

From: [PlanningCommission](#)
To: [Daniel Bursuck](#); [Ian Wan](#); [Carver Struve](#); [Christina Anaya](#); [Nicholas Martell](#)
Subject: FW: Middle Housing code change Study Session 91725 comment
Date: Tuesday, September 16, 2025 3:38:29 PM

From: Beryl Baker <berylbaker35@hotmail.com>
Sent: Tuesday, September 16, 2025 3:38:20 PM (UTC-07:00) Arizona
To: PlanningCommission <PlanningCommission@tucsonaz.gov>
Subject: [EXTERNAL] Middle Housing code change Study Session 91725 comment

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9/16/25

The Middle Housing code change
Planning Commission for a Study Session
Wednesday, September 17, 2025 AT 6:00 PM

Most of the proposed changes will help destroy old established neighborhoods as well as take away hard fought for neighborhood protections.

Is this really the direction people want to take Tucson?

Please vote to table this and send it back to staff to come up with ideas that don't destroy our historical, cultural, liveable, affordable old neighborhoods.

Thank you,

Beryl Baker
SCSW Neighborhood Facilitator

From: [PlanningCommission](#)
To: [Daniel Bursuck](#); [Ian Wan](#); [Carver Struve](#); [Christina Anaya](#); [Nicholas Martell](#)
Subject: FW: [EXTERNAL] Middle Housing
Date: Tuesday, September 16, 2025 1:33:40 PM

From: North Dodge Neighborhood <northdodgena@gmail.com>
Sent: Tuesday, September 16, 2025 1:33:30 PM (UTC-07:00) Arizona
To: PlanningCommission <PlanningCommission@tucsonaz.gov>
Cc: MayorRomero <Mayor.Romero@tucsonaz.gov>; Ward1 <Ward1@tucsonaz.gov>; Ward2 <Ward2@tucsonaz.gov>; ward3 <ward3@tucsonaz.gov>; Ward4 <Ward4@tucsonaz.gov>; Ward5 <Ward5@tucsonaz.gov>; Ward6 <Ward6@tucsonaz.gov>; cityclerk <cityclerk@tucsonaz.gov>
Subject: [EXTERNAL] Middle Housing

Good Afternoon Planning Commission Members ~~

I received the following from a resident that would prefer to remain anonymous but would still like his opinion known. I don't know if relaying an email is acceptable but best to at least try.

It was relayed to me because I am a volunteer for multiple neighborhoods in midtown Tucson and put out newsletters. I do not know this person personally.

Thank you,

Fran Garcia
Volunteer

I just slapped together some thoughts about what the city is doing and why. FYI.

Would you say these "neighborhoods" are already "built out"? If it is built out, or if a neighborhood is "built out", what effect will building some more in those areas have on:

- fire and safety operations

- the adequacy of infrastructure in water, sewer, and other utilities and resources to serve the current existing development

Does the city even have the ability to modify the current infrastructure to accommodate the new structures, and even if they do, physically and financially, how long will it take? And do residents need to suffer in squalor waiting for necessary changes?

- wastewater and storm drain systems-what is the plan to deal with the extra water that is not going to be absorbed by land but instead will flow over concrete and buildings to settle in yet unknown areas? Flooding.

- Has the city done any investigation to determine what the effects these structures will have on the area?

What will be the average household size of the people who move in the area? What type of people will they be? Where will these people put their "possessions" if these are all small mini-homes? Where will they park? What will the city do with all the garbage cans? Trash?

The city can't keep the lights on (copper thefts), can't change light bulbs (was it presidio and palo verde that a bulb was burnt out for months?) and can't keep shopping carts off the streets, how are they going to deal with a much more compressed situation?

-Do we not consider the impacts on parking, schools, air pollution, noise pollution, smells, the availability of parks and green spaces?.

clogging narrow streets, reducing emergency accessibility

-Are these statutory provisions really reasonably related to the goal of providing affordable housing. Affordability is the excuse given to allow these massive building measures. Are there any affordability restrictions applicable to the new structures? If the goal is affordable housing, and all the new housing can be sold or leased at market rates, who is going to be able to move in? Would this actually decrease the availability of affordable housing? Really, what is considered "affordable"? What is an "affordable" home price? An "affordable" monthly rent?

-Will owners of the properties, landlords, be required to be available 24/7 in likely need to address issues occurring on their properties that will arise as a result of packing people in together? Who will a person be able to call if the dog is barking, the music is too loud, drug smoke is wafting into their evap cooler and into the house? If your neighbor takes your parking space or leaves his stinky garbage can out all week? Or doesn't pick up his dogs poop? You obviously can't call the TPD. They don't bother coming out unless there is blood, and then you have to wait. Law enforcement resources are scarce now and not sufficient to deal with the current crime rates. In Chicago, they built the projects, and while they were still standing, they were hellholes of violence and drugs.

These are all examples of problems that already exist and will only be amplified when you pack people more closely together? Is this some sort of psychological experiment? I'm sure any "expert" can tell you about the effects of packing people together like cows on a dairy farm.

-I do believe the city codes require a builder obtain a "demolition" permit to modify a land parcel, and that that process requires notice to neighbors. Is there a similar provision to provide notice to neighbors of a proposed build on a neighboring or nearby lot, just in case the public, which up to this point has had no say in the process, wishes to challenge the build?

I'm not sure anyone has thought about whether these statutes and city law, code, modifications, are constitutional. Because I think that the city, by encouraging this massive building, albeit by private citizens, is actually doing the "taking" of landowners property rights. They are changing existing codes that have been in effect for decades to accomplish their "purported" goal of affordable housing. All of this building will be done to facilitate the city's goal. (Similar methods are being

employed worldwide to accomplish other goals. This is being done everywhere in the world, especially in the USA. Governments are funding "NGOs" to engage in activities the government itself cannot do. The governments can deny they are responsible yet they provide the means and opportunities) Here, the city thinks it's protected from suit because "private" people are building, but that's not right and not fair.

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So if a large building goes up blocking your access to the sun-?????

what about blocking your access to a mountain view, especially one you have had for decades when you bought the property?

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what if garbage, lawn debris, etc. begins to accumulate on your lot? What if engine oil, etc is all over the road, tracked into your house? What if your place gets flooded?

What if emergency service access to your property is impaired?

What other "property" rights are out there we have yet to discover?

Inverse Condemnation

In United States constitutional law, a regulatory taking refers to a situation in which governmental regulations restrict the use of private property to an extent that the landowner is substantially deprived of the reasonable use or value of their property. This principle is grounded in the Fifth Amendment to the United States Constitution, which stipulates that governments are obligated to provide just compensation for such takings.

Incidents of land ownership-what are they?

Deprived of reasonable use or value of your property?

If all this building goes up, will you be able to let your kids play outside? Will you be able to have a bar-b-q in what might remain of your yard?

Does the city have other alternatives to massive infilling? Why disrupt an established community?

It is really a crime to take an R-1 single family residentially zoned area and turn it into

a motel.

Is it really a legitimate State interest to build "affordable" housing? Is it really? Since when is the city involved in the business of home construction? What about building semi-affordable housing? Why stop at affordable housing, maybe we should build affordable businesses? Affordable doctor's office? Affordable dentist office? How about affordable grocery stores?

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From: [PlanningCommission](#)
To: [Daniel Bursuck](#); [Ian Wan](#); [Carver Struve](#); [Christina Anaya](#); [Nicholas Martell](#)
Subject: FW: [EXTERNAL] Middle Housing
Date: Tuesday, September 16, 2025 1:32:51 PM

From: fran garcia <cabrini85716@cox.net>
Sent: Tuesday, September 16, 2025 1:32:37 PM (UTC-07:00) Arizona
To: PlanningCommission <PlanningCommission@tucsonaz.gov>
Cc: MayorRomero <Mayor.Romero@tucsonaz.gov>; Ward1 <Ward1@tucsonaz.gov>; Ward2 <Ward2@tucsonaz.gov>; ward3 <ward3@tucsonaz.gov>; Ward4 <Ward4@tucsonaz.gov>; Ward5 <Ward5@tucsonaz.gov>; Ward6 <Ward6@tucsonaz.gov>; cityclerk <cityclerk@tucsonaz.gov>
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Good Day Planning Commission Members ~~

Once again I am reaching out on a subject that I am uneducated on and that is all this re-zoning of our city.

Probably the things that make me most alarmed is that I am quite typical of most Tucsonans in the regard that we don't know, understand or even particularly care about Zoning. It's dry, complicated and boring to the vast majority of us and that's why we entrust our Planning Commission and Mayor and Council to do what is right and in the best interest of our city with its unique climate, terrain, residents, neighborhoods and future. It's obvious to all that our climate is changing at an accelerated pace and being a world-wide problem, we can't do too much to modify what is happening but we can and should be extremely careful with our delicate desert and the rare and exceptional vegetation and the living things that can't survive elsewhere.

I realize that incorporating Middle-Housing into our city's zoning, has been mandated by our state but that only applies to the "downtown core" and outward one-mile. I do feel that is a difficult burden on our historic barrios and other neighborhoods within that zone and feel it can and could be expanded but very carefully and with precise and prudently determined boundaries. What PDSD has presented for boundaries is much further and also suggests that it is "wanted" to expand city-wide.

Accessory Dwelling Units, Community Corridors Tool, Major Streets & Routes (MS&R is basically covert but still more major rezoning included) and on the heels of these is now yet another huge rezoning effort with even more major slicing and dicing of our city.

Once again, this stayed in the basement and Tucson residents don't know anything about it while it's being formulated into marvelous presentations with lovely graphics and the presenters are trained and skilled into spinning this so that people are convinced that even manufactured housing and shipping containers that will be able to be planted on tiny, carved out spaces will beautify and enhance our barrios and neighborhoods. In actuality they play down or leave out information entirely regarding manufactured housing and shipping containers but it is included in this - buried but included.

Maybe as a "concession" that particular allowance will be yanked but it won't make up for the all the rest of it and on top of all the other rezoning that has been passed. One of the things I'm finding so distasteful is the misrepresentation. Currently, PDSD is telling us that 76% of the feedback from meetings wants this to expand to boundaries further than what they've currently presented and even city-wide! wow. What we need to do is ask two questions on that with one being just how many constitute 76%? 3,800 of 5,000? 760 of 1000? 380 of 500? Or most likely, something along the lines of 76 out of 100. The extremely high likelihood of this being something like seventy-six is extraordinary. So something like 76 people can determine the course of our city? Please keep in mind, it is quite possible comments at a "Public Event" are each attributed separately to different people. One person can make multiple comments in favor that may be counted multiple times. I take it an absurd comments like "*Reduce setback to 0'*" and there were three almost identical in a row (207, 208, 209) would be considered in favor. That's all it takes and do things like that multiple times at a public event.

But there's more. Just who are these "76" people? These are mostly the architects, designers, developers, builders, real estate folks, et al who have a stake in this. I don't blame them - this is their livelihood and few others outside of that field who are paying attention and attending presentations or answering surveys. The people included in that 76% aren't there for the meetings, presentations, surveys, etc. regarding crime, transportation, roads, homelessness, infrastructure, environment, climate, pollution, traffic, waste management, public services, etc., etc., etc., Just why are these few people given such enormous privilege to possibly determine the fate of the city of Tucson's Zoning future? Because they attended a single presentation and expressed they'd like to see it expand? wow.

Many of you that sit on the Planning Commission are involved in the "industry" and so it should be as you are far more knowledgeable in this area than the average citizen.

I can only hope you see this Middle-Housing expansion for what it is. It's not genuinely creating the "affordable housing" that Bill 2721 is trying create but instead has morphed from that concept and shifted into becoming another means to generate desperately needed revenue for this city. PDSD gets tasked with selling it and they do an incredible job of this. They have some exceptional people working there and it is their responsibility to do as they are directed. I truly wish they weren't so good at their jobs.

In the meantime this one has been known to Tucson since May of 2024 when Gov. Hobbs signed the bill and it would have been directed to PDSD at that time to start

crafting alternative boundaries and incorporating as much housing as possible into smaller and smaller lots. The residents of Tucson were not made aware of this until an entire year later when all the pretty pictures and convincing verbiage were ready and set to go.

April 28, 2025 is the first time we hear murmurs of Middle Housing and in mid-May an announcement goes out to Tucsonans that three public meetings would be held on this subject. These were just days away and in short succession on 5/22, 5/28 and 5/29. Not only are our city's citizens and residents expected to drop their lives and attend these meeting that can't be planned for, I guess thru powers of some-type of middle-housing osmosis, our community is expected to be knowledgeable and prepared with relevant and important questions or simply accept what PDSD is accurate and not enhanced.

Right behind that there is a Comment Form offered up until June 30. From informing us of Middle Housing to shutting the door for input was six weeks. I do need to add how shameful that Comment Form was. It was either put together by a third grader or deliberately written to disengage us. I do have the list of questions should anyone be interested. But this gets worse. It was probably recognized that the initial survey was so dreadful that a follow-up one was made and put online. This survey is reasonable but it never went out over NewsNet or in an email - I don't know when it went online and I'm swimming in city briefs, news releases, flyers as I put out newsletters to multiple neighborhoods but I got nothing. So while this one is decent and still available, it has been hidden under wraps and hasn't really had the time or opportunity to reach our residents. I only accidentally learned of it within the past week.

Planning Commission Members, I plead with you to consider keeping this Middle-Housing Proposal as scaled back as possible so that it is in compliance with House Bill 2721 and not much more at least at this time.

Things like this can always be expanded but almost impossible to roll back. We need permeable land and not more asphalt and rooftops. We need more vegetation and not substituting bushes for trees and no accountability if they die. We need our historic barrios to have a fighting chance at maintaining their legacy and culture. Potential overcrowding of neighborhoods can and will create crime and strains on infrastructure and more traffic and noise. Parking will be a nightmare for every neighborhood this touches. I see the destruction of neighborhoods and the up rise of slums and ghettos and the loss of generational wealth and family homes. In the more congested areas there won't be the tiniest bit of open space for kids, critters or cactus. But I guess that's all okay if the city can increase revenue even by a minuscule margin.

Just how many new layers of zoning does one city need in an extraordinarily short period. ADUs, CCT and MS&R - Bang! Bang! Bang! Now this on top of those. This seems so strikingly greedy and over the top. One has to assume that the others have failed if this is truly necessary as well.

We need genuine planning and not simply cramming and to stop the slicing and

licing of Tucson and get back to caring about residents, families, neighborhoods, climate, our desert, animals, vegetation, and on and on but the budget is broken and our Mayor sees rezoning as a way to generate income instead of other means including requiring modest-cost business licenses for all the rental properties that proliferate Tucson plus the short-term rentals that have driven up prices and take away from our rental inventory. Just a modest price of say \$100 per property could generate tens of millions. Easy to do and if not that way, there's lots more ideas without another layer of destructive zoning.

Fran Garcia
Cabrini Neighborhood



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From: [PlanningCommission](#)
To: [Daniel Bursuck](#); [Ian Wan](#); [Carver Struve](#); [Christina Anaya](#); [Nicholas Martell](#)
Subject: FW: Middle Housing
Date: Tuesday, September 16, 2025 8:33:56 AM
Attachments: [Garden District Traffic Count.pdf](#)

From: KRISTINE D YARTER <kyarter@msn.com>
Sent: Tuesday, September 16, 2025 8:33:10 AM (UTC-07:00) Arizona
To: PlanningCommission
Subject: [EXTERNAL] Middle Housing

When I was working with other neighborhood leaders on the Grant-Alvernon Area Plan and Plan Tucson, I regularly reminded Dan, Bursuck and the other PDSO planners about all the problems that still occur in my old neighborhood from infill-gone-crazy that ruined my R-2 neighborhood! When my husband and I bought our 1938 small one-bedroom adobe house in 1973 our quadrant still had empty lots filled with cactus and creosote bushes. It wasn't long before the lots filled up with cheaply built townhouses, duplexes, triplexes and fourplexes without any required plans to fit into the neighborhood. Most of this wildcat development occurred in the late '70's and early '80's.

I'm adding a traffic study and map below that Steve Kozachik did for my quadrant that is bordered by Speedway Blvd, Alvernon, Columbus and Pima. We were trying to keep a new Quik Trips and Circle K from going in at the empty lot at Lee and Alvernon where our beloved Dairy Queen is at now. The study showed the problems with cut-thru and speeding traffic and the map shows all the weird L-shaped lots with all the ugly rental properties that have never fit in with our old neighborhood. Sadly, my quadrant is now 74% rentals with transient renters and out of state absentee landlords hiding behind LLCs. Code Enforcement has a difficult time tracking down the out of state landlords that really could care less about how their properties are maintained.

Now PDSO is showing drawings of older styles rentals and new styles with nicely maintained rental properties for their rush to supposedly provide housing for the working class and low-paid teachers, etc. that will have a difficult time even coming up with the high rental and utility charges. Most longtime Tucson residents already know what will go wrong by complying with the House Bill 2721. The City of Tucson and developers are using this as an excuse to create urban renewal by removing and trashing our zoning code protections. This is going to be a giant gift to corporation landowners and city developers and none of the housing will be affordable for locals!

I hope you will take the time to look at the quadrant map below and please note that everyone that lives here owns at least one car or more. Rent is only affordable if you want to live in a place that still has coolers and isn't maintained- it doesn't take long for "Middle Housing" to look run down and renters suffer from quality of life and dare not complain or they will get "kicked out"!

Regards,

Kris Yarter

From: [PlanningCommission](#)
To: [Daniel Bursuck](#); [Ian Wan](#); [Carver Struve](#); [Christina Anaya](#); [Nicholas Martell](#)
Subject: FW: [EXTERNAL] Please approve the Middle Housing Code Changes
Date: Monday, September 15, 2025 2:58:43 PM

From: Jarrett Reidhead <jarrett15@gmail.com>
Sent: Monday, September 15, 2025 2:58:21 PM (UTC-07:00) Arizona
To: PlanningCommission <PlanningCommission@tucsonaz.gov>
Subject: [EXTERNAL] Please approve the Middle Housing Code Changes

To Whom It May Concern:

I am writing to advocate for the adoption of the Middle Housing code changes that will allow duplexes, triplexes, and fourplexes to be built on R-1 lots. Tucson needs more dense development to house our increasing population. Without this change, there is no way to bring down the costs of development and provide for the housing shortage that is already taking place. Please approve these code changes. Thank you for your time.

Best Regards,
Jarrett Reidhead, MSIRE, CCIM, DB
Pinnacle Realty and Investment Advisors LLC
520.331.8050 Cell
Jarrett15@Gmail.com

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25 SEP 16 PM 2:40

[EXTERNAL] Middle Housing

From North Dodge Neighborhood <northdodgena@gmail.com>

Date Tue 9/16/2025 1:33 PM

To PlanningCommission <PlanningCommission@tucsonaz.gov>

Cc MayorRomero <Mayor.Romero@tucsonaz.gov>; Ward1 <Ward1@tucsonaz.gov>; Ward2 <Ward2@tucsonaz.gov>; ward3 <ward3@tucsonaz.gov>; Ward4 <Ward4@tucsonaz.gov>; Ward5 <Ward5@tucsonaz.gov>; Ward6 <Ward6@tucsonaz.gov>; cityclerk <cityclerk@tucsonaz.gov>

OFFICE OF THE
CITY CLERK

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DISTRIBUTION		LOG NO. 233750
Mayor	★	City Clerk, City Hall
Council	★	City Deputy City Clerk
City Attorney	★	Asst. City Clerk
City Manager	★	Records Manager
City Clerk		Mgmt. Asst.
Posting		Officer Supervisor
Public File	0	Systems Analyst
EA		Liquor/Bingo
		Agenda
		BCC
		Payment/Procurement

Key
✓-Information Copy
X-Action Copy
0-Original

★ = Emailed

PUBLIC RECORDS COPY

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[EXTERNAL] Middle Housing

From fran garcia <cabrini85716@cox.net>

Date Tue 9/16/2025 1:32 PM

To PlanningCommission <PlanningCommission@tucsonaz.gov>

Cc MayorRomero <Mayor.Romero@tucsonaz.gov>; Ward1 <Ward1@tucsonaz.gov>; Ward2 <Ward2@tucsonaz.gov>; ward3 <ward3@tucsonaz.gov>; Ward4 <Ward4@tucsonaz.gov>; Ward5 <Ward5@tucsonaz.gov>; Ward6 <Ward6@tucsonaz.gov>; cityclerk <cityclerk@tucsonaz.gov>

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Good Day Planning Commission Members ~~

Once again I am reaching out on a subject that I am uneducated on and that is all this re-zoning of our city.

Probably the things that make me most alarmed is that I am quite typical of most Tucsonans in the regard that we don't know, understand or even particularly care about Zoning. It's dry, complicated and boring to the vast majority of us and that's why we entrust our Planning Commission and Mayor and Council to do what is right and in the best interest of our city with its unique climate, terrain, residents, neighborhoods and future. It's obvious to all that our climate is changing at an accelerated pace and being a world-wide problem, we can't do too much to modify what is happening but we can and should be extremely careful with our delicate desert and the rare and exceptional vegetation and the living things that can't survive elsewhere.

I realize that incorporating Middle-Housing into our city's zoning, has been mandated by our state but that only applies to the "downtown core" and outward one-mile. I do feel that is a difficult burden on our historic barrios and other neighborhoods within that zone and feel it can and could be expanded but very carefully and with precise and prudently determined boundaries. What PDSD has presented for boundaries is much further and also suggests that it is "wanted" to expand city-wide.

Accessory Dwelling Units, Community Corridors Tool, Major Streets & Routes (MS&R is basically covert but still more major rezoning included) and on the heels of these is now yet another huge rezoning effort with even more major slicing and dicing of our city.

Once again, this stayed in the basement and Tucson residents don't know anything about it while it's being formulated into marvelous presentations with lovely graphics and the presenters are trained and skilled into spinning this so that people are convinced that even manufactured housing and shipping containers that will be able to be planted on tiny, carved out spaces will beautify and enhance our barrios and neighborhoods. In actuality they play down or leave out information entirely regarding

manufactured housing and shipping containers but it is included in this - buried but included.

Maybe as a "concession" that particular allowance will be yanked but it won't make up for the all the rest of it and on top of all the other rezoning that has been passed. One of the things I'm finding so distasteful is the misrepresentation. Currently, PDSD is telling us that 76% of the feedback from meetings wants this to expand to boundaries further than what they've currently presented and even city-wide! wow. What we need to do is ask two questions on that with one being just how many constitute 76%? 3,800 of 5,000? 760 of 1000? 380 of 500? Or most likely, something along the lines of 76 out of 100. The extremely high likelihood of this being something like seventy-six is extraordinary. So something like 76 people can determine the course of our city? Please keep in mind, it is quite possible comments at a "Public Event" are each attributed separately to different people. One person can make multiple comments in favor that may be counted multiple times. I take it an absurd comments like "*Reduce setback to 0'*" and there were three almost identical in a row (207, 208, 209) would be considered in favor. That's all it takes and do things like that multiple times at a public event.

But there's more. Just who are these "76" people? These are mostly the architects, designers, developers, builders, real estate folks, et al who have a stake in this. I don't blame them - this is their livelihood and few others outside of that field who are paying attention and attending presentations or answering surveys. The people included in that 76% aren't there for the meetings, presentations, surveys, etc. regarding crime, transportation, roads, homelessness, infrastructure, environment, climate, pollution, traffic, waste management, public services, etc., etc., etc., Just why are these few people given such enormous privilege to possibly determine the fate of the city of Tucson's Zoning future? Because they attended a single presentation and expressed they'd like to see it expand? wow.

Many of you that sit on the Planning Commission are involved in the "industry" and so it should be as you are far more knowledgeable in this area than the average citizen. I can only hope you see this Middle-Housing expansion for what it is. It's not genuinely creating the "affordable housing" that Bill 2721 is trying create but instead has morphed from that concept and shifted into becoming another means to generate desperately needed revenue for this city. PDSD gets tasked with selling it and they do an incredible job of this. They have some exceptional people working there and it is their responsibility to do as they are directed. I truly wish they weren't so good at their jobs.

In the meantime this one has been known to Tucson since May of 2024 when Gov. Hobbs signed the bill and it would have been directed to PDSD at that time to start crafting alternative boundaries and incorporating as much housing as possible into smaller and smaller lots. The residents of Tucson were not made aware of this until an entire year later when all the pretty pictures and convincing verbiage were ready and set to go.

April 28, 2025 is the first time we hear murmurs of Middle Housing and in mid-May an announcement goes out to Tucsonans that three public meetings would be held on this subject. These were just days away and in short succession on 5/22, 5/28 and 5/29. Not only are our city's citizens and residents expected to drop their lives and attend these meeting that can't be planned for, I guess thru powers of some-type of middle-housing osmosis, our community is expected to be knowledgeable and prepared with relevant and important questions or simply accept what PDSD is accurate and not enhanced.

Right behind that there is a Comment Form offered up until June 30. From informing us of Middle Housing to shutting the door for input was six weeks. I do need to add how shameful that Comment

Form was. It was either put together by a third grader or deliberately written to disengage us. I do have the list of questions should anyone be interested. But this gets worse. It was probably recognized that the initial survey was so dreadful that a follow-up one was made and put online. This survey is reasonable but it never went out over NewsNet or in an email - I don't know when it went online and I'm swimming in city briefs, news releases, flyers as I put out newsletters to multiple neighborhoods but I got nothing. So while this one is decent and still available, it has been hidden under wraps and hasn't really had the time or opportunity to reach our residents. I only accidentally learned of it within the past week.

Planning Commission Members, I plead with you to consider keeping this Middle-Housing Proposal as scaled back as possible so that it is in compliance with House Bill 2721 and not much more at least at this time.

Things like this can always be expanded but almost impossible to roll back. We need permeable land and not more asphalt and rooftops. We need more vegetation and not substituting bushes for trees and no accountability if they die. We need our historic barrios to have a fighting chance at maintaining their legacy and culture. Potential overcrowding of neighborhoods can and will create crime and strains on infrastructure and more traffic and noise. Parking will be a nightmare for every neighborhood this touches. I see the destruction of neighborhoods and the up rise of slums and ghettos and the loss of generational wealth and family homes. In the more congested areas there won't be the tiniest bit of open space for kids, critters or cactus. But I guess that's all okay if the city can increase revenue even by a minuscule margin.

Just how many new layers of zoning does one city need in an extraordinarily short period. ADUs, CCT and MS&R - Bang! Bang! Bang! Now this on top of those. This seems so strikingly greedy and over the top. One has to assume that the others have failed if this is truly necessary as well.

We need genuine planning and not simply cramming and to stop the slicing and dicing of Tucson and get back to caring about residents, families, neighborhoods, climate, our desert, animals, vegetation, and on and on but the budget is broken and our Mayor sees rezoning as a way to generate income instead of other means including requiring modest-cost business licenses for all the rental properties that proliferate Tucson plus the short-term rentals that have driven up prices and take away from our rental inventory. Just a modest price of say \$100 per property could generate tens of millions. Easy to do and if not that way, there's lots more ideas without another layer of destructive zoning.

Fran Garcia
Cabrini Neighborhood



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Middle Housing Concerns

September 16, 2025

I am writing to advocate for pulling the proposed Middle Housing zone back to the smallest area possible; restore any unnecessary code changes by sticking with Option A, and then study the results to work out the bugs. Once these changes are in place, Prop 207 guarantees that they will never be removed. Tucson should not be playing Russian Roulette with our city and our citizens. See below for specific concerns.

Colette Altaffer, Community Advocate

These are key elements this Commission needs to consider.

Drachman Report: Page 18

This is where the rubber meets the road. Notice that the “return” on investment for EVERY unit is a LOSS. Then read their paragraphs below.

UNIT ^A	SIZE	COST TO BUILD*	OPERATING COST ^{^^}	INCOME ^{**}	RETURN
1 Bedroom Unit	625 square feet	\$209,248	\$18,105	\$14,062.50	-\$4,042.73
2 Bedroom Unit	900 square feet	\$293,310	\$22,607	\$17,437.50	-\$5,169.25
3 Bedroom Unit	1,100 square feet	\$356,310	\$25,980	\$20,812.50	-\$5,167.90
2 2BR Units	1,800 square feet	\$582,570	\$44,997	\$34,875	-\$10,121.60
3 2BR Units	3,000 square feet	\$942,140	\$71,152	\$52,312.50	-\$18,839.10
4 2BR Units	4,000 square feet	\$1,247,140	\$94,384	\$69,750	-\$24,634.50

The bottom line is small scale housing developments do not provide a positive return on investment. The relationship with construction cost, operating cost, and income needs to change radically for any zoning modification to have an impact in the city. Most projects at this scale happen only because the property owner needs for it to happen; for instance, to house an aging family member. Assuming a mid-town lot in Tucson is worth +/- \$400,000, and to build these projects would require an additional investment of \$200K to \$1.2M, it is hard to imagine properties selling for the price required to get one's investment back.

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FINANCING

Banks see construction loans as one of the riskiest investments. Financing for any construction project of 4 units or less would be considered a personal loan or consumer product; financing for any construction project of 5 units or more would be considered a commercial loan, requiring a Limited Liability Company or other legal form of entity. Both loan categories require extensive information from the borrower. Banks prefer borrowers that have a history of completing successful income-generating projects.

Conclusion

Developing a typical three-unit project runs at least \$1,000,000; not many single-family residence owners (the people most affected by this house bill) have access to that capital. In general, any

additional units beyond one increases the perceived value of the property beyond what it is worth on the market.

All we can really say is do what you can to allow more development flexibility. Decreasing setback requirements and allowing parking to be in the right of way can produce more varied and higher quality designs.

So what did the city do? It reduced code requirements and added manufactured housing to the mix; cargo containers are considered “manufactured housing”. **That hardly qualifies as “higher quality designs”.**

Destroying a Village in Order to Save It

For all of our city’s the talk about equity, this proposed Middle Housing zone is crafted to undercut our historic neighborhoods and Barrios, rather than raising up the standard of living for lower-income neighborhoods.

- Reducing lot size requirements: Trying to cram more units onto crowded lots
- Minimal landscaping requirements with waiver provisions: Ensuring greater heat island effect
- Parking reductions and waivers: Ensuring trash pick-up is less likely to occur with wall-to-wall parking

On its face, this proposed ordinance appears to be the city’s attempt to destroy its unique history and trash a large swath of the city between downtown and the University. The next time a potential large employer visits our community, one look at what our government, in its infinite “wisdom” has done, will ensure that no employer will want to bring high-paying jobs to Tucson.

Way to go, Tucson!



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SENT VIA ELECTRONIC MAIL

September 16, 2025

Chris Ortiz y Pino, Chair
Tucson Planning Commission
255 W. Alameda Rd.
Tucson, AZ 85701

Subject: Middle Housing Code Amendment, Item #3

Chair Ortiz y Pino
Cc: Members of the Planning Commission

On behalf of the Southern Arizona Home Builders Association (SAHBA), I am writing to express our support for Tucson's Middle Housing Code Amendment. SAHBA represents the development and home building industry in Southern Arizona and is committed to advancing policies that expand housing choice, improve affordability, and reduce barriers to new housing supply. We believe the proposed amendment is an important step and recommend the following refinements:

- 1. Apply Middle Housing Citywide:** Housing opportunities should not be limited to a "Middle Housing Zone" that would preclude certain sites from being developed to increase housing supply or meet the objectives of the statute.
- 2. Simplify Development Services Review:** We encourage the amendment to be drafted in way to streamline the review and approval processes administratively.
- 3. Reduce Regulatory Barriers**
 - Parking:** Consider further reducing or eliminating minimums, especially in infill/transit areas.
 - Landscaping:** The proposed requirements add costs for small-scale infill. Exemptions for projects under four units or fee-in-lieu options would balance environmental goals with affordability.
 - Subdivision Standards:** We would encourage the city to consider increasing the allowance for Middle Housing and reducing the site to less than ten acres.
- 4. Reduce Administrative Burdens:** We would like to work with the city to reduce planning or any other regulatory burdens.

SAHBA supports the Middle Housing Code Amendment and urges the Commission to strengthen it by applying it citywide, reducing regulatory barriers, and streamlining approvals. These refinements will expand housing choice, reduce costs, and increase supply.

Thank you for your consideration.

BT Lyons

Brendan Lyons, MPA
Director of Government Affairs
Southern Arizona Home Builders Association

From: [Joe Silins](#)
To: [Nicholas Martell](#)
Subject: [EXTERNAL] Shared sewer agreements
Date: Monday, September 15, 2025 3:54:47 PM

Hi Nick,

One thing I forgot to mention at the middle housing input session is the suggestion that the City revisit its position on shared sewer connections as a way to make middle housing more affordable. Your team outlined the possibility that middle housing developments might also be able to split units to create more homeownership opportunities, and the ability to share sewer connections between lots would be very helpful in reducing costs. I was informed by Bob Sherry that the City doesn't allow sewer connections to be shared between lots, which can cost an additional \$10-30K in connection costs. When I called the regional wastewater district, they seemed open to the idea and referred me to Bob.

Best,
Joe



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