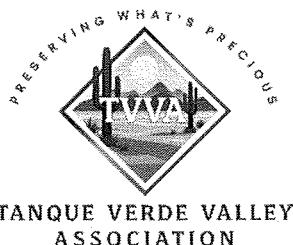


# AGENDA MATERIAL

DATE 11/18/25

ITEM NO. RA 9



November 16, 2025

Subject: P25TA00002 Zoning Code Text Amendment for Accessory Dwelling Units

Dear Honorable Supervisors,

Thank you for the opportunity to comment on the proposed ADU text amendment to Ordinance 18.03.020 U, and for the collaborative process that Development Services has maintained throughout this effort.

Neighborhood organizations across the county, including the Catalina Foothills Association, the Tucson Mountains Association, and the Tanque Verde Valley Association, have participated extensively in both the Pima Prospects 2025 process and this accelerated ADU amendment process. We appreciate the County's willingness to incorporate several key concerns raised by stakeholders.

First, we want to acknowledge and thank staff for adopting several important modifications to the draft ordinance.

The **increased side and rear setbacks**, and the **10-foot separation requirement** between an ADU and the primary structure, will help preserve native vegetation and reduce unnecessary grading of the Sonoran Desert landscape. These standards are particularly important in environmentally sensitive areas and in neighborhoods with established low-density character.

We also strongly support the **requirement that any ADU rented for fewer than 30 days must be owner-occupied**. This provision will help prevent investor-driven conversions of single-family homes into short-term rental revenue properties, preserving residential stability and neighborhood cohesion.

In addition, we appreciate the inclusion of language, confirming that **existing Pima County development standards continue to apply**. This will help minimize unintended impacts, particularly in areas where multiple accessory structures already exist.

However, several significant concerns remain regarding **Section U.4**, which allows an additional detached dwelling unit on parcels one acre or larger, provided that the third unit is "restricted affordable." While we support the State's goal of increasing affordable housing, the ordinance as written lacks the clarity and enforcement mechanisms needed to make this provision workable.

**First**, the ordinance does not define "restricted affordable."

Arizona State Statute 810.01.5 specifies that a restricted-affordable dwelling unit must be rented to households earning up to 80% of the area median income and must be governed through either a deed restriction or a development agreement. For consistency and transparency, this same definition should be included directly in the County ordinance.

**Second**, the ordinance must identify who is responsible for placing and administering the deed restriction. Is this a County responsibility? Will property owners be required to file such restrictions themselves? Clear guidance is needed to avoid confusion and ensure uniform application.

**Third**, there should be a **standardized development agreement** template for all restricted-affordable ADUs. Without a consistent framework, enforcement will be uneven and burdensome for both applicants and staff.

**Fourth**, income verification and ongoing compliance must be addressed. Who will ensure that renters meet the 80% AMI threshold? How will income documentation be collected and reviewed? And given the County's current challenges enforcing short-term rental rules, what resources will be allocated to ensure that this affordability requirement is meaningful and enforceable rather than symbolic?

Beyond Section 4, we also share concerns, particularly in rural and environmentally sensitive areas, about the potential cumulative impacts of allowing two detached ADUs on parcels one acre and larger. These impacts include additional grading, new access points, increased traffic, and the loss of natural open space and wildlife habitat. For these reasons, we request the addition of two clarifying provisions:

1. that no new driveways or access points be permitted for ADUs, and
2. that lot coverage and grading limits apply cumulatively to all structures, including new ADUs.

Finally, we encourage the County to consider the broader land-use goals established in Pima Prosper 2025. ADUs may be most compatible in areas close to employment and educational centers, and less suitable in rural "special areas" where natural open space and low-density character are defining community assets.

In closing, we thank Development Services staff for their collaboration and for incorporating several important stakeholder recommendations. We respectfully ask that the remaining issues, particularly the definition, administration, and enforcement mechanisms for "restricted affordable" units, be clarified before the ordinance is approved. Clear, enforceable standards will help ensure that ADUs effectively support affordable housing while protecting the unique character and environmental resources of Pima County's diverse communities.

Thank you for your time and consideration.

Sincerely

*James Trego*

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Tanque Verde Valley Association, Inc.

*JoAnn F. Trego*

JoAnn F. Trego, Secretary  
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