1. Neighbors incurred thousands in property damage when the city allowed the developer to illegally divert stormwater from his development onto adjoining properties. Existing properties were flooded, including one young single mother who had 3 inches of water and \$60,000 worth of repairs as a result
2. Failed to read the developer's soil report, so failed to notice that there was no justification for granting the developer a variance from the retention basin requirements. This exacerbated the downstream flooding
3. Failed to follow the code regarding fill height and mitigation and allowed the developer to dump twice the allowable fill along two sides of this development without having to adhere to the mitigation requirements.

· Target the corruption in the department. The Fry's rezoning at Houghton and 22nd is a prime example. The lawyer and the Planning Center were sneaking a big box store and a plan amendment through. Staff was well aware of this but ignored all the evidence the neighbors presented to them. That leaves people wondering if employees were on the take.

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1. The Planning Center hid the size of the gas station kiosk in the Drainage report. That number pushed the size of the proposed building over 100,000sf, yet the city staff never required the developer, or their attorney, to revamp their documents to follow the zoning code requirements for big box stores.
2. The city allowed the developer's attorney to change the size of the store AFTER the zoning hearing so that the store, plus the kiosk, would fall just below 100,000sf.
3. After Mayor/Council approval, the developer came back and filed new paperwork that increased the size of the proposed store above 100,000sf.
4. The Planning Center and the attorney hid a plan amendment within the PAD document, effectively bypassing the Plan Amendment requirements and eviscerating the undisturbed open space requirement.  
UDC requirements for big box stores, Plan Amendment processes

· Target the corruption in the department. In 2016 the developers and Lawyers of the Fry's rezoning project @ 22nd and Houghton forced its preconceived industry commercial model to the site with unique restrictions required the developers and the City of Tucson staff to contort the UDC and the HENP. The Houghton East Neighborhood Association and residents found the rezoning request to be imprecise, distorted, and contradictory, proving their case with a plethora of detailed violation documentations.

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The entire rezoning process raised disturbing concerns about the objectivity of City of Tucson employees. It appeared they went to unconventional lengths to accommodate the applicant and to justify the project.

After the hearing it was discovered that a neighbor was offered a bribe. This "Bribe" was paid by way of services/product. Said neighbor received wrought iron bars covering all windows and doors on their property in exchange for their support of the project, estimated to be worth in the range of 5 figures, paid by the Fry's Corporation.

- 50 · Throughout the UDC there are procedures which require the applicant to contact neighbors and neighborhood associations. This presupposes that in the area for which the project is proposed there are active neighborhood associations AND that the City records have the current addresses/emails to make contact with them. Given that there has been almost no COT investment in Neighborhood Resources for more than a decade, those assumptions are dubious, at best,
 

Tinkering with the UDC does not address a major issue: Does Neighborhood Resources belong in PDSD or is there another department which could better meet the needs for building and maintaining strong neighborhood associations? If it is agreed that PDSD is the proper home for it, what support will be given to getting the association records current and providing informational/educational services to the neighborhood groups? The one means of communication used in the past few years, the Neighborhood Nugget, seemingly has disappeared without any explanation or alternative. PDSD's commitment has been beyond pitiful!
- 51 · to avoid questions about why small cell towers and 5g cell towers are not reviewed, can we have in the code an explanation that we do not review these because of limitations due to state and federal guidelines
 

Would really just be a reference to federal or state guidelines, likely in section 3 of 4.9.4.i that discuss FCC, add a note that if those laws change then our code will reflect it.
- 52 · What it actually means
 

Not consistent allocation

But there was like something where like garage, like on a principal structure vehicle uses in included like if it's a garage, but if it's an accessory structure and they have a garage detached.

It's meant to minimize the size of the accessory structure
- 53 · Why doesn't the City adhere to the code that is in place. These new code changes have had negative impacts to older established neighborhoods. Please don't use the need for infill as the reason to change code as M&C just approved a new development on the far eastside for over 2,000 acres of state trust land for a new development as this is not infill. Don't use infill as a reason to control climate changes as the City's heat map show how those neighborhoods, especially on the southside that are extreme dense, have the highest temp in the Tucson area. Please don't say white roofs will solve this issue. Please look at where our Mayor lives, or our City attorney lives, or our acting assistant city manager lives and how they are protected by their HOA from the impacts of all these codes changes as was the past Director of PDSD protected.
 

Stop forcing older neighborhoods to go through the HPZ process to protect their neighborhoods unless the City is going to pay for the process like they paid for Menlo Park's new Neighborhood Plan by the Planning Center.

Why are you only concerned about the barriers developers are facing when you hand them 8 year GPLET's and give specially protection to those in the downtown area with extra police patrols while the rest of the City does have these extra patrols. Don't use the work equity unless all residents have the save protection as those who live in the expensive high rent area known as downtown.

**Reduced Construction Costs and Improved Housing Affordability**

- 54 · ALL areas need this NOW folks losing..👤 rent has hit Tucson 🏠👤👤👤
- 55 · Back in 2017 we (Cypress and a few other stakeholders) worked directly with Environmental Services (ES) to revise the trash collection standards (TSM Section 8). At that time, ES got as far as producing revised standards and details but these were never advanced to the point of adoption. I have the revised standards I can share and it would be great to see this followed thru as the revised standards help reduce trash enclosure sizes and make it easier to incorporate the required enclosures on tight sites.



56	<ul style="list-style-type: none"> <li>City codes should allow a homeowner to work on their own house without requiring a permit. State legislation makes us a buyer beware state and that means that any new buyer is to find out through inspections of their own, If a house they are buying is safe, secure and will hold value. That means is Sellers of a house make improper repairs they will be required to remedy that prior to sale to bot damage the public. If they make improper repairs while living in it that is their own problem not the Cities. In a world that is struggling with the inability to find trades people to work on homes, in the near future we will find that most homes will be out of code and the values will come down throughout the town because whether the homeowner did the work right or wrong it will always be considered wrong by the city's code enforcement and thus becoming a problem on resale. If the city is ahead of the game on this it will reduce the burdens on homeowners during a crisis period and will save the city millions on code enforcement.</li> </ul>
57	<ul style="list-style-type: none"> <li>Development of more inclusive zoning regarding density, height and affordable housing, through density bonuses and/or linkages fees that are a limited profit percentage as opposed to a flat rate. Also requiring or incentivizing a hot water recirculating pump on non-tankless water heaters.</li> </ul>
58	<ul style="list-style-type: none"> <li>In my specific case, T22CM05551 I have been informed that when I add an ADU to an existing duplex it becomes a commercial development because by definition, anything with 3 or more dwelling units is multi-family and not considered residential anymore. What is inferred in the blurb about ADUs is that it remains residential and not multi-family. That is the inference. The inference is that this new ADU ideal should make it easier for owners to add living space to their existing property and that it will eliminate the practice of unpermitted conversions. IF that is the intention then it has to be clarified that Use does not change to multi-family commercial when you add an ADU to a duplex on an R-3 lot. It should be allowed to be added and remain residential the same as if it were just one house otherwise you just may get more of what you do not want. In other words, more sleeping quarters, with unpermitted conversions. I think it defeats the whole purpose of what was intended. I think the code should clarify or make an exception that an ADU on lot with a duplex will not change its use to commercial and allow it to remain a residential use. Even better, let new construction allow for a duplex with an ADU to be treated as residential and not multi-family. HOW: Change the definition of multi-family development to include an exception that excludes ADUs for lots with a duplex. Change the definition of accessory dwelling unit to include duplexes on a single lot.</li> </ul>
59	<ul style="list-style-type: none"> <li>It is a real problem that single-family attached units are not really permitted anywhere by-right in the code without an additional process. They are not allowed per any use table, unless setbacks are modified through a DDO or FLD. The additional process seems onerous especially in zones where multifamily is already allowed.</li> </ul>
60	<ul style="list-style-type: none"> <li>Parking requirements for residences. The current requirement for multiple parking involving 6 or fewer parking spaces in R-3 and HR3 zones needs a tweak. The requirement includes the need to be able to drive in and turn around before exiting back on to the street. That makes sense along collector and arterial streets. It is unnecessary along residential streets. There are many current examples of parking that was put in place decades ago where cars park on the property perpendicularly to the residential street. Example: Old Town Apartments at 720 S. 5th Ave. There are several more examples in just the Armory Park Neighborhood. Backing out onto busy streets can be dangerous, but not on low volume residential streets. This requirement puts an unnecessary burden on plans in R-3 cases that uselessly restricts what can be done to develop these properties.</li> </ul>
61	<ul style="list-style-type: none"> <li>Remove the parking requirements, burdening the business owners, proprietors, delays in construction, and leaving less space for other businesses and housing, pushing them out to less viable areas. Condensing businesses and living spaces in one area can helps several communities thrive instead of contributing to the counterproductive model of urban sprawl. That does not foster any sense of community, and people won't even feel an obligation, nor volunteer interest in their neighborhood or city. This is what limitless expansion does. End the minimum</li> </ul>
62	<ul style="list-style-type: none"> <li>The minimum required R2 lot size is 5,000 sf. The minimum land area required in R2 for a condominium is 2,904 sf. So, two condominiums can be built on a shared 5,808 lot. But two single family homes, each on their own lot, requires 10,000 sf of land. This increased land requirement disincentivizes developing single family homes in R2 and reduces opportunities for home ownership. To be equitable and facilitate affordable home ownership in R2 zones, the minimum required R2 lot size for a single-family home should be changed to 2,904 sf.</li> </ul>

## Higher Quality Built Environment and Urban Design

63	<ul style="list-style-type: none"><li>· Can't use an alley</li><li>· Can't maneuver off site</li><li>· Uses up lots of space on a lot</li><li>· Cuts into housing</li></ul>
64	<ul style="list-style-type: none"><li>· Simplify variable setbacks</li><li>· Certain setbacks for 1st and 2nd floor</li><li>· Programs can't render what's possible</li></ul>
65	<ul style="list-style-type: none"><li>· Detriment to good design</li><li>· People can't figure it out</li><li>· Requirements - why do we have to enforce when a road will never be widened again..</li><li>· No one is comfortable with and they can never get it right</li><li>· Developing vs. established criteria</li><li>· No logic - stuck in time</li><li>· Identified in the UDC</li><li>· Is it mentioned/comes from MSNR plan? (probably)</li><li>· variable setbacks, especially along major streets - setbacks increase with height which doesn't make sense, it forces buildings to have parking in the front</li><li>· established areas vs developing areas -- we may need a third definition of setbacks for MSRs - nowhere are MSRs in developing areas except in the definition -- maybe a simple change of the definition here would help -- established areas still have variable setback</li><li>· can we have a universal setback for each zone?</li><li>· affects other street frontages on other parcels - can we look at setbacks for all surrounding properties as part of this project?</li></ul>
66	<ul style="list-style-type: none"><li>· Ridiculous</li><li>· Could they go away? At least in the residential zone</li><li>· Housing options, availability</li></ul>
67	<ul style="list-style-type: none"><li>· 1 ft setback adjacent to parking canopy</li><li>· Unless 15 feet or higher</li><li>· Regulations split across sections in confusing way</li></ul>
68	<ul style="list-style-type: none"><li>· 1) Building heights of proposed new buildings must be in reasonable proportion to the already existing building heights in the area of the proposed building. This generally accepted architectural principle was flagrantly ignored by Mayor and Council a few years ago when M&amp;C granted approval for a 20-story tower at Speedway and Campbell. As a solution, Tucson should have two zones dedicated to tall buildings, A) downtown, and B) in the vicinity of 5151 E. Broadway Blvd. Two zones of tall buildings are found in many US cities, including Phoenix, Los Angeles, New York, and Chicago.</li><li>· 2) The rule that additions on homes must not match the existing architecture of the home must be rescinded. Such a rule is not only aesthetically incongruous, but it is patently absurd and unnecessarily restrictive.</li></ul>
69	<ul style="list-style-type: none"><li>· Add a "natural desert" option to the landscape border requirements.</li></ul>

70	<ul style="list-style-type: none"> <li>Fix street setbacks on major streets. The only reference in the UDC is based on "established area setback". Established Area Setback A term used to describe the required building setback from a street applicable as follows.             <ol style="list-style-type: none"> <li>When street frontage of the property is on a street other than one designated a major street or route by the adopted Major Streets and Routes (MS&amp;R) Plan; and</li> <li>Where an established area exists.</li> </ol> </li> </ul>
71	<ul style="list-style-type: none"> <li>Gap in there - C1 too restrictive C2 too permissive Mission Rd - nice proposal, n'hood has no problem with specific proposal But needs C2, and n'hood doesn't want a future new tenant to move in... with less restrictions</li> </ul>
72	<ul style="list-style-type: none"> <li>I live in Menlo Park and quickly outgrowing my small home. My property is zoned R2 but I'd like an update to the code to allow for a two story structure so that I don't have to take up all the land to build a home large enough for my growing family.</li> </ul>
73	<ul style="list-style-type: none"> <li>I've had great experiences with the city of Tucson permitting and development office. They're probably the most responsive and informed department in the whole city. The planning site has actually improved a lot in the last couple of years bringing a lot more clarity to the process. My only request would be to possibly differentiate the process for general contractors and diy homeowners - not to lessen the requirements but just to help encourage code compliance and general good building practices especially with all of the remodeling/flipping around town. Many people I know seem to think the permitting process is more difficult than it was - it'd be nice to change that perspective so people recognize the benefit of having an extra set of eyes on plans/changes to a building that are more than cosmetic</li> </ul>
74	<ul style="list-style-type: none"> <li>Increase development density in the urban core/city limits. Allow more opportunities for mid-rise, multi-use, multi-level development and infill development. Increase the allowed size of Accessory Dwelling Units.</li> </ul>
75	<ul style="list-style-type: none"> <li>Increase threshold for MF to 4 units instead of 3</li> </ul>
76	<ul style="list-style-type: none"> <li>maybe remove because engineer never requires concrete</li> </ul>
77	<ul style="list-style-type: none"> <li>More bus stop cut-outs to increase traffic safety. Encourage solar collector roofing over all public and private parking lots. Eventually, minibuses with frequent schedules to replace or enhance infrequent schedules of large city buses. Thanks for such a marvelous City!</li> </ul>
78	<ul style="list-style-type: none"> <li>Please remove parking minimums from the Tucson City code. I don't own a car, bike almost everywhere, and walk my dog around Dunbar Spring/W University with my dog. Parking lots just increase the urban heat island, exacerbate flooding, and make life worse. If a property developer needs parking to attract buyers or tenants, so be it. There is no reason for Tucson to mandate parking anywhere in this city. The greatest urban neighborhoods in the world developed long before parking minimums. No one goes to the River Seine or Central Park and then complains about how there is a lack of parking! Barrio Viejo and Armory Park are both beautiful neighborhoods with a lack of parking generally.</li> </ul>
79	<ul style="list-style-type: none"> <li>Proposed improvements to existing City parks should NOT be reviewed as commercial developments. They are not commercial and they are not new developments. This is how they are currently being reviewed, and it adds tremendous costs and hurdles to the process of getting park improvements implemented for the public.</li> </ul>
80	<ul style="list-style-type: none"> <li>Remove mandatory minimum parking requirements completely. Spreading out buildings from each other and the street induces demand for cars which increases traffic, pollution and lack of safety for bikers and pedestrians.</li> </ul>

81	<ul style="list-style-type: none"> <li>Remove restrictions on placing power line poles on so-called "gateway corridors." The "gateway corridor" term is a euphemism for "ugly, blighted, polluted, transportation and utility corridors," which is exactly where large electrical infrastructure should be placed. Protect neighborhoods by placing mega-infrastructure along mega-corridors. (TEP DeMoss-Petrie Transmission Line Project).</li> </ul>
82	<ul style="list-style-type: none"> <li>Requirements for commercial parking standards when you hit 5 parking spaces in a res development</li> </ul>
83	<ul style="list-style-type: none"> <li>Significant improvements are needed in the Historic Preservation section of the UDC along with improvements in staffing and procedure. These changes need to be done in a public and transparent process, not behind closed doors.</li> </ul>
84	<ul style="list-style-type: none"> <li>solid waste enclosure standards will require collaboration with other departments</li> <li>ES had conducted reviews, he had a draft (80% complete) but hadn't started public process for revisions</li> <li>real challenge is making sure that EGS is comfortable with the final changes</li> <li>for example there is a specified standard, much of it is over-specified, could be more performance-based, City of Phoenix may be a good example</li> <li>Has been brought up in IID projects</li> </ul>
85	<ul style="list-style-type: none"> <li>Stop trying to get rid of single-family zoning and replacing it with rental housing wherein the people who need housing become victims of landowners instead of being able to become property owners themselves. Stop trying to solve community problems through changes to the land use code.</li> </ul>
86	<ul style="list-style-type: none"> <li>This is very vague, I know, but I feel it is especially important to limit all new buildings to one story so as not to block views. There is plenty of land in this valley, we need not be challenged in that regard. I know that developers and builders wish to earn the maximum on investments which means cramming as much as possible into a square foot, but this is unfriendly to neighborhoods.</li> </ul>
87	<ul style="list-style-type: none"> <li>This suggestion is to address what seems to be an inadvertent mistake regarding HPZ requirements. Currently the UDC defines "contributing property" to include both "historic sites" and "non-historic compatible properties." From my research the concept of non-historic compatible properties was created to place demolition review requirements of the HPZ on properties that were potentially historic but did not yet meet the age requirement of 50 years. This was a worthy issue to address. However, the unintended consequence of changing the definition of "contributing property" to include "non-historic compatible properties" results in new development in HPZs being compared against new, non-historic properties to determine whether the proposed new development fits into the character of its development zone. The result is new construction in HPZs being compared for compatibility against non-historic properties. The more new construction there is, the less weight the actually historic properties have in design review. This is a particularly troubling problem in the Fort Lowell HPZ, which has the fewest number of actually historic properties and a relatively large number of undeveloped land. New construction, for example, is being compared for compatibility against homes built in the 1990s, which could not possibly have been the intent of the HPZ. This issue can be corrected simply by either changing the definition of "contributing property," or adding clarification to the HPZ design standards for new construction. Please contact me for additional information and supporting research already completed.</li> </ul>
88	<ul style="list-style-type: none"> <li>Train, retain and use qualified building inspectors, and return to use of in-person inspections to properly enforce the building codes that are on the books. The past 2+ years of video inspections have allowed a great deal of cheating and skirting of building codes. This is not fair to legitimate operators who follow codes and rules, or to the legacy of consumers and building owners and occupants who inherit the problems created by shady builders who are being enabled by lax building inspections and non-existent code enforcement.</li> </ul>

- 89
- 1. Redefine "dwelling." Make the code much more flexible for a variety of domestic living arrangements.
  - 2. Remove 1 kitchen = 1 dwelling definition from the code. Allow multiple kitchens in a dwelling.
  - 3. Remove "full site maneuverability" for parking vehicles for residential projects with 8 or less units. If 8 is too large a number, at the very least remove the requirement for triplexes and fourplexes.
  - 4. Remove all code language regarding "group dwelling." Allow SRO's.
  - 5. Allow homes with chassis and non-permanent attachments to the ground.
  - 6. Rewrite the entire Downtown Links Overlay language. No more subdistricts of subdistricts or subdistricts.
  - 7. No more overlays - just change the base code.
  - 8. Don't make "artisan" occupancy so specific. Allow live/work everywhere.
  - 9. Allow attached single-family residences in all zones.
  - 10. Revisit when a DP is required for site improvement projects . . . should a DP be provided for an expansion to a restaurant of 0.006% that removes 4 parking spaces from a 600+ parking lot? It was. Not sure that was necessary.

90

Hello: Kindly allow food trucks (carts, wagons, etc.) in Office zones. Since peddlers would still have to operate with the property owner's permission and more than 100 feet from any residential zone, allowing additional operation in Office zones would not appear to add any more burden to surrounding neighborhoods than what is imposed by food trucks in C-1. One might consider forbidding generators or anything "loud" (however many decibels) in 'O' if noise is a concern. Thank you.

91

Hi! This is about bicycle racks. (1) They need to be within twenty-five (25) feet AND within line-of-sight of a business's front/ main entry. (2) If a business that has more than one entrance (e.g., Bookman's at Rancho Centro, Natural Grocers at Broadway Village) and closes one entry to public use (e.g., to monitor customer capacity during a pandemic lockdown order), the entry left open must have bicycle racks with 25 feet and line-of-sight of the remaining entrance (both Natural Grocers at Broadway Village and Bank of America at Randolph/ Broadway chose to use their back doors as the "main" entry during lockdown, despite the fact that the bike racks were way around the front of the buildings). (3) Bicycle racks must be designed and placed so that the bicycles do not touch each other when locked (the current "acceptable" design, an inverted 'U', fails here and quite spectacularly; the "legs" of the U must be further apart), and there is room to have more than one option for locking the bike (e.g., some racks are placed so close to a wall that one cannot lock the frame and must lock just the wheel which is an invitation to theft; some inverted 'U' racks are placed such that a cargo bike or bike trailer is SOL). (4) Bicycle rack tubing must be stout enough to be worth locking to, but must be of narrow enough diameter that one can comfortably lock a wheel and frame to the rack using a standard U-lock (the racks at Natural Grocers use tubing that is too thick, requiring some jiggling and dancing around to get a U-lock to work, and the "legs" of the inverted 'U' are so close together that one must also bang into the bike locked on the other side). (5) Bicycle racks must be of sufficient height to securely hold a tall bicycle without it falling around the rack. The racks at TCC near the arena entrance are pretty close to ideal. (6) Currently, when a building has a change of use, the space must be brought up to current code (including car and bike parking). However, places like shopping malls and commercial strips tend to stay malls and strips (even though individual tenants may change). Respectfully suggest that any time a mall or strip gets "renovated" or "updated" with over "X" dollars' worth of work (\$50,000?), bicycle parking must be brought to (or preferably to exceed) current code. This would assure that bike parking gets brought current at some point (instead of allowing crap racks to be "grandfathered"), and if this is part of an overall renovation it should not cause a financial issue (e.g., if one is paying \$500,000 to paint the whole thing, one can certainly afford to install some proper bike racks). Thank you for your consideration. :^)

92

How to reconcile the need to retain mature vegetation for climate control/ reduction of the heat island effect while allowing infill development projects to be built out where those very plantings are bull-dozed out is not now addressed in the UDC. It, however, is an on-going conflict of interest, from the largest construction areas such as the recent Cholla/36th St. project to backyards where vegetation will likely be destroyed to accommodate an ADU.

Even if there were a requirement for planting of saplings for the destruction of healthy mature specimens, it is a lose-lose to ground heating. Preservation must be given higher priority.

- 93 · Parking requirements are too demanding. On-site parking is not a good use of land, the streets should be accommodating residential parking in all situations. And in more dense areas where there is diminished parking available, people will be encouraged to use alternative modes of transport.

### Improved Climate Resiliency

- 94 · As an ecological “water-harvesting” designer/contractor, I see one of the best ways to facilitate the planting of a lot more trees within the rights-of-way would be to streamline and subsidize the permitting process for curb-cuts and bump-outs/chicanes for stormwater harvesting.
- 95 · Large parking lots in the city of Tucson are a waste of space. We are a desert city and they are creating an urban heat island. The lots should be used to make tall buildings in order to help with global warming and to prevent urban sprawl. If parking is such an issue investment in public transit or parking garages would be helpful.
- 96 · Minimum parking standards are cooking the city and leaving less room for housing and businesses. Parking studies have repeatedly shown that we provide far too much parking. There are 100s of examples of unutilized space preserved for parking. Just to provide one example: T22PRE0059, the proposed development is far smaller than the vehicle use area.
- Minimum lot size prevents infill and housing. The most ubiquitous zone in the city is R-1, which has suburban minimum lot size standards. This is a barrier to sustainability and infill.
- 97 · Ordinance no. 10549. I would like to see the solar water heating with copper lines changed to provide for two additional good and feasible alternatives. 1) Use of rainwater, filtered to make it potable, for water heater use will not work with copper lines, since rainwater will eat through copper eventually. 2) Use of heat pump water heaters in conjunction with solar powered electricity seems like a viable alternative to actually using the sun itself to heat the water. (I currently do the latter on my home- heat glycol in pipes using the sun itself, which is then pumped through the water in my water heater. It works very well- but heat pump water heaters are also very efficient).
- 98 · Ordinance No. 10597. I would like those exact same rainwater requirements to be placed on all new residential construction, for the same reason- that we are in a climate emergency. Along those lines, I would also like to see current residences given additional rebates (beyond the current \$2,000 limit) when additional rainwater harvesting features are installed, up to 50% of water use indoors and out, for the same reason- that we are in a climate emergency.
- 99 · Shade sails should be permitted within the front setback.
- 100 · The new policy regarding building housing units on existing property does not as for developers to live on site. I fear this will invite more of what we have seen; out-of-town developers who have no stake in the wellbeing of Tucsonans creating more and more student housing in residential neighborhoods. There is also no provision for additional parking. The expectation that people will use public transport seems wishful. Without a serious investment in public transportation in Tucson, more development will create more traffic and even more unsafe conditions for Tucsonans on foot or bicycle.
- 101 · The solar-ready requirements and inclusive home design requirements are both positive requirements and I appreciate the message it sends. Gray water requirements are minimal and should go further than just requiring capped plumbing connections that make gray water "possible" - we could and should do more to educate and require new projects to incorporate on-site water retention by way of storage tanks or drainage swales and retention basins. Perhaps there could be a water treatment option - either make all interior fixtures (tubs, showers, bathroom sinks, and washing machines) gray water ready and then provide monetary incentives for people to actually install a storage tank (this may take a creative partnership

with some other entity which should not dissuade.) Perhaps there could be a tradeoff - if a person does not want to do gray water, they could then design for (AND build - verified through inspections) a rainwater harvesting system that collects water from the roof and stores or captures water on site. Prioritize the environment, not the continuation of collecting vehicles through stringent parking requirements. The future has fewer cars and more public transportation - and the air is clean.

## Health, Safety and Quality of Life

- 102 · Re-Examine Marijuana Growing Facilities close to residential neighborhoods. One is approved for 500 feet from our residential neighborhood. It will house 2 buildings over 50,000 sq. feet each. Even though the land is zoned for light industrial, this type of industry in such close proximity to residential homes will impact the neighborhood residents with air quality contaminants and unpleasant odors. Any type of grow facility or industry that emits VOC's and BVOC's, methanol and odors should be set to a higher standard of scrutiny. These industries heavy water use, needs to be evaluated and vetted more thoroughly. Has the City of Tucson Development Services done analysis or studies on the byproducts emitted into the surrounding air? Given the large number of different strains of commercial cannabis and variations within strains, compiling such an inventory would be a massive undertaking. This makes cannabis odor assessment extremely complex. This large variability, at least in part, dictates why specific analysis is necessary. Once an emission rate is assigned to each compound, we can model complete profiles of all gas molecules coming off the over 600 different cannabis strains and determine possible contributions to public health, odor, and air quality concerns. This type of "light industry" should be over 1500 yards away from a residential area. Are children and infants ok to be exposed to possible air contaminant constantly? This industry will also use a HUGE amount of water per acre of plants. Is Tucson willing to use precious water resources for this purpose? How about the VOC and ozone considerations?

Parcel ID: 141110250. Is the City more concerned about collecting tax dollars on this "light industry" or public health?

Please consider reading this article-<https://j cannabisresearch.biomedcentral.com/articles/10.1186/s42238-021-00090-0>

- 103 · The City of Tucson's UDC does not adequately consider a facilities use, storage, or generation of hazardous materials and/or hazardous air pollutants with respect to the proximity to environmentally stressed communities. Recently, this became a significant problem when Pima County proposed to issue the Becton-Dickinson medical sterilization facility an air quality permit, as required by law. The UDC should be modified to limit the placement of facilities that use, store, or generate hazardous material and/or hazardous air pollutant to only an industrial zone AND to require that the facility be subject to the Mayor and Council Special Exception Procedure. This would provide an opportunity for the City make discretionary decisions regarding the placement of these facilities in environmentally stressed communities.

## Two or More Benefit Areas

- 104 · Airport zone approach departure corridor  
South of Reid park, west of Reid park  
No ADUs
- 105 · accessory structure regulations - particularly detached accessory in front yard and setbacks for things like sheds - a non-dwelling unit setback should be smaller than a dwelling unit
- 106 · Allow increased density per lot.  
Speed up process for development approvals
- 107 · Building insulation details have also become very hazy over the last few years. I seem to get different comments for each project I submit, and it would be nice if the City were to offer some standard details for various situations - drawn per code and I'd be happy to help create the drawings with you. It is confusing for the designers - and even more so for builders and homeowners. There is a lot of talk about cool roof requirements, and it is my opinion that stipulation does not provide enough impact if the buildings are not insulated properly.

108	<ul style="list-style-type: none"> <li>I have 2 concerns:             <ol style="list-style-type: none"> <li>When there was an electric vehicle charging station at Woods Library a prime parking space was devoted to it and no one ever used it. If we are going to require/allow these they should be monitored for a reasonable period to see if they are used, otherwise should be vacated/relocated.</li> <li>I am wary of reducing parking requirements for restaurants/commercial establishments. I am regularly leaving the Campbell/Glenn shopping center early morning hours (Ace hardware) and heading west on Glenn. The drive thru lane of the Starbucks on the NW corner of Campbell Glenn is backed up to the intersection and I have to illegally and unsafely go into the turn lane to get thru or sit hanging out (illegally and unsafely) in the lanes of Campbell as the light changes.</li> </ol> </li> </ul>
109	<ul style="list-style-type: none"> <li>I'm one of the new Small Business Navigators in the City. There are many benefits to having a local economy where it is inexpensive to launch a small business including crime reduction and increased stability. Our building codes are designed to protect us all but currently are obstacles to the process of inexpensively iterating and growing a viable a small business. The result is that the companies that survive are the ones with access to capital through family and friends. In order for working class folks to be able to compete -- our code needs to have provisional categories that allow business owners to operate on a temporary basis in older buildings for a short period of time such as 2 years. During those two years they can see if their business is profitable and after the 2-year provisional period they would then be obligated to bring the building up to code. Of course, the provisional status would require the city to check and assure that there are no immediate dangers present. The 30-day temp cert is not long enough.</li> </ul>
110	<ul style="list-style-type: none"> <li>In reviewing proposals for new development or expansion projects, add a specific provision in the environmental review process that add another layer of review focused specifically on the impact of development proposals on environmental justice communities. The purpose of this review policy would be to ensure that new noxious developments do not exacerbate disproportionate and cumulative impacts in already overburdened areas. Include a provision that ensures that City has the express authority to reject these applications or require changes that mitigate their impacts. See Cincinnati Environmental Justice Ordinance (<a href="https://engagedscholarship.csuohio.edu/cgi/viewcontent.cgi?article=1007&amp;context=clevstrev">https://engagedscholarship.csuohio.edu/cgi/viewcontent.cgi?article=1007&amp;context=clevstrev</a>) and Newark Cumulative Impacts Ordinance (<a href="https://ecode360.com/36713865">https://ecode360.com/36713865</a>).</li> </ul>
111	<ul style="list-style-type: none"> <li>Parking minimum at Bars too high</li> </ul>
112	<ul style="list-style-type: none"> <li>Remove Section 8.7.3 Flexible Lot Development (FLD) or improve the code in many ways. FLDs should be in the urban center, 2 miles from the City/County border to prevent urban sprawl into low density areas. FLDs are ruining City Registered Neighborhood Associations (NA) and a FLD should not be within 1/4 mile of a NA.</li> </ul>
113	<ul style="list-style-type: none"> <li>Safe lighting vs Code requirements. Well-lit streets are known to be a crime deterrent, yet our Code requires that streets not be well lit. I think some accommodation needs to be made for high crime neighborhoods in order to make the streets safer.</li> </ul>
114	<ul style="list-style-type: none"> <li>Shade for cars</li> <li>Pergolas in the front yards... activate streetscapes</li> <li>Accessory in the front yard</li> <li>Rather than allow any (could be bad)</li> <li>Maybe allow solar to be exception</li> <li>Limit to solar - related structures</li> <li>Allow for shade, period</li> <li>More incentives/exceptions for adding solar</li> <li>concerns about flimsy, Costco shade that deteriorates in wind</li> <li>Turns into trash in the front yard</li> <li>Engineering review possible?</li> </ul>



Maybe requirements on number of walls  
Limit to open air structures  
Be careful of equity issues/exclusion of more affordable shade solutions

115 · Site visibility triangles. These cover typical intersections & drivers views to left and right. But there is another driver view situation. It involves waiting to make a left hand turn in the curbed median turn lanes. These are not intersections, but the driver has to wait for oncoming traffic before turning. What I've discovered is landscaping across the paved area in the next median blocks view of oncoming traffic. It is usually a bushy Texas ranger or bird of paradise. The type of plants should be required to be low to ground or up high enough. like a tree, to not block view.

116 · Codify what exactly DP are for  
Related to solar  
If something isn't going to affect something on the ground, it shouldn't need a DP  
Like shade over existing parking lot  
-we need to protect our communities from the elements

117 · Adding a mezzanine to an existing structure currently requires a revision to a DP, but if that additional is within an existing structure, and especially if it's for storage, is that process really necessary? Especially if the current trend is to reduce parking requirements could this be processed as part of the TI? Asking someone to go through what is currently a 6-9 month process for this simple change seems like poor customer service.

118 · Hi. This is not a suggestion for codes, rather a process suggestion. The current system for approving modifications and new construction in the 5 historic zones is in need to streamlining and simplification. Currently, every major review applicant is required to present and get approval from both the local and the City/County advisory boards. This is an unnecessary duplication, especially since they are both 'advisory' and the final decision is up to staff. There are other tweaks that could be applied. However, applicants should get approval from the local board and the city/county board should be relegated to hearing appeals. Thanks.

119 · update Neighborhood Preservation requirements for weed control; residents are now planting native wild flowers that are sometimes looked at as weeds; removal of invasives should be via root-removal (vs. mowing down to 6")  
  
update landscape parking requirements to include RWH basins (not just commercial) but also multi-housing/apartments  
  
chapter 25, adjacent property-owner responsible for landscape maintenance does not have any consequences if not done  
  
parking requirements currently do not have maximum numbers (only minimum); to prevent urban heat island effect, there should be maximums so developments do not pave excess areas  
  
landscape buffer yard standards: landscape pockets for tree plantings have a very small requirement for tree wells; not sufficient root zone; planter with tree areas need to include minimum 500 cubic feet (ideal would be 1000 cubic feet)

120	<ul style="list-style-type: none"> <li>1. Allowing plan checkers to contact Architect/Engineer if there is a minor issue and either let Plan Checker to change drawing with an emailed approval from the registrant or a new sheet sent by registrant. Allows Plan Checker to approve plan and client not to have to go through a lengthy resubmittal process and should ultimately save time for both COT and client.</li> <li>2. The client advocate idea is great, how does the applicant know who to contact, will this advocate be identified upon acceptance of a plan submittal. This will allow a better coordination between the Site and Building submittals.</li> </ul>
121	<ul style="list-style-type: none"> <li>8.1 General Requirements Criteria for Fill This section needed reconsideration for the intent and implementation. It is my belief that the current restrictions cause additional work and expenses for consultants and staff.</li> </ul> <p>I have worked on projects that had to go through the process the fill was in an area lower than the affected parcels. Those parcels were separated from the site by a 20-foot alley.</p> <p>In general Tucson is developing uphill. The standard practice is to cut the grade on the uphill side of a site and fill the lower areas of the site. This allows for an earthwork balance. This automatically caused a differential to the adjacent uphill project. The 2-foot limit for fill above the existing grades within 100-feet does is very limiting, especially if there are any drainage swales. Warren Thompson and I were on the original stakeholder's committee when this standard was developed. We expressed this concern then. I would be happy to work on this again</p>
122	<ul style="list-style-type: none"> <li>Eliminate parking minimums for developments. This is a barrier across Tucson as it prevents the city from being able to do true infill and/or transit-oriented development. Parking minimums also add unnecessary expense to development projects, especially multi-family housing development in the city core where people may be less likely to need/want parking.</li> </ul>
123	<ul style="list-style-type: none"> <li>Eliminate parking requirements. Requiring a minimum number of parking spaces for housing and businesses has several negative consequences. It drives up the cost of projects, which will drive up rents, sale prices, and purchase prices. It creates more paved space that greatly exacerbates our urban heat island effect. It encourages the use of automobiles at the very moment we are trying to discourage automobile use for safety and environmental reasons. It ignores the large investment we already have in parking lanes on paved streets that are not fully utilized.</li> </ul>
124	<ul style="list-style-type: none"> <li>Interior commercial remodel/adaptive reuse. Initially was told to put in 2 ADA accessible bathrooms even though space is very tiny. Just getting the permits for one, in the end, took months and months. Other properties (i.e., Peach) get away with not remodeling to code. Older buildings should have certain grandfathered in permissions and should be treated differently - I see this all over 4th Ave but for some reason we had a different playbook</li> </ul>
125	<ul style="list-style-type: none"> <li>My suggestion is that City align the process to develop townhomes to be as simple as possible. For example, by making it as similar as possible to the existing process to develop condos - specifically, removing site requirements as practicable, the neighborhood meeting, and the tentative plat.</li> </ul> <p>Our housing affordability crisis is borne out of a lack of housing supply. Making processes for housing development easier in general will result in more development of housing, and streamlining saves time and money, which results in lower cost housing that is affordable to more people.</p> <p>Regarding conversion of multifamily: Incentivizing the conversion of rental housing to for-sale housing will expand the number of ownership options for Tucsonans. Ownership not only allows for people to participate in upside, but the other side of the coin is that it protects them from the type of double-digit percentage rent increases we've seen in the past few years. For-sale housing gives people access to federally-backed financing on long terms, usually with fixed financing for 30 year terms, which means they don't have to worry about potential devastation of eviction from year to year.</p> <p>Also, by taking requirements out of the townhome approval process that mandate large areas for parking and landscaping and drives, the result is</p>

	<p>more housing density in the places where that is appropriate (because townhome development is typically pursued in dense infill areas - and in the case of conversion from multifamily, the site has already operated there before). That has strong implications both for housing affordability and for sustainability, as less land is wasted (and less parking to contribute to heat island effects). And in the case of conversion, there are further sustainable impacts from the significant reuse of materials.</p>
126	<ul style="list-style-type: none"> <li>Revisit the Development Plan process. Consider a multitude of development scales . . . Why is the cut off at a certain percentage or certain use? Review projects from the past few years and ask was a Development Plan review necessary?</li> </ul>
127	<ul style="list-style-type: none"> <li>Rewrite the Manual in its entirety. It is outdated and confusing at best. I would rather have my teeth pulled than submit another simple lot split to the COT. There are too many staff members involved in the various aspects, any of whom can cause a resubmittal whether they are correct in their assessment or not. In comparison, the County has a very simple process. The County provides a comprehensive list at the beginning of the project and their staff appear to understand the process. At the City, you get contradictory citations from various staff members, and in some cases, it is a misinterpretation.</li> </ul>
128	<ul style="list-style-type: none"> <li>The ADU code has not sufficiently closed the loophole on "sleeping quarters" The impact fees incentivize homeowners to continue proposing guest houses as sleeping quarters and then adding stoves and fridges later. The size limitations are arbitrary and would be more functional if guest houses were sized in relation to primary structures and lot coverage. One ADU should only require one parking space - either on street or on property, no matter how many rooms. All limitations on ADUs needs to be clarified - i.e. There are overlay zones that limit one's ability to build an ADU, it needs to be listed within documents that directly address and talk to ADU zoning and not buried in the UDC overlay descriptions. COT should establish an "over counter" or two-day turnaround preliminary review of a property for homeowners to quickly understand the viability of building an ADU. Cool roof is not robust enough of a requirement - effective environmentally sustainable design requires a holistic approach and should be more inclusive than just requiring roofs to be of a specific reflectance. That is only one small piece of the puzzle.</li> </ul>
129	<ul style="list-style-type: none"> <li>The intent of the HDZ is to protect foothill and mountain slopes visible from offsite, views but it currently applies to interior areas along drainages and other areas not visible from off site. The exceptions for HDZ areas are very limited. From the UDC "Exception. Any sloped area no greater than 15 feet in any horizontal direction and no greater than seven and one-half feet vertically may be excluded from compliance with this section. Adjacent exempted areas are not cumulative way HDZ areas are determined." This exception really does not do much.  A simple change to the standard used in Pima County - 7.5' vertical and 50-feet horizontal, which works out to a 50 x 50 area, would be a good start.  Reconsidering the application of the HDZ to onsite areas that are not visible from off site would also simplify the development process.</li> </ul>
130	<ul style="list-style-type: none"> <li>UDC 5.32.5.C. Flexible Lot Development (FLD) 3. For property within the HDZ, sloped areas in excess of 15% with an area greater than or equal to 7,000 square feet shall be delineated and set aside as and designated as common area.  The requirement to set aside minor interior non-continuous areas of 15% or greater slopes greatly limits the use of the FLD cluster development of undulating sites.  This section needs to be reconsidered for the intent.</li> </ul>

- 131 · Update traffic engineering codes. Life schedules are now more critical throughout the day not just traditional morning and evening commuter hours. Surges and congestion occur during school drop off and pickups, weekend off road caravans. Require improvements in new construction to analyze over all area impacts for water, police and fire rather than just parcel reviews.

**Other**

- 132 · 12 University Blvd remodel - several complaints were filed. Work was done without permits. Balconies were walled in. Who knows if it is safe? Workers were there for weeks. New sewer, etc., too, I think. Unbelievable that some of us want to play by the rules but it just ends up costing us so much more and adds so much aggravation if we do try to apply for permits and go thru the process. Again, some of us get nailed for the slightest thing while others get away with doing all the work illegally
- 133 · 1662 N Bryant Avenue is overflowing with junk and trash on the east and north sides and have reported it to Code Enforcement but told you can't see it from the street so ... it's okay. This particular rental property looks like a junk yard and landlord does nothing. Have contacted Ms. Estruvillo (landlord) to no avail.
- 134 · For all residents, clean up the bus stops, spray the pads, empty trash, etc. on a schedule. Garbage in the streets, washes, parking lots and parks. It is a sad way to present our city. Enforcement of all codes, building, grass and weeds, cars parked 9 to a house, flop houses, the homeless camps that once they are MOVED what remains is disgusting... SPEEDING AND LITERING CODES MUST BE INVORCED.
- 135 · Restoring an old building in the El Presidio neighborhood