



SENT VIA ELECTRONIC MAIL

August 19, 2025

Chair Rick Bright  
Tucson - Pima County Joint Consolidated Code Committee (TPCJCC)

**RE: Proposed Amendment to IBC/IRC Grading Slope Requirements (.5% Slope Provision)**

Chair Bright and Members of the Tucson-Pima County Joint Code Committee,

On behalf of the Southern Arizona Home Builders Association (SAHBA), thank you for the opportunity to provide comments regarding the proposed amendment to Section 1804.4 of the 2024 International Building Code (IBC) and Section R401.3 of the 2024 International Residential Code (IRC), which would allow a minimum slope of 0.5 percent for site grading under defined conditions. SAHBA supports this amendment and offers the following considerations to support its adoption.

- Aligns with Standard Construction Practices:** Lot pads are typically graded flat during initial site development to establish a level foundation for the home. This is done by the civil contractor early in the process. The drainage slope is not finalized until after construction is complete, once plumbing, dry utilities, screen walls, and other grade-disrupting features are installed. Final lot grading is generally performed by the builder or landscape contractor and is best verified near the time of certificate of occupancy, when accurate assessment of positive drainage can occur. The proposed amendment reflects this phasing and practical reality.
- Builds on Proven Precedent in Arizona:** While the standard drainage requirement for building pads in the City of Tucson is a 2 percent slope toward approved drainage facilities, the code includes an exception allowing for a 1 percent gradient when certain conditions exist throughout the permit area, including no proposed fills or cuts greater than ten feet in height, and no existing slopes steeper than 10 percent exceeding ten feet in height. This flexibility acknowledges that lower slopes can be appropriate and for over 20 years, subdivisions in the City and County have been built using a 1 percent gradient. In the Phoenix metro area, many subdivisions have implemented 0.5 percent lot grading details for just as long. Neither region has experienced widespread drainage or flooding issues on residential lots under these reduced slope standards. These longstanding practices demonstrate that lower gradients, when properly designed, are effective in Southern Arizona’s environment.
- Promotes Housing Affordability Through Reduced Site Costs:** Lower slope requirements result in meaningful cost savings during development. Flatter grading reduces building pad height and minimizes the volume of imported fill material required. It also reduces or eliminates the need for retaining walls, which are often necessary on corner lots or where grade transitions are abrupt. With dirt import costs often exceeding \$25 per cubic yard, subdivisions can avoid tens or even hundreds of thousands of dollars in additional cost by optimizing grading strategies. These savings support housing affordability by helping keep home prices lower.

**Accessibility for Residents and Vehicles:** Flatter lot slopes create more accessible entry homebuyers with mobility challenges, assistive devices, or limited physical range.

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Additionally, lower slopes reduce steep driveway transitions, improving functionality for vehicles with lower ground clearance or longer wheelbases. A 0.5 percent slope helps enhance both physical and vehicular accessibility for a broader range of households.

5. **Supports Middle Housing and ADU Development Goals:** The City of Tucson and Pima County have prioritized increased housing choice through Accessory Dwelling Units (ADUs) and various forms of Middle Housing. These types of housing often depend on smaller lots and tighter site configurations where standard grading requirements can become a barrier to feasibility. By reducing slope constraints, this amendment supports local goals to expand housing diversity and increase the supply of attainable homes.
6. **Better Reflects Local Climate:** Southern Arizona’s arid climate is well suited for lower-slope drainage solutions. Unlike areas with high rainfall and poor infiltration, our region can safely accommodate reduced slopes without increasing the risk of water accumulation or foundation issues. The amendment allows jurisdictions to apply local performance-based standards in place of national defaults that may not reflect regional realities.
7. **Clarification of Engineering Responsibility:** While the amendment appropriately requires engineering oversight, SAHBA recommends clarifying the responsible party. Specifically, the Geotechnical Engineer should certify the suitability of the 0.5 percent slope in the Geotechnical Report. The Civil Engineering Plans should reference that report. This reflects standard industry practice and ensures proper professional accountability.
8. **Recommended Language for Exception 3:** “Modification to these requirements will be accepted only upon certification by a Licensed or Qualified Geotechnical Engineer within the Geotechnical Report, acknowledging and accepting the deviation from standard grading code requirements. The Final Grading and Paving Plan shall reference this report.”

This amendment is a practical and locally appropriate update that supports affordability, accessibility, and housing production while maintaining engineering standards and public safety. With the clarification noted above, SAHBA urges the Committee to adopt the proposed amendment.

*BT Lyons*

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