

Middle Housing Unified Development Code Amendment

Planning Commission Study Session 11/12

Tonight's Discussion

- Background
- Mayor and Council Direction
- Code Development
- Public Engagement
- Planning Commission Feedback
- Proposed Middle Housing Amendment

Overview of Proposed Amendment

Based on direction, comments, and feedback



Middle Housing Use

- Limited to Middle Housing Area
- Reduced setbacks and minimum lot size, increased density
- Option to waive parking
- Privacy mitigation for 2-story homes

Other city-wide changes

- Easing of building code requirements
- Easing of commercial development standards
- Landscaping requirements
- Large subdivisions with 20% middle housing allowed
- Administrative approval of plats

House Bill 2721 – Middle Housing

- Applies to cities with populations over 75,000
- Requires local regulations allowing middle housing (duplexes, triplexes, fourplexes) within one mile of the Central Business District (CBD):
 - On all single-family lots
 - In at least 20% of new developments over 10 acres
 - Regulations can't be more restrictive than those for single-family housing
 - Single-family and middle housing follow the same standards and procedures
- **Development standards:**
 - Height: minimum allowance of two stories
 - Parking: maximum of one off-street space per unit
 - Commercial standards apply to 5+ unit projects (previously 3+)

Plan Alignment

P-CHIP (2025)

- Goal E: Increase Affordable and Attainable Housing Options

Tucson Norte Sur (2024)

- Initiate development code updates to support transit-oriented development

Prosperity Initiative (2024)

- Increase housing mobility and opportunity

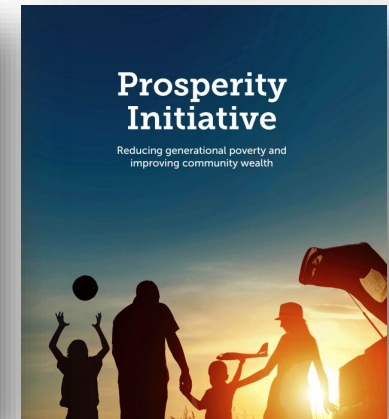
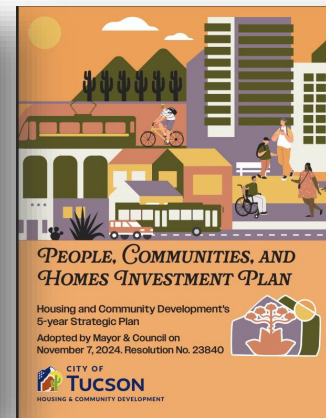
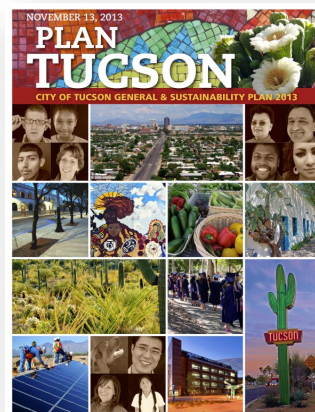
Plan Tucson (2013)

Housing Policy H2 – Focus public and private investment on documented housing needs and priorities considering long-term housing supply and demand.

Housing Policy H7 – Increase access to safe, healthy, and affordable housing choices, including mitigating the impacts of foreclosure.

Housing Policy H9 - Promote safe, decent, and affordable housing and neighborhoods that support aging in place.

Housing Policy H11 -Encourage residential development including both market rate and affordable housing projects in Tucson.



Existing Tools for Middle Housing

- **Zoning:** Many zones currently allow 2–4 units;
 - R-1 permits 2 units on 10,000 sf lots; R-2 allows 15 units/acre
- **Flexible Lot Development (FLD):** Popular subdivision tool; enables smaller lots and flexible site design across most zones
- **Accessory Dwelling Units (ADUs):** Allowed on all residential lots; exempt from density caps; parking waivers near transit/bike routes; pre-approved design library available
- **Single-Family Attached:** Reduced lot sizes (e.g., 2,904 sf in R-2) for attached units like townhomes
- **Parking Updates:** New code reduces required spaces for 2–4 unit projects (1 space/unit); commercial lot requirements also eased

What is an Accessory Dwelling Unit (ADU)?

¿Qué es una Unidad de Vivienda Accesorio (ADU)?

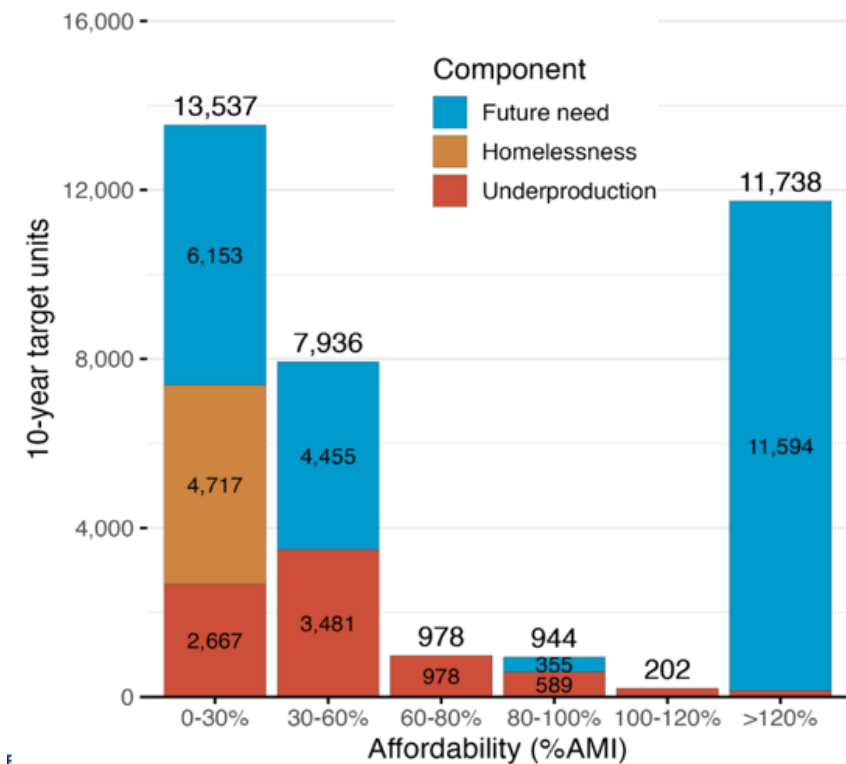


What is Currently Allowed & HB 2721 requirements

	R-1	R-2 & R-3	Commercial, Office zones
SFR, & Townhomes	Yes	Yes	Yes
Duplexes/2 units	On large lots only On all lots	Yes	Yes
Triplexes/Fourplexes	No Yes, with residential standards	Yes, with commercial standards Yes, with residential standards	Yes, with commercial standards Yes, with residential standards
5+ multifamily apartments	No	Yes, with commercial standards	Yes, with commercial standards
ADUs	Yes; up to 2 unless there are already 2 units then only 1 is allowed; 3 units if one is Affordable	Yes; up to 2 unless there are already 2 units then only 1 is allowed; 3 units if one is Affordable	Yes; up to 2 unless there are already 2 units then only 1 is allowed; 3 units if one is Affordable
Typical maximum number of permitted units on a lot	3 4	Varies greatly	Varies greatly

Middle Housing and Affordability

	Demand Segment	Need Served	Affordability	AMI for a 2-person Household
Condos and Townhomes	- First Time Homebuyers - Young Professionals - Older adults - Single parents	Older adults looking to downsize or younger adults looking for affordable ownership opportunities	80 – 120% AMI	\$61k to \$92k annually
Small detached single unit	- Families - Older adults - Single parents	Older adults looking to downsize, small/young families, newly single parents	120 – 150% AMI	\$92k to \$115k annually
Large detached single unit	Market-rate ownership	Families and higher-income households	200% AMI +	\$154k annually
Casitas	- Multi-generational households - First Time Homebuyers	Supports multi-generational living and increases affordable options	Lack of data, but generally 80-100% AMI	

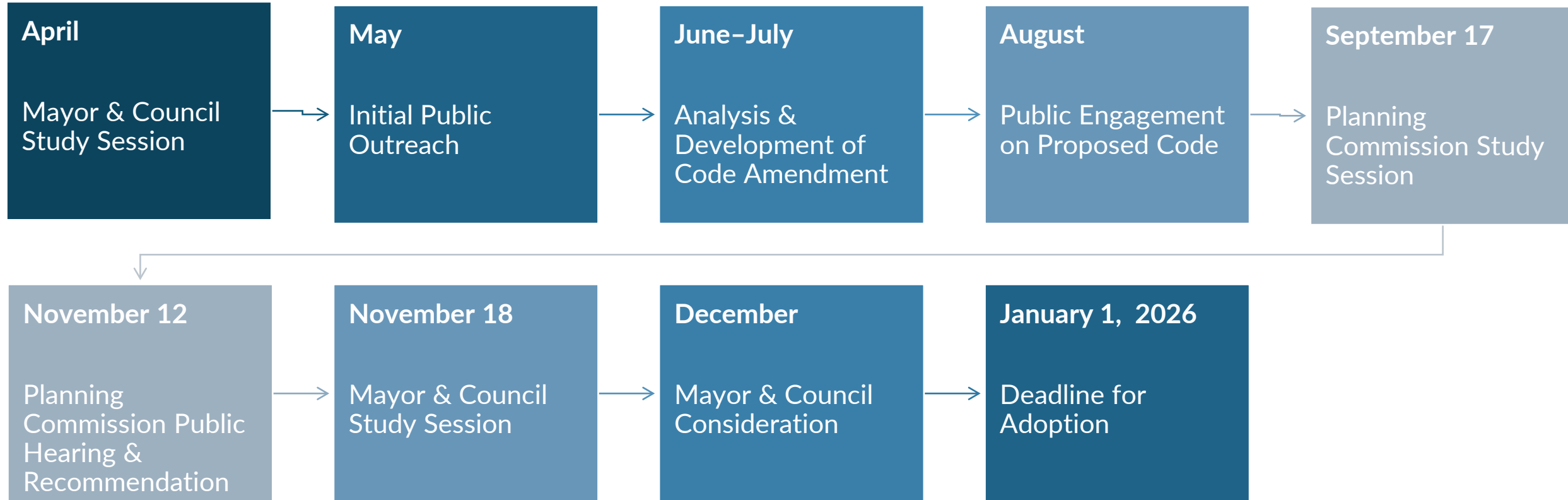


Over 35,000 housing units needed

Sources: MAP Dashboard, 2024; ULI (2020); Tucson Housing Needs Assessment



Middle Housing Timeline - 2025



M&C held a study session on April 22nd

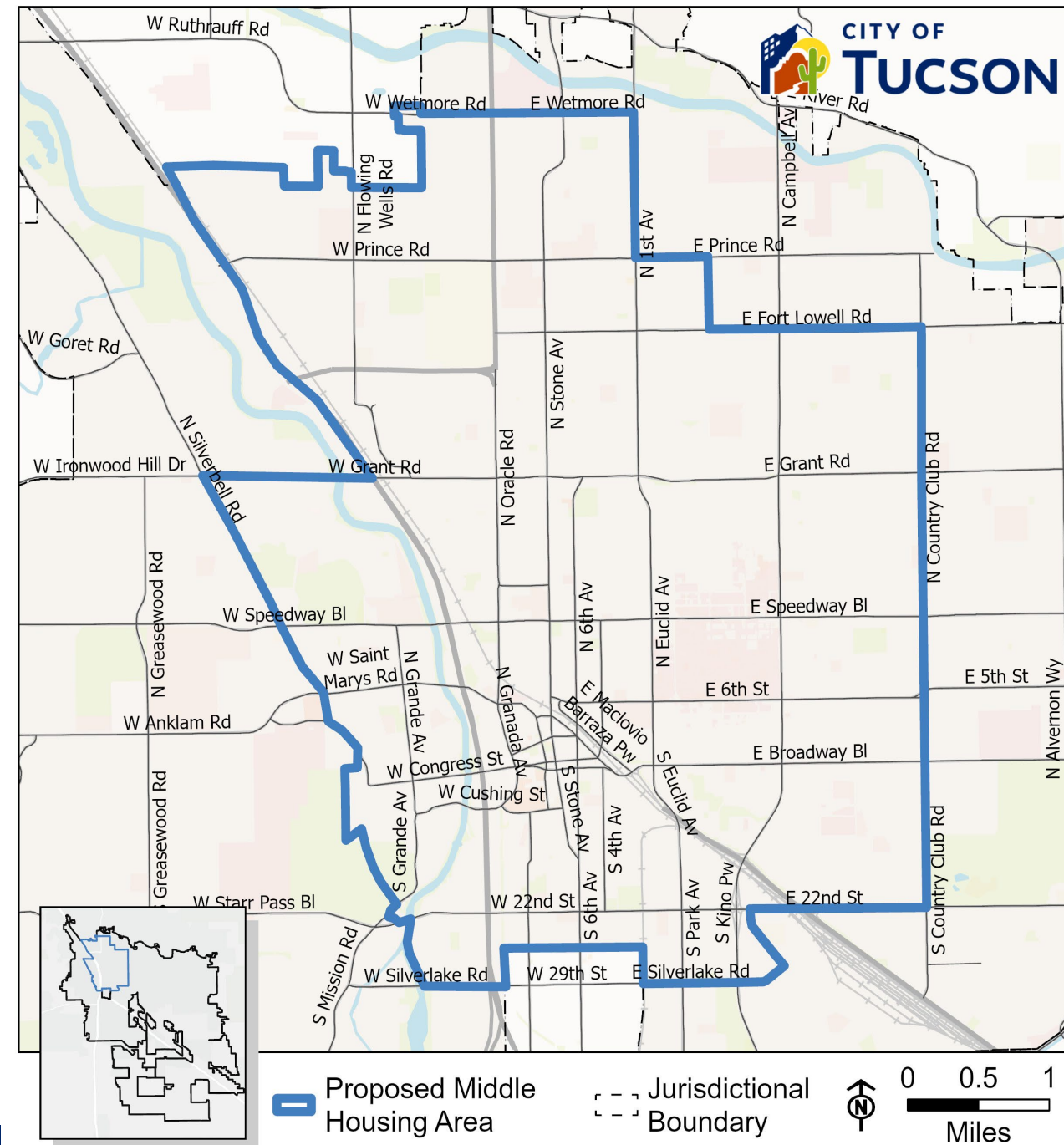
Directed staff to explore the following:

- More flexible development standards (height, setbacks, minimum lot size)
- Applying the middle housing rules citywide/more a wider geography
- Design standards for landscaping, pedestrian circulation, etc.
- Phased approach to allow for review and modification of standards over time



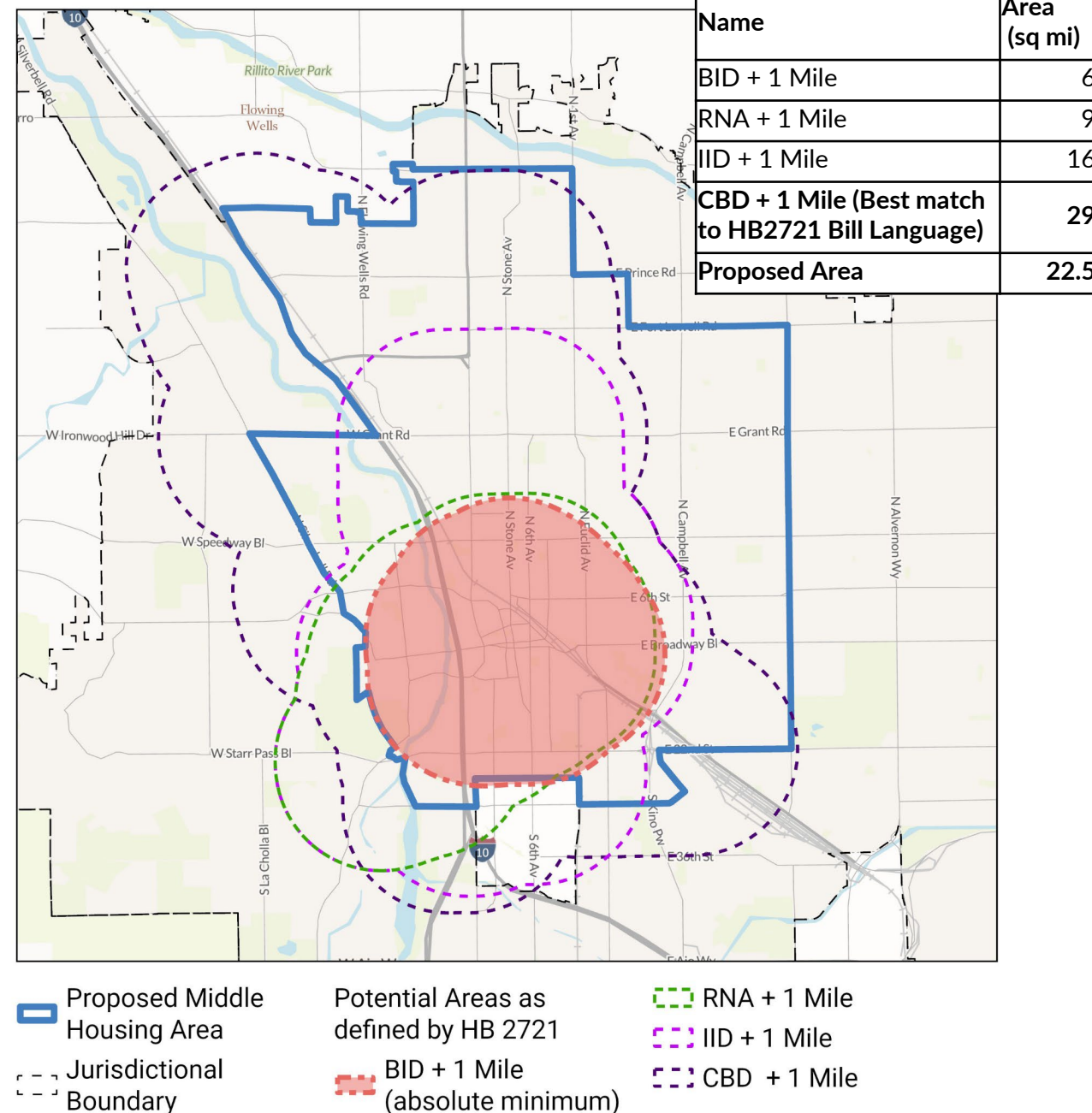
Middle Housing Area:

- “Tucson Norte Sur – Country Club option.” Now called “Proposed Middle Housing Area”
- Range of housing types and neighborhood characteristics
- Meeting the timeline requirements of HB 2721 with intent to explore citywide code amendments in the future



Geographic Process

- Started with four potential options from HB 2721
- Adjustments based on local contextual data, including:
 - A range of zones, but no rural residential
 - Existing middle housing will offer design precedent
 - A range of housing and neighborhood characteristics will support evaluation and adaptation
 - Street network, neighborhood boundaries are more locally grounded (original boundaries, which would create confusion and split parcels)
 - Balances high and low risk of displacement
- Community input showed a preference for the Proposed MHA shown





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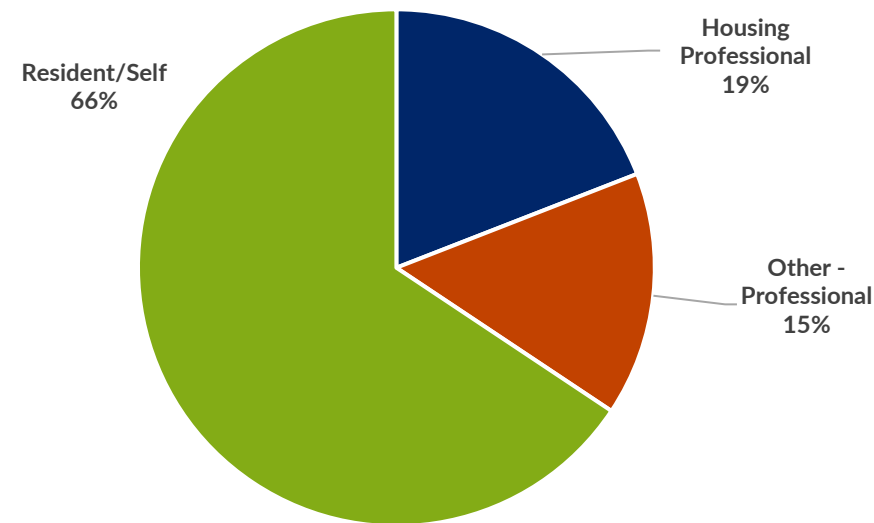
Public Engagement

Middle Housing Public Meetings May 2025 (Phase One)

Public Engagement (May)

- 3 public meetings + online feedback
- ~360 participants, 500+ comments
- Mix of residents, businesses, advocates, and design professionals
- Broad support for more flexibility + wider, citywide applicability

Participant Affiliation



Type	Participated
In person meeting held on May 22nd	37
Two online meetings held on May 28 th and May 29 th	90
Online Comment Form	234

Key Themes From May Public Feedback

- **Code Flexibility:** Support for flexibility in dimensional standards
- **Neighborhood & Historic Preservation:** Concerns about impacts on character and historic districts
- **Parking:** Split views—concerns about too little parking vs. calls for reductions
- **Landscape Standards:** Worries about cost, enforcement, and lack of flexibility
- **Affordability & Investors:** Concerns over institutional buyers reducing local ownership
- **Geography & Equity:** Debate over limiting areas vs. citywide applicability

Second M&C Study Session on June 17, 2025

M&C held a study session on June 17 and directed staff to explore the following:

- More flexible development standards (height, setbacks, minimum lot size)
- Applying the middle housing rules to an established Norte Sur area
- Design standards for landscaping, pedestrian circulation, etc.
- Phased approach to allow for review and modification of standards over time

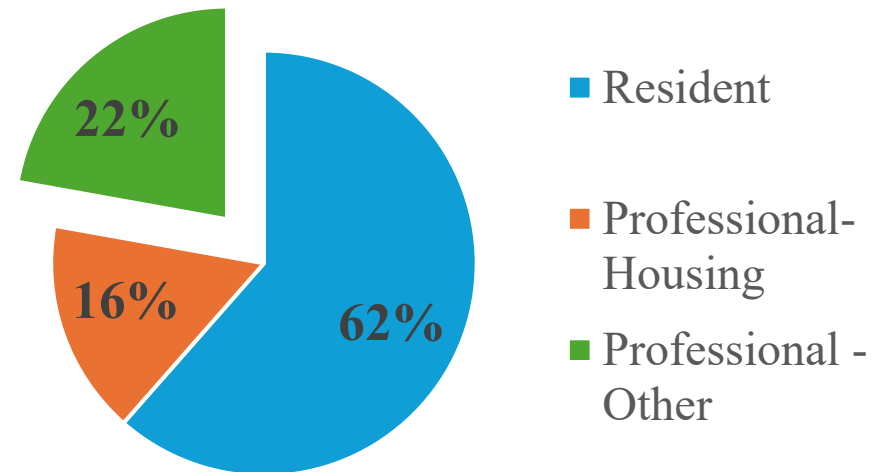


Middle Housing Public Meetings August 2025

In late August, PDSD held three public meetings to receive feedback on middle housing options:

- 193 Attendees
- 450 + Comments received between August 17 and September 7
- General sentiment for more flexibility and desire for larger geographic applicability and city-wide option
- Support for home ownership model
- Concern for National Register Historic Districts

Figure 1: Middle Housing Meeting Participants in August



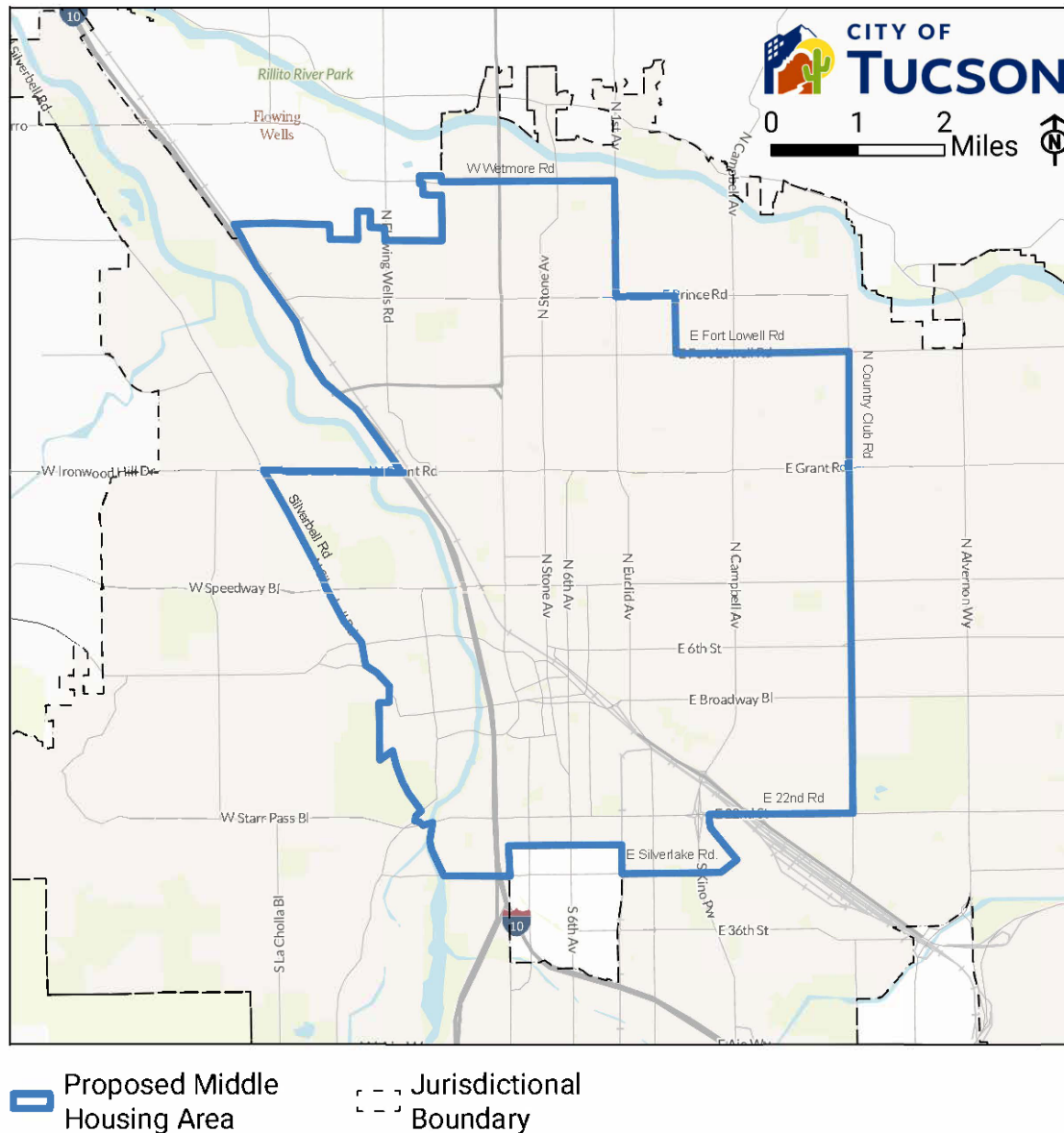


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Middle Housing Proposal

New Middle Housing Land Use



11.3.7. RESIDENTIAL USE GROUP

The Residential Use Group includes Land Use Classes and Land Use Types that are residential on a non-transient basis. The following Land Use Classes, Land Use Types, and examples constitute the Residential Use Group.

A. Family Dwelling

The occupancy (habitation) of a permanent structure or structures on a lot or parcel by one or more individuals holding the dwelling unit under common property rights, living together as a single household, and using common cooking facilities. Typical uses include attached or detached dwellings and single-family or multiple-family dwellings.

1. Duplex

A building containing two dwelling units on a single lot or parcel.

2. Manufactured Housing

3. Middle Housing

A building or buildings with two to four dwelling units on a site, including townhomes, excluding Accessory Dwelling Units.

Proposed Amendment Overview

Major Changes	Proposed in MH Area	Proposed Citywide
Building Code – International Residential Code (IRC) may be used for structures of 1-4 units (currently only applies to 1-2 unit structures) – no registrant required to create plans using IRC		X
Commercial standards for Zoning (UDC) apply to 5 or more units – no Development Package required for projects of 1-4 units		X
New landscaping requirements apply to new infill with 1-4 units		X
Middle Housing is added as a new use, with • Reduced setback • Reduced minimum lot size • An option to waive parking • Privacy mitigation requirements	X	
Large subdivisions must allow middle housing on at least 20% of residential lots		X
Administrative approval of plats instead of Mayor and Council		X

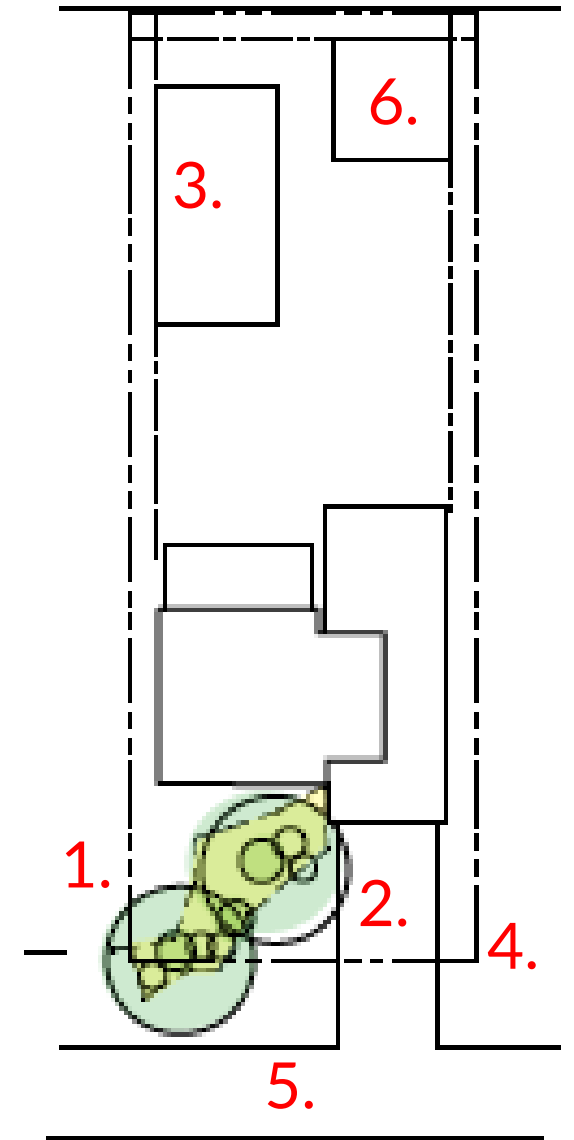
Development Standards

- **Defined use and geography:** Middle Housing (2–4 units) allowed on all single-family lots within the Middle Housing Area
- **Flexibility related to setbacks:** 5 ft side, 10 ft front (to match neighboring properties)
- **Reduced Minimum Lot Size for Middle Housing:**

<u>Zones</u>	<u>SFR Min Lot Size</u>	<u>MH Min Lot Size</u>
• R-1, MH-1, O-1	7,000 sf	6,000 sf
• R-2, MH-2, O-2	5,000 sf	4,000 sf
• R-3, O-3	5,000 sf	4,000 sf
- **Increased Density:** Up to 4 units on parcels meeting new minimum lot size

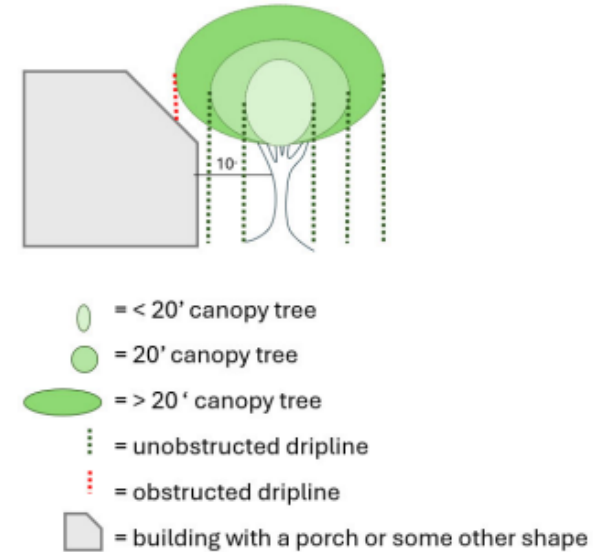
Proposed Design Standards

1. New Landscape Requirements (landscape is not currently required)
2. Parking – Max of 2 spaces allowed in front yard
3. Privacy Mitigation: Applies if adjacent to a one-story building in an R-2 or more restrictive zone
4. Prevailing Front Yard Setbacks
5. Sidewalk and Access Requirements
6. Subject to Inclusive Home Design Standards

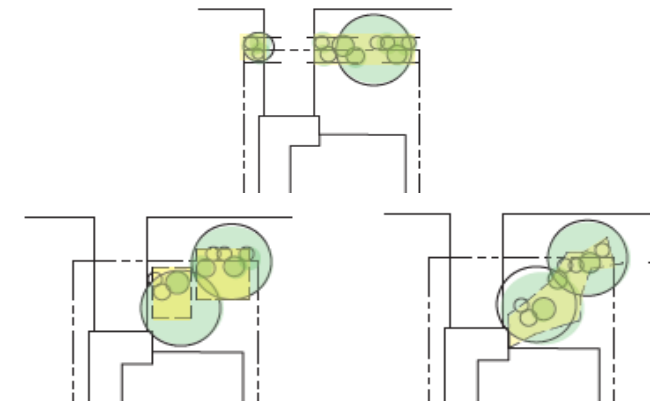


Landscaping Code Proposal

1. Applies to new builds 1-4 units, including ADUs, citywide
2. Tree Requirement: One per 1,000 sf of floor area
 - Existing trees count; half in front yard, except ADU trees anywhere on site; shrub substitutions for site constraints
3. Groundcover Requirement: required area is a 5' strip along street frontage minus curb cuts, but placed anywhere in front yard;
 - Small & Irregular lot clarifications
4. Distancing requirement away from utilities, structures, sidewalks
 - Sidewalk spacing reduced to 5'
5. Depressed planting area around trees (6 inches deep, 36 sq ft)
6. Flexible Watering Requirements
7. Plant species criteria: low to very-low water use, hardiness rating below 15 degrees, non-invasive, and from ADWRs plant list
8. Definitions and documentation requirements clarified



Existing Trees must be unobstructed and use root protection



Groundcover Placement Examples

Landscaping Code Proposed Exceptions

- Existing and Expansions of existing residential projects
- Projects with 5+ Projects (those use commercial standards)
- Middle Housing built through subdivisions (8 lots or more) because they have their own Subdivision standards
- Flexible Lot Development (also use subdivision standards)



Planning Commission Study Session Themes (September 17th)

- Expansion of the proposed Middle Housing Area to larger area or city-wide
- Landscaping code components, such as exceptions for ADUs
- Improvements to the passive water harvesting elements, spacing from sidewalks, and the accepted species
- Dimensional standards, such as the street perimeter yard setbacks
- Privacy mitigation flexibility
- Eligibility for the parking waiver
- Questions about separate utilities
- Clarify the large subdivision process
- Question about appropriate maximum lot coverage and minimum lot size

Changes made since Planning Commission Study Session on September 17

- Cleaned up Use Specific Standards to clarify Group Dwellings
- Landscaping
 - Removed landscaping exception for ADUs
 - Clarified tree placement requirements
 - Added non-invasive clarification for ADWR plant list
 - Added 4-foot diameter planting basin
- Clarified parking waiver for transit/bike infrastructure
- Prevailing front setback flexibility
- Updated Privacy Mitigation Standards

Summary of Public Hearing Comments Received

1. **Geography:** City-wide boundary vs. Middle Housing Area vs. Minimum Boundary
2. **Infrastructure:** Concerns about needed infrastructure upgrades
3. **Overlays:** Concerns about MH Area and how it applies to overlay districts (AEZ, HPZ, NPZ)
4. **National Register:** Impact of Middle Housing on National Register Historic Districts
5. **Design:** Support for Design Standards, Landscaping,
6. **Setbacks:** Impact of setback changes and privacy
7. **Property Values:** Concerns of impact on housing values
8. **Housing Crisis:** Middle housing expansion can help with the housing crisis
 - Helps provide a diversity of housing types for families, younger people, seniors, and people who live independently
 - Incentivizes infill opportunities
 - Supports making housing more affordable
9. **Equity:** Broader zoning flexibility helps distribute growth and reduces exclusion

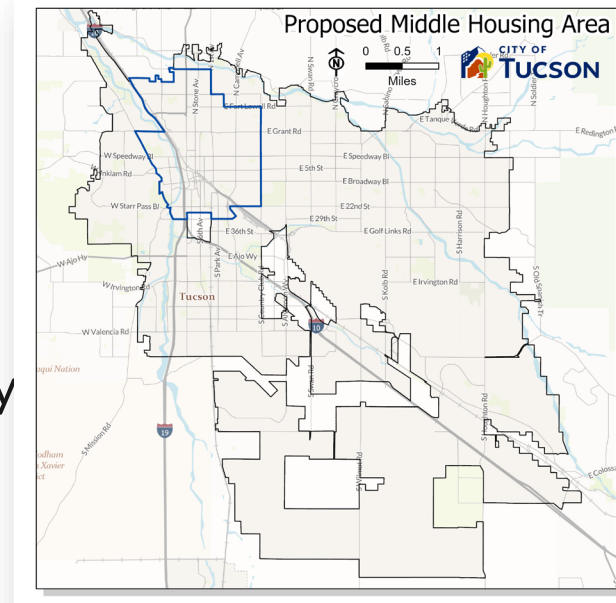
Middle Housing Area vs. City Wide Implementation

Proposal:

- Meets and **Exceeds State Requirements**
- Grounded in **Local Zoning and Adopted Plans and Planning Initiatives**
- Defines a **Clear, Context-Sensitive Boundary** compared to the HB2721 Minimum
- **Public Input** both supports and opposes an expansion
- **Includes several citywide** supportive changes
- **Phased Approach** toward citywide expansion is already planned and funded through PRO Housing Grant

Future Phases:

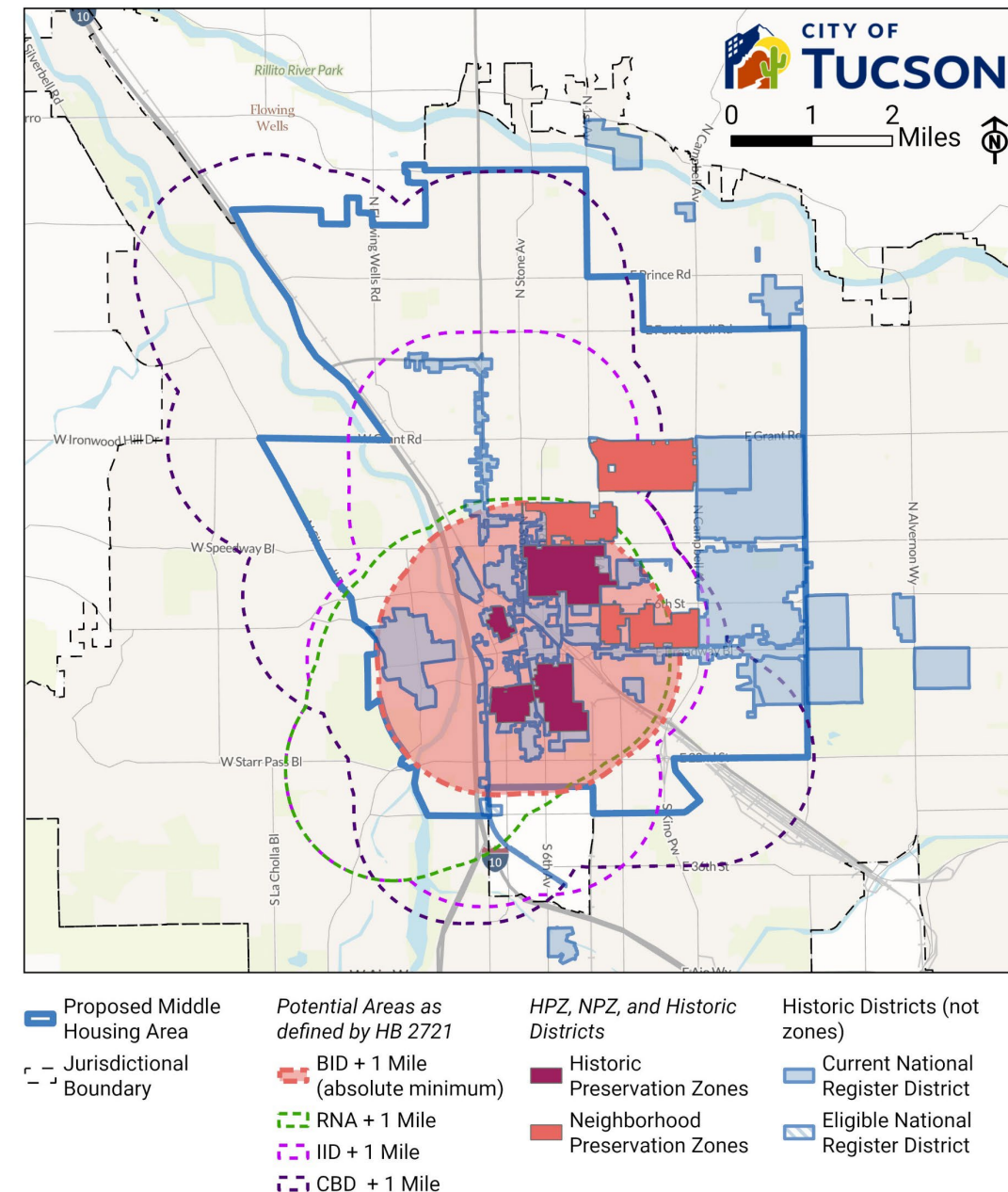
- Allows for **additional analysis** of areas with different characteristics and less plan guidance than the Middle Housing Area, such as **rural residential zones, different development patterns, design standards, landscaping, etc.**
- **Allows for evaluation and revision** of the initial proposal prior to expansion
- Provides opportunity for **outreach in additional regions**



Historic Preservation

Historic Preservation Zones (HPZ) and Neighborhood Preservation Zones (NPZ):

- All historic requirements will remain the same.
- All sites must still go through the historic review process
- Many historic zones have typically allowed for Middle Housing



National Register Historic Districts:

- Proposed expanded Middle Housing area to help decrease pressure on specific historic neighborhoods
- Based on Drachman Institute research, more flexibility with dimensional standards can disincentivize demolitions
- The scale of middle housing development is generally in the context of existing neighborhoods and the development of this type usually is incremental and doesn't lead to wholesale neighborhood change.
- Staff cannot legally prohibit demolitions or restrict the delisting of contributing properties



Airport Overlay Zones

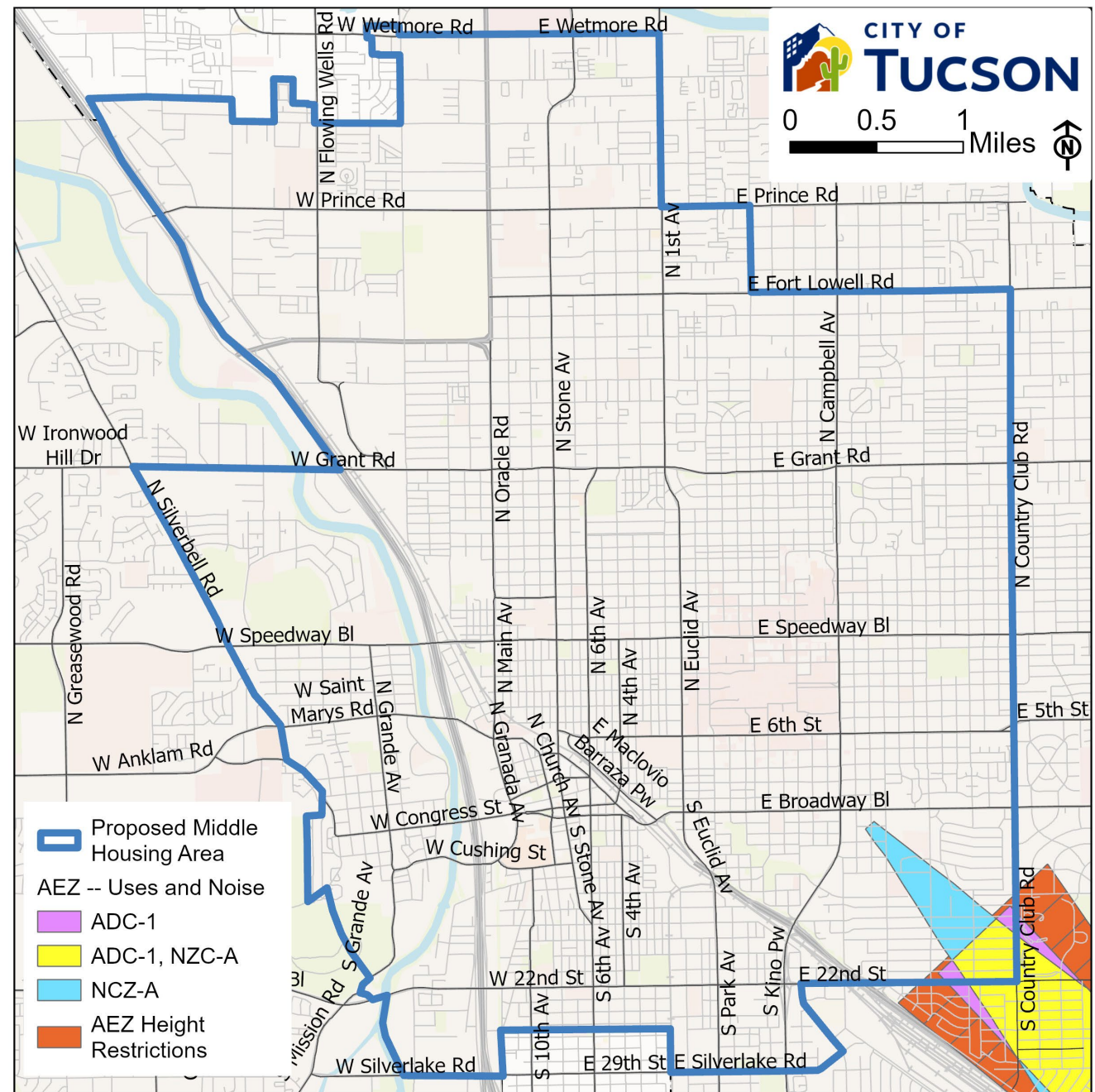
5.6.7 Applicability in the DMAFB Environs

“.....Where standards conflict, the most restrictive shall apply.”

5.6.8. Approach Departure Corridors

“The required land use standards within the Approach Departure Corridors are as follows.... 2. Prohibited Land Uses.... e. Residential use group...”

Takeaway: AEZ takes precedent, and no new residential dwellings are allowed in the ADC (purple and yellow)

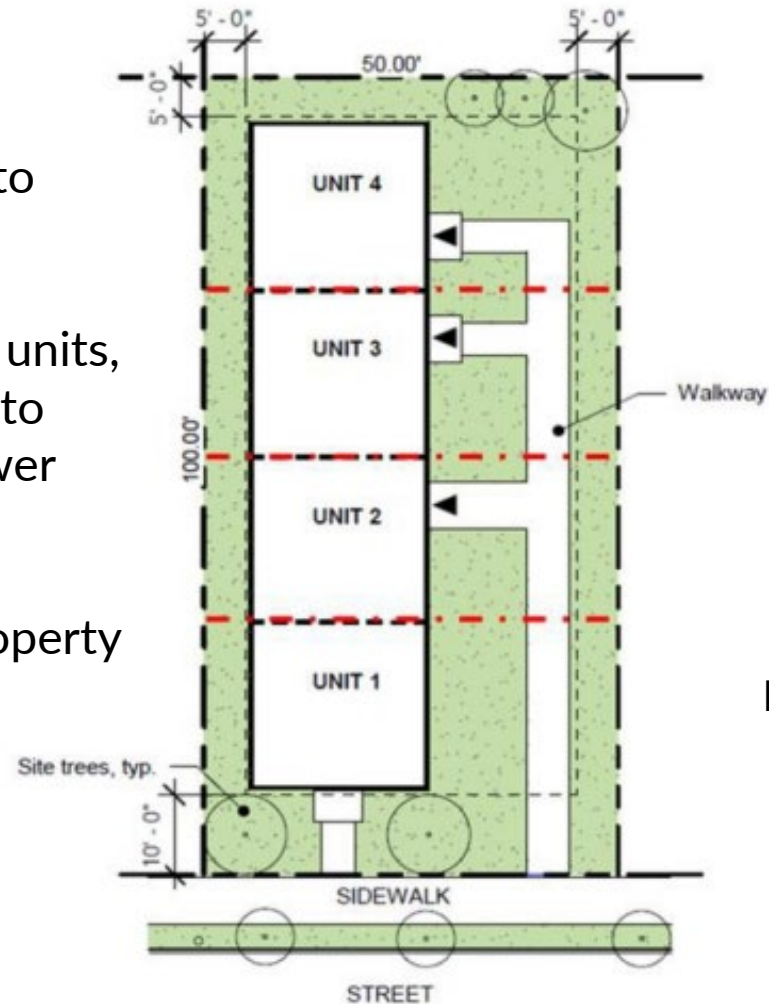


Lot Size Equal to Middle Housing Density

Based on feedback regarding different ownership models, staff have the option to propose a minimum lot size by density.

This would allow for the same number of units, but with an option to split or subdivide into smaller lots, creating the possibility of lower priced units.

This provides extra code flexibility for property owners to sell newly created parcels.



Proposed
Density
Example
R-1 Zone

Proposed
Density
and Lot
Size
Example
R-1 Zone

Density

Minimum
Lot Size

SF (2 units):
2/10,000 sf
Middle Housing:
4/6,000 sf

Middle Housing:
6,000 sf

SF (2 units):
2/10,000 sf
Middle Housing:
4/6,000 sf

Middle Housing:
1,500 Sf

Other Responses to Feedback

Infrastructure

No changes proposed to infrastructure upgrades. Infrastructure upgrades are required when deemed necessary by reviewers.

There are no changes proposed to impact fees, which go to Fire, Parks, Police, and Streets.

Affordability

City staff cannot mandate the building of subsidized affordable housing. However, most data shows that Middle Housing can be less expensive than traditional single-family homes.

Lot Splits

The State regulates much of the criteria for Lot Splits and Subdivisions. However, decreasing the minimum lot size increases the number of lots that are eligible to be split in the Middle Housing area. Changes to Admin for plat review

Group Dwellings

There is one use-specific standards that is being addressed in the code that does not align with HB 2721

ADUs

The allowance for Accessory Dwelling Units (ADUs) are not in addition to the four units per lot. They follow current regulations, which allow two ADUs on a site with a single-family home, or one ADU on a site with a duplex. An ADU would not be allowed on a site with a triplex or fourplex

Future Considerations

Phase 2 Middle Housing – City-wide:

- Monitor outcomes and evaluate expansion citywide
- Track development patterns & unintended impacts
- Engage public in Phase 2 reforms for broader middle housing adoption
- Staff propose reviewing data after a year to determine the effectiveness of the code
- Staff are able to recommend changes based on outreach and data

HUD PRO Housing Grant:

- Expand Model Plan Library with middle housing designs
- Provide technical assistance & capacity building for small-scale developers

Staff Recommendation

Staff recommends the Planning Commission make a recommendation to Mayor and Council to adopt the Middle Housing Code Amendment as proposed.