TUCSON MIDDLE HOUSING DEVELOPMENT IN RELATION TO STATE OF ARIZONA HB 2721 - PART TWO

Prepared by Drachman Institute Staff

UNIVERSITY OF ARIZONA
COLLEGE OF ARCHITECTURE PLANNING AND LANDSCAPE ARCHITECTURE
OCTOBER 2025

Drachman Institute
for the Built Environment

At the conclusion of the report, Tucson Middle Housing Development in Relation to State of Arizona HB2721, the Drachman Institute and the staff of the City of Tucson Planning and Development Services Department presented their findings to the Mayor and Council of the City of Tucson.

Mayor and Council directed staff to further study the proposed geographic area the new code regulations would take place and to further define the development regulations with an emphasis on Minimum Lot Size, Building Setbacks, Landscape Requirements, and Access.

Based on existing planning efforts, existing neighborhood boundaries, public outreach meetings, and maps generated by the Drachman Institute during the "Part One" effort, the geographic area for the implementation of "Middle Housing" code was determined by city staff.

The Drachman Institute was then asked to look at the following development regulations more closely:

Dimensional Standards
- Lot Size
- Setbacks
- Density

Site Access
- Pedestrian and Vehicular Access

Landscaping Requirements

Parking Requirements

This report was completed by Bill Mackey, Greg Veitch, and Courtney Crosson of the Drachman Institute, CAPLA, University of Arizona for the staff of the City of Tucson Planning and Development Services Department, namely Daniel Bursuck, Amanda Smith, and Nicholas Martell.

Rincon Heights neighborhood

Blenman Elm neighborhood

Sam Hughes neighborhood

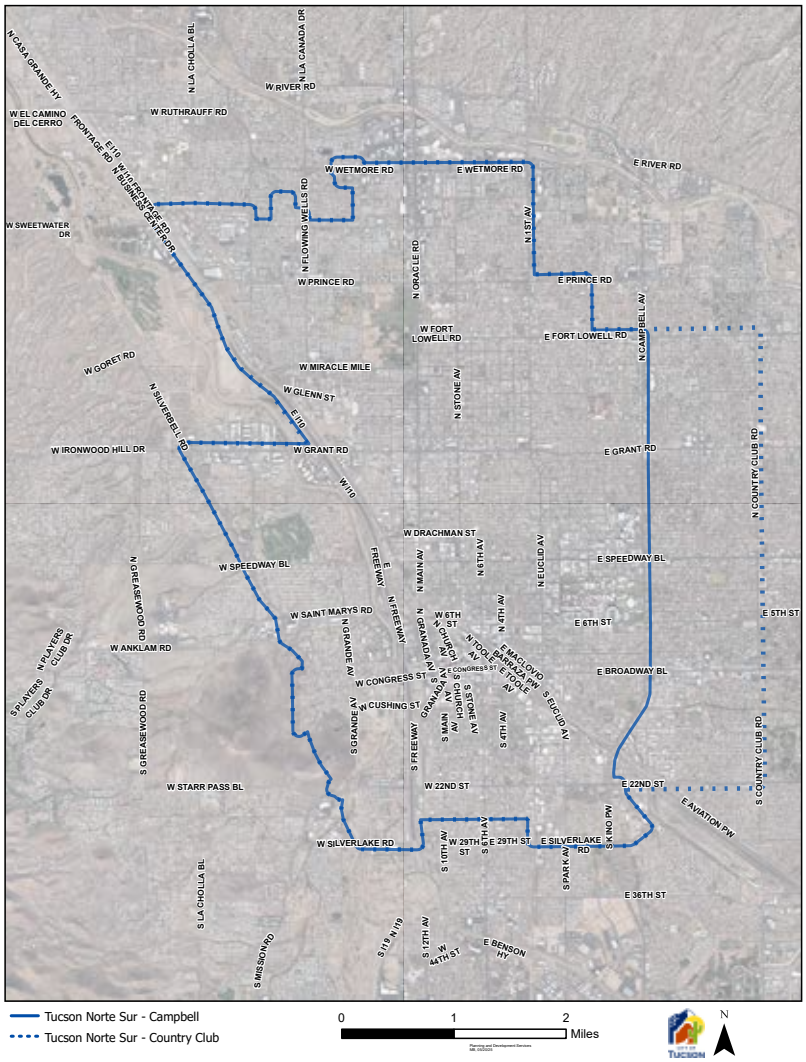
Table of Contents

Geographic Area

Part One identified a variety of geographic areas that could meet the requirements of HB 2721 language - being an area 1 mile from the central business district. Based on these maps, along with current planning developments with the Norte Sur effort, along with existing neighborhood boundaries*, and responding to comments made during public outreach meetings, city staff at PDSD generated the following area for the implementation of middle housing code regulations: generally bound by Silverbell to the west, Wetmore to the north, Country Club to the east, and Silverlake/29th to the south.

*Many of the maps generated with a strict interpretation of the 1 mile distance from the central business district included only portions of neighborhoods - i.e., one map included only the southwest corner of Sam Hughes neighborhood. It was determined to extend the boundary to the neighborhood boundaries if a portion was within the one mile dimension.

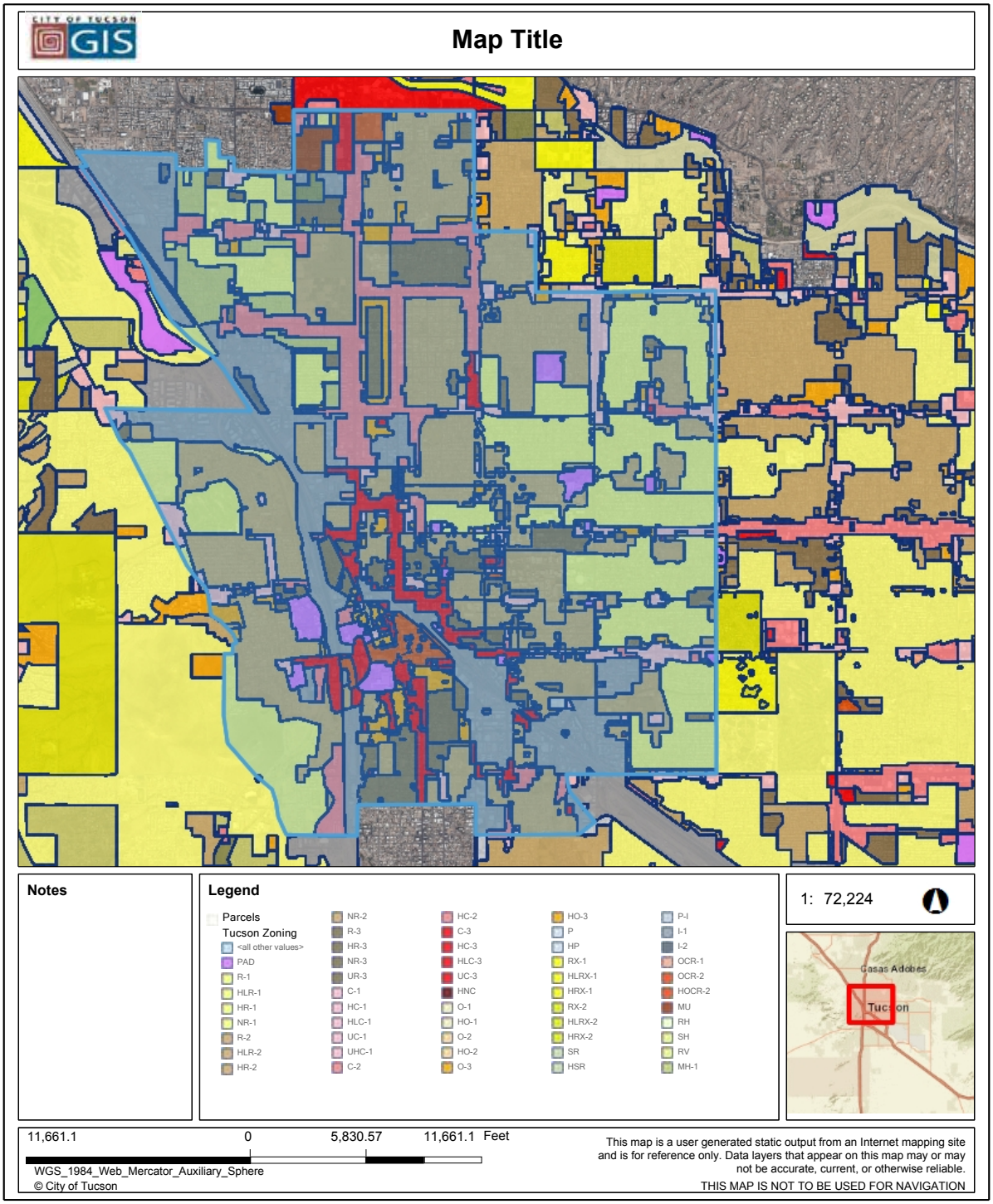
Tucson Norte Sur - Campbell Av and Tucson Norte Sur - Country Club Rd



Proposed Geographic Area for implementation of HB 2721

Zoning

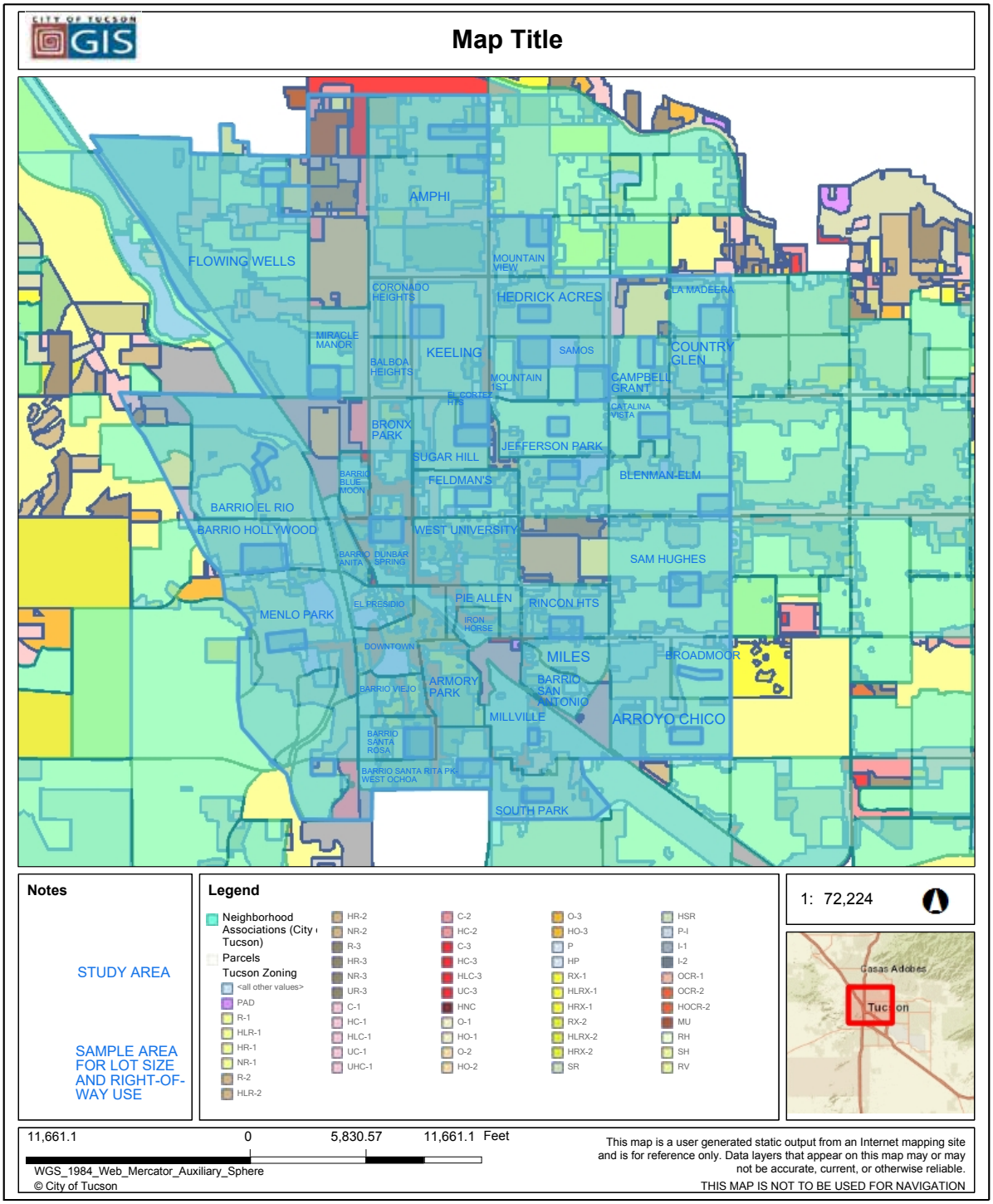
The geographic area represents a typical cross section in terms of zoning for the City of Tucson - single family residential zoning boarded by arterial and collector streets with a mix of commercial and higher density residential zoning. The exception is the downtown area that is comprised of mixed use zoning and local Historic Preservation Zones. Another exception are the few Neighborhood Preservation Zones around the university area. Per Part One, the processes in place for the development of properties in either of these zones (HPZ and NPZ) are not affected by HB 2721.



Zoning for proposed Geographic Area for implementation of HB 2721

Neighborhoods

The map indicates the 43 neighborhoods impacted by the middle housing code amendments. We looked at sample blocks within these neighborhoods to understand typical lot sizes to test our previous work in Part One on the various regulations that determine the buildable area for development.



Neighborhood Boundaries for proposed Geographic Area for implementation of HB 2721

Parcel Sizes

We visually surveyed each neighborhood utilizing aerial imagery and selected a block that appeared to be a typical block in the neighborhood. We then obtained the assessor's plat of that particular block to determine the lot dimensions. The table on the right identifies a typical lot dimension within the specified neighborhood.

We did not take sample sizes from H zoned neighborhoods. H zoned parcels have completely different land use requirements based on context rather than prescriptive numbers.

The parcel sizes vary within the geographic area - but the resulting variety is not atypical for Tucson. Widths vary from 50' to 150' with an average of 60'; depths from 68'(!) to 240' with an average of 135'; areas range from 3,400 square feet to 11,900 square feet with an average of 8,160 square feet.

Size is critical. Our previous studies have indicated while a property may be zoned for "medium residential density," very few properties can achieve that designation. Also, depending on the width, it may be very difficult to achieve 3 or 4 unit developments without demolition or setback reduction processes. All of these lots, with exception of Dunbar Spring, are similar to the lots we studied in Part One.

Note under the current land use code development regulations for density, the average number of units that can be placed on these R-2 properties is 2.

NEIGHBORHOOD	ZONE	WIDTH	DEPTH	AREA	DENS CALC	UNITS
AMPHI	R2	76	136	10336	3.56	3
ARROYO CHICO	R1	50	121	6050		1
EL RIO	R2	50	167	8350	2.88	2
EL RIO	R2	70	170	11900	4.10	4
HOLLY	R2	50	150	7500	2.58	2
SANTA RITA	R2	50	150	7500	2.58	2
HEDRICK ACRES	R2	66	130	8580	2.95	2
KEELING	R2	50	120	6000	2.07	2
		75	120	9000	3.10	3
COUNTRY CLUB GLEN	R1	75	145	10875		2
BLENMAN ELM	R1	60	192	11520		2
BORADMOOR	R1	70	120	8400		1
CAMPBELL GRANT	R1	77	110	8470		1
CATALINA VISTA	R1	75	135	10125		2
DUNBAR SPRINGS	R2	50	80	4000	1.38	1
FELDMANS	R1	47	150	7050		1
FLOWING WELLS	R1	77	105	8085		1
MOUNTAIN VIEW	R2	68	120	8160	2.81	2
NORTH UNIVERSITY	R2	50	150	7500	2.58	2
FAIRVIEW AND THURBER	R1	60	103	6180		1
SANTA CRUZ AND 24TH	R1	42	114	4788		1
RINCON HEIGHTS	R2	50	150	7500	2.58	2
		50	100	5000		1
SAM HUGHES	R1	50	135	6750		1
JEFFERSON PARK	R1	60	150	9000		1
LA MADERA	R1	75	110	8250		1
LIMBERLOST	R2	150	240	36000	12.40	12
		75	150	11250	3.87	3
		75	160	12000	4.13	4
		75	120	9000	3.10	3
MILLVILLE	R2	48	115	5520	1.90	1
		50	68	3400	1.17	1
		50	185	9250	3.19	3
MIRACLE MANOR	R1	50	140	7000		1
MOUNTAIN FIRST	R2	55	126	6930	2.39	2

Typical lot dimensions for proposed Geographic Area for implementation of HB 2721

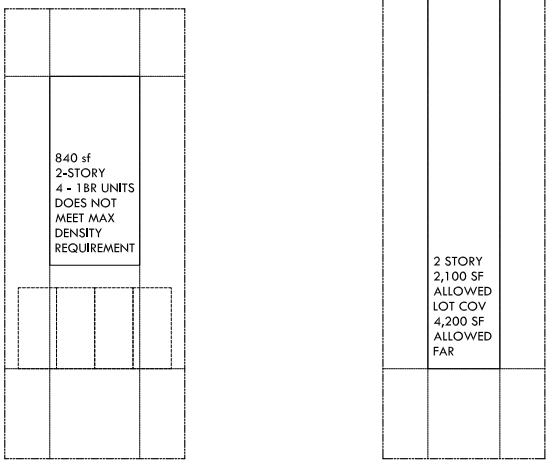
Minimum Lot Size

HB2721 states a jurisdiction shall not discourage the development of middle housing through requirements or actions that make impracticable the siting of middle housing or set restrictions for middle housing that are more restrictive than those for single-family dwellings. Including minimum lot size as a part of the development regulations has the potential to make the design and review of the development more complicated than what is necessary. The City is proposing reducing minimum lot size to add more flexibility, and we support that. But, given the development regulations of number of units per site, setbacks, height, access, and landscaping, is requiring a minimum lot size even necessary?

Recommendations from industry leaders and actual code changes from municipalities throughout the country have a wide range of minimum lot size requirements from 0 to 11,250 square feet.

Portland, Austin, Phoenix include minimum lot widths and minimum lot sizes within their multi-family housing zones. Phoenix adds units per acre, Portland adds maximum floor area ratios, and Austin adds site per number of bedrooms to the mix.

These lead to complicated development procedures and reviews and, when tested, the minimum lot sizes rarely yield anything realistic in terms of housing form or number of units. For example in Phoenix's R-5 OPT zone, which allows a 43.5 units per acre density, the minimum lot size only yields 2 units. And, Portland's minimum lot size, when combined with their minimum lot width, yields a 16' wide building 130' long!



Sample Minimum Lot Sizes per jurisdiction codes yield unrealistic or inconsistent results with actual intention of zone

Pima County has veered away utilizing minimum lot size in regulating development for multi-housing projects. They prefer to handle everything through the setbacks, height, and average site area per dwelling unit (similar to Tucson's density calculation).

The geographic area for this study is more or less built out. More than likely, no new subdivisions will be made. The most likely scenario where minimum lot size would be utilized is in a lot split process. This could happen on some large R-2 or R-3 sites or on the typical residential sites of 50' x 150'. If a typical R-2 site were to be split, it may be beneficial to look at minimum lots sizes in relation to existing average lot square footages - for instance, a typical lot of 7,500 square feet divided in half yields two 3,750 square feet lots or divided in three yields three 2,500 square feet lots. Maybe those should guide the minimum lot size numbers?

There are some concerns about subdivision processes being arduous for anything at 4 or more lots. This will be alleviated with approved legislation making the approval of a subdivision administrative rather than through a public process with Mayor and Council.

Using ADOH standard square footages for unit sizes, it is possible to develop 1,500 sf lot sizes with 4 units. Does this become an exercise in determining the minimum size of a lot for the maximum number of units? Is it an issue of allowing a developer or owner to split a lot and rendering one of the lots undevelopable due to a small lot size? C-zone parcels in the City of Tucson have no minimum lot size – they can be 0.

Without a minimum lot size, the challenge for the developer, and the city, is to determine what is appropriate for a 1, 2, 3, or 4 unit development given the other development requirements. Adding minimum lot size to the mix is superfluous and could hamper the creativity of the development.

MINIMUM LOT SIZE, SQUARE FEET FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY

PHOENIX	2000 - 2500
PORTLAND	1500 - 4200
AUSTIN	8000
PIMA COUNTY	NA (0)
ALBUQUERQUE	5000
DENVER	3000
TUCSON	5,000

Minimum Lot Sizes elsewhere and Tucson

Many cities are opting for this approach. According to Patrick Sisson, writing for the New York Times, from 2023 to 2024, 96 laws were passed to help increase housing production . . . the zoning changes get rid of minimum lot sizes and parking requirements that housing advocates and developers say have made it nearly impossible to build "the missing middle."

There is much discussion about this because of ownership. Mayor and Council have discussed a need for increasing home ownership and citizens - especially the younger generation entering the workforce - have expressed a concern about never being able to obtain ownership of real property. A question during this study is how can we leverage this house bill to increase ownership possibilities?

Another issue are undevelopable vacant lots - lots that are zoned R-1 or R-2 and are below the 5,000 square foot minimum lot size requirement. City staff is suggesting to reduce the minimum lot size by 1,000 square feet which will allow a large number of these lots to meet lot size requirements. We suggest, per above, reducing the lot size to a divisible number related to

actual lot size areas. This will still achieve getting vacant lots off the nonconforming list and simultaneously allow the lots to be developed so all lots from a split can be conforming.

Minimum lot sizes at the number of "0" may be too much for many in the community. Many neighborhoods surrounding the university have felt extreme pressure from student housing development. There is a fear that if minimum lot size is reduced to nothing, there may be consequences not yet imaginable. So, we have developed a few scenarios from safe to extreme in regards to minimum lot size.

The following 3 pages offer a few different scenarios:

Page 11 offers a comparison between:
- No Change to Lot Size
- Minimal Change to Lot Size
- Remove Minimum Lot Size

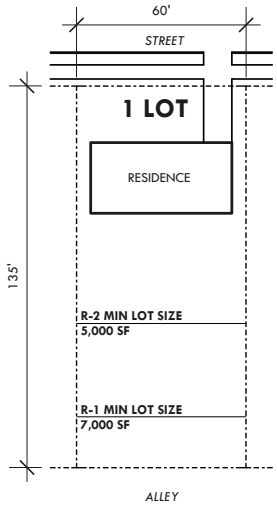
with commentary on the resulting plans.

Page 12 offers the variety of development that could happen with no minimum lot size.

Page 13 offers scenarios on "how low can you go" with property sizes given Arizona Department of Housing standard unit sizes.

OPTION 1: NO CHANGE TO MINIMUM LOT SIZE

MEDIAN LOT IN STUDY AREA:
60' X 135' (8,100 SQUARE FEET)



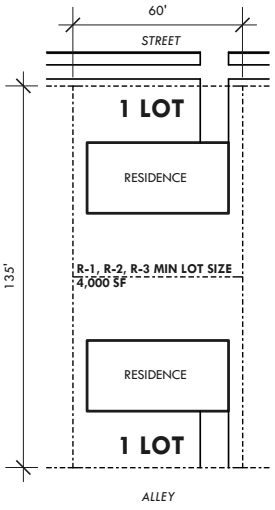
R-1 MIN LOT SIZE: 7,000 SF
R-2 MIN LOT SIZE: 5,000 SF
MEDIAN LOT SIZE IN STUDY AREA: 8,100 SF

MEDIAN LOT IN STUDY AREA CANNOT BE SPLIT

NO SUBSTANTIAL INCREASE IN LOT OWNERSHIP POTENTIAL WITHIN STUDY AREA

OPTION 2: SMALL CHANGE TO MINIMUM LOT SIZE

MEDIAN LOT IN STUDY AREA:
60' X 135' (8,100 SQUARE FEET)



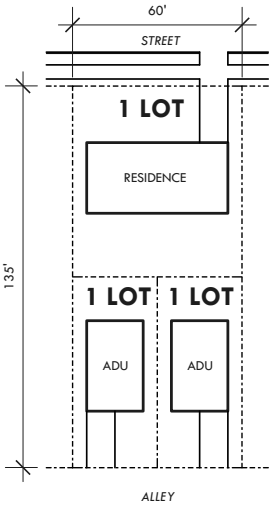
PROPOSED R-1 MIN LOT SIZE: 4,000 SF
PROPOSED R-2 MIN LOT SIZE: 4,000 SF
PROPOSED R-3 MIN LOT SIZE: 4,000 SF
MEDIAN LOT SIZE IN STUDY AREA: 8,100 SF

MEDIAN LOT IN STUDY AREA CAN BE SPLIT INTO TWO LOTS, REGARDLESS OF R-1, R-2, OR R-3

200% INCREASE IN LOT OWNERSHIP POTENTIAL WITHIN STUDY AREA

OPTION 3: REMOVE MINIMUM LOT SIZE

MEDIAN LOT IN STUDY AREA:
60' X 135' (8,100 SQUARE FEET)



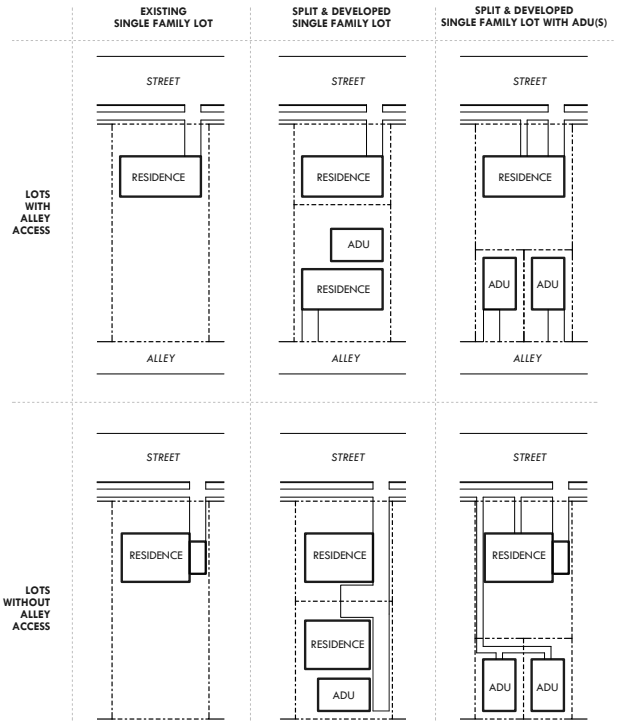
PROPOSED R-1, R-2, R-3 MIN LOT SIZE: 0 SF
MEDIAN LOT SIZE IN STUDY AREA: 8,100 SF

MEDIAN LOT IN STUDY AREA CAN BE SPLIT AS MANY LOTS AS DEVELOPMENT STANDARDS ALLOWS. THESE STANDARDS INCLUDE SETBACKS, BUILDING HEIGHTS, ACCESS, LANDSCAPING, AND LOT COVERAGE.

SUBSTANTIAL INCREASE IN POTENTIAL FOR ADU OWNERSHIP, INCREASED DEVELOPMENT FLEXIBILITY, WHILE STILL ABINDING BY ALL REGULATIONS SET FORTH UNDER DEVELOPMENT STANDARDS.

ZERO SQUARE FOOT MINIMUM LOT SIZE DEVELOPMENT

ALL DEVELOPMENTS ABIDE BY CITY OF TUCSON DEVELOPMENT STANDARDS FOR MIDDLE HOUSING



LOT SIZES

ALL LOTS HAVE ALLEY OR STREET ACCESS

EXISTING SINGLE FAMILY LOT SIZE: 8,100 SF (AVERAGE IN STUDY AREA)

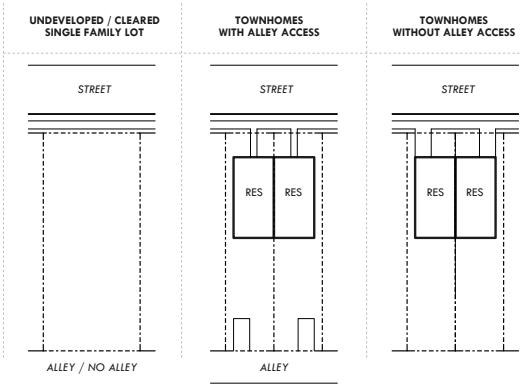
LOT SIZES AFTER SPLIT:

RESIDENCE	3,000 SF
	3,720 SF
	4,380 SF
	4,680 SF
	5,100 SF
ADU	1,500 SF
	1,710 SF
TOWNHOME	4,050 SF

STRUCTURE SIZES

ALL STRUCTURES ARE ONE FLOOR IN HEIGHT

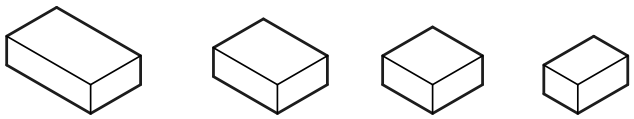
RESIDENCE	1,250 SF
ADU	650 SF
TOWNHOME	1,250 SF



MINIMUM LOT SIZES PER ARIZONA DEPARTMENT OF HOUSING MINUMUM UNIT SIZES

ALL DEVELOPMENTS ABIDE BY CITY OF TUCSON DEVELOPMENT STANDARDS FOR MIDDLE HOUSING AND INCLUDE ONE ON-SITE PARKING SPACE PER RESIDENCE

ADOH MINIMUM UNIT SIZES



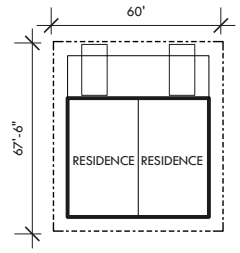
3 BEDROOM
1,050 SQUARE FEET

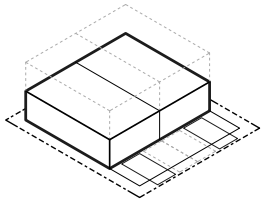
2 BEDROOM
800 SQUARE FEET

1 BEDROOM
575 SQUARE FEET

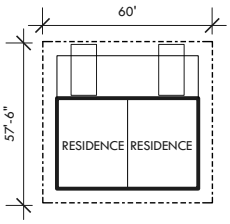
STUDIO
380 SQUARE FEET

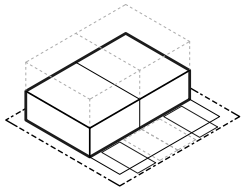
(2 OR 4) THREE BEDROOM UNITS
4,020 SF LOT



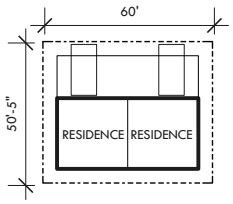


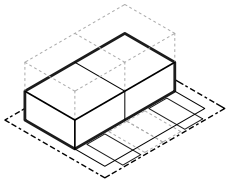
(2 OR 4) TWO BEDROOM UNITS
3,420 SF LOT



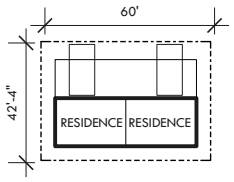


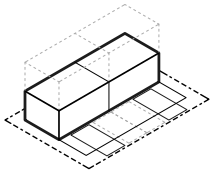
(2 OR 4) ONE BEDROOM UNITS
3,000 SF LOT





(2 OR 4) STUDIO UNITS
2,520 SF LOT





Density

Density has been predetermined by the state. All properties shall be allowed to have 4 units on them.

But, here is where density and minimum lot size are related and how the current development regulations can influence if a site can be developed or not. If a particular property does not meet the current minimum lot size in the current code, for example, an existing vacant lot zoned R-1 or R-2 below 5,000 square feet, it cannot be developed; 0 units.

Currently, the City of Tucson allows 1 unit per 5,000 square feet for a maximum of 2 units in the R-1 zone. It allows 1 unit per 2,904 square feet in the R-2 zone.

For R-2 properties that are large enough to allow more than 4 units per current UDC density calculations, then the developer shall follow the current UDC regulations for 5+ units.

Further study is required to research the nuances between lot size and density, as well as introducing other means to calculate buildable area on a property, such as Floor Area Ratio.

DENSITY FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY

PHOENIX	1 UNIT PER 1000sf
PORTLAND	FLOOR AREA RATIO VARIES PER NUMBER OF UNITS (FOR EXAMPLE, ONE CAN BUILD 4 UNITS TOTALING 4,200sf ON A 6000sf LOT)
AUSTIN	3 UNITS PER 5,750sf IN SFH ZONES SQUARE FOOTAGE / BEDROOM RATIO IN MULTIFAMILY ZONES
PIMA COUNTY	1 UNIT PER 2000sf
TUCSON	2,904

Density allocations for sample jurisdictions and Tucson.

Setbacks

Historic Setbacks

If one reviews the historic development patterns of Tucson – or any city in the United States – one sees an increase in the distance between the building and the property lines. Do we just not like our neighbors? Why did this happen? Was it the automobile? The increase of domestic use in devices with amplified sound?

Tucson neighborhoods developed before the post-World War II housing boom have setbacks between 0' and 10' from side property lines. The majority are somewhere between 3' and 8'. Much of the existing built environment in these neighborhoods would need to either go through a variance or a "Design Development Option" process if they were built with today's regulations. Many additions to the original structures in these neighborhoods require the variance or DDO process or some other workaround developers and city staff have figured out through years of looking at these projects. By-right development changed and we are not sure if it is for the better. To be clear, a house in Sam Hughes, meeting the 6'6 average setback, would be required to be 9'10 tall. Most houses in Sam Hughes are taller than 9'10.

Many of these historic (Local, National, or undesignated) neighborhoods are desired specifically because of the built environment – bungalow houses with porches and small front yards and houses close together.

Sam Hughes Neighborhood, average distance between buildings = 13'0

La Madera Neighborhood, average distance between buildings = 19'0

We looked at the distance between adjacent structures and the distance between structures and the curb in blocks in the sample neighborhoods of the geographic area and found the following:

1. Each neighborhood – and even each block – has its own unique pattern of distances between adjacent structures and distance between structures and curbs.

2. On average, the distances between adjacent structures were 13' to 19'. This translates to a setback from property line of 6'6 to 9'6.

3. On average, the distance between structures and the curb was 33' to 49'. This translates to a setback from the property line of 20' to 37' (assuming a 12' distance between the property line and the curb/road).

Rear setbacks are a conundrum. The back yard has historically been a private space for the single-family residence. This pattern is apparent in historical and contemporary developments. Even current standards for multi-family housing developments have a larger number for the back yard setback than the side yard setback. Maybe this is just a cultural carryover? Is it arbitrary? The City of Tucson makes no such distinction in their current land use code. Setbacks are the same for side as rear. The difference is the type of development the proposed development is and what it is adjacent to (residential or non-residential).

SIDE YARD SETBACKS EXISTING - STUDY AREA NUMBER INDICATED IS HALF THE DISTANCE BETWEEN BUILDINGS

NEIGHBORHOOD	AVE	MEDIAN
SAM HUGHES	6'6	6'6
FELDMAN'S	6'9	5'7
MENLO	7'0	6'7
HOLLYWOOD	6'9	6'6
DUNBAR	5'6	5'7
EL RIO	6'7	5'7
SUGAR HILL	9'1	10'
BROADMOOR	6'3	5'10
ARROYO CHICO	5'6	5'
BLENMAN ELM	8'0	7'6
CATALINA VISTA	8'0	6'6
COUNTRY GLEN	8'0	7'3
LA MADERA	9'6	9'4
CAMPBELL GRANT	7'8	6'9
RINCON HEIGHTS	8'9	8'5

Average and Median side yard setbacks in sample neighborhoods of the proposed Geographic Area

Front Yard Setbacks

Generally, front yard setbacks are consistent among the neighborhoods studied. A 20' setback is the norm and has been for a long time in Tucson - probably since the advent of the private use automobile - it is about the space you need to park your car in front of your house. Per our previous investigation, a 15' front yard setback is advantageous for allowing more flexible designs and does not seem to altar the existing landscape too much.

One method that is not difficult to oversee is a contextual response; simply draw a line from one adjacent property to another and don't build past it.

Building Code Setbacks

If a building is 5' from a property line for residential projects (single-family home or a duplex), the wall of the building does not have to be fire protected and is allowed to have as many openings as possible within the wall. If a building is 3' from the property line, the wall of the building shall be 1-hour fire protected and 25% of the wall can have openings. Anything less than 3' requires no openings.
For multi-family projects (anything above 2 units), assuming the construction is the least restrictive construction type, walls with a fire separation of 5' or more do not need to have a fire-resistance rating. City staff is recommending utilizing the residential code for 4 units or less; this seems appropriate.

FRONT YARD SETBACKS EXISTING - STUDY AREA NUMBER INDICATED IS TO THE CURB OR STREET. ASSUME PROPERTY LINE IS 15' OR 12' FROM CURB.

NEIGHBORHOOD	AVE	MEDIAN
SAM HUGHES	49'2	50'0
FELDMAN'S	32'6	34'1
MENLO	37'6	37'9
HOLLYWOOD	35'8	36'0
DUNBAR	26'9	30'2
EL RIO	40'0	35'6
SUGAR HILL	37'10	37'0
BROADMOOR	37'0	39'5
ARROYO CHICO	38'2	39'10
BLENMAN ELM	48'7	49'2
CATALINA VISTA	39'11	40'4
COUNTRY GLEN	37'4	37'2
LA MADERA	40'0	38'0
CAMPBELL GRANT	32'8	34'6
RINCON HEIGHTS	43'11	42'2

Average and Median front yard setbacks in sample neighborhoods of the proposed Geographic Area

Precedent

Other communities (Phoenix, Austin, Portland, Salt Lake City, Pima County, Puget Sound Region) have the following ranges of setbacks.

Front:	10' to 25'
Rear:	5' to 20'
Side:	5' to 10'

Opticos has concerns about the development of sites having too much depth and suggests a setback of a percentage of the depth of the lot. We are not sure of the issue with having a development having too much depth – especially when considering the majority of sites in the determined area have a maximum depth of 150'.

The Puget Sound Region includes setbacks not just at the perimeter of the site, but between the various development components – pedestrian walkways, other buildings, and parking areas. It also requires a 12' open space to the back of the site from the front street view.

SIDE YARD SETBACKS FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY

PHOENIX	10'
PORTLAND	5' - 10'
AUSTIN	5'
SLC	20% DEPTH
PIMA CTY	10'
PUGET SOUND	10'
ALBUQUERQUE	5'
FLAGSTAFF	CONTEXTUAL
YUMA	7'
DENVER	5'
BUILDING CODE	5'
TUCSON	10' OR 0.75*HEIGHT

FRONT YARD SETBACKS FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY

PHOENIX	20'
PORTLAND	10'-20'
AUSTIN	15'-25'
SLC	25'
PIMA CTY	20'
PUGET SND	15'
ALBQ	15'
FLAGSTAFF	CONTEXTUAL
YUMA	20'
DENVER	CONTEXTUAL
TUCSON	20'

Setbacks from other jurisdictions and Tucson

Testing on Actual Sites

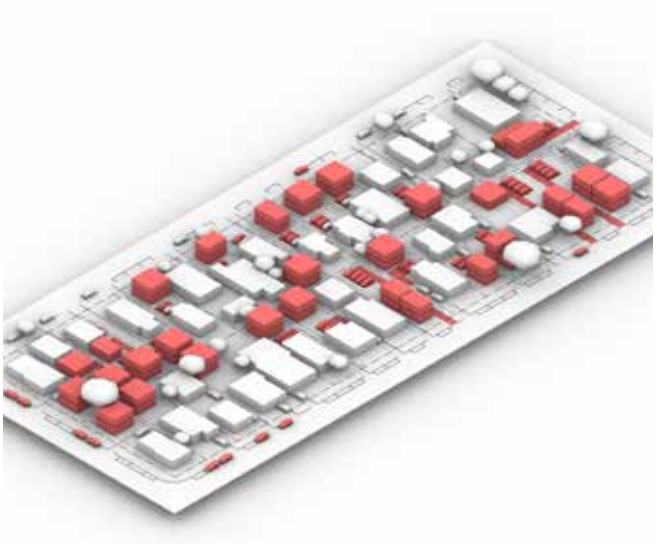
Per our previous report, utilizing the existing setbacks for single-family residential development hinders any multi-family development on existing sites in the determined area. It reduces the number of 1-story units possible and it reduces the quality of space between buildings.

Conclusion

One of the main questions regarding setbacks is should it be a prescribed number or be based on context.

Context is always important. The H zone properties use "development zones" to set the precedent for setbacks and building heights. Developers are required to understand the setbacks within the block of the development and use those as a guideline for their development. In a town north of Chicago, the front yard setback is determined by drawing a line from one adjacent property to the other. Whatever development occurs between these two properties, it cannot cross this line. This is what architecture schools teach their students – prescribed zoning laws are less important to learn, and actual site analysis of context should determine the built form of any development. But, would using the context of a single-family development be appropriate for the potential of fourplex multi-family development? If the results of HB2721 are maximized, we will have a very different landscape on our hands – one that is no longer single-family residential.

If we were looking at a hard number, based on our testing and precedent in other communities, as well as the setbacks determined in the CCT (which has the same goals as HB2721), 5' at the side and back is appropriate.
When looking at the context, a 5' setback is less than the existing conditions, but not far off. As previously stated in our earlier report, it allows for the most flexibility to create quality architecture and quality outdoor space – one that allows vegetation to grow and respects the privacy of others.



BARRIO HOLLYWOOD
5' SIDE YARD SETBACK
PARKING ON OR OFF SITE

PER THE STUDY COMPLETED IN
THE SPRING OF 2025, THE 5' YARD
SETBACK ALLOWED FOR
MORE FLEXIBILITY
QUALITY OUTDOOR SPACE
GREATER PRIVACY MITIGATION

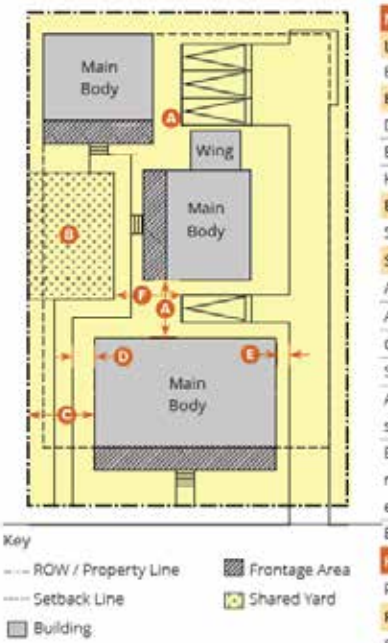
Design exercise from Part One investigating impact of HB 2721 on actual sites

Site Access

The City of Tucson requires an accessible path to the front door of residential properties. It has guidelines stating the path should be a particular width and be of an approved material.

Adding aesthetics as a quality of the built environment, the Puget Sound development standards for middle housing consider access as an integral part of the design - it should be considered as part of the view into the site and it should be considered in relation to other objects such as cars, drives, and buildings. City of Tucson looks at site access from a purely practical point of view. It identifies dimensions and materials for vehicular access and front door access.

Figure 2.030.1 Multiple Buildings on a Site



Multiple Buildings		
Lot Coverage (Max.)		
Building Footprints[1]	60%	
Building Size (Max.)		
Detached House	25' x 25', 1.5 stories	
Buildings with 2 > Units	48' x 48'	
Height	as allowed by Overlay Zone	
Building Separation		
Space Between Buildings	10' min. (clear)	A
Shared Yard		
Area (up to 5 buildings)	20' x 30' min. clear	B
Area (6 or more buildings)	20% of the lot min.; 20' min. dimension	
Opening to Front or Side Street	12' min. clear	C
Shared yard required behind front setback, 30' min., from the rear lot line.		
All buildings not fronting a street must front the required shared yard space or the pedestrian path between the shared space and the building.		
Buildings fronting shared yard space must take primary access from the required shared yard and include a frontage type for each building/unit entry.		
Encroachments into the required shared yard space are not allowed.		
Pedestrian Access		
Pedestrian Path Setbacks	5' min	D
Frontage Area per Building		
8' area min., required for full length of main body façade(s) within 10' of a pedestrian path or shared yard space. At least 2/3 of the overall building (including wings) must abut the shared yard space.		
Vehicle Access and Parking		
Distance from Buildings	5' min.	E
Setback from Shared Yard	15' min.	F
Parking and vehicular access are not allowed to encroach into the required shared yard.		
Driveway and parking location shall comply with standards in Table 2.030.A: Overlay Zone Standards.		

[1] Building footprint only; does not include Frontages (Porches, Dooryards, Stoops)

from Traditional Neighborhood Design: Middle Housing Toolkit Objective Development + Design Standards, Puget Sound Region, Basic Standards

Landscaping

Precedent – Communities are starting to require a square footage of landscape area or open space based on a percentage of the lot size or number of dwelling units. They are also requiring a tree per every feet of lot frontage. Landscape yards and trees per lineal feet are required by the City of Tucson for any development over 3 dwelling units. Furthermore, irrigation and water harvesting systems are required.

The saying goes, if you have a piece of ugly architecture, throw some ivy on it. Landscaped, vegetated areas make us healthier and more sane. There should be a requirement for a street frontage landscape area similar to other commercial properties – 10' wide with trees every 33' - but allow the developer/owner to place this anywhere within the front yard area.

It would be beneficial to everyone if the requirements, installation, and maintenance of the landscape area could be done with as much ease as possible. The existing landscape code is difficult to interpret and expensive to implement for the average homeowner.

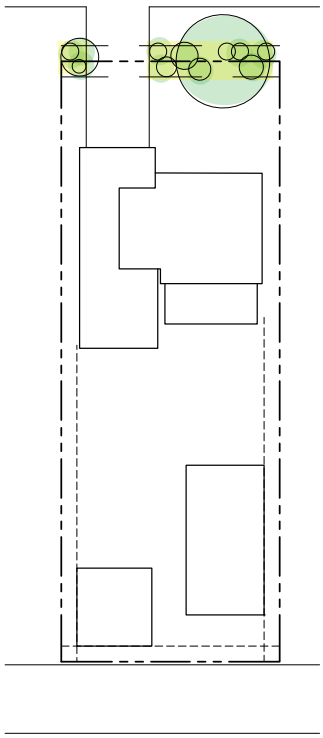
The city could devise a formula that states a landscape area should be X depressed, with X number of shrubs (from a list of approved material) in X square feet, and X number of trees (from a list of approved material) in X square feet.

LANDSCAPING REGULATIONS FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY

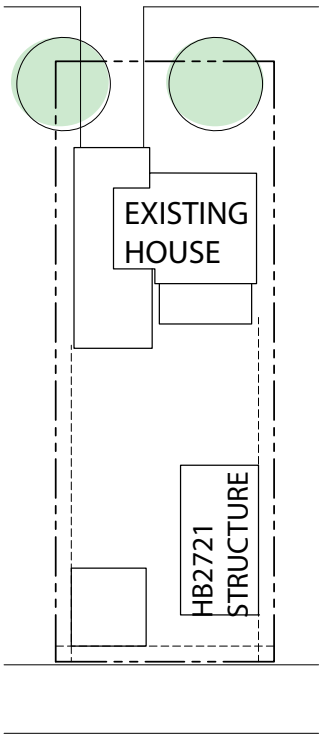
PORTLAND	40% SITE AREA 1 LARGE TREE PER 1000 SF 1 MEDIUM TREE PER 500 SF 1 SMALL TREE PER 300 SF
PUGET SOUND	20X30 SHARED YARD 20% OF LOT 20' MIN DIMENSION 12' OPENING FROM STREET
MISSOULA	35% OF LOT
SILVERTON, OR	1000 SF YARD 2? PER 1000 SF 1 TREE PER 1000 SF FRONT YARD
ADELANTO, CA	1 TREE 6 SHRUBS PER 30 LF FRONTAGE
PEORIA, AZ	1 TREE 3 SHRUBS PER 25 LF FRONTAGE
TUCSON BUFFERYARD	3+ UNITS: 10' 1 TREE PER 33 LF OF FRONTAGE 50% SHRUBS
HB2721	NA

Landscaping regulations from other jurisdictions and Tucson

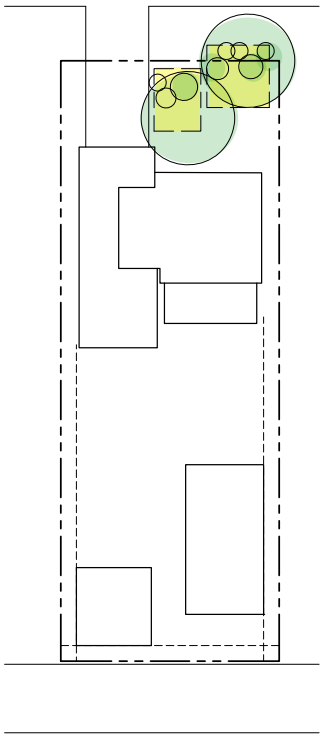
TYPICAL TUCSON LOT
EXISTING REG'S

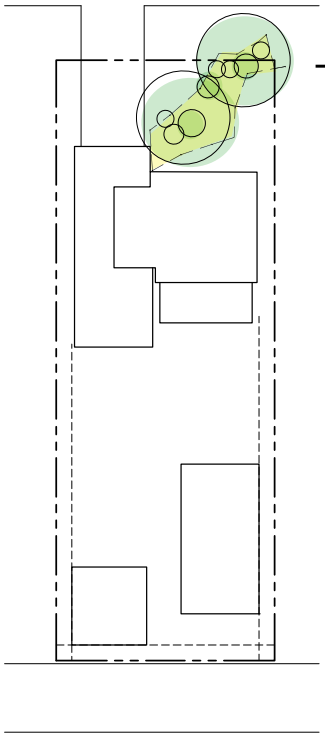


TYPICAL TUCSON LOT
TREE PER SF



TYPICAL TUCSON LOT





TYPICAL TUCSON LOT
EXISTING REG'S
TO CALCULATE
SQUARE FOOTAGE OF
REQUIRED LANDSCAPE
AREA AND NUMBER
OF TREES, BUT ALLOW
IT TO BE PLACED
ANYWHERE WITHIN
THE FRONT YARD

Potential landscaping requirements and design on a typical lot

Parking

HB 2721 requires the parking count to be a minimum of 1 parking space per 1 unit. Given the discussions that have occurred at the community meetings regarding HB 2721, it seems worthwhile to digress a bit with the issue of parking.

There seems to be a general trend to regulate parking differently than the way it has been done for the past 50 years. Communities are either reducing the ratios of cars to unit, not requiring any parking minimums, requiring different minimums based on the location of the property in relation to transit, or even requiring a maximum number of parking spaces per unit.

In a recent study in the Journal of the APA, the authors found that by decreasing the minimum parking requirements, a community saw lower development costs, increased density, and increased municipal revenue. (https://www.planning.org/blog/9294686/deregulating-parking/)

Another study found that allowing for fully flexible parking could lead to more new homes – more than other land use reforms combined, resulting in two to three times as many homes as legalizing granny flats (ADUs) or larger multi-family buildings near transit, and projects become more financially feasible. (https://www.sightline.org/2024/12/10/parking-reform-alone-can-boost-homebuilding-by-40-to-70-percent/)

There are probably hundreds, if not thousands, of examples out there stating on-site parking requirements should either be reduced or removed. Marana, Portland, Austin, etc., no longer have parking requirements. Shoup, et. al., have always stated the ratios were never scientifically determined – just good guesses. For a recent multifamily housing project in Tucson, the individual parking plan identified 4 different ways to determine parking - from another city, from the U.S. Census Micro Sample of the area, from the Institute of Transportation Engineers, and from the City of Tucson. The count ranged from 90 required spaces to 255 required spaces.

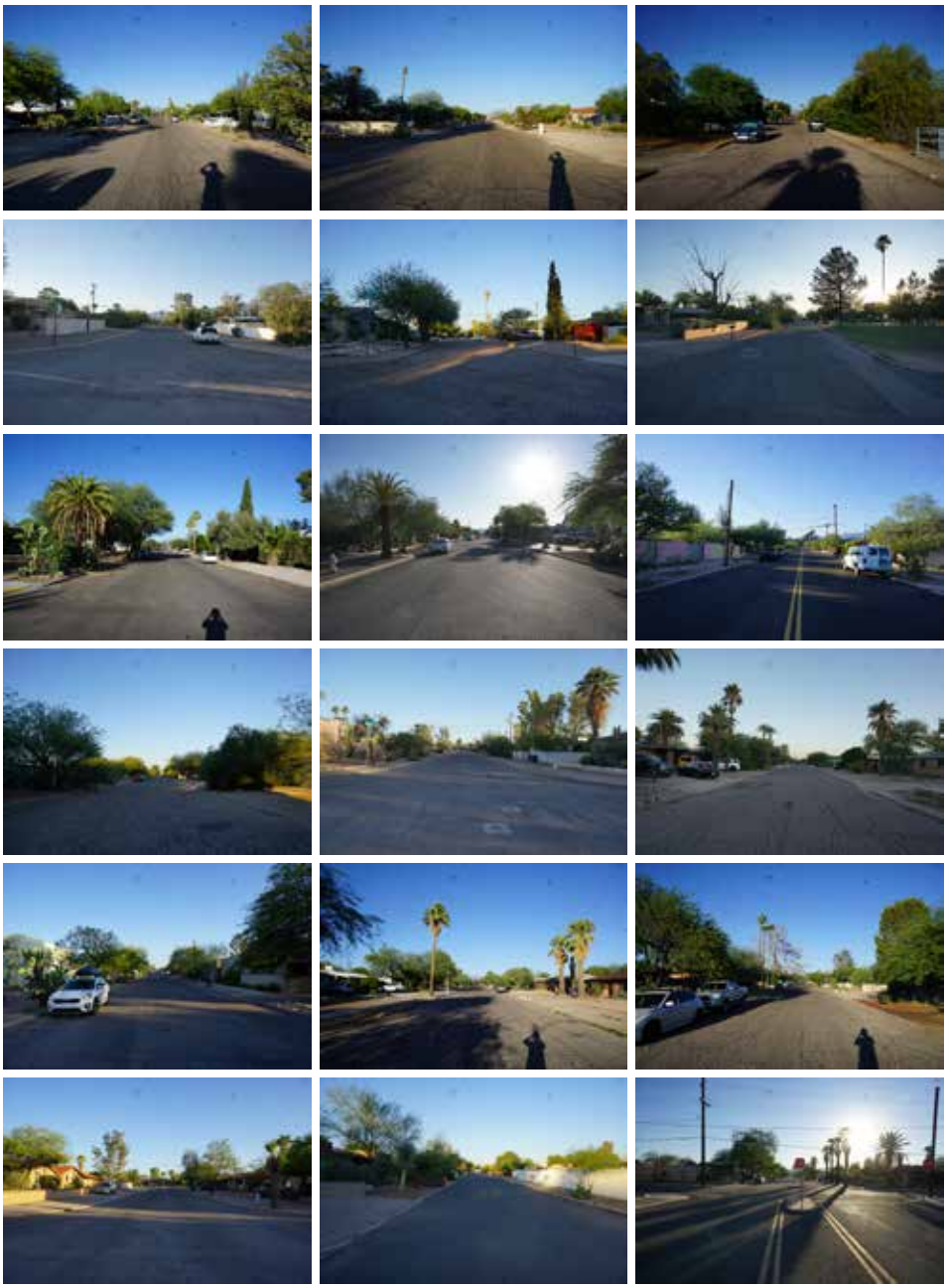
Do you determine the number of cars per household within a certain census tract, or do you let the market decide? Many are veering toward the market approach.

Based on personal experience with developer-driven projects of various scales of housing, we can attest providing parking on-site is always a preference. We have not come across someone who does not want parking; it doesn't sell with most properties. But we are always confronted with the required number of parking spaces being too much, and this mostly has to do with the large percentage of the site it requires to park the number of cars required. Developers are looking for a balance between too much and too little parking and making informed decisions based on their and other data.

In any given scenario, a 4-unit complex with 3 bedrooms each could have 0 to 12 or more parking spaces. This number could change from month to month or year to year depending on how the property is managed. That is a range of 0 square feet to more than 4,200 square feet. With the City of Tucson, one can choose to provide "proof" of the required parking for a particular site with a particular use through the use of an Individual Parking Plan. Marana requires developers to use this on all of their projects (in a less detailed manner). Applicants can provide information on existing alternative transportation systems, data on parking ratios currently used by other cities/think tanks/transportation engineers, and information on the immediate neighborhood and available parking. Context becomes very important in these studies. Even in the neighborhood with the most

controversy regarding parking in Tucson, Armory Park, a contextual study reveals there are an exorbitant amount of available parking spaces in the right-of-way. Our investigation of the blocks in the neighborhoods of the geographic area for this study found the right-of-way was extremely underutilized. Why not let that be used?

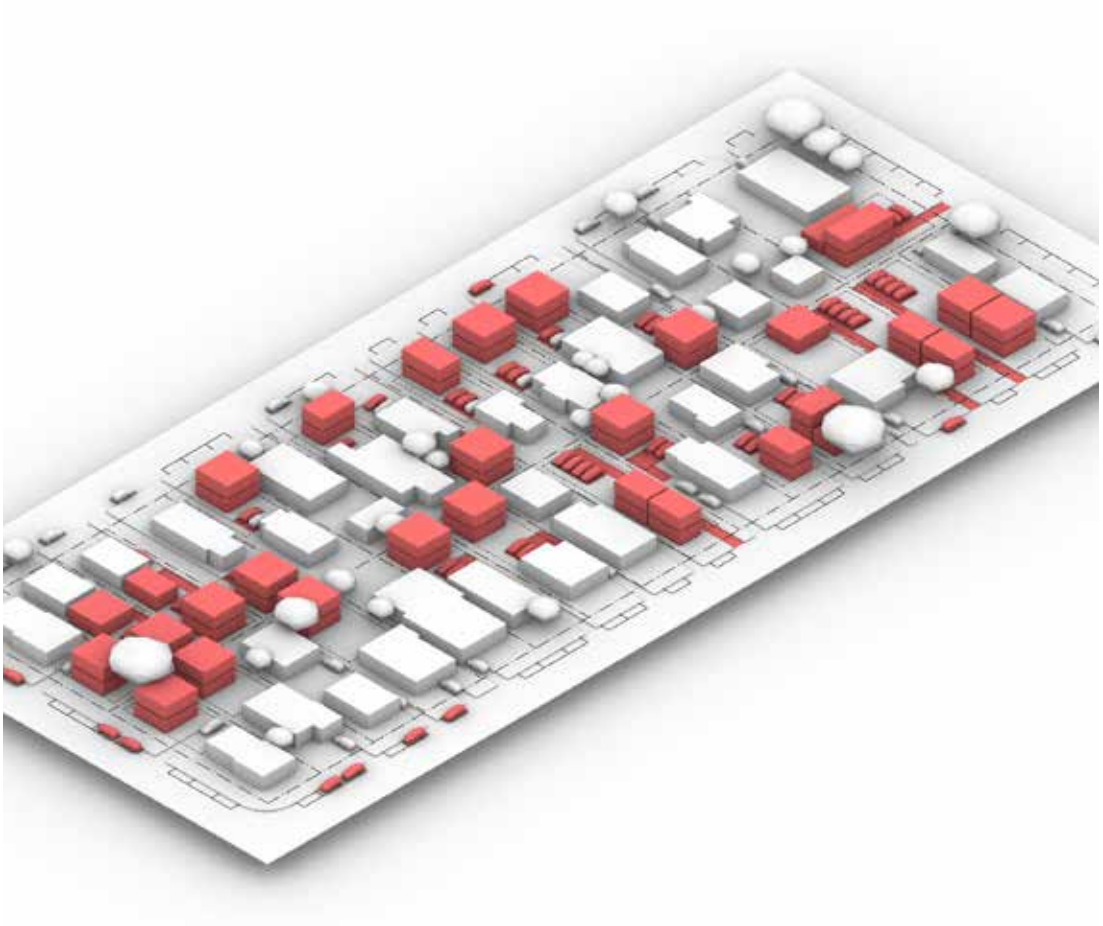
We know there are discrete areas where the right-of-way may not be as underutilized as others. Requiring a developer to provide a Parking Statement that documents the context and rationalizes the number of vehicles required for a development is an option for projects of 1 to 4 units.



Right-of-way samples from neighbohoods in the proposed Geographic Area
Photos taken between 6pm and 7pm on a weekday

The city currently allows use of the right-of-way directly in front of the subject property for a percentage of the parking for certain projects. Continue this and expand it to the block.

In our Part One study, we did find utilizing the right-of-way led to more flexible designs, allowed for more space between buildings, resulting in more desirable green space.



BARRIO HOLLYWOOD
UTILIZATION OF STREET FOR PARKING

PER THE STUDY COMPLETED IN THE SPRING OF 2025, UTILIZING THE STREET FOR PARKING ALLOWED FOR:

MORE FLEXIBILITY
QUALITY OUTDOOR SPACE
GREATER PRIVACY MITIGATION

PRECEDENT

As stated earlier, other communities are beginning to reduce parking requirements. Portland is actually regulating the maximum number of vehicles that can be parked on a site.

ON SITE PARKING REGULATIONS FOR MULTI-FAMILY HOUSING, MEDIUM DENSITY, PER UNIT

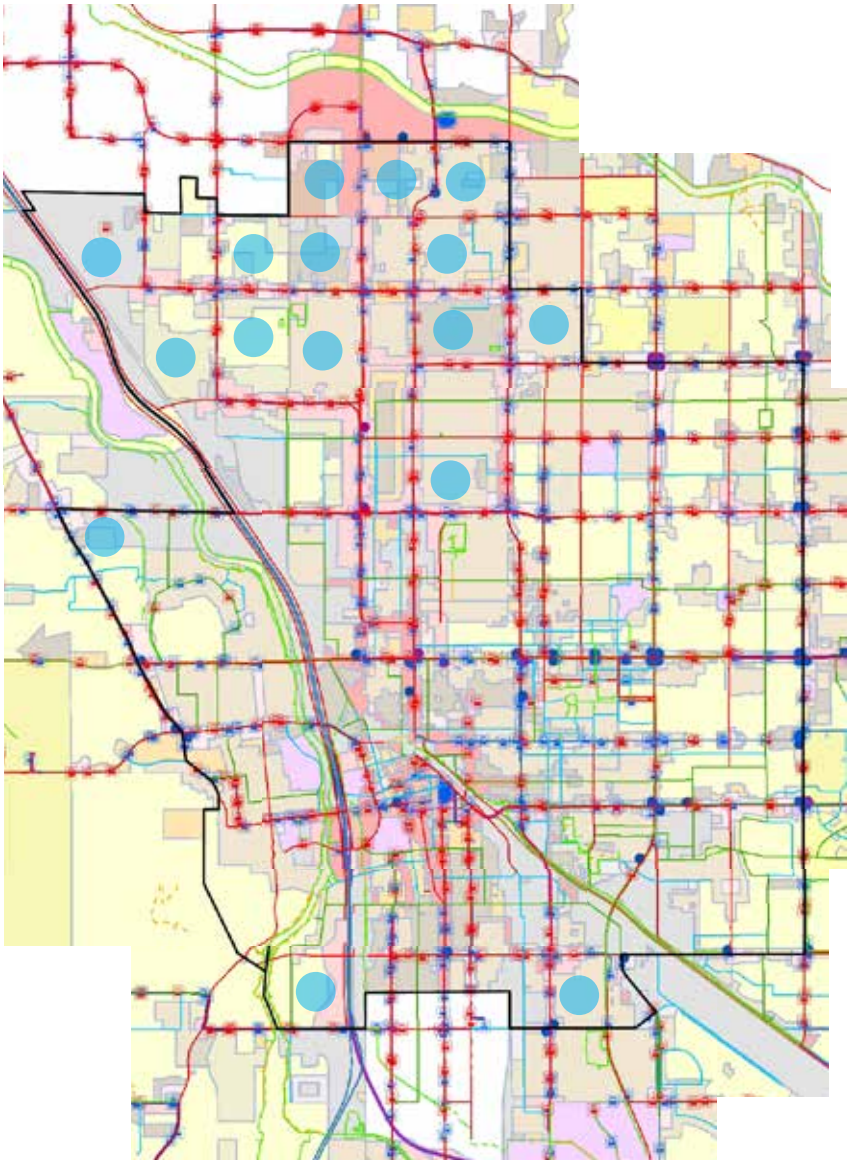
PHOENIX	1.5	
PORTLAND	0	
AUSTIN	0	
SLC	1	1BR
	1.5	2BR
	0	TRANSIT
PUGET SOUND	1	
ALBUQUERQUE	1.0	STUDIO
	1.2	1BR
	1.6	2BR
	1.8	3BR
FLAGSTAFF	1.25	STUDIO
	1.5	1BR
	2	2-3BR
	2.5	4BR
	3	5+BR
YUMA	1	1BR
	1.5	2BR
	2	3BR
DENVER	1	
TUCSON	1 UP TO 5 UNITS	
HB2721	1	

There is discussion on allowing reductions for parking in similar fashion to existing code language - if a property is within a quarter mile to a transit stop or an established bicycle route. On the map, a blue circle represents the quarter mile radius. There are many neighborhoods in the study area that are not within a quarter mile of a bike route or a bus stop. While it is nice for the code to allow reductions in parking if located near alternative modes of transportation, there are many cases where a property does not meet the criteria.

We worked on a project on Broadway - a road that has the highest ridership bus route - but the property owner could not take a parking reduction being close to transit because they were smack in the middle of two bus stops. There will always be a case where a property does not meet the criteria.

This map aligns with economically stressed areas of Tucson as well. It seems inequitable to offer a reduction on something for infrastructure that is not spread equitably.

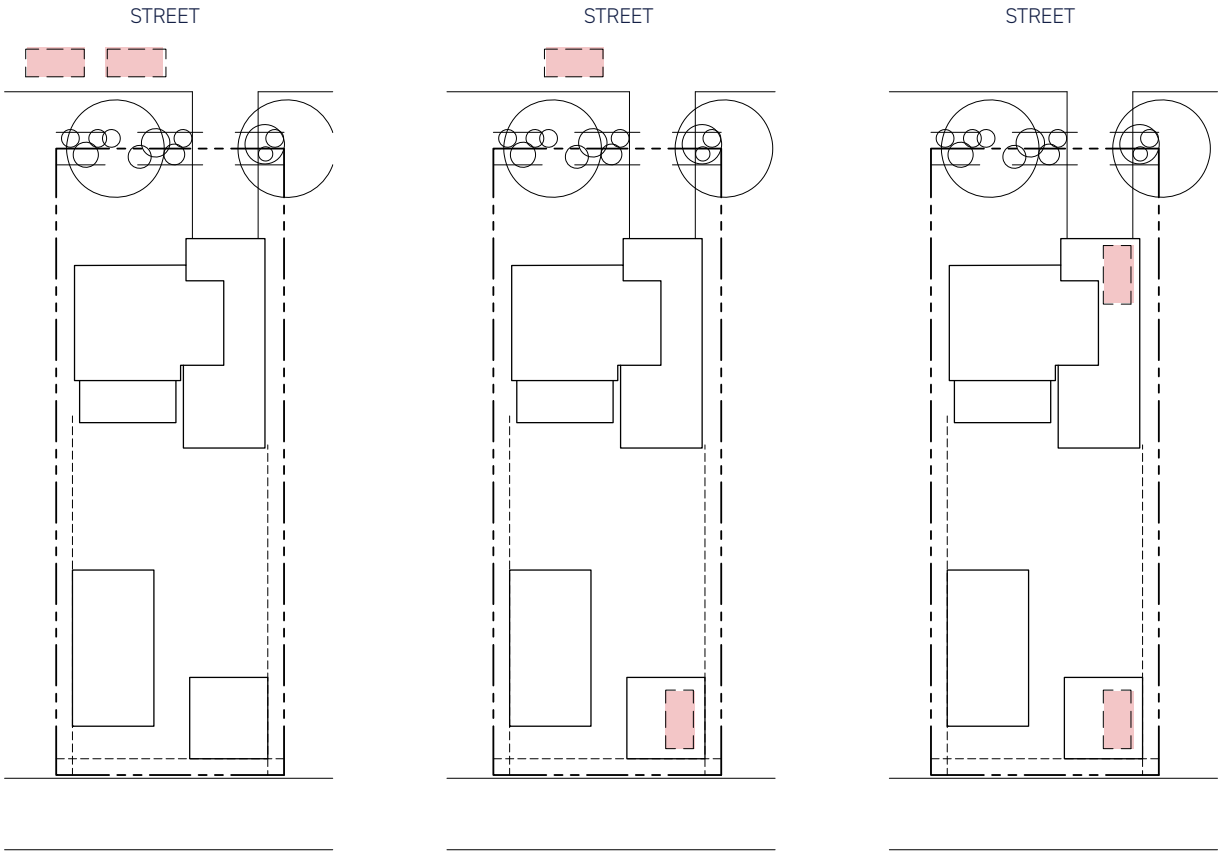
Another option is to assume everyone has access to a bike lane or a bus stop, regardless of the distance.



Proposed Geographic Area with bus routes and bike routes and areas that are not within 1/4 mile of bus or bike routes (blue circle)

This graphic helps realize all the possibilities for the location of required parking.

One thing to consider is limiting the number of parking spaces located in the front of structure. Portland limits the number to 2 vehicles.



OPTION A

PARKING OFF-SITE
IN THE R.O.W.
WITHIN THE BLOCK
OF THE RESIDENCES

OPTION B

PARKING OFF-SITE
IN THE R.O.W.
WITHIN THE BOUNDARY OF THE PROPERTY
LINE OF THE OF THE RESIDENCES

OPTION C

PARKING ON-SITE

2 UNITS, 2 PARKING SPACES REQUIRED

Privacy Mitigation

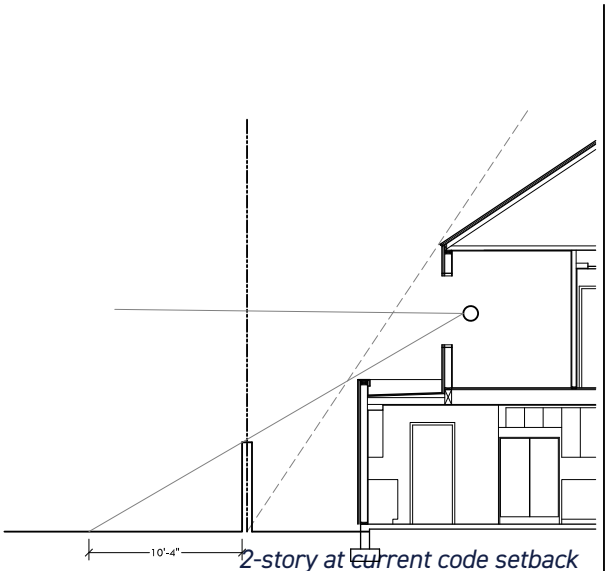
A quick note on the issue of height and what it brings to the conversation regarding privacy mitigation. HB 2721 requires cities allow the development of 2-story structures. This has inspired discussions regarding privacy mitigation by staff during the public meetings held in the summer and fall of 2025. Staff is recommending not allowing windows of proposed 2-story structures to face adjacent properties unless they are clerestory windows (so one on the inside cannot look down on the neighbor). We have concerns about this for the following reasons:

1. 25' building height is currently allowed in R-1 and R-2 zoning. There are no privacy mitigations requirements for those constructions. Why add them now? When it comes to setbacks, is 5' really much more invasive than a building built at the .66*height standard? The diagram on the right indicates one can see 6 more feet of yard with the 5' setback.

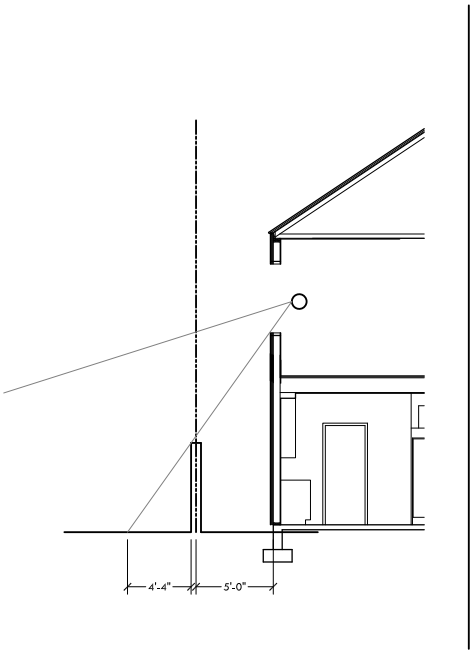
2. Natural light is extremely important for the space in residences. This will severely limit the amount and location of windows, decreasing the amount of natural light.

3. Fenestrations are an important design feature in the overall composition of the building. Limiting the construction to clerestory windows could be devastating on the aesthetic appearance of the structures.

It may be better to allow some flexibility for design and construction of windows and balconies for these structures. There could be innovative ways to screen openings. Or, adjacent neighbors could agree on the location of the windows or balconies.



2-story at current code setback



2-story at proposed 5' setback

A Note On Impact

It appears much of the concern over this change in zoning regulations is about impact. Some public voices say the modifications are not going far enough, some say they will negatively impact the existing fabric of Tucson's neighborhoods.

The Bipartisan Policy Center published a paper in 2023 investigating the impact of Minneapolis, Minnesota's "2040" plan. The plan instituted 4 main zoning changes: 1. Eliminate parking requirements, 2. Develop apartment complexes along corridors, 3. Create minimum heights along corridors, 4. Allow duplex and triplex developments on all residential lots.

The results of this plan, as corroborated in another paper by the Pew Research Center, housing supply increased in Minneapolis at a faster rate than other Midwestern cities and land and rent prices stabilized. What did not happen was a similar increase in middle housing. The Bipartisan Policy Center offers the following reasons: 1. Covid-19, 2. Legal status of 2040 was being challenged, 3. No substantial increases in height or sizes of buildings for middle housing development, 4. Lot size and setback restrictions may be limited development, 5. Fees and regulations were costly for middle housing, 6. No existing ecosystem of middle housing developers and finances, 7. By its very nature, middle housing development in existing neighborhoods is gradual and gentle.

This research is in line with many of the roadblocks we discussed in Part One of this study. Tucson lot dimensions, coupled with development regulations do not support middle housing. The proposed regulations will help - but it will still be a challenge to develop the existing lots in the proposed Geographic Area. Tucson developers consider middle housing very expensive - not only in terms of money, but also time. Many of the middle housing developers have had their financial backers up and leave and take their money elsewhere. It is hard to make the project pencil and it takes too much time to get it approved for construction.

Minneapolis is a good case study for this new set of regulations. The Planning and Development Services Department is seemingly employing similar regulation changes - the Commercial Corridor Tool and the proposed changes for middle housing development could assist in creating more affordable housing for the citizens of Tucson. It just may take a little time and you may not even notice it.

Conclusion

HB 2721 is requiring municipalities in Arizona to allow for more dense development on existing residentially zoned sites. Allowing for more dense development is supported by a variety of groups in the City of Tucson and is present in the past few General Plans created by the community.

Our question is what are the goals that will help guide staff, Mayor and Council, neighborhood organizations, the Planning Commission, and the community at large in the decision making process for the new regulations? Does the City simply meet the guidelines of HB 2721? Does it lean on best practices found in the United States? Does it lean on recently adopted regulations found in the current code? Does it use this an opportunity to introduce more sustainable practices? Does it try to open the door to more flexible and creative approaches to development? Does it safeguard against worst-case-scenarios?

There is a continuum - probably contrived - between flexibility and prescription. Each regulation - lot size, setbacks, density, access, landscaping, parking - could be looked at within that continuum. Some may be more prescriptive than others (landscaping?), while others may be more flexible (parking?), or vice versa.

It is our interpretation from attending the community meetings and reading community responses that the people of Tucson are getting closer to not only accepting, but desiring, a more dense environment built with more trees and less cars encompassing the entire city core.

MINIMUM LOT SIZE
The prescriptive approach would be to set a hard and fast number to minimum lot sizes. A flexible approach would be to allow properties to be divided in half or in thirds or in quarters, regardless of their square foot area. The city could also allow the development of sites currently not meeting minimum lot sizes by identifying them as “noncomforming.”

DENSITY
We are not sure how density meshes with HB 2721 and worry including density confuses the conversation. Maybe hold off on density and look at it later with a larger discussion about lot size, density, and floor area ratio.

SETBACKS
Per Part One, a 5’ setback delivers a more flexible option for development while allowing for more open space and potential privacy between units.

SITE ACCESS
Consider developing similar regulations to the Puget Sound Region for setbacks from site access - allowing for more green space and less impervious material.

LANDSCAPING
Develop simple to understand, simple to implement, flexible landscape regulations for the average homeowner of Tucson while stressing the importance of native landscape has on our environment.

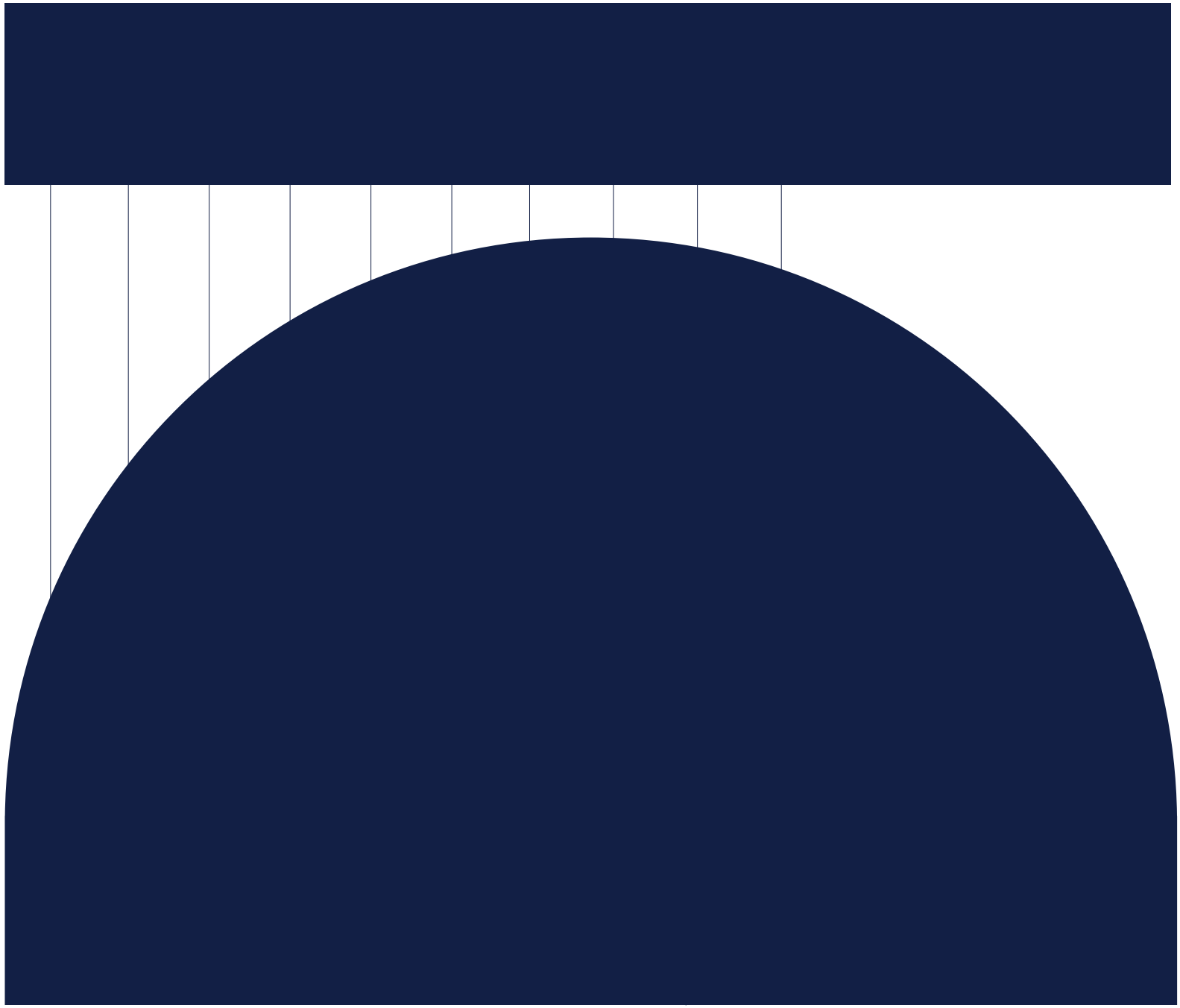
PARKING
The prescriptive approach is to keep the parking at 1 space per 1 unit. A flexible approach could utilize a simplified Individual Parking Plan process, allowing the developer to justify the parking count. And, because aesthetics is a constant theme, consider limiting number of cars allowed in the front yard setback area.

About the Drachman Institute

The Drachman Institute of the University of Arizona College of Architecture, Planning and Landscape Architecture (CAPLA) serves as a nexus for research and design projects that center around outreach work.

The Drachman Institute is committed to advancing equity, resilience, connection and belonging across the built environment through transformational interdisciplinary research, design and outreach partnerships.

The Drachman Institute bridges community needs and CAPLA's knowledge and expertise to advance equity, resilience, connection and belonging across the built environment. The Drachman Institute's research and design work are linked in an iterative process that continues to calibrate the performance of the built environment to meet the goals of the populations it serves.



Drachman Institute
for the Built Environment