



PLANNING COMMISSION MEMORANDUM

Date: November 6th, 2025 for November 12, 2025 scheduled meeting Page: 1 of 12
To: Planning Commission
From: Koren Manning, Director of Planning and Development Services,
and Executive Secretary
Subject: C8-25-01 Middle Housing Unified Development Code
Amendment (Citywide)

Issue – This is a public hearing to review a proposed code amendment to the Unified Development Code (UDC) to allow for Middle Housing as a Residential Land Use based on direction from Mayor and Council and public input from two phases of community outreach. House Bill 2721 (Attachment A), passed by the Arizona State Legislature, requires municipalities of 75,000 or more to adopt regulations to allow middle housing in certain areas of the city. Middle housing refers to duplexes, triplexes, and fourplexes, townhomes, or residential development consisting of 2-4 units. The bill has a deadline of January 1, 2026 for municipalities to comply.

In addition to meeting the base requirements of House Bill 2721, staff have reviewed adopted plan policies and have looked for ways to use these state-required amendments as an opportunity to further City-wide housing and climate goals. The resulting draft middle housing amendments (see Attachment B for proposed Middle Housing code amendments) are developed to achieve both of those goals. PDSD staff have worked to ensure compliance with HB 2721 as well as the City's own policies by using adopted City Plans to guide staff recommendations, promoting alignment between state legislation and local objectives.

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

Background – House Bill 2721, signed into law in May 2024, mandates that cities with populations of 75,000 or more allow middle housing, defined as 2–4-unit dwellings like duplexes, triplexes and fourplexes, on all lots zoned for single-family use within one mile of the Central Business District (CBD) and in 20% of large developments (10+ acres). Cities must adopt regulations by January 1, 2026, or middle housing will be automatically allowed with no local restrictions. In addition to complying with state regulations, this code amendment presents an opportunity to align the zoning code with adopted City policies.

City staff are proposing several code changes to comply with the HB2721, however, there are multiple methods by which Middle Housing can currently be built in the City of Tucson.

Utilizing Existing Zoning Density

Many residential zones already allow for Middle Housing, which is the building of 2-4 units on a site. Most residential zones allow for the building of a second unit, while still utilizing residential standards.

The residential density of the R-2 zone is 15 units per acre. The City's most ubiquitous zone, the R-1, allows for the building of two units on a lot with a minimum lot size of 10,000 square feet.

Flexible Lot Development (FLD)

The FLD, which is the most popular subdivision tool in the City, allows for smaller lot sizes with some tradeoffs for better site design. FLD lot sizes are typically much smaller than those of the underlying zoning. The FLD can be utilized in nearly every zone in the city, proving relief to dimensional standards like density, setbacks, and lot size.

Accessory Dwelling Units (ADU)

The City allows for the building of one to two ADUs on any residential lot in the city with one or two homes. ADUs do not count towards density caps and do not have parking requirements. The City has an ADU library where an applicant can utilize pre-approved plans to cut down on costs.

Single-Family Attached Use

The UDC allows for reduced minimum lot sizes, equivalent to the multifamily density, for single-family attached units in zones R-2 and less restrictive. For example, a lot can be 2,904 square feet in the R-2 zone if an applicant is building attached units, such as townhomes.

Recent Updates to Parking and Vehicle Use Area on Residential Lots

Recent code updates have allowed for a reduction in parking for smaller 2–4-unit sites, with a requirement of one parking space per unit. The City has also changed the requirement for commercial parking lots for those sites for additional flexibility on access and paving requirements.

Related Plans and Policies

Plan Tucson

The City's most recently ratified General Plan from 2013 outlines several Housing Policy goals that align with Middle Housing:

- 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.

Plan Tucson 2025, the General Plan update which has been adopted by Mayor and Council and is pending voter ratification this November under Proposition 417, includes housing goals and policies that align with middle housing.

People, Communities, and Homes Investment Plan (P-CHIP)

In November 2024, Mayor and Council adopted the [P-CHIP](#) plan, which established goals and objectives for housing policy over the next five years. The goal of the plan is to create equitable pathways for safe, affordable, and quality housing for community members. Among the many strategies found in the plan is the recognition of Middle Housing as a tool to allow for diverse housing types, and the acknowledgement that there have been barriers to constructing Middle Housing in the City.

Housing Affordability Strategy for Tucson (HAST)

HAST outlines key strategies for increasing housing affordability in Tucson. HAST Policy initiatives include “updating the zoning regulations to encourage affordable housing” and “enhancing efforts aimed at housing Tucson's most vulnerable to housing instability.”

Tucson Norte-Sur

In June 2020, the City of Tucson was awarded a grant to develop a strategic [plan](#) for future land use investments along a future transit corridor. Part of the planning effort for the project includes a strategy to create more vibrant and connected neighborhoods, with strategies to expand more diverse housing opportunities near transit routes.

The Tucson Norte-Sur study area aligns closely with the proposed Middle Housing area, which can encourage increased density and diversity of housing types nearby planned transit routes, furthering Tucson’s commitment to fostering sustainable, equitable growth.

Prosperity Initiative

In January 2024, Mayor and Council adopted the [Prosperity Initiative](#), which includes 13 policy recommendations in an effort to reduce generational poverty. Among those 13 policy recommendations is a goal to improve housing stability among low-income renters and homeowners. Increasing housing supply and ownership opportunities is a vital part of housing stability, particularly for high poverty areas, as outlined in the initiative.

Thrive in the 05

In March 2022, the Mayor and Council adopted the Thrive in the 05 plan, a community-driven, inclusive neighborhood initiative. In planning for the future of the Oracle Road/Miracle Mile area within the 85705 zip code (an area within the Middle Housing boundaries), the Thrive Initiative aims to make strides with investments in housing, transportation, and economic development.

Community Outreach

Tucson’s Planning and Development Services Department (PDSD) launched a multi-phased community outreach process to share information, present proposed code amendments, and gather input.

On April 22, 2025, Mayor and Council held a study session and directed staff to conduct public outreach related to the following:

- Applying Middle Housing rules city-wide or expanding the minimum geography
- More flexible development standards
- Design standards for landscaping and pedestrian circulation
- Analysis regarding an approach to allow for review and modification of standards over time

Staff took feedback from Mayor and Council and began an outreach process to seek community input.

The first round of public engagement took place in May where PDSD held three public meetings (one in-person and two virtual) to present options for potential code amendments and to receive feedback.



There were 127 participants. An additional 238 people responded to an online survey. At the meetings, there was strong support for the broader application of middle housing; many participants favored implementing it citywide rather than limiting it to the minimum required areas. Additional feedback showed a preference for more flexible zoning standards, including decreased interior setback, lot size, and height restrictions, to make development easier. Attendees also emphasized the importance of community aesthetics, landscaping, and maintaining affordability, while also raising concerns about impacts on historic neighborhoods and architectural character. Preferences were expressed for design standards that support landscaping, lighting, and accessible pathways, but many wanted to keep additional requirements minimal to avoid raising costs.

On June 17, 2025 staff returned to Mayor and Council for a study session to share feedback from the first round of public engagement. Mayor and Council gave direction to develop a proposal using the public feedback. The feedback from the meetings, along with direction from Mayor and Council, adopted policy documents, and House Bill 2721, were used to develop an initial draft proposal.

In late August, Planning and Development Services presented the draft proposed Middle Housing UDC Code Amendment at three public meetings (one in-person and two virtual). 193 people attended the three meetings. Feedback from the second round of outreach focused more deeply on the specific code changes, including parking waivers, lot size flexibility, and landscaping enforcement. There was a split between those who wanted immediate citywide implementation and others who preferred a phased rollout to monitor impacts. Affordability, infrastructure capacity, and the influence of outside investors were common concerns, along with how middle housing might affect historic preservation zones. Overall, most participants continued to favor more flexible regulations, with thoughtful design and implementation to protect neighborhood identity. For a more detailed public engagement summary, see Attachment D. In late August, staff revised the code amendment to incorporate community feedback.

On September 17th, Planning and Development Services presented the updated draft code amendment to the City of Tucson Planning Commission for their review. The Commissioners had varying opinions on the applicable geography, with some prioritizing the spread of middle housing benefits and others prioritizing the opportunity to learn before expanding citywide. Commissioners' comments addressed the following:

- Expansion of the proposed Middle Housing Area and the potential for expansion of the middle housing proposal 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
- Separate utilities
- Large subdivision process

A recording of the Planning Commission study session is available on [YouTube](#), and the dialogue is summarized in the [Legal Action Report](#). The Planning Commission comments are addressed in the Present Considerations section of this memo.

Planning Commission Public Hearing October 15

Staff had a Planning Commission Public hearing scheduled for October 15. Due to a public notice issue, staff had to postpone the meeting for November 12.

Key Public Feedback Themes

During the public engagement phases, key themes emerged as discussion points. Some of the more common themes are as follows:

- **Code Flexibility:** There was a desire from community members to provide flexibility with some dimensional standards to provide more options on-site and to help disincentivize potential demolitions.
- **Neighborhood Character and Historic Preservation:** There were concerns about the potential de-listing of historic properties in National Register Historic Districts. Comments frequently addressed potential impacts on existing neighborhood character and historic districts. Respondents expressed concerns about maintaining architectural compatibility and preserving the distinctive qualities of established areas.
- **Parking:** Parking was a major topic of discussion. Some community members had concerns about increasing density, and not providing enough parking spaces on-site, while others wanted more options for parking reductions and limiting vehicle use area.
- **Landscape Standards and Enforcement:** Concerns were raised about long-term enforcement and the financial burden on property owners of planting and maintaining required landscape areas and trees. Some felt the requirements were too prescriptive and didn't leave development flexibility.
- **Housing Affordability and Investors:** Concerns about outside institutional investors acquiring properties for rental purposes rather than supporting local homeownership were expressed.
- **Proposed Area and Equity:** Some community members were concerned that by limiting the Middle Housing area, there was potential for inequitable treatment across neighborhoods and increased development pressures on areas already experiencing increased rents and displacement. Others were concerned about changes to neighborhood character. Many respondents advocated for city-wide application to help minimize displacement and development pressures, while some wanted to solely adhere to the minimum geography as required by the state.

Present Consideration(s) – After receiving direction from Mayor and Council, conducting two rounds of public engagement, and receiving feedback from the community and the Planning Commission, staff are proposing the following changes to the UDC (see Attachment B for proposed Middle Housing code amendments):

- Landscape requirements now apply to any new single-family home as well as middle housing

These changes are described in greater detail in the Administrative Procedures and Definitions section of this memo.

There has been considerable discussion about the middle housing geography and the potential to expand it or implement middle housing regulations citywide. The proposed geography is based not only on the area stipulated by state code, but areas where previous planning initiatives have engaged neighborhoods on their goals and priorities, through the Thrive in the 05 and Tucson Norte Sur planning efforts. Through these efforts, middle housing and incremental development were identified as community priorities. Additionally, the proposed middle housing area is centered around a proposed future high-capacity transit route on Stone Ave, aligning land use with future infrastructure and promoting transit-oriented neighborhoods with densities that will support transit ridership. This level of prior planning and engagement has not occurred in other neighborhoods across the City, which staff believe is a valuable part of the code amendment process.

Additionally, the current proposal includes significant zoning flexibility for middle housing beyond what is required per HB 2721. In particular, the proposed reduction in minimum lot size could facilitate more lot splits and greater levels of middle housing development by making more lots eligible for middle housing. The impacts of reduced minimum lot size is in particular an area that staff will monitor as a citywide adoption of middle housing is explored.

An opt-in solution was suggested at the Planning Commission study session. However, zoning standards must be uniform across a zone or geography in order to ensure consistent regulation and provide predictability to property owners.

Staff believe that, considering the timeline for compliance with HB 2721 and the already planned citywide exploration of middle housing through a PRO Housing grant, that the proposed middle housing geography is a robust starting point to allow middle housing in Tucson. Development trends in this area will be closely monitored for insights as staff explores citywide implementation of middle housing.

Proposed Zoning Code Changes

Dimensional Standards within the Proposed MHA

City of Tucson Mayor and Council directed staff to engage the public on ways to provide more code flexibility regarding the building of Middle Housing. In phase one of public outreach, 60% of the attendees who responded were in favor of the City creating more flexible dimensional standards for middle housing. While staff are proposing several changes to dimensional standards, there are some that will remain the same:

Building Height:

Staff are not proposing any changes to maximum building height, aside for an increase in the Office-1 (O-1) and Neighborhood Commercial (NC) zones, which are being raised to 25' from 16' to comply with the state's mandate that Cities may not restrict two story homes for Middle Housing. All other height standards remain. Most residential lots already allow a 25' maximum building height.

Lot Coverage:

HB 2721 restricts the City from applying a less than 50% Floor Area Ratio (FAR). While the

City utilizes Lot Coverage, as opposed to FAR, the lot coverage in each zone does not conflict with FAR standards. Staff are not proposing any changes to lot coverage, which dictates the developable area of a site, including building and vehicle use areas. Most residential zones allow for up to 70% lot coverage, including the R-1 zone. A 2025 [publication](#) from Harvard recommends a lot coverage of 30% to 60%, or more.

Some of the proposed changes to dimensional standards are as follows:

Density:

To comply with HB 2721, City staff propose to amend density allowances in the UDC Dimensional Standards to allow for up to four units per lot within the Middle Housing area. While some zones already allow for four units per lot, staff have amended the code to ensure there are no restrictions that do not apply to single-family dwellings within the same zone.

It should be noted that 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.

Minimum Lot Size:

One of the community goals, both from the Mayor and Council, and among the public, was the increase in flexibility for lot splits by reducing minimum lot size, to allow greater opportunities for homeownership as well as rental housing, both key needs in the community. Staff worked with the Drachman Institute to analyze how changes to minimum lot size standards can help create more flexibility and align with the City's housing goals and policies.

During the first phase of public engagement, there was a desire from the community to ease some of the regulations that have historically been a barrier to building Middle Housing. In response to the feedback, staff proposed the following changes to the minimum lot size:

- R-1, O-1: 7,000 sf to 6,000 sf.
- R-2, O-2: 5,000 sf to 4,000 sf.
- R-3, O-3: 5,000 sf to 4,000 sf

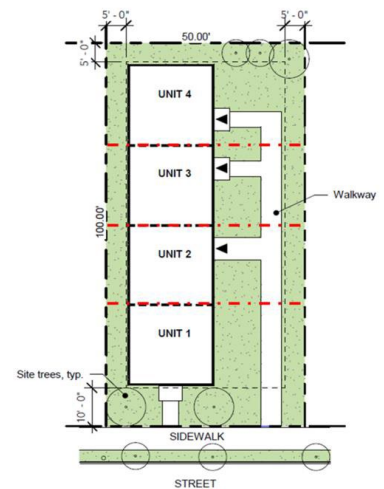
The proposed decrease in minimum lot size helps address two barriers that have made Middle Housing difficult to build:

1. Reducing the minimum lot size increases the number of buildable lots by allowing some previously non-conforming lots to become conforming. For example, an R-2 lot in the city that is 4,500 square feet—previously considered non-conforming—would now meet the new 4,000 square foot minimum.

2. The reduced minimum lot size allows more lots to be eligible for splitting. For example, a 12,000 square foot lot in the R-1 zone would now qualify for a split, whereas the previous minimum was 14,000 square feet.

Density Option

In addition to allowing for smaller minimum lot sizes, staff propose basing lot size standards on density allowances. Considering the allowance of 4 units per lot in the Middle Housing Area, there is potential to allow for the splitting or subdividing of lots to match the new allowable density. This would open the potential for different ownership models on smaller lots, providing another option for applicants. This process follows best practices from [Portland, OR](#) and [Washington state](#). This image illustrates a potential division of a fourplex into four separate lots.



Interior Perimeter Yard Setbacks

Staff are proposing changes to residential perimeter yard setbacks. Several zones, using current UDC standards, have a variable setback requirement, depending on the height of the proposed structure. To reduce complexity that comes along with variable setbacks, and in response to some public concern about potential increases in the number of home demolitions to make room for Middle Housing projects, staff are proposing a standard five-foot minimum building setback from side and rear property lines, with privacy mitigation measures for multi-story houses. This could help disincentivize the demolition of existing buildings, as it provides more flexibility regarding where a housing unit may be built on a site and removes the variable setback.

Street Perimeter Yard Setbacks

In most zones, principal structures must be set back 20' from the street; however, in some historic districts, the existing development patterns have a smaller setback. Based on feedback from the Planning Commission study session, staff have revised the proposed amendment to add flexibility, allowing the street perimeter yard to be reduced by up to 10 feet to match the adjacent properties.

Development Standards within the Proposed MHA

Development standards in the City of Tucson UDC are intended to provide guidelines for better development in Tucson communities, including aesthetics, safety, and quality, in order to minimize any development impacts. There were some concerns from the community about how development standards could be incorporated into the code for a better built environment. Staff are proposing the following standards for middle housing:

Privacy Mitigation

Privacy mitigation measures are proposed when multistory Middle Housing residences are proposed within 10' of a property line and adjacent to existing single-story residences. Some of those measures include limiting balconies, windows, except for clerestory and translucent windows, or any other feature on the upper floor that overlooks the rear and side yards of an adjacent residence, or other alternatives as proposed by the designer.

Parking

Consistent with current UDC standards for small-scale multifamily development and the former standards for Accessory Dwelling Units (prior to HB 2720), parking will be required at a rate of one parking space per dwelling unit, with an option to waive parking if the site is within a quarter mile of a transit stop or an “All Ages and Abilities Bikeway”, which is defined by the City of Tucson’s Department of Transportation and Mobility as “facilities that provide comfortable, low-stress conditions for people on bikes that will encourage more people to ride bikes. In the Tucson context, this would refer to our growing mobility networks of Bicycle Boulevards, Shared Use Paths or Greenways and Protected Bike Lanes.” It should also be noted that, in an attempt to provide a better-designed product, parking areas are proposed to be limited to 400 square feet or approximately two spaces in the front yard.

Citywide Residential Landscaping Code

In an effort to promote better aesthetics, health and safety, support environmental sustainability goals, and support contextual compatibility, staff are proposing new citywide landscape standards that would apply to all new single-family homes as well as middle housing. Currently, buildings of three or more units are required to follow commercial landscape standards, while sites with one or two units are not required to provide landscaping. Because middle housing may not be required to comply with any standards that do not apply to single-family dwellings, these landscape standards are proposed to apply to both single-family, middle housing development, and accessory dwelling units. Existing dwellings are exempt, and subdivision landscape standards would remain the same.

After hearing robust feedback on the importance of neighborhood aesthetics and the need for shade, staff are proposing new landscape standards that include:

- One new tree for every 1,000 square feet of gross floor area
- Additional groundcover as a landscaping buffer in the front yard
- Watering requirements, such as water harvesting or irrigation
- A six-inch deep and 4-foot diameter (or 36 square feet area) depressed landscape area for trees
- Setbacks from utilities
- Plants are to be low water use, non-invasive, and hardy at 15 degrees Fahrenheit. The ADWR plant list includes this information, and additional plants can be suggested if they meet the criteria.

Administrative Procedures and Definitions

HB 2721 introduced changes that require revisions not only to dimensional and development standards, but also to the administrative procedures and definitions within the UDC:

Multifamily Threshold

Current UDC standards define the multifamily use as any site with three or more dwelling units. Multifamily is a type of commercial development, therefore commercial parking, landscape and site circulation standards apply. HB 2721 states that municipalities shall not require commercial development standards for any site consisting of 1-4 units. Therefore, the proposed code amendment would allow all Middle Housing developments to use residential development standards, which have less stringent parking, landscape, circulation, and other site standards. For this reason, staff have proposed new landscape standards described above.

Subdivision Standards

All developments of 10 or more contiguous acres must allow for Middle Housing to be built on 20% of the area. While there is no requirement to build middle housing on 10+ acre sites, the use must be allowed. Most sites of 10 or more acres are larger subdivision sites, which typically don't contain Middle Housing. While changes to the Administrative Manual are not a part of the process of the Planning Commission review, a change in the City of Tucson Administrative Manual is required to ensure Middle Housing is an allowed land use on at least 20% of lots within a subdivision.

Group Dwelling Clarification

In HB 2721, a "Household" is defined as "A single person living or residing in a dwelling or place of residence." And "Two or more persons living together or residing in the same dwelling or place of residence" While there is no conflict between that definition and the City's definition of Group Dwelling, there is a conflicting use-specific standard that applies to R-1 zones, which counts occupancy as the number of people "on-site" with regard to when a site is considered a group dwelling, as opposed to within a building.

Because that single standard pertains to the number of individuals on a site, having five or more people on a lot has the potential to push some sites into a group dwelling land use, which contradicts the HB 2721 definition. The proposed amendment removes the use-specific standard that applies to sites within R-1 zones to avoid conflict with the state definition of "household".

Building Code Amendments

Currently, the International Residential Code (IRC) may only be used for structures of one or two dwelling units. Any structure with three or more dwelling units must comply with the International Building Code (IBC), which governs commercial buildings.

Because HB2721 restricts municipalities from requiring commercial building standards for middle housing, the City of Tucson has proposed a set of amendments to the IRC, to allow it to be used for structures of 1-4 units. This proposed building code amendment has been reviewed and recommended for approval by the Tucson-Pima County Joint Building Code Committee. The proposed building code amendments will be presented to Mayor and Council for consideration along with the proposed UDC amendments for middle housing.

These proposed building code amendments would apply citywide and would make it easier to build middle housing in the proposed MH area as well as anywhere middle housing is already permitted (i.e. any zone that allows multi-family uses such as R-2 and R-3).

Shared Utilities

Tucson water can allow for joint meters and has agreed to allow it for middle housing. Similarly, there is precedent for shared utilities with Pima County Wastewater Reclamation and TEP. Formalizing these agreements and processes is outside the scope of middle housing amendments. Staff will continue to work with utility providers to find ways to improve processes.

Overlay Zones

The middle housing code amendment would change the by-right development standards in the zoning code; however, overlay zones, also known as special districts, would not be affected.

Certain overlay zones with additional design criteria or limitations take precedence. These include but are not limited to Historic Preservation Zones (HPZ), Neighborhood Preservation Zones (NPZ), the Airport Environs Zone (AEZ) and Environmental Resource Zones (ERZ).

Some overlays and special districts, such as HPZ and NPZ, impose design standards to ensure historic status or preserve neighborhood character, respectively. These overlays do not prevent middle housing from being built, particularly since middle housing exists in many of these older neighborhoods. However, in these zones, any new development would be required to go through a design review process.

The HPZ and NPZ zones are local zoning regulations based on state and national historic districts. However, National Registered Historic Districts are not a local designation, and as such, they are not subject to local regulation such as design standards, unless they are also within an HPZ or NPZ.

Capacity Building and Future Middle Housing Code Amendment

The City of Tucson was awarded a Housing and Urban Development (HUD) PRO Housing grant to address barriers to housing development in Tucson. Key activities funded through this grant are to expand the Model Plan Library to include plans for middle housing, provide technical assistance to small-scale housing developers, including those building middle housing, and support capacity building for middle housing developers. These programs and resources will support greater utilization of new middle housing zoning regulations.

The PRO Housing grant also supports the City's ongoing efforts to adopt zoning reforms that remove barriers to housing development. Much of the public comment received throughout the outreach process expressed a desire to see middle housing allowed citywide. This first proposed code amendment to allow middle housing is an initial step towards greater housing diversity and options in Tucson. Staff will track the impact of these amendments, monitoring the number, type and location of middle housing that is produced. PDSD's intent is to evaluate the impact of this amendment in approximately 12-18 months and further engage the public to consider how to expand Middle Housing regulations citywide in a second phase of code amendments. Over the next year, staff will work to track development patterns, monitor unintended consequences, and evaluate how code changes will affect a larger geography.

Next Steps

Staff seek to bring a Planning Commission recommendation to Mayor and Council for consideration in December to achieve adoption before the January 1, 2026, state established deadline.

Attachments:

- A. Text of House Bill 2721 – Middle Housing
- B. Proposed Middle Housing UDC Amendments – PCPH Draft 11.5.25
- C. Map of the proposed Middle Housing Area
- D. Phase two public outreach comments
- E. Drachman Report on Middle Housing
- F. Planning Commission Public Hearing Comments