

COB - BOSAIR FORM

10/30/2025 8:54 AM (MST)

Submitted by Anita.McNamara@pima.gov



BOARD OF SUPERVISORS AGENDA ITEM REPORT (BOSAIR)

All fields are required. Enter N/A if not applicable. For number fields, enter 0 if not applicable.

Award Type: Agenda Item

Is a Board Meeting Date Requested? Yes

Requested Board Meeting Date: 11/18/2025

Project Title / Description: P25TA00002 - Accessory Dwelling Units Text Amendment

Agenda Item Report

Introduction / Background: A proposal to amend by Ordinance the Pima County Zoning Code section 18.03 General Definitions to add a definition for Accessory Dwelling Unit and 18.09.020 to add standards for Accessory Dwelling Units.

Discussion: This zoning text amendment will add section 18.09.020.U Accessory Dwelling Units to Chapter 18.09 General Residential and Rural Zoning Provisions and a definition for Accessory Dwelling Units to section 18.03 Definitions. The amendment complies with HB 2928 passed by the Arizona legislature in May 2025. HB2928 requires counties to adopt zoning regulations to allow accessory dwelling units on lots/parcels that allow single-family residences.

Conclusion: The proposed zoning text code amendment is intended to comply with House Bill 2928, which mandates counties adopt certain zoning code amendments relating to accessory dwelling units before January 1, 2026.

Recommendation: The Planning and Zoning Commission recommends APPROVAL of the zoning code text amendment. Staff recommends APPROVAL of the zoning code text amendment.

Fiscal Impact: 0

Support of Prosperity Initiative: 3. Improve Housing Stability

Provide information that explains how this activity supports the selected Prosperity Initiative Accessory Dwelling Units can serve to enhance housing stability by creating diverse, affordable housing options within existing neighborhoods and by allowing homeowners to generate rental income to help with housing costs.

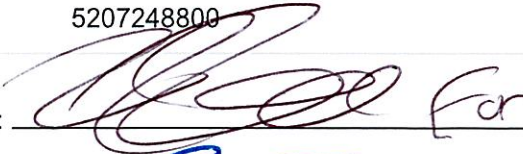
Board of Supervisor District:

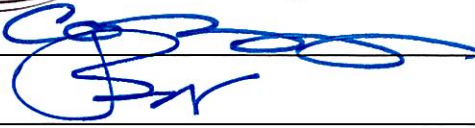
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Department: Development Services, Planning Division

Name: Anita McNamara

Telephone: 5207248800

Department Director Signature:  For Date: 10/30/25

Deputy County Administrator Signature:  Date: 11/3/2025

County Administrator Signature:  Date: 11/3/2025



TO: Honorable Board of Supervisors

FROM: Tom Drzazgowski, Deputy Director
Public Works-Development Services Department Planning Division

DATE: October 28, 2025

SUBJECT: P25TA00002 ACCESSORY DWELLING UNITS
(Zoning Code Text Amendment)

The above referenced Zoning Code Text Amendment is scheduled for the Board of Supervisors' **TUESDAY, November 18, 2025** hearing.

REQUEST: Proposal to amend by ordinance, the Pima County Zoning Code 18.09 (General Residential and Rural Zoning Provisions) and 18.03 (Definitions) to add standards and a definition for Accessory Dwelling Units.

OWNER: N/A

APPLICANT: Pima County Development Services Department

DISTRICT: ALL

STAFF CONTACT: Anita McNamara, AICP, Planner II

PUBLIC COMMENT TO DATE: As of October 28, 2025, staff has written public comments (attached).

PLANNING AND ZONING RECOMMENDATION: **APPROVAL** (6-0; Commissioners Becker, Matter, Gungl and Cook were absent).

STAFF RECOMMENDATION: Staff recommends **APPROVAL**.

TD/AM/ds
Attachments



BOARD OF SUPERVISORS MEMORANDUM

Subject: P25TA00002

Page 1 of 6

FOR NOVEMBER 18, 2025 MEETING OF THE BOARD OF SUPERVISORS

TO: HONORABLE BOARD OF SUPERVISORS

FROM: Tom Drzazgowski, Deputy Director
Public Works-Development Services Department-Planning Division

DATE: October 28, 2025

ADVERTISED ITEM FOR PUBLIC HEARING

ZONING CODE TEXT AMENDMENT

P25TA00002 ACCESSORY DWELLING UNITS

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA, RELATING TO ZONING (TITLE 18); AMENDING THE PIMA COUNTY CODE CHAPTER 18.03 (GENERAL DEFINITIONS), SECTION 18.03.020 (DEFINITIONS) TO ADD A DEFINITION FOR ACCESSORY DWELLING UNIT, AND AMENDING THE PIMA COUNTY CODE CHAPTER 18.09 (GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS) TO ADD STANDARDS FOR ACCESSORY DWELLING UNITS. On motion, the Planning and Zoning Commission voted 6-0 to recommend **APPROVAL** (Commissioners Becker, Matter, Gungle and Cook were absent). Staff recommends **APPROVAL**. (All Districts)

Summary of the Planning and Zoning Commission Hearing (September 24, 2025)

Staff presented the staff report highlighting the zoning code text amendment to amend Section 18.09 to add standards accessory dwelling units. In May 2025, the Arizona legislature passed, and the Governor signed House Bill 2928. HB 2928 requires counties to adopt ordinances by January 1, 2025 that allow accessory dwelling units anywhere that single family homes are permitted. The house bill also requires certain standards for accessory dwelling units.

A commissioner asked if accessory dwelling units will come before the commission for approval. Staff responded that accessory dwelling units will not come before the commission or any other public process. They will go through the standard permitting and inspection processes. The commissioner asked a follow-up question related the commission's role. Staff replied that there will be no public process for approval of the units. The state requires that the county must allow accessory dwelling units. It may increase density in lower density zones by adding ADUs. This will not change for commercial zones or areas allowing multifamily.

A commissioner asked for clarification regarding allowing one and one detached and whether two detached units would be allowed instead of one attached and one detached. Staff replied that someone could only do two detached if there is one attached and the property is an acre or greater, with the third unit being income restricted. The commissioner replied by doing that it may be inconsistent with what the state wants. The commissioner asked for clarification on this.

A commissioner asked for clarification on the maximum lot coverage for accessory dwelling units and other accessory buildings. Staff replied that the intent is to manage the massing of structures on properties. There are processes to increase lot coverage maximums that involve notice to neighbors.

A commissioner asked about impact fees for accessory dwelling units. This bill gives homeowners and small-scale local industry opportunities to create more housing units in a low impact manner. Impact fees are based on square footage. A 1,250 sf ADU structure would have an impact fee of approximately \$5,000 on top of permitting fees. An impact fee for the existing home on the property would have been collected. She asked for consideration of reduced or no impact fees for accessory dwelling units and that guest houses do not incur impact fees.

Staff clarified that Pima County only has transportation impact fees. Staff understands the argument that it adds costs, but the issue is that unlike guest houses which are one family unit with less traffic, family living or staying in the guest house is that an ADU can be rented to a separate household, which adds additional traffic. Impact fees are used to fund projects to increase capacity. Staff is supportive of impact fees for this reason. This is a zoning text amendment and does not address impact fees. The commissioner responded to say national studies show that the impacts of ADUs is negligible. She asked the county to consider advocating at the state level for no or at least reduced impact fees for ADUs. Staff responded that the county impact fees stay local and this will be brought up with the appropriate parties at the county.

A commissioner asked if the site-built requirement would eliminate mobile homes? If someone wanted to add a manufactured home to their property, wouldn't they need to have the minimum parcel area for a second unit?

Staff responded that is correct that this would not allow mobile homes and that if someone wanted to add a manufactured home, they would need to have enough parcel area for that second unit.

A commissioner about allowing short-term rentals.

Staff replied that the state says we cannot restrict short-term rentals. This is generally consistent with our regulations. The county will apply the same standards for the ADU as the main residence.

A commissioner stated that by allowing accessory dwelling units to be used as short term rentals, it will not increase the housing supply.

Staff responded that property owners will add these units for short-term and long-term rental. This will be likely be dependent on market and location.

A commissioner asked what is the difference between a guest house and an ADU?

Staff responded that a guest house cannot be rented. Guest houses are for family and non-paying guests only. Guest houses can be used for multi-generational housing. They don't pay rent to live there. ADU can be used as a rental unit.

A commissioner stated that she wanted to revisit allowing manufactured homes as ADUs. There is a growing industry for offsite constructed units. The units can be almost indistinguishable from site built. They should be allowed to be used as ADUs in zones where manufactured are allowed.

A commissioner asked if the county approves the permit for a manufactured home.

Staff replied there are many types of structures. One is the type of structure where lumber brought on site and the home is constructed and inspected. Then there are manufactured homes which are built to HUD standards with a seal. They are not site-built homes or dwelling units. County considers those as manufactured homes in the zoning code. Those are an easy process. The state inspects. Another type are buildings that are partially constructed offsite to building code and assembled on site. Then there are modular units that are steel allowed in certain locations. And then there are shipping containers and other alternate construction. There are buildings that are completely constructed offsite. All of these are different. The ones that are partially built off site delivered and assembled onsite. The county reviews and inspects these and these are allowed as ADU. It's the other completely built off-site that are the issue due to questions such as what code are these built to and what area they are considered. It's an undefined process where the state inspects not county. These are the structures the commissioner wants to be allowed as an ADU.

A commissioner stated that if someone added one because they are built to IRC. In zones that already allow for manufactured housing should allow manufactured homes as ADUs.

Staff replied that the county must adhere to Prop 207 laws. The careful approach is to allow only site-built. We are in a public hearing where people can speak on this. We need to be very careful about allowing manufactured homes where they are not allowed. If the commission wants to make changes, that can be discussed after we hear public comment.

A commissioner responded that there is a significant cost difference. Need to allow what is allowed and what fits contextually.

A commissioner asked about the process for approval.

Staff said no matter what happens ADUs will be allowed on January 1, 2026. The state allows counties to add unique standards subject to the framework they created. Pima Prospers promotes additional housing types and to also protect existing neighborhoods. This is also why we added the lot coverage requirements to avoid too much massing.

A commissioner asked if homeowners associations covenants supersede.

Staff replied that in state law HOAs can restrict them.

A commissioner asked what would happen if the commission didn't approve the text amendment.

Staff replied that if the text amendment doesn't get approved or if it gets delayed, starting on January 1, 2026 anyone could get a permit for an accessory dwelling unit up to what the state allows. We want to be careful and considerate but also move quickly through the process while also protecting what is special about Pima County.

A commissioner asked for clarification on the 20-foot building separation on lots one acre or

greater versus the 3-foot separation on lots less than one acre.

Staff responded that on larger lots, 20 feet is consistent with the existing standards for main building separation. On the smaller lots, the 3 feet is consistent with building code fire walls.

A commissioner asked if someone has a lot larger than an acre that has restricted open space areas, can they have an accessory dwelling unit?

Staff replied that in such circumstances, the process is the Modification of Setback requirements and explained how that process works.

A commissioner asked about the 3-foot separation and setback for ADUs versus other accessory buildings.

Staff replied that there is no separation requirement between an accessory structure and a house. The setback of 3 feet is due to the firewall requirement. Homeowners on smaller lots will want to maximize their development potential.

The chairman opened the public hearing and asked if there was anyone who wished to speak.

A representative of the Southern Arizona Home Builders Association spoke about supporting allowing manufactured homes as accessory dwelling units because this will allow for more flexibility. Accessory dwelling units should be allowed to be up to 1,250 square feet without restrictions on attachment type and size. He also spoke regarding consideration of exploring changes to impact fees.

A representative of the Manufactured Housing Industry of Arizona spoke about the cost of a manufactured home is about 60% of a site-built house. Quicker, less disruptive and has less waste to neighbors than standard construction and asked that the ordinance be amended to allow manufactured homes.

The chair asked the representative if someone could hire a company to assemble a unit on site.

The representative said the he did not have an answer to that. Their products are built to HUD standards. Something like what you described would be built to IRC standards.

Staff responded that manufactured homes are easily processed. For other buildings, it is a gray area.

A member of the manufactured home industry stated GR-1 allows manufactured but as proposed ADUs are required to be site built. Perceptions of manufactured homes are often based on their appearance. If allowed by Homeowners' Association Covenants, owners can alter the exterior with stucco or differing roof types to fit into the neighborhood. Consideration should be given to Park Models and allowing tiny homes which are factory built.

A member of the public who lives in the Tucson Mountains and is also a member of the Tucson Mountains Association spoke about the housing issues in Tucson. Tucson Mountain Area is one acre or larger lots. He asked for clarification about how many units are allowed. Staff replied that on lots one acre or larger can have up to 3 ADUs. He stated that Tribal lands and airport areas are excluded. He asked that ADUs not be allowed in Tucson Mountains. It is not an infill area. These are intended for infill. He asked that ADUs not be allowed in special planning areas.

Staff replied that state law will not allow an area like that to be excluded. Staff can meet with Tucson Mountain Association separately to discuss their concerns.

The commission voted to close the public hearing.

A commissioner stated that a manufactured home could fit in the Tucson Mountains area.

Staff replied that Tucson Mountains is low density SR or CR-1. Neither of those zones allow manufactured homes. If the commission wants to allow manufactured housing for ADUs, it should only be in zones that allow manufactured homes. There are many other zones that allow manufactured homes.

A commissioner stated she is advocating for manufactured homes for more flexibility to allow more housing units. Limiting manufactured homes limits future housing.

The chair asked if the commissioner could make a motion to allow manufactured homes as accessory dwelling units where the zone allows them.

Staff replied yes and discussed how the language could be updated. Planning works closely with our building official and will keep in contact and once we have a better understanding of the other types.

Staff also recommended adding modular to the language in number 10.

The chair asked about impact fees.

Staff stated that this ordinance does not have the ability to allow or not allow impact fees.

Chair asked if a motion could be made including impact fees.

Staff said that because this ordinance does not include impact fees, that it could not.

A commissioner talked about impact fees and the importance to affordability and the low impact of ADUs.

Staff stated that they are supportive of impact fees to help with capacity.

A commissioner talked about the requiring an attached unit. She stated that she would like number 4 to be updated to allow the third unit to be restricted affordable.

Staff talked about how the language could be revised if that is the will of the commission.

A commissioner asked if the 1,000 square feet for attached could be increased to 1,250 square feet.

Staff replied they are comfortable with the 75% or 1,000 square feet for attached and this is how the state worded it.

A commissioner asked about taxes of ADUs. Staff replied taxes are the role of the Assessor's office.

Staff clarified the difference between guest houses and accessory dwelling units and that accessory dwelling units add additional households. Staff advocates to keep impact fees because as additional unit it adds impacts.

Regarding section U.3, allowing 2 detached units on all lots, staff mentioned that on higher density smaller lots, staff wants to protect neighbors, and to allow only one detached unit on smaller lots. With the proposed changes to U.4, you could do two detached units with the restricted affordable unit being triggered by third unit.

A commissioner asked whether the commission could encourage staff to consider reduced impact fees.

Staff replied that impact fees are meant to offset the impact of a new unit. Having a family member in a guest house is different than the impacts of adding a new unit with new a family. The impact fee ordinance is on a different schedule so its update will be after the adoption of this zoning text amendment ordinance. What is proposed in this ordinance is a very big change for Pima County.

A commissioner asked if additional changes could be proposed for the ordinance now.

Staff replied that the time frame now makes additional changes difficult. Staff can always bring this back to the commission to make changes to the ordinance in the future.

Commissioner Lane made a motion to recommend **APPROVAL** of Zoning Code Text Amendment P25TA00002 Accessory Dwelling Units with the following changes: In U.4, reword to "an additional detached unit is allowed" and strikethrough restricted affordable and add "The third unit must be restricted affordable." In U.10, add "In zoning districts where manufactured homes are allowed, accessory dwelling may be manufactured and modular homes.". Work with the Department of Transportation to explore impact fee options. Commissioner Maese gave second.

Upon a roll call vote, the motion to recommend **APPROVAL** passed (6-0; Commissioners Becker, Matter, Gungle and Cook were absent).

TD/AM/ds
Attachments

C: Chris Poirier, Director

ORDINANCE 2025-_____

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA, RELATING TO ZONING (TITLE 18); AMENDING THE PIMA COUNTY CODE CHAPTER 18.03 (GENERAL DEFINITIONS), SECTION 18.03.020 (DEFINITIONS) TO ADD A DEFINITION FOR ACCESSORY DWELLING UNIT, AND AMENDING THE PIMA COUNTY CODE CHAPTER 18.09 (GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS) TO ADD STANDARDS FOR ACCESSORY DWELLING UNITS

THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA FINDS THAT:

1. The Arizona State Legislature passed H.B. 2928 in May 2025 to mandate counties adopt certain zoning code amendments relating to accessory dwelling units.
2. The Planning and Zoning Commission, at its June 25, 2025, hearing, initiated and authorized staff to amend the Pima County Zoning Code to add a definition and standards for accessory dwelling units.
3. The amendments to this ordinance will provide a definition and standards for accessory dwelling units.
4. This ordinance does not create new restrictions on the use of property, and this ordinance is not intended to, nor should it be construed to, reduce any existing rights to use, divide, sell, or possess private real property.

IT IS ORDAINED BY THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA:

Section 1. Pima County Code Chapter 18.03 (GENERAL DEFINITIONS), Section 18.03.020 (Definitions), is amended to adopt a definition for accessory dwelling units as follows:

Chapter 18.03
GENERAL DEFINITIONS

...

18.03.020 Definitions.

...

A. Definitions "A."

...

2. Accessory dwelling unit: A self-contained living unit that is on the same lot or parcel as a single-family dwelling of greater square footage than the accessory dwelling unit, that includes its own sleeping and sanitation facilities and that may include its own kitchen facilities.
3. Accessory structure...

...

Section 2. Pima County Code Chapter 18.09 (GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS), Section 18.09.020 (General requirements and exceptions), is amended to add standards for accessory dwelling units as follows:

Chapter 18.09
GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS

...

18.09.020 General requirements and exceptions.

...

U. Accessory Dwelling Units

1. Accessory dwelling units are permitted on any residential or rural lot which allows a single-family dwelling.
2. Permitted coverage: Accessory dwelling unit square footage counts toward the accessory structure lot coverage limits for the zone in which the accessory dwelling unit is located and are permitted up to the maximum allowed by section 18.09.020.U.5. Accessory dwelling unit(s) are not restricted by the accessory structure coverage but count toward the lot coverage limits.
3. One attached accessory dwelling unit and one detached accessory dwelling unit per lot is allowed.
4. On lots or parcels one acre or greater in size: an additional detached dwelling unit is allowed. The third unit must be restricted affordable.
5. Size:
 - a. Detached accessory dwelling unit(s) may be developed up to 75% of the gross floor area of the main dwelling or 1,250 square feet, whichever is less.
 - b. Attached accessory dwelling unit(s) may be developed up to 75% of the gross floor area of the main dwelling or 1,000 square feet, whichever is less.
6. Minimum yard requirements:

- a. Front: In accordance with accessory building standards of the appropriate zone.
- b. Side and Rear: Three feet.
- c. Distance to main structures:
 - i. Lots one acre and greater: 20 feet.
 - ii. Lots less than 1 acre: 3 feet.
- 7. Height: In accordance with single-family dwelling standards of the appropriate zone.
- 8. Accessory dwelling unit(s) shall use the same access which serves the main dwelling.
- 9. Accessory dwelling unit(s) may be used as a short- or long-term rental.
- 10. Accessory dwelling unit(s) must be site-built. Manufactured and modular homes may be used as accessory dwelling units in zoning districts where these units are permitted.
- 11. No additional parking is required for accessory dwelling units to accommodate an accessory dwelling unit.
- 12. This section does not apply to lots or parcels that are located on tribal land, on land in the territory in the vicinity of a military airport or ancillary military facility as defined in A.R.S. section 28-8461, on land in the territory in the vicinity of a federal aviation administration commercially licensed airport or a general aviation airport or on land in the territory in the vicinity of a public airport as defined in A.R.S. section 28-8486 that has a noise level of greater than sixty-five decibels.

Section 3. This ordinance is effective 31 days after its adoption.

PASSED AND ADOPTED by the Board of Supervisors of Pima County, Arizona, this

_____ day of _____, 2025.

ATTEST:

BOARD OF SUPERVISORS

Melissa Manriquez
Clerk of the Board of Supervisors

Rex Scott
Chairman, Board of Supervisors

APPROVED AS TO FORM:



Bobby Yu, Deputy County Attorney

APPROVED:



Executive Secretary
Planning and Zoning Commission

**PIMA COUNTY DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
STAFF REPORT TO THE PLANNING AND ZONING COMMISSION**

**PUBLIC HEARING
September 24, 2025**

P25TA00002

ACCESSORY DWELLING UNITS

STATUS / AGENDA ITEMS

Planning and Zoning Commission Public Hearing
Zoning Code Text Amendment

REQUEST

An ordinance of the Board of Supervisors of Pima County, Arizona, relating to zoning (Title 18); amending the Pima County Code Chapter 18.03 (General Definitions), Section 18.03.020 (Definitions) to add a definition for accessory dwelling unit, and amending the Pima County Code Chapter 18.09 (General Residential and Rural Zoning Provisions) to add standards for accessory dwelling units. (All Districts)

INITIATION

Planning and Zoning Commission, June 25, 2025

STAFF RECOMMENDATION

Staff recommends **APPROVAL** of the proposed Accessory Dwelling Units Zoning Code Text Amendment.

The proposed zoning text code amendment is intended to comply with House Bill 2928, which mandates counties adopt certain zoning code amendments relating to accessory dwelling units before January 1, 2026.

ACCESSORY DWELLING UNITS

This zoning text amendment will add section 18.09.020.U Accessory Dwelling Units to Chapter 18.09 General Residential and Rural Zoning Provisions and a definition for Accessory Dwelling Units to section 18.03 Definitions. The amendment complies with HB 2928 passed by the Arizona legislature in May 2025. HB2928 requires counties to adopt zoning regulations to allow accessory dwelling units on lots/parcels that allow single-family residences.

These changes will ensure Pima County complies with the Arizona State Legislature timeline for adopting standards to allow accessory dwelling units. The amendment will also help facilitate housing opportunities that will support both housing choice and supply.

Departmental and Stakeholder Review and Comment

Staff sent the draft text amendment to county departments and other local development and stakeholder groups for review and comment. Received comments are attached.

Respectfully Submitted,



Anita McNamara, AICP
Planner II

ORDINANCE 2025-_____

AN ORDINANCE OF THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA, RELATING TO ZONING (TITLE 18); AMENDING THE PIMA COUNTY CODE CHAPTER 18.03 (GENERAL DEFINITIONS), SECTION 18.03.020 (DEFINITIONS) TO ADD A DEFINITION FOR ACCESSORY DWELLING UNIT, AND AMENDING THE PIMA COUNTY CODE CHAPTER 18.09 (GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS) TO ADD STANDARDS FOR ACCESSORY DWELLING UNITS

THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA FINDS THAT:

1. The Arizona State Legislature passed H.B. 2928 in May 2025 to mandate counties adopt certain zoning code amendments relating to accessory dwelling units.
2. The Planning and Zoning Commission, at its June 25, 2025, hearing, initiated and authorized staff to amend the Pima County Zoning Code to add a definition and standards for accessory dwelling units.
3. The amendments to this ordinance will provide a definition and standards for accessory dwelling units.
4. This ordinance does not create new restrictions on the use of property, and this ordinance is not intended to, nor should it be construed to, reduce any existing rights to use, divide, sell, or possess private real property.

IT IS ORDAINED BY THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA:

Section 1. Pima County Code Chapter 18.03 (GENERAL DEFINITIONS), Section 18.03.020 (Definitions), is amended to adopt a definition for accessory dwelling units as follows:

Chapter 18.03
GENERAL DEFINITIONS

18.03.020 Definitions.

A. Definitions "A."

...

...

...

2. Accessory dwelling unit: A self-contained living unit that is on the same lot or parcel as a single-family dwelling of greater square footage than the accessory dwelling unit, that includes its own sleeping and sanitation facilities and that may include its own kitchen facilities.

3. Accessory structure: As defined in 18.03.020 Definitions

...

Section 2. Pima County Code Chapter 18.09 (GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS), Section 18.09.020 (General requirements and exceptions), is amended to add standards for accessory dwelling units as follows:

...

Chapter 18.09

GENERAL RESIDENTIAL AND RURAL ZONING PROVISIONS

18.09.010 Purpose.

Reserved.

18.09.020 General requirements and exceptions.

...

U. Accessory Dwelling Units

1. Accessory dwelling units are permitted on any residential or rural lot which allows a single-family dwelling.
2. Permitted coverage: Accessory dwelling unit square footage counts toward the accessory structure lot coverage limits for the zone in which the accessory dwelling unit is located and are permitted up to the maximum allowed by section 18.09.020.5. Accessory dwelling unit(s) are not restricted by the accessory structure coverage but count toward the lot coverage limits.
3. One attached accessory dwelling unit and one detached accessory dwelling unit per lot is allowed
4. On lots or parcels one acre or greater in size: a minimum of one additional detached dwelling unit (if restricted affordable).
5. Size:
 - a. Detached accessory dwelling unit(s) may be developed up to 75% of the gross floor area of the main dwelling or 1,250 square feet, whichever is less.
 - b. Attached accessory dwelling unit(s) may be developed up to 75% of the gross floor area of the main dwelling or 1,000 square feet, whichever is less.
6. Minimum yard requirements:
 - a. Front: In accordance with accessory building standards of the appropriate zone.
 - b. Side and Rear: Three feet.

c. Distance to main structures:

- i. Lots one acre and greater: 20 feet.
- ii. Lots less than 1 acre: 3 feet.

- 7. Height: In accordance with single-family dwelling standards of the appropriate zone.
- 8. Accessory dwelling unit(s) shall use the same access which serves the main dwelling.
- 9. Accessory dwelling unit(s) may be used as a short- or long-term rental.
- 10. Accessory dwelling unit(s) must be site-built.
- 11. No additional parking is required for accessory dwelling units to accommodate an accessory dwelling unit.
- 12. This section does not apply to lots or parcels that are located on tribal land, on land in the territory in the vicinity of a military airport or ancillary military facility as defined in A.R.S. section 28-8461, on land in the territory in the vicinity of a federal aviation administration commercially licensed airport or a general aviation airport or on land in the territory in the vicinity of a public airport as defined in A.R.S. section 28-8486 that has a noise level of greater than sixty-five decibels.

...

Section 3. This ordinance is effective 31 days after its adoption.

PASSED AND ADOPTED by the Board of Supervisors of Pima County, Arizona, this

_____ day of _____, 2025.

ATTEST:

BOARD OF SUPERVISORS

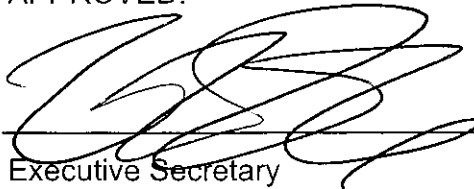
Melissa Manriquez
Clerk of the Board of Supervisors

Rex Scott
Chairman, Board of Supervisors

APPROVED AS TO FORM:

APPROVED:

Bobby Yu, Deputy County Attorney


Executive Secretary
Planning and Zoning Commission

From: [Patricia Gilbert](#)
To: [Anita McNamara](#)
Cc: [Thomas Drzazgowski](#); [Chris Poirier](#)
Subject: RE: Pima County Zoning Code Text Amendments - Accessory Dwelling Units as required by AZ HB 2928
Date: Monday, August 25, 2025 10:18:29 AM

Good Morning Anita,

The District has no input to provide. Ran it by Eric, it looks fine to us!

Patricia Gilbert
Hydrologist III
Floodplain Management Division
Pima County Regional Flood Control District

201 North Stone Ave
9th Floor
Tucson, Arizona, 85701
Direct - 520.724.4606

From: Anita McNamara <Anita.McNamara@pima.gov>
Sent: Thursday, August 21, 2025 11:16 AM
To: Anita McNamara <Anita.McNamara@pima.gov>
Cc: Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>; Chris Poirier <Chris.Poirier@pima.gov>
Subject: Pima County Zoning Code Text Amendments - Accessory Dwelling Units as required by AZ HB 2928

Good morning,

Pima County is updating the County Zoning Code as mandated by House Bill 2928 which requires counties to permit Accessory Dwelling Units (ADUs) on any lot or parcel that allows a single-family dwelling in the County. The law also provides certain standards for accessory dwelling units and prevents counties from applying restrictions. Counties must adopt changes to their Zoning Codes by January 1, 2026, or ADUs will be allowed without any restrictions. Accordingly, staff has a tight timeframe in which to accomplish these code revisions. The text amendment is scheduled for the September 24th Planning and Zoning Commission meeting.

Attached is a draft of the proposed zoning code text amendment for review and comments. In the past, our stakeholders have provided very valuable comments on text amendments. Your time is very much appreciated.

Please provide us with any comments you may have by **September 2, 2025**.

Should you have any questions, please let us know.

Thank you,

Anita McNamara, AICP
Senior Planner
Pima County Development Services
Planning Division

From: [Larry Potter](#)
To: [Anita McNamara](#)
Subject: ADU ordinance
Date: Saturday, August 30, 2025 12:59:01 AM

You don't often get email from larrycpotter@gmail.com. [Learn why this is important](#)

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The draft ordinance looks great with one exception. Manufactured homes should be allowed. Especially where manufactured homes are allowed as the primary residence.

Larry Potter

Real Estate Sales, Leasing and Consulting
Tucson Professional Realty, LLC
PO Box 1557, Cortaro, AZ 85652
520-991-2311 larry@ah101.com

From: [Thomas Drzazgowski](#)
To: [Anita McNamara](#)
Subject: FW: SAHBA Comments on Proposed Pima County ADU Code Amendments
Date: Tuesday, August 19, 2025 3:27:04 PM
Attachments: [Outlook-cu3fonib.png](#)
[Outlook-thq4trc5.png](#)
[Outlook-uk1ef3j1.png](#)
[Outlook-5fev34px.png](#)
[Outlook-ianqzmz54.png](#)
[Outlook-ynnkm1ty.png](#)
[Outlook-wpswuc1f.png](#)
[Outlook-d3mtasjx.png](#)

FYI. I received these from Brendan with SAHBA. Nothing to do right now.

Tom Drzazgowski
Deputy Director
520-724-6675
Thomas.Drzazgowski@pima.gov

From: Brendan Lyons <Brendan@sahba.org>
Sent: Thursday, July 31, 2025 5:13 PM
To: Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>
Subject: SAHBA Comments on Proposed Pima County ADU Code Amendments

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Hi Tom,

Thanks for the call today and for including SAHBA as a stakeholder in the County's efforts to revise its zoning code to comply with HB 2928 and expand opportunities for ADUs. We appreciate the County's leadership on this issue. Generally speaking, SAHBA encourages a less regulatory approach, consideration of practical affordability, and the use of incentives to promote broader participation and faster delivery of housing.

Policy Recommendations:

- **Allow Greater Flexibility Based on Lot Size and Simplify Affordability**
Provisions: Flexibility in unit count based on parcel size, without strict affordability conditions, will encourage broader participation and faster housing growth. If affordability requirements are imposed, we recommend increasing the threshold to 90 to 100 percent of Area Median Income (AMI) to better reflect market conditions.
 - The proposed 80 percent AMI restriction presents challenges, including how

tenant income would be verified, who would manage compliance, and what happens if a tenant's income increases during the lease. These requirements could be difficult to enforce and discourage participation. There is also the risk of misuse, such as tenants underreporting income to qualify, followed by rent increases. Streamlined, incentive-based policies and increased supply are more effective in promoting affordability.

- **Increase Maximum ADU Size to 1,250 Square Feet:** A larger size allowance supports functional living for multigenerational families, caregivers, or renters, especially on larger lots.
- **Avoid Stricter Standards Than for Primary Homes:** ADUs should not face more restrictive design, parking, or setback requirements than the main residence. Consistent standards reduce confusion and promote buildability.
- **Support Height Flexibility and Shared Infrastructure:** Shared utility lines should be permitted for multiple ADUs to reduce cost and improve efficiency. As backyard density increases, the County could encourage the use of flexible building materials to help reduce risk. Property owners should be allowed to build up to conserve yard space and improve site layout options.

We look forward to continued engagement and collaboration as the County develops a balanced and workable ADU policy that increases housing options and aligns with community needs. Thank you!



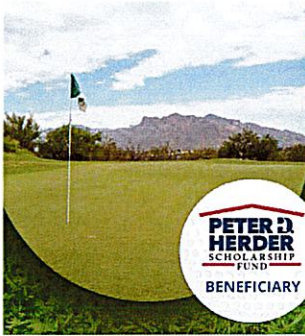
BT Lyons

BRENDAN LYONS, MPA, Government Affairs Director
Southern Arizona Home Builders Association
[2840 N. Country Club Road | Tucson, AZ 85716](#)
d: 520.918.2367 **m:** 520-248-9874
e: brendan@sahba.org **w:** sahba.org

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SAHBA is a 501(c)(3) non-profit organization

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Anita McNamara

From: Thomas Drzazgowski
Sent: Tuesday, August 5, 2025 12:43 PM
To: Anita McNamara
Subject: FW: SAHBA Comments on Proposed Pima County ADU Code Amendments

On the ADU text amendment.

Tom Drzazgowski
Deputy Director
520-724-6675
Thomas.Drzazgowski@pima.gov

From: Brendan Lyons <Brendan@sahba.org>
Sent: Thursday, July 31, 2025 5:13 PM
To: Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>
Subject: SAHBA Comments on Proposed Pima County ADU Code Amendments

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BT Lyons



BRENDAN LYONS, MPA, Government Affairs Director
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 e: brendan@sahba.org w: sahba.org

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From: [Vivian Harte](#)
To: [Anita McNamara](#); [Thomas Drzazgowski](#); [Chris Poirier](#)
Subject: Comments by the Tucson Mountains Association on the Proposed Text Amendments for ADUs
Date: Tuesday, September 2, 2025 12:13:47 PM

Some people who received this message don't often get email from vivian.harte@gmail.com. [Learn why this is important](#)

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

On the proposed Zoning Code Text Amendment for Accessory Dwelling Units (ADUs), comments and questions are provided by the Tucson Mountains Association.

TMA recognizes the importance of expanding housing options in Pima County. We strive to prevent impacts to residents, environmental or other resources, and property rights in the Tucson Mountains. TMA members or residents have expressed concerns about Accessory Structures' size, use, and whether the property can be rented. ADUs can be a new concern of adverse impacts in the Tucson Mountains.

For the past couple years, TMA has provided input to the update to the Pima Prospers 2025 Comprehensive Plan, especially the S-8 Tucson Mountains. S-8 is one of 14 special planning areas where policies guide development in the unique areas. Tribal land, military and airport uses, and unique geography of neighborhoods are special planning areas.

For the proposed Text Amendment, here are TMA's comments and questions:

18.09.020 General requirements and exceptions. U.3. and U.4. On lots or parcels one acre or greater in size: a minimum of one additional detached dwelling unit (if restricted affordable). Please clarify this ADU requirement for large parcels, which are predominant in the Tucson Mountains. A maximum of two detached ADUs are allowed on large parcels? In U.4., what does (if restricted affordable) mean?

U.9. The proposed language is that ADUs may be used as a short- or long- term rental. TMA understands that rentals of a Guest House detached from the main house is prohibited per 18.03.020(G.)9. Guest House definition... used primarily by members of the same family occupying the main dwelling and their non paying guests. How will Development Services explain the differences between Guest House and ADUs codes? For example, 18.09.020 has no requirement for utility meters, but in 18.09.020(G.)6, the guest house and the main dwelling shall not be served by separate utility meters. There

are similarities such as U.8. and 18.09.020(G.)5 Shall use the same access which serves the main building.

U.12. At the end, insert “on land located in comprehensive plan special planning areas.”
So it reads This section does not apply to lots or parcels that are located on tribal land...in the vicinity of a military airport or ancillary military facility...commercially licensed airport...or public airport...on land located in comprehensive plan special planning areas.

The Arizona housing mandate is met because there is more land available for ADU housing options in unincorporated Pima County than land in special planning areas.

Given the recent Arizona laws and Pima County Text Amendment for Zoning Code changes, how will Development Services summarize the regulations for multi-family structures, duplexes or triplexes, ADUs, and middle housing? A summary could help TMA and neighborhood associations understand the Zoning Code changes.

Thank you for contacting the Tucson Mountains Association about this Text Amendment for ADUs. TMA could have more comments when the Text Amendment goes to the Planning and Zoning Commission.

Sincerely,
Vivian Harte, Vice President and Acting President
Tucson Mountains Association

From: [Thomas Drzazgowski](#)
To: [Anita McNamara](#)
Subject: FW: ADU Ordinance PnZ Commission in September
Date: Monday, September 22, 2025 10:32:22 AM

Tom Drzazgowski
Deputy Director
520-724-6675
Thomas.Drzazgowski@pima.gov

From: Carmine DeBonis <Carmine.DeBonis@pima.gov>
Sent: Monday, September 22, 2025 10:09 AM
To: Tom Dunn <tdunn@azhousing.org>
Cc: Chris Poirier <Chris.Poirier@pima.gov>; Thomas Drzazgowski <Thomas.Drzazgowski@pima.gov>
Subject: RE: ADU Ordinance PnZ Commission in September

Hi Tom,

Apologies for the delayed response. I'm copying our Development Services Director Chris Poirier. He would be a good contact for you to discuss this with.

Regards,
Carmine

Carmine DeBonis Jr.
Deputy County Administrator

Pima County
115 N. Church Avenue, Suite 231
Tucson, Arizona 85701

Phone: (520) 724-8474
Mobile: (520) 349-0921
Email: carmine.debonis@pima.gov
Website: <https://webcms.pima.gov/>

From: Tom Dunn <tdunn@azhousing.org>
Sent: Tuesday, September 2, 2025 12:16 PM

To: Carmine DeBonis <Carmine.DeBonis@pima.gov>
Subject: ADU Ordinance PnZ Commission in September

You don't often get email from tdunn@azhousing.org. [Learn why this is important](#)

Carmine - I was speaking with Tim Bee and he suggested that I bring you in on the loop about the ADU Ordinance and excluding manufactured housing. I did reach out to Anita McNamara this morning but would love to have a chance to discuss with the appropriate staffer and PnZ Commission leadership prior to any final decisions be made.

FYI - I left the Arizona Builders Alliance in 2023 and now lead the Manufactured Housing Industry of Arizona trade association (representing a \$3 billion economic impact of Arizona annually!

Tom Dunn, President
MHIA

From: Tom Dunn <tdunn@azhousing.org>
Sent: Tuesday, September 2, 2025 11:32 AM
To: anita.mcnamara@pima.gov <anita.mcnamara@pima.gov>
Cc: Venise Gomez <venisejgo@gmail.com>; David Roe Jr. <Dave.Roe@ClaytonHomes.com>; Terry Gleeson <gleesonmhs@aol.com>
Subject: ADU Ordinance PnZ Commission in September

Anita,

Good morning. The information sheet about the proposed ADU Ordinance was sent to me this weekend and there is significant concern regarding limiting the type of construction of ADUs in Pima County to site built only. The state focus on the housing affordability crisis has been on expanding opportunity, not limiting housing diversity. Labor shortages and material cost increases alone have proven to limit ownership to those that can afford to pay more (especially in rural areas where significant costs occur to entice contractors to be interested in the work). Recent studies have site-built construction double the cost of manufactured housing and factory-built homes.

Manufactured housing has been the ADU answer in California and can be here as well.

The link below is our website that discusses Manufactured Housing as an ADU solution.
<https://www.housingarizona.org/accessory-dwelling-units/>

[Factory Built Accessory Dwelling Units](https://www.housingarizona.org/accessory-dwelling-units/)



- MHIA

Factory Built Accessory Dwelling Units Addressing Arizona's Affordable Housing Challenge with ADUs In the face of an ever-growing demand for accessible and economical housing solutions spanning the varied landscapes of Arizona's counties and entitlement communities, the investigation into Accessory Dwelling Units (ADUs) arises as an especially promising avenue. www.housingarizona.org
This guide, as comprehensive ...

As the President of the Manufactured Housing Industry of Arizona, I would like the opportunity to meet with staff prior to the Planning and Zoning Commission meeting to discuss the issue. I'm available to meet the week of September 15th (Monday 9/17, Tuesday 9/18 & Wednesday 9/17 are available to schedule a meeting).

Best Regards,

Tom Dunn, PHC

President MHIA

Manufactured Housing Industry of Arizona

4525 S Lakeshore Dr #105

Tempe, AZ 85282

TDunn@AZHousing.org

520-481-7919 (c)

480-456-6530 (o)

AZHousing.org

September 22, 2025



Pima County Planning Commission
c/o Development Services Department
201 N. Stone Avenue
Tucson, AZ 85701

Re: Support for Permitting Construction of Accessory Dwelling Units

Dear Chair and Members of the Planning Commission,

On behalf of the Tucson Association of REALTORS®, we express our strong support for amending Pima County's zoning code permitting the construction of accessory dwelling units and encourage the Commission's consideration of a 1,250 sq. ft. maximum without restrictions. This approach will better align with the realities of our local housing needs by creating homes that are functional, cost-effective, and attainable for a wide range of residents.

The gross floor area of the main unit, or whether a unit is attached or detached, should not drive housing policy. A consistent 1,250 sq. ft. cap across all housing types removes unnecessary complexity, provides clarity for builders, and allows the market to deliver diverse, attainable options. A straightforward standard ensures efficiency, predictability, and fairness, while recognizing that a 1,250 sq. ft. home, regardless of form, can be a well-designed, livable space that meets Pima County's housing needs.

This flexibility is critical. REALTORS® see firsthand the challenges renters face: limited supply, escalating costs, and a shrinking range of attainable options. By establishing a clear standard, Pima County can encourage construction of smaller, more affordable homes while giving builders the certainty they need to move forward with projects. This approach will expand housing choice, relieve pressure on rents, and better reflect the realities of today's market.

For these reasons, the Tucson Association of REALTORS® urges the Planning Commission to support a maximum square footage of 1,250 sq. ft. without restrictions related to gross floor area, attachment, or unit type. Doing so will advance the County's broader goals of expanding affordability, promoting sustainability, and making more efficient use of land while meeting the pressing housing needs of our residents.

Sincerely,

A handwritten signature in black ink that reads 'Shawn Cote'.

cc: Mr. Chris Poirier, Mr. Thomas Drzazgowski

