



OVERVIEW

Tucson is a unique place with a special natural environment. The Sonoran Desert landscape is integral to the identity of the community. To remain good stewards of the land and reinforce Tucson's identity, Living Landscapes furthers the community's goals of expanding rainwater harvesting, conserving potable water, increasing our urban tree canopy, and promoting the use of native plant species.

Rainwater harvesting is a long-established practice of collecting, channeling, and storing runoff water from hard surfaces for later reuse. In commercial developments, rainwater can be harvested from building roofs and parking areas to flow into planting areas. This reduces the demand for irrigated water and allows plants to thrive. In residential subdivisions, rainwater can be harvested from streets. This water can be redirected to shared community areas and street trees to help shade pedestrian walkways and beautify the neighborhood.

Living Landscapes is an effort led by the City of Tucson to further rainwater harvesting and planting goals. The city's existing regulations for commercial rainwater harvesting were adopted by the Mayor and City Council in 2008. There are not currently any requirements for rainwater harvesting for residential subdivisions.

The existing commercial regulations require new commercial development to meet at least 50 percent of the site's landscape irrigation demand using onsite rainwater harvesting. This reduces potable water use by capturing rainfall and directing it to landscaped areas, reducing the need for supplemental irrigation.

Over time, staff and stakeholders have identified opportunities to improve how rainwater harvesting systems are designed, constructed, inspected, and maintained. Based on this, at the Study Session on April 7, 2026, the Mayor and City Council directed staff to address the following policy objectives:

1. Stormwater Capture - Require depressed non-paved areas in new commercial development to capture additional storm runoff from developed portions of the site.
2. Right-of-way Runoff - Evaluate mechanisms to direct adjacent right-of-way runoff into onsite rainwater harvesting systems, where feasible.
3. Approved Plant List - Adopt a Tucson-specific plant list to guide landscape design and support water-efficient, drought-tolerant planting, led by the City's Landscape Advisory Committee.
4. Tree Canopy - Evaluate an increased tree-to-understory planting ratio to expand tree canopy coverage.
5. Applicability - Evaluate extending ordinance requirements to golf course, church, and cemetery parking lots.

The proposed code amendments are intended to strengthen the regulations by improving stormwater capture, supporting healthier landscapes, providing clearer standards, and improving long-term implementation.

Residential low impact development (LID) regulations requiring rainwater harvesting and green stormwater infrastructure in new residential development are in development, as directed by Mayor and Council in June 2022.

The Living Landscapes initiative is being completed in two phases. Phase one will address the updates to commercial rainwater harvesting standards. Phase two will establish residential Low Impact Development standards, evaluate further amendments to commercial rainwater harvesting standards, and explore feasibility of broad adoption of the Tucson Basin Native Plant List.



Phase 1: This document presents phase one items based on the April 2026 Mayor and City Council direction. These proposed amendments to the Tucson City Code, Unified Development Code, and Technical Standards Manual sections are proposed to strengthen implementation of commercial rainwater harvesting standards.

Phase 2: Future discussions regarding commercial and residential rainwater harvesting will be held as part of phase two. For consideration, City staff have already identified several commercial rainwater harvesting topics for potential future evaluation that would require further technical review and stakeholder input:

- A three-year conditional water-credit or reduction system for qualifying projects.
- Codified baseline irrigation demand figures to support consistent compliance calculations.
- New survey, control-point, and drainage design requirements to improve construction accuracy.
- A formal, staged inspection call-in protocol that ties grading, irrigation, and planting review together.
- Require new rainwater harvesting and landscape plans to be completed by a registrant, with exceptions

SUMMARY OF PROPOSAL

#	Topic	Code Sections	Change
1	All non-paved areas of new commercial development be 'depressed' in order to capture additional storm run-off	UDC 7.6.4.B	Require parking lot tree planting areas to be depressed a minimum of 6 to 9 inches below adjacent paved surface grade to capture and retain stormwater runoff. Require curb cuts or openings for surface runoff to enter planting areas.
		7.6.6.C	Add reference to standard details as the governing standard for all passive water harvesting features.
		TSM 4-01.2.1	Require planting areas adjacent to hardscape to be recessed and direct water into infiltration areas. Require use of standard details.
		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.
2	Ensure that all right-of-way (ROW) run-off may be utilized	UDC 7.6.4.F	Allow green stormwater infrastructure in the public right-of-way and expressly permit capturing of right-of-way runoff on private property, subject to engineering and flooding approval.
3	Landscaping — increase tree to understory ratio	UDC 7.6.4.B.	Increase the size of the required tree planting area in parking lots.
		7.6.4.C.	Require a higher ratio of trees to linear feet of landscape border, with the option to provide some trees as shade to pedestrian areas.
4	Include golf course, church, and cemetery parking lots in the ordinance	TCC Sec. 6-185	Rewrite exceptions for golf courses and cemeteries. Church parking lots are not proposed to be exempt.
		TSM 4-01.1.3.	Add applicability clarification regarding exceptions.
5	Future topics	Various sections UDC TCC TSM	New 3-year conditional water-credit/reduction system Codified baseline irrigation numbers New survey/control-point and drainage design requirements Formal, staged inspection call-in protocol tying grading, irrigation, and planting review together Require new rainwater harvesting and landscape plans to be completed by a registrant, with exceptions

TUCSON CITY CODE (TCC)

CHAPTER 6 BUILDINGS, ELECTRICITY, PLUMBING, AND MECHANICAL CODE

ARTICLE VIII. RAINWATER COLLECTION AND DISTRIBUTION REQUIREMENTS

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SEC. 6-185. EXCEPTIONS.

A. That portion of a development which includes the following land uses shall be excepted from the fifty (50) percent rainwater harvesting requirements, except for the associated buildings, paved areas, or parking lots are not exempt:

1. Public parks and botanical gardens;
2. Outdoor recreation facilities, whether under public or private ownership, for public use, schools, and day care centers;
3. The playing areas of golf courses;
4. Cemeteries;
5. Natural open space;
6. Crop production.

* * *

UNIFIED DEVELOPMENT CODE (UDC)

ARTICLE 7 – DEVELOPMENT STANDARDS

7.6. LANDSCAPING AND SCREENING

7.6.4. LANDSCAPE STANDARDS

B. Vehicular Use Areas

The standards in this Section 7.6.4.B apply to all developments that provide more than four motor vehicle parking spaces, except as provide in Section 7.6.4.B.1.c, Exemptions

1. Canopy Trees in Vehicle Use Areas

a. General Standards

For each four motor vehicle parking spaces, one canopy tree shall be provided.

(1) The canopy tree shall be a minimum of 18 inches in diameter at the base of the trunk of a

use area. Every parking space shall have a canopy tree (as defined in Section 7.6.4.B.1.c, Exemptions) located within

the parking space or adjacent to the parking space. The canopy tree shall be a minimum of 18 inches in diameter at the base of the trunk of a

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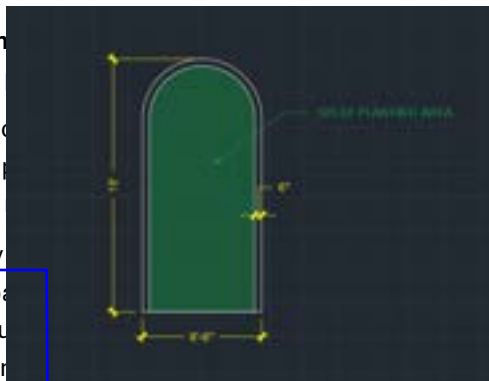
use area. Every parking space shall have a canopy tree (as defined in Section 7.6.4.B.1.c, Exemptions) located within

the parking space or adjacent to the parking space. The canopy tree shall be a minimum of 18 inches in diameter at the base of the trunk of a

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use area. Every parking space shall have a canopy tree (as defined in Section 7.6.4.B.1.c, Exemptions) located within



How was this number determined? A typical parking island (if it were to match the size of a 90 degree parking space) only provides 125 SF.

If the min SF is 144 and the min width is 6 FT, then the min length would have to be 24'. This isn't practical. What scenario would this occur?

This is a significant safety concern. There should always be a shoulder between the paved surface (sidewalk, curb, etc) and a rainwater harvesting basin. Its dangerous to step off a curb or sidewalk in a parking area into a depression. A 6" tall curb adjacent to a 9" depression is a massive liability. Shoulder width should be 12" min, 18" preferred, and 24" for walkways with heavy pedestrian traffic.

(3) An unpaved planting area, which must be a minimum of ~~34~~ **144** square feet in area and ~~four six~~ feet in width, ~~and must be provided~~ **is required** for each canopy tree. The planting area ~~may be at grade or depressed below the elevation of the adjacent paved surface~~ **must be depressed a minimum of 6 to 9 inches below the elevation of the adjacent paved surface and** graded to receive and **retain** stormwater runoff from the surrounding vehicular use area.

2. Plant Protection. Areas where trees are planted shall be protected from injury by vehicular or pedestrian traffic must be protected by appropriate measures, such as bollards, or low walls.

Where are these numbers coming from? Has the city prepared standard details?

3. Planter Area. For each tree required by this code, a planter area with a minimum unpaved area of ~~34~~ **144** square feet and a ~~four six~~ foot minimum width is required.

a. The planter area must have a raised border four inches high to prohibit the tires of the vehicle from encroaching onto the planter. Standard wheel barriers are acceptable but not encouraged, as they can be easily moved and could allow damage to the tree. **The planter area must be depressed a minimum of 6 to 9 inches below the elevation of the adjacent paved surface to facilitate stormwater capture and retention. Curb cuts or openings must be provided to allow surface runoff to enter the planting basin, subject to engineering and flooding requirements.**

This is dangerous. And once shoulders and slopes are accounted for, its not often possible to depress 6-9". See the screenshot to the right, which depicts 18" shoulders and 4:1 side-slopes. The result isn't a basin, but a "v" shaped channel that provides 6" depth. 9" isn't even possible. It would be good for the City to prepare typical details that include safety measures and practical depths.



C. Landscape Borders

This language is a bit confusing. What about this:
 "Up to 25% of required canopy trees may be planted outside of the required landscape border, if intended to shade internal pedestrian circulation paths."
 "Up to 25%" is permissive.
 "No more than 25%" is restrictive.

meet landscape borders and interior landscape borders.
 borders.
 d for every ~~33~~ 25 linear feet of landscape border or ingress or egress points.
 tree is required within a required landscape border.

c. Trees may be planted at varying distances apart.

d. No more than 25% of required canopy trees may be planted outside the required landscape border if intended to shade internal pedestrian circulation paths.

F. Use of the Public Right-of-Way.

~~Nonrequired~~ Landscaping may be placed in the public right-of-way, if the following standards are met:

1. The landscaping is approved by the City Engineer or designee and complies with the City Engineer's standards on construction, irrigation, location, flooding and plant type;
2. All vegetation complies with the standards of Section 7.6.4, Landscaping Standards; and
3. Green Stormwater Infrastructure (GSI) improvements within the public right-of-way, including bioswales, curb extensions, and vegetated infiltration areas, are permitted where approved by the City Engineer or designee and consistent with approved standard details;
4. Runoff from adjacent public rights-of-way may be captured and directed into on-site Water Harvesting Infiltration Areas, subject to approval by the City Engineer or designee and compliance with DTM drainage engineering standards; and,
- ~~3-5.~~ The landscaping or rainwater harvesting areas do~~does~~ not interfere with the use of the sidewalk~~right-of-way and do not cause flooding on the private property.~~

7.6.6. USE OF WATER

The following standards conserve water and assist in carrying out xeriscape design principles.

A. Water Conservation Design

Landscape plans shall incorporate water-conserving designs. A water-conserving design must take into account soil and drainage factors and microclimates, includes grouping of plants with similar water standards and use of efficient irrigation systems, and attempts to preserve on-site vegetation.

B. Use of Reclaimed Water

1. Reclaimed water must be used in new and expanded development in accordance with the adopted Mayor and Council Water Policies and other applicable state and local standards.
2. The availability of a reclaimed water service does not confer any right to plant turf areas except as permitted under this Section 7.6.4.D, Use of Turf.

C. Stormwater Runoff

1. Storm water detention/retention basins not integrated with paved vehicular use areas must be designed in accordance with the Storm Water Detention Retention Manual.

2. Grading, hydrology, and landscape structural plans must be integrated to make maximum use of site storm water runoff for supplemental on-site irrigation purposes. The landscape plan shall indicate use of all runoff, from individual catch basins around single trees to basins accepting flow from an entire vehicular use area or roof area.

3. All passive water harvesting features, including depressed landscaping, bioswales, curb cuts, and stormwater infiltration basins, shall be designed in accordance with the adopted standard details.

* * *

Please provide standard details for local Landscape Architects and Civil Engineers to review. I'd recommend starting with the standard details, and then reworking the language in the code.

TECHNICAL STANDARDS MANUAL (TSM)

SECTION 4: HYDROLOGY

SECTION 4-01.0.0: COMMERCIAL RAINWATER HARVESTING

4-01.1.0 GENERAL

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1.3 Applicability.

This standard applies to all commercial and multifamily development plans submitted after June 1, 2010. notwithstanding exceptions in Tucson City Code Sec. 6-185.

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4-01.2.0 DESIGN CONSIDERATIONS AND TECHNICAL REQUIREMENTS

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2.1 Passive Water Harvesting

Passive water harvesting consists of the collection of stormwater directly in Water Harvesting Infiltration Areas without the temporary storage of water in containment systems. Passive water harvesting functions through gravity-flow of stormwater. It requires no tanks, piping, metering, pumps or other infrastructure associated with containment systems. However, in passive water harvesting, infrastructure components may be needed to route overflow water, pass water under roads, sidewalks, or parking lots, or for other purposes conducive to the effective functioning of the passive systems.

A. Passive Water Harvesting Design Considerations

An array of techniques and designs are available to accomplish passive water harvesting. Whatever techniques or designs are used, the items listed below should be considered to create safe, efficient and effective passive water harvesting systems.

1. Use Water Harvesting Infiltration Areas, where feasible, to offset the size of a retention/detention basin that may be needed at a site. Consult Appendix C of the City of Tucson Water Harvesting Guidance Manual for information on the allowed offset.
2. The area and depth of Water Harvesting Infiltration Areas should be determined according to the anticipated volume of harvested water that will enter these areas and the infiltration characteristics of the underlying soil.
3. Plants with similar water demands should be placed in the same areas within Water Harvesting Infiltration Areas.
4. Soils within Water Harvesting Infiltration Areas should be modified as needed to counteract the effects of mechanical compaction and/or poor soil infiltration conditions in order to ensure appropriate water infiltration.
5. The edge of Water Harvesting Infiltration Areas should be set back from building foundations or other structures to allow for positive drainage of water. Consult a soils professional where necessary.

6. Planting areas that harvest water ~~should~~shall be recessed below the grade of adjacent hardscapes. Hardscape surfaces ~~should~~shall be sloped toward adjacent recessed planting areas to direct stormwater runoff into Water Harvesting Infiltration Areas.

7. Pedestrian circulation ~~should~~shall be designed to discourage cutting across recessed planting areas to avoid soil compaction, erosion, and damage to plants and to minimize the risk of injury to pedestrians.

8. Maximum reveal at the edge of public sidewalks and pedestrian circulation paths should be two inches or less to minimize the risk of injury to pedestrians. A minimum 12-inch wide shoulder with a maximum 2% cross-slope away from a public sidewalk or pedestrian circulation path should be provided where possible.

9. Water Harvesting Infiltration Areas should be stabilized for dust control purposes. Techniques could include spreading one-half inch or larger rock, hydroseeding with native seed mixes, or using other stabilizing techniques and materials. Fine-grained particles that could block water infiltration by clogging soil pores should be washed from materials prior to placement. Avoid

The current water budget table excel file is problematic. Consider replacing the water budget table with practical guidelines, like:

EXAMPLE ---

Landscape areas should be designed to maximize passive rainwater harvesting through shallow, depressed planting areas that collect and infiltrate stormwater runoff. Rainwater harvesting basins should be incorporated wherever practical, except where site conditions, infrastructure, safety, or plant requirements make depressed planting areas unsuitable. The following guidelines should be considered when determining appropriate basin locations:

- Building Foundations: Avoid locating basins within 10 feet of building foundations unless otherwise approved by a qualified soils professional.

- Utilities: Avoid conflicts with existing or proposed underground utilities, utility easements, equipment, and required maintenance access.

4-0 - Access Easements: Avoid depressing landscape areas within access easements, emergency access routes, or areas requiring unobstructed access.

A R - Slopes: Avoid basins on steep slopes where grading, erosion, or stabilization requirements make water harvesting impractical. Consider terraced basins where appropriate.

land - Signs and Site Features: Avoid basins where grading or ponding may compromise monument signs, walls, foundations, site furnishings, or other improvements.

and - Pedestrian Safety: Provide appropriate level shoulders adjacent to sidewalks and pedestrian areas. A minimum 12-inch shoulder and 4:1 basin side slopes are recommended where feasible.

req of th - Plant Compatibility: Avoid prolonged inundation around plants that are sensitive to saturated soils. Locate these plants on basin slopes, raised areas, or outside depressed planting areas.

3.1

The

meet 50% of landscape demand. The Site Water Budget and the Water Harvesting Implementation Plan shall be consistent with one another.

A water budget format is shown in Exhibit A, along with the background data and assumptions used to develop it. This water budget format is available to applicants as an Excel spreadsheet at http://www.tucsonaz.gov/PDSD/What_s_New/what_s_new.html. A water budget format, along with background data and assumptions used to develop it is available to applicants as an Excel spreadsheet maintained by PDSD and available on the PDSD website.

Applicants may use this water budget format to enter site -specific data to develop their Site Water Budget. Alternatively, applicants may develop their own

Site Water Budget format. Whichever format is used, the submitted Site Water Budget shall incorporate and provide the information below.

Who is responsible for scheduling and conducting this meeting? Is the contractor expected to coordinate the attendance of the project engineer, landscape architect, and PDSD inspector?

How can basin depths, inlet/outlet elevations, and other grading features be accurately staked and verified before grading begins? On an undisturbed site, these features may not be physically identifiable or accessible for meaningful inspection.

How would this requirement apply to larger, more complicated developments? Some projects include dozens of rainwater harvesting basins, inlets, outlets, and other drainage features spread across a large site. Surveying and staking all these improvements before grading would be an extensive and costly undertaking.

What is the benefit of requiring this staking before grading? Most, if not all, of the stakes would be disturbed or removed during initial grading operations, requiring the improvements to be staked again during construction.

We question whether this meeting would provide meaningful value, particularly when the features being inspected have not yet been constructed and the stakes used to identify them would likely be removed during grading.

We recommend eliminating the mandatory preconstruction meeting and instead requiring verification of rainwater harvesting improvements at an appropriate stage of construction, when basin grades, inlets, outlets, and drainage connections can be meaningfully inspected.

Output of the Site Water Budget shall include calculations showing how 50% of landscape water demand as an average across the site will be met using harvested rainwater, and shall include assumptions and supporting calculations as necessary to document these outputs. Output of the Site Water Budget shall include total water demand and rainwater supply calculations for each Water Harvesting Infiltration Area at the site.

* * *

4-01.7.0 ENFORCEMENT

The steps described below are required to ensure the site is constructed according to the requirements of the approved Implementation Plan.

7.1 Inspections

A. Prior to commencement of grading, a preconstruction meeting shall be held on-site with the project engineer, landscape architect, contractor, and PDSD inspector to verify that Water Harvesting Infiltration Area locations, depression depths, inlet and outlet elevations, and any ROW connection points are clearly staked and consistent with the approved Water Harvesting Implementation Plan. All site-scale grading related to water harvesting Sub-watersheds and Water Harvesting Infiltration Areas must be inspected and accepted by PDSD prior to application of any surface treatment (e.g., concrete, asphalt, rock, etc.) to verify that slopes, recessed areas, overflows, and other design elements have been properly graded. PDSD shall verify that Water Harvesting Infiltration Areas are depressed to the minimum required depth and that elevation benchmarks for inlets, outlets, and spillways are consistent with the approved Implementation Plan.

B. All landscape-scale grading in Water Harvesting Infiltration Areas where planting will be conducted must be inspected and accepted by PDSD prior to plant installation and application of organic mulch or rock to verify they have been properly graded. [Unchanged]

C. PDSD will inspect the site for compliance with the provisions of the Rainwater Harvesting Plan prior to issuance of a final certificate of occupancy. [Unchanged]

* * *



Outlook

FW: SAHBA Comments - Agenda Items #4/Living Landscapes & #5/CODE

From PlanningCommission <PlanningCommission@tucsonaz.gov>

Date Wed 10/7/2026 11:21 AM

To Ian Wan <Ian.Wan@tucsonaz.gov>; Carver Struve <Carver.Struve@tucsonaz.gov>; Christina Anaya <Christina.Anaya@tucsonaz.gov>; Amanda Smith <Amanda.Smith@tucsonaz.gov>; Sarah Meggison <Sarah.Meggison@tucsonaz.gov>

From: David Godlewski <David@sahba.org>

Sent: Wednesday, October 7, 2026 11:21:04 AM (UTC-07:00) Arizona

To: PlanningCommission <PlanningCommission@tucsonaz.gov>

Cc: Koren Manning <Koren.Manning@tucsonaz.gov>; Ian Wan <Ian.Wan@tucsonaz.gov>; Elisa Hamblin <Elisa.Hamblin@tucsonaz.gov>

Subject: SAHBA Comments - Agenda Items #4/Living Landscapes & #5/CODE

Honorable Members of the Commission:

The Southern Arizona Home Builders Association (SAHBA) represents more than 300-member business across the spectrum of real estate, development and construction professionals. Our members are committed to building vibrant communities and providing the housing opportunities needed by our growing community. On their behalf, I would like to convey the following brief and initial comments on two important items on this evening's agenda that will influence and shape future development in the City of Tucson.

- 1. Agenda Item #4: Living Landscapes Phase 1 Code Amendment** - We appreciate the City's interest in maximizing our water resources and the phased approach to addressing the policy objectives proposed by Mayor & Council. We would like to point out that while the commercial regulations were adopted in 2008, and residential requirements were not, that is because the focus was on residential regulations for graywater plumbing in all new homes which occurred concurrently. Home building, through this regulation, existing LID guidelines, and initiatives like WaterSense, have made new homes/subdivisions very water efficient. With specific request to the Summary of Proposal found in the staff materials, **we request additional engagement with industry professionals who have relevant subject matter expertise to evaluate the proposed changes, understand any concerns and consider recommended alternatives** including but not limited to the areas of: minimum landscape area in vehicular use areas, minimum basin depths, new standard details, water budget spreadsheet and the preconstruction meeting. We are confident industry professionals can provide valid input that leads to a better end product that achieves water conservation objectives and encourages new development. SAHBA stands ready to assist on this Amendment and specifically on the forthcoming plant list and residential requirement proposals.
- 2. Agenda Item #5: CODE Tucson '26 Amendment** – “Ease of Use” and “Speed to Market” are two key determinants when builders are looking to invest in new projects. Planning and development codes, and related processes, influence both. Communities that can

modernize, clarify and streamline them put themselves at a competitive advantage. Each new project brings jobs, housing opportunities and tax revenue. **We commend the City for undertaking the CODE initiative and request a continuous review of codes and process – with the help of industry partners – to identify and pursue other areas that can be improved to achieve our housing and development goals.** Again, SAHBA and our members can be an asset to this effort.

Sincerely,
David



DAVID GODLEWSKI, President & CEO

Southern Arizona Home Builders Association

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