



PLANNING COMMISSION MEMORANDUM

Date: August 19, 2026 for August 26, 2026 Scheduled Meeting
 To: Planning Commission
 From: Koren Manning, Director of Planning and Development
 Services, and Executive Secretary
 Subject: C8-26-02 Living Landscapes Phase 1
 Code Amendments (Citywide)

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Issue – This study session presents the proposed **Living Landscapes Phase 1** code update package which includes amendments to the Unified Development Code (UDC), Tucson City Code, and Technical Standards Manual supporting updates to the Commercial Rainwater Harvesting Ordinance (CRWHO) and the Tucson Basin Native Plant List.

Living Landscapes is based on the principle that water and vegetation standards work best when updated together. This initiative aligns previously separate efforts, strengthening the CRWHO. The result is a more integrated approach that improves stormwater capture, expands tree canopy and shade, and supports water-efficient, drought-tolerant landscapes suited to the Sonoran Desert.

At the April 7, 2026 Study Session Mayor and Council directed staff to amend the Commercial Rainwater Harvesting Ordinance and associated standards and the Landscape Advisory Committee (LAC) to move forward focusing on a plant palette native to the Tucson Basin and begin the process of amending the *Unified Development Code*, *Technical Standards Manual*, and *Tucson City Code* (Attachment A).

Over the past four months, PDSD has conducted departmental and interagency coordination as well as a stakeholder roundtable. This has resulted in a project summary and draft redlines as shown in Attachment B. The stakeholder roundtable report, including the meeting summary, presentation, and comments are shown in Attachment C.

The proposed redlines represent 10 changes to the City's Code, Unified Development Code, and Technical Standards Manual. The changes represent two central themes related to stormwater runoff and landscaping. Four of the amendments are to the Unified Development Code (UDC) which requires review by the Planning Commission for any amendments. Other proposed changes are also provided for Planning Commission awareness.

Staff Recommendation – Staff recommends the Planning Commission set a Planning Commission Public Hearing for September 16, 2026.

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, as detailed in the associated Technical Standard. Compliance is verified through development plan review and enforced under the City's Water Waste Ordinance.

At the March 22, 2022 Study Session, the Mayor and Council directed staff to evaluate the ordinance's effectiveness and to strengthen plan review and site inspection processes. Staff have since made several operational improvements including: closer coordination among grading, landscape, and rainwater harvesting plan review; enhanced inspection practices and staff training; additional PDSO staff capacity; and improved coordination with Tucson Water during development review and inspection.

Building on that work, at the April 7, 2026 Study Session, the Mayor and Council requested code and standards changes to further strengthen the ordinance. Mayor and Council directed staff to amend the CRWHO, to work with the Landscape Advisory Committee (LAC) on a plant palette native to the Tucson Basin (Attachment A).

The effort has since been rebranded as Living Landscapes, which coordinates current directions with an already underway effort to create residential rainwater harvesting standards. Each phase includes stakeholder outreach to help inform the proposal.

Phase 1 — Commercial Development. Strengthens the existing CRWHO by improving stormwater capture, expanding tree canopy, and clarifying design and inspection standards, and recommends the Tucson Basin Native Plant List to guide water-efficient, drought-tolerant landscaping.

Phase 2 — Residential Development. Staff will return to Mayor and Council with recommendations for residential rainwater harvesting, informed by the parallel Low Impact Development ordinance, along with further updates to the Tucson Basin Native Plant List.

Phase 1 Outreach

On August 12, 2026 stakeholders were invited to participate in a virtual roundtable discussion regarding the Living Landscapes Phase 1 proposal. Approximately 30 community participants attended, representing professional organizations, employers, and individual community interests. Most of those external participants actively engaged in discussion and provided feedback on the proposed amendments. A full report of the roundtable is shown in Attachment C. The feedback is summarized in five themes:

- Plant selection and ecology: Strong support for prioritizing native, low-water species for their wildlife value; caution that some drought-tolerant exotics are naturalizing; discussion of how to distinguish “native” from “near-native.”
- Green stormwater infrastructure and basin design: Requests for precise, consistent standards — minimum curb depth, planting shelf versus basin bottom, grading feasibility in narrow islands, rainwater-harvesting scope, and establishment-period irrigation.
- Tree placement and site constraints: Difficulty fitting low-and-wide native trees into narrow streetscapes, rights-of-way, and small planters; calls to enlarge minimum planter size and address tree-soil volume.
- Utilities, right-of-way: Utility prior rights and offsets in the right-of-way; potential soil import/export cost impacts; City liability and possible FEMA flood-insurance implications.
- Maintenance and long-term care: Emphasis on preventing poor pruning practices; the maintenance burden of denser plantings; pruning standards tied to installation and establishment.

Present Considerations

The Living Landscapes Phase 1 code update package includes 10 specific code amendments divided into two overall themes, some of which are within the Unified Development Code and within the purview of the Planning Commission. The proposed amendments are outlined below, and detailed in Attachment B.

- Depress parking lot tree planting areas 6–9 inches below adjacent paved grade; require curb cuts or openings for runoff to enter planting areas.
- Add reference to standard details as the governing standard for all passive water harvesting features.
- Require planting areas adjacent to hardscape to be recessed and direct water into infiltration areas. Require use of standard details.
- Add preconstruction meeting requirement and inspection checkpoint for depression depth and elevation benchmarks. Add inspection of ROW connection points where applicable.
- Allow green stormwater infrastructure in the public right-of-way and expressly permit capturing of ROW runoff on private property, subject to engineering approval.
- Update plant selection language to reference the City of Tucson Basin Native Plant List (TBNPL).
- Include the Tucson Basin Native Plant List as recommended in commercial rainwater harvesting landscape areas. Add subsections for purpose, relationship to ADWR list, list maintenance, and non-native species policy.
- Require a higher ratio of trees to linear feet of landscape border, with the option to provide some trees as shade to pedestrian areas.
- Rewrite exceptions for certain uses, such as golf courses, to clarify building and parking areas are not exempt.

Plan Tucson Considerations

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. Project Summary and Proposed Amendments
- C. Living Landscapes Phase 1 Stakeholder Roundtable Report