



**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

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