

September 16, 2025

Planning Commission
Planning and Development Services
PO Box 27210
Tucson, AZ 85716

Dear Commissioners,

Please accept these comments for Study Session of Wednesday, September 17, 2025, Agenda item 2, Middle Housing Code Amendment.

The Arizona Legislature's response to the current demand for "missing middle housing" was a knee jerk response to a complicated problem. It effectively eliminates single family zoning – the first choice of most homebuyers – except in subdivisions with HOAs, whose privacy and property values are protected. It can weaken or destroy existing neighborhoods through uncontrolled building of duplexes, triplexes and townhomes intended for renters. It does nothing to combat sprawl, improve sustainability or infrastructure demand, or assure affordability.

The current mantra with YIMBYs is that zoning is obsolete and that subdivisions with yards and off-street parking are no longer desirable. Until that is, they desire yards and privacy and pools themselves in their own next home.

City of Tucson planners expanded a terrible idea from a one-mile mandate to many miles. This agenda – to adopt the terrible idea city-wide - is being promoted by developers and by loud complaints of inequity from downtown residents who say it is unfair to impose pain on them alone. Other voices in public meetings were shouted down. COT public meeting slides and City website photos are disingenuous to show charming historic duplexes as examples of what would be built as middle housing after 2026.

Do not paint the whole city with the same brush. There are 150 organized Neighborhood Associations in the COT, each with its own identity and characteristics. Most people prioritize the location, value and privacy that landscape and good neighbors afford. Allowing mixed use on every R-1 lot can destroy a neighborhood's character and puts at risk the substantial investment homeowners have made in their properties. As more of the public across the city become aware of this change, the public response will shift against it.

The new laws are in conflict with existing single-family neighborhoods, historic preservation zones, historic districts, neighborhood preservation zones and neighborhood plans. The City is aware of the conflicts, misalignment of laws and potential failures, but has not addressed them.

We recommend that the City:

1. Meet the state-required minimum in this mandated action and expand only after it proves to be successful.
2. Find a way to equitably protect National Register Historic Districts, Preservation Zones, and established neighborhoods.
3. Give existing successful neighborhoods a voice. Look at other options for new housing developments on vacant lots. Align it with other redevelopment initiatives, transportation corridors, industrial zones.
4. Consider the impact on infrastructure before saddling utilities and customers with increased demand, especially in areas with old infrastructure.
5. Control parking requirements before every front yard becomes a car park.
6. Reduce minimum lot size only where splits are planned and ownership is viable.
7. Promote and reserve green space.

Emphasize planning on real solutions for housing, e.g. redevelopment of blighted properties, conversion of vacant commercial properties, allow more dense use on vacant land in *appropriate* neighborhoods. Consider introducing middle housing in alignment with the Wards and cooperation of the neighborhoods.

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Neighborhoods are the cornerstone of Tucson's identity and quality of life, serving as the fundamental building blocks of the larger community. The overall health and sustainability of the City are intrinsically linked to the well-being of its neighborhoods. In addition to wanting housing that meets family needs, Tucsonans value safe and accessible neighborhoods in which to live. The Neighborhood Preservation Ordinance was enacted to address this desire by promoting the health, safety, and welfare of residents.
Plan Tucson 2025, Chapter 2

As residents of central neighborhoods, we thank you for your consideration,

Sincerely,

Elaine Hill, Old Fort Lowell

Katy Brown, Vista Del Monte

Janis Findlay, Sam Hughes

Fran Mauri, Glenn Aire

Barbara Burstein, Blenman Elm

Linda Anderson, Old Fort Lowell

Margo Sackheim, Old Fort Lowell