



Fw: Middle Housing Ordinance

From Adriana Fisher <AFisher@flagstaffaz.gov>

Date Tue 3/4/2025 2:34 PM

To Michelle J. McNulty <Michelle.McNulty@flagstaffaz.gov>; Tiffany Antol <TAntol@flagstaffaz.gov>

Cc Justyna Costa <jcosta@flagstaffaz.gov>; Sarah Darr <sdarr@flagstaffaz.gov>; Christina Rubalcava <CRubalcava@flagstaffaz.gov>

Hi Michelle and Tiffany,

Please see the below email from Housing Commissioner Tyler Denham. Per your request, I've copied Christina.

Please let me know if you need anything further from me.

Best,



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From: tyler denham <tyler.b.denham@gmail.com>

Sent: Thursday, February 27, 2025 3:02 PM

To: Adriana Fisher <AFisher@flagstaffaz.gov>

Subject: Middle Housing Ordinance

Hi Adriana, I'm copying my comments from earlier, and I've added red text to explain my thinking to help the planning staff interpret it. Thank you for passing this along!

As you are well aware, housing in Flagstaff is unaffordable in part because there are not enough homes. This shortage creates cutthroat competition that drives up prices. When there aren't enough homes, the wealthy will always outbid working people, and everyone else has to move farther away. Right now, the people Flagstaff relies on - like teachers, fire fighters, service and retail workers - can't find homes in the community they serve. Allowing missing middle housing - duplexes, triplexes, fourplexes, townhomes - is a great way to address our shortage of homes in a way that minimizes concerns about neighborhood character. To make Flagstaff more affordable for locals, shorten commutes, help local businesses, and support a thriving community, we need to pass a robust missing middle housing ordinance.

With that in mind, I have some ideas about how to best implement the ordinance. First, I suggest the scope of the ordinance be extended to developments of 6 units, in order to include [cottage courts](#) and [courtyard buildings](#). These are not mentioned in HB2721, but are lovely housing options that would be

popular with residents. Second, I suggest the ordinance legalize missing middle housing citywide instead of in a narrow zone around downtown. This will make the ordinance more effective, and is also an equity issue - concentrating development on a few neighborhoods increases the risk of displacement. Third, I suggest the ordinance legalize missing middle housing through changes to the transect and non-transect zones, instead of through the creation of a new overlay. I believe the over-reliance on overlays contributes to the complexity that makes Flagstaff's codes so inaccessible to the average resident.

If it's helpful, I've created a guide on how I think the ordinance should be written. I envision this as a starting point for discussions and I'm greatly interested in your feedback:

1. Exempt residential developments of 6 or less units and 9 or less bedrooms from the density requirements in Table [10-40.30.030.C](#); units/acre, bedrooms/acre, and lot area/unit limits. You could alternatively calibrate the values to allow missing middle housing, but that's hard to do without benefiting larger-scale developments. **When I calculated these density measures from example middle housing projects, it became clear that most forms exceed the standards currently in code. For example, a stacked triplex with alley parking easily has a net density of 31 units per acre, and 47 bedrooms/acre with only 1.5 bedrooms per unit. To make middle housing work the density standards need recalibrated, but it may be hard to do so without unintentionally benefitting larger-scale housing. My proposal to get around this is to exempt middle housing from the standards. Alternatively, you could set different standards for housing ≤ 6 units. The density requirements section of Table 10-40.30.030.C already does this, with different standards for developments ≥ 4 units.**
2. Exempt residential developments of 6 or less units and 9 or less bedrooms from the parking requirements in [Table 10-50.80.040.A](#). The Code Analysis Project is holding a broader conversation on parking requirements, but for now it's enough to understand that parking requirements are a poison pill for missing middle housing. **Parking kills middle housing. I've heard this from every expert I've talked to, and played around with simple CAD models to confirm. If not outright exempting from parking minimums, HB2721 requires that middle housing within a mile of downtown have parking minimums ≤ 1 per unit. If we enact middle housing citywide, let's at least make it consistent citywide.**
3. Allow residential developments of 6 or less units and 9 or less bedrooms to use the International Residential Code (IRC). **Section B.6 of HB2721 requires that the city allow triplexes and fourplexes to use the International Residential Code (IRC) instead of the International Building Code (IBC). My suggestion is to extend that requirement to developments up to 6 units, like what [Memphis Tennessee did](#).**
4. Waive public ROW upgrades for residential developments of 6 or less units and 9 or less bedrooms, as is currently the case for developments up to triplexes. **I got this suggestion from a local developer I spoke with after the CAP Chat presentation. My understanding is that these ROW improvements can be prohibitive to smaller-scale projects.**
5. Combine the R1 and R1N zones. The building standards and densities are nigh-identical, the biggest difference is R1N allows multiple homes per lot. If we're legalizing missing middle housing city-wide that difference goes away. **This is from my reading of the R1 and R1N intents and building standards.**
6. In the CC, MH, and combined R1/R1N zones, publish a simple set of building standards conducive to single-family homes, duplexes, triplexes, and fourplexes. The exact values are a work in progress, but I calculated these by examining missing middle developments [here](#) and [here](#): **To add more detail, I tabulated the building standards from 24 middle housing plans and looked for commonalities.**

- o Minimum lot size: 2,000 sqft.
 - o Minimum lot width: 25 ft.
 - o Maximum building height: 35 ft.
 - o Minimum front and back setbacks: minimum of 5 ft each and a combined 12 ft.
 - o Minimum side setbacks: 5 ft each.
 - o Maximum Lot Coverage: 60%. This value is probably too low for some types of middle housing. Ideally this would be a sliding scale from 60 - 100% depending on the area, like the Transect zones. This is one of the reasons I think we should fix and extend the Transect zone - it already allows many types of middle housing and gives a mechanism for sliding scale lot coverage.
7. Recalibrate the T2, T3, and T4 Transect Zones to allow developments up to fourplexes. My understanding is these zones currently only allow up to triplexes.
 8. Everywhere there exists a R1/R1N parcel without a Transect overlay, apply the T3 overlay. In the R1 / R1N areas downtown this is the Transect zone overlaid on them.
 9. Everywhere there exists a CC or MH parcel without a Transect Overlay, apply the T4 overlay. In the MH areas downtown this is the Transect zone overlaid on them.
 10. There are a handful of ER and RR zoned parcels within a mile of downtown. Instead of changing the zones, just rezone the parcels to R1/R1N. In my understanding ER and RR zones aren't intended to see much development if any at all - it's only because housing costs have skyrocketed that it's becoming financially viable to do so. Rezoning a handful of properties seems easier than messing with these zones.

Best,
Tyler Denham