



**Southern Arizona  
Home Builders  
Association**

2840 N. Country Club Rd.  
Tucson, AZ 85716  
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www.sahba.org

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December 12, 2025

Mayor Regina Romero  
City of Tucson  
255 W. Alameda St.  
Tucson, AZ 85701

*RE: 12.16.2025 Regular Agenda, Item #8, C8-25-01 Middle Housing Unified  
Development Code Amendment*

Honorable Mayor Romero,

On behalf of the Southern Arizona Home Builders Association (SAHBA), we express our support for Middle Housing. This is a critical component of the housing continuum and necessary for a healthy housing market that can address the needs of the entire spectrum of potential homeowners. The proposed Code Amendment is an important step in the right direction.

We commend City staff for their efforts to balance neighborhood and development community priorities. With each new version, we continue to see progress.

As you consider this item, which we encourage you to support, we would like you to consider:

1. **Apply the Middle Housing framework citywide** to optimize housing potential;
2. **Establish a process to revisit.** A structured review will help identify what works, where refinements are needed, and how the framework can best support the City's housing goals.
3. **Allow minor flexibility for parking requirements.** In certain cases, existing lot dimensions or maneuvering requirements leave the front yard as the only technically feasible area to meet minimum parking and access standards which are limited to two spaces. To decrease on-street parking, and maximize the use of the amendment, we suggest the following:

*“Additional parking spaces and vehicular use area beyond the two-space or 400-square-foot front-yard limit may be permitted when existing lot dimensions or maneuvering requirements make the front yard the only feasible onsite location to meet required parking and access.”*

SAHBA appreciates the collaborative approach taken throughout this process and remains committed to supporting successful implementation of the Middle Housing Code Amendment.

*BT Lyons*

Brendan Lyons, MPA  
Director of Government Affairs  
Southern Arizona Home Builders Association



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October 10, 2025

Chris Ortiz y Pino, Chair  
Tucson Planning Commission  
255 W. Alameda Rd.  
Tucson, AZ 85701

*RE: 10.14.2025 Meeting Agenda, Item #3, Middle Housing Code Amendment*

Chair Ortiz y Pino  
Cc: Members of the Planning Commission

On behalf of the Southern Arizona Home Builders Association (SAHBA), thank you for your continued efforts to advance Tucson’s Middle Housing Code Amendment. SAHBA remains strongly supportive of the City’s commitment to broadening housing options and improving affordability through thoughtful policy changes. We share the City’s goal of creating more diverse, attainable housing choices that align with market realities and community needs.

The **Tucson Housing Needs Assessment**, completed by **ECONorthwest in 2024** for the City of Tucson, determined that the city must produce **over 35,000 new housing units in the next decade**. This total includes homes to address homelessness, make up for the historical underproduction of housing since the Great Recession, and accommodate future population growth. A bold and city-wide approach is required to achieve this goal.

However, to ensure this amendment achieves its intended purpose and meaningfully addresses Tucson’s housing crisis, we respectfully recommend several refinements that are critical to the success of this initiative:

**1. Apply Middle Housing Citywide:** Middle Housing should be implemented citywide rather than limited to narrowly defined zones; while recognizing historic neighborhoods, through growth strategies that respect their unique character. A citywide approach would:

- Reduce rezoning pressures on large-lot properties, particularly those zoned more restrictively than R-1, while preserving the character of low-density neighborhoods.
- Allow for more efficient use of available land and expand opportunities for a wider range of homebuyers.
- Promote balanced growth across all Wards and prevent development pressures from concentrating disproportionately in a few neighborhoods.
- Align with the public feedback gathered through the City’s outreach process, which demonstrated strong support for citywide implementation and more flexible middle housing standards. Broader community input from the Plan Tucson and CCT public engagement efforts further reinforced these preferences, highlighting where residents want to see growth and the types of development they value.

Restricting Middle Housing to only certain portions of the City could also have unintended consequences, such as concentrating development pressures and affordability challenges in select neighborhoods rather than distributing opportunities equitably.

It could also mean missing the opportunity to support growth near existing economic, community, and transit hubs such as Thrive in the '29, The Bridges, Kino Sports Complex, Laos Transit Center, and Park Place Mall. If Middle Housing is appropriate in the Norte-Sur corridor and outer areas of the City (i.e., where the majority of lots greater than 10 acres in size exist and infrastructure is lacking), shouldn't it also be appropriate in between? For these reasons, citywide implementation is the most equitable and effective approach.

- 2. Remove Landscaping Requirements for Single-Family Residences:** Members representing the landscape architecture community have expressed that the landscape standards currently presented for Middle Housing lack clarity, consistency, and flexibility. While we support the intent to promote landscaping and recognize its value in creating livable communities, the proposed standards are overly prescriptive and would benefit from additional refinements to provide greater certainty regarding requirements, interpretation, process, timing, required plan sets, review procedures, and enforcement.

Further, we request the removal of the proposed language that would “*add landscape requirements for all new single-family homes throughout the City.*” This amendment is focused on Middle Housing, not single-family residential development, and we feel that it would be more beneficial and respectful to the community at large to have the space to discuss these requirements outside of the Middle Housing Code Amendment. Our members are also concerned that extending the new landscape requirements to single-family homes adds unnecessary costs and complexities to projects, limiting flexibility for homebuyers and builders, and ultimately creating another barrier to new housing development.

- 3. Clarify the 20% Requirement to Be Optional:** The proposed language that 20% of lots within qualifying developments allow for Middle Housing should be clarified to indicate that Middle Housing is permitted “by right” but is not required. This approach incentivizes participation without imposing rigidity and respects developers’ ability to respond to market demand.
- 4. Reduce the Minimum Site Size Threshold:** To unlock greater housing potential, reduce the minimum site size from ten (10) acres to five (5) acres for citywide applicability. This adjustment would enable more properties to participate in the Middle Housing program, especially those located within the “middle” of Tucson’s urban fabric, where infrastructure and demand already exist.

SAHBA appreciates the City’s proactive leadership on this important initiative and applauds the thoughtful dialogue it has inspired. The Middle Housing Code Amendment represents a major opportunity to help Tucson meet its documented housing needs. Incorporating a citywide framework, flexibility in site size and design standards, and removal of unnecessary requirements will ensure this effort effectively contributes to the 35,000 new units identified in the 2024 Housing Needs Assessment. These refinements will expand opportunity across all Wards, support affordability, and strengthen Tucson’s long-term housing resilience. Thank you for your ongoing collaboration and for considering our recommendations. SAHBA remains ready to partner with City staff and the Commission to ensure this effort succeeds in delivering attainable, diverse housing for all Tucsonans.

*BT Lyons*

Brendan Lyons, MPA  
Director of Government Affairs  
Southern Arizona Home Builders Association



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September 16, 2025

Chris Ortiz y Pino, Chair  
Tucson Planning Commission  
255 W. Alameda Rd.  
Tucson, AZ 85701

*Subject: Middle Housing Code Amendment, Item #3*

Chair Ortiz y Pino  
Cc: Members of the Planning Commission

On behalf of the Southern Arizona Home Builders Association (SAHBA), I am writing to express our support for Tucson’s Middle Housing Code Amendment. SAHBA represents the development and home building industry in Southern Arizona and is committed to advancing policies that expand housing choice, improve affordability, and reduce barriers to new housing supply. We believe the proposed amendment is an important step and recommend the following refinements:

1. **Apply Middle Housing Citywide:** Housing opportunities should not be limited to a “Middle Housing Zone” that would preclude certain sites from being developed to increase housing supply or meet the objectives of the statute.
2. **Simplify Development Services Review:** We encourage the amendment to be drafted in way to streamline the review and approval processes administratively.
3. **Reduce Regulatory Barriers**
  - **Parking:** Consider further reducing or eliminating minimums, especially in infill/transit areas.
  - **Landscaping:** The proposed requirements add costs for small-scale infill. Exemptions for projects under four units or fee-in-lieu options would balance environmental goals with affordability.
  - **Subdivision Standards:** We would encourage the city to consider increasing the allowance for Middle Housing and reducing the site to less than ten acres.
4. **Reduce Administrative Burdens:** We would like to work with the city to reduce planning or any other regulatory burdens.

SAHBA supports the Middle Housing Code Amendment and urges the Commission to strengthen it by applying it citywide, reducing regulatory barriers, and streamlining approvals. These refinements will expand housing choice, reduce costs, and increase supply.

Thank you for your consideration.

*BT Lyons*

Brendan Lyons, MPA  
Director of Government Affairs  
Southern Arizona Home Builders Association