



November 16, 2025

Pima County Board of Supervisors  
Tucson, Arizona

**Re: P25TA00002 Zoning Code Text Amendment for Accessory Dwelling Units**

Dear Honorable Supervisors,

Tucson Mountains Association was founded in 1934 by homesteading families to improve living in the Tucson Mountains. TMA continues to protect the large lots, low density residential development, open space, Sonoran Desert habitats, dark skies, scenic views, and quality of life in the Tucson Mountains.

TMA appreciates working with Development Services Department staff on Pima Prospers 2025 and this ADU text amendment. It has been a 2-year process for Pima Prospers, but less than three months for the ADU process of stakeholder input.

The Pima County ADU text amendment is due to the recent passage of House Bill 2928 by the State of Arizona. HB 2928 is a State legislative attempt to address the Arizona housing crisis by allowing ADUs. Development Services is proposing an ADU ordinance with appropriate ADU standards for Pima County without creating adverse impacts to neighborhoods.

TMA recognizes the need to expand housing supply and options in Pima County. TMA and other organized neighborhood stakeholder groups have provided input to the ADU text amendment. In 18.09.020 U. Accessory Dwelling Units standards, TMA supports Development Services following suggested changes or proposed amendments:

- **Side and Rear setback** change from 3 to **5 feet**;
- **Minimum Distance to main structures**, lots one acre and greater from 20 to **10 feet**;
- **Pima County Code Regulations**, added a section that all development standards still apply, to prevent further impacts. For lots one acre or greater up to two detached ADUs are allowed, in addition to one attached ADU for a total of 3 ADUs on one large residential lot.
- **Short-Term Rental (STR) ADUs**, added a section that for rentals of less than 30 days the owners must reside on the property.

TMA is concerned that detached ADUs could be setback 5 feet from the property boundary far away or maximum distance to the main structure and cause additional adverse impacts to neighbors and the Sonoran Desert land. Adding an amendment that all Pima County Code regulations still apply could prevent further impacts by ADUs.

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There are many lots one acre and greater in the Tucson Mountains with accessory buildings such as garages and guest houses. Proposed is up to two detached ADUs. To prevent more impacts by the ADU access and grading for ADU buildings, **TMA requests adding:**

- “(No new driveway or other access points allowed) from the website for GUEST HOUSE;
- Maximum lot coverage grading amounts are for all buildings including new detached ADUs (similar to the Permitted coverage that ADU square footage counts toward lot coverage).

TMA is also concerned that on large residential lots, a second detached ADU is allowed if “restricted affordable.” While this could address affordable housing, how will Pima County enforce this ADU standard that involves ensuring the renter’s household income is 80% of the area median income, a deed restriction placed on the property, or a development agreement with the County?

Pima County Transportation and Development Services acknowledge there can be more traffic from new ADUs that will be subject to Impact Fees. TMA believes new ADUs can cause additional potential adverse impacts to housing density, open space, and Sonoran Desert habitats in the Tucson Mountains. Housing by ADUs may not be compatible with low density residential areas and natural open space as exists in the Tucson Mountains.

Pima Prospers 2025 encourages infill, as does TMA. We strongly encourage ADUs where they are compatible close to the education and employment urban core of Tucson. HB 2928 includes exemptions for tribal lands, military areas, and high-noise areas like airports to not allow ADUs. Pima Prospers 2025 has special areas including tribal lands, military and airport areas, and neighborhoods with unique physical features or location.

***TMA requests Development Services add a line or section to the proposed ADU text amendment with standards to recognize and protect unique neighborhoods or environments in Pima County, including but not limited to comprehensive plan special planning areas (example: S-8 Tucson Mountains).***

There are unique environments and special areas in every Pima County District. County Supervisors cannot prevent or limit ADUs on residential lots in their District, but Development Services can prepare ADU standards unique to Pima County. And Development Services can thoroughly review ADU permit applications for compliance with all Pima County Codes to prevent adverse impacts to District residents.

Thank You for the opportunity by Tucson Mountains Association to provide ADU input.

Sincerely,

*Vivian Harte*

Vivian Harte, Acting President  
Tucson Mountains Association

*Steve Dolan*

Steve Dolan, Board Member  
Tucson Mountain Association