



PLANNING COMMISSION MEMORANDUM

Date: October 1, 2026 for October 7, 2026 Scheduled Meeting Page 1 of 4
To: Planning Commission
From: Koren Manning, Director of Planning and Development Services, Executive Secretary
Subject: C8-26-02 Living Landscapes Phase 1 Code Amendments (Citywide)

Issue

This is a public hearing on three proposed amendments to the Unified Development Code (UDC) related to the Living Landscapes Phase 1 code update package. The Mayor and Council initiated the package on April 7, 2026 (Attachment A). The amendments strengthen the Commercial Rainwater Harvesting (CRWH) standards by improving stormwater capture in commercial landscapes and clarifying design requirements.

The Planning Commission held study sessions on the package on August 26, 2026 and September 16, 2026 (Attachment B and C) and voted 9–0 to set this public hearing on the proposed UDC amendments. Related Technical Standards Manual (TSM) and Tucson City Code (TCC) amendments are outside the Commission’s purview and are included for context only.

Staff Recommendation

Staff recommends the Planning Commission forward the proposed Living Landscapes Phase 1 amendments to the Unified Development Code to the Mayor and Council with a recommendation of approval.

Background

The City's Commercial Rainwater Harvesting Ordinance (Ordinance No. 10597), adopted in 2008, requires new commercial development to meet 50 percent of landscape irrigation demand through onsite rainwater harvesting. Compliance is verified through development plan review and enforced under the City's Water Waste Ordinance (Tucson Code 27-15).

At the March 22, 2022 study session, the Mayor and Council directed staff to strengthen plan review and site inspection. Staff have since improved coordination, inspections, training and capacity. At the April 7, 2026 study session, the Mayor and Council directed staff to amend the CRWH standards (Attachment A). They also directed the Landscape Advisory Committee (LAC) to work on a plant palette native to the Tucson Basin.

Living Landscapes coordinates this direction with an existing effort to create residential rainwater harvesting and low impact development standards. The work is organized in two phases, and each phase includes stakeholder outreach.

- **Phase 1: Commercial Development.** Strengthens the existing CRWH standards by improving stormwater capture and clarifying design and inspection requirements. This is the package before the Commission.
- **Phase 2: Commercial/Residential Development.** Establishes residential low impact development standards, evaluates further commercial rainwater harvesting amendments, and explores broad adoption of a Tucson-specific plant list.

Public Outreach

On August 12, 2026, PDSO held a virtual stakeholder roundtable on the Phase 1 proposal. About 30 community participants attended, representing professional organizations, employers, and individual community interests. Feedback covered plant selection and ecology, green stormwater infrastructure and basin design, tree placement and site constraints, utilities and the right-of-way, and long-term maintenance. The full report is in Attachment E. No additional public comments have been received since the study sessions.

Present Considerations

Phase 1 includes seven amendments: three to the UDC and four within the TSM and TCC which are included for context. The proposed amendments are outlined below, and shown in full in Attachment D.

Parking Lot Planting Areas (UDC 7.6.4.B)

Section 7.6.4.B would increase the minimum parking lot tree planting area from 34 square feet to 144 square feet and require planting areas to be depressed 6 to 9 inches below the adjacent paved surface, with curb cuts or openings to allow runoff to enter. The existing 34 square-foot standard is not considered sufficient to support trees as they mature and provide their full potential for shade, site character, and pedestrian scale. The proposed 144-square-foot area is approximately the size of a standard 18-foot by 8-foot parking space, providing a consistent design dimension around which parking spaces can be organized while maintaining the existing requirement of one parking lot tree per four parking spaces under UDC Section 7.6. The depressed planting area would also function as a stormwater basin, capturing and retaining runoff from the surrounding parking lot. The 6-9-inch basin depth is based on the Commercial Rainwater Harvesting standards and the Pima County Retention/Detention Manual; depths greater than 9 inches require additional geotechnical testing and reporting. The depth would be measured from the hardscape surface flowline to a maximum of 9 inches at the bottom of the basin, measured to the surface of the inorganic or organic ground cover. Additional standards or design measures may be needed to increase the viable drainage area available to the tree's root system and dripline. The 6-9-inch depressed condition will be reviewed by City staff during plan submittal in relation to the dimensions and configuration of the planting area to ensure that tree islands provide adequate growing space while maintaining safe and accessible parking lot circulation and avoiding potential health, safety, and welfare concerns for parking lot users.

Landscape Borders and Standard Details (UDC 7.6.6.C)

Section 7.6.6.C would raise the required tree ratio along landscape borders from 1 tree per 33 linear feet to 1 tree per 25 linear feet. Up to 25 percent of required trees may be planted outside the border to shade internal pedestrian paths. This amended section would also make the City's adopted standard details the governing standard for all passive water harvesting features, including depressed landscaping, bioswales, curb cuts, and infiltration basins. Pima County Regional Flood Control District has been coordinating the standard detail review and edits to the PAG Standard Details, and will be heading to public review in late fall early winter 2026.

Right-of-Way Runoff (UDC 7.6.4.F)

Section 7.6.4.F would allow green stormwater infrastructure (GSI) in the public right-of-way. Runoff from the right-of-way on private property could be captured in right-of-way GSI areas where approved by the City Engineer and consistent with standard details. The standards would apply to all landscaping in the right-of-way, not only non-required landscaping. Landscaping and

rainwater harvesting areas could not interfere with the use of the right-of-way or cause flooding on private property.

Related Amendments (TSM and TCC) – No Commission Action

Updates to the Technical Standards Manual (TSM) can be made by the City Manager after consultation with the City Development Review Committee as well as other development review agencies and stakeholders. Amendments to the Tucson City Code (TCC) are considered by Mayor and Council following review by any relevant stakeholders. Because these proposed amendments are intended to support the proposed changes to the UDC described above, they are provided for context.

- TSM 4-01.2.1: Require planting areas that harvest water to be recessed below adjacent hardscape, with hardscape sloped to direct runoff into infiltration areas. Require pedestrian circulation designed to avoid recessed areas, and require use of GSI standard details.
- TSM 4-01.7.1: Add preconstruction meeting requirement and inspection checkpoint for depression depth and elevation benchmarks. Add inspection of right-of-way connection points where applicable.
- TSM 4-01.1.3: Extend applicability to multifamily development, and clarify how the standard applies given the exceptions in TCC Sec. 6-185.
- TSM 4-01.3.1: Reference the PDSD-maintained water budget spreadsheet, and require alternative assumptions to be justified to PDSD's Landscape Architect.
- TCC Sec. 6-185: Clarify that buildings, paved areas, and parking lots associated with excepted uses, including golf courses and cemeteries, are not exempt. Church parking lots are not exempt.

Related Effort: Tucson-Specific Plant List

The Tucson-specific plant list is not part of this public hearing. Based on Commission feedback and discussions with Tucson Water, further action on the plant list is paused while the Landscape Advisory Committee continues its work. A public engagement effort is anticipated in late Fall 2026 as part of Phase 2.

Plan Tucson Considerations

Phase 1 of Living Landscapes is supported by the following Plan Tucson policies:

Ecosystems 3: Support and expand opportunities for well-maintained, water-efficient green spaces and vegetation in new development or redevelopment to mitigate the urban heat island effect.

Ecosystems 5: Preserve existing mature trees and promote the planting of desert-adapted trees when replacement is necessary.

Ecosystems 6: Expand and maintain a healthy, drought-tolerant, low-water-use tree canopy and urban forest that utilizes harvested water to provide Sonoran Desert ecosystem services, mitigate the urban heat island effect, and improve neighborhood microclimates.

Ecosystems 9: Reduce flood and erosion hazards, damage, and associated costs.

Water 6: Expand and maintain stormwater management in public and private new development and redevelopment.

Water 7: Encourage increased water efficiency in both existing and new private and public developments, promoting user-level conservation practices across all water use contexts.

Attachments:

- A. Mayor and Council Legal Action Report dated April 7, 2026
- B. Planning Commission Legal Action Report dated August 26, 2026
- C. Planning Commission Legal Action Report dated September 16, 2026
- D. Proposed Unified Development Code Amendments (Redline)
- E. Living Landscapes Phase 1 Stakeholder Roundtable Report