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Sonoran Land Resources, LLC
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VIA E-MAIL (JOHN.BEALL@TUCSONAZ.GOV)

John Beall
 Entitlements Section Manager
 City of Tucson Planning & Development Services Dept.
 201 N. Stone Avenue
 Tucson, Arizona 85701

SPECIAL EXCEPTION
Preliminary Development Plan
TP-ENT- 1025-00021 Date 1-16-2026
Planning & Development Services

**SUBJECT: TP-ENT-1025-00021 TEP Vine Substation SELU Addendum
 Request for Setback and Wall Height Modifications per UDC**

Mr. Beall:

This addendum letter is being submitted as part of the Zoning Examiner Special Exception Land Use (SELU) process to permit the construction of a new 138 kilovolt (“kV”) electric power substation (the “Project”). The Project is located on approximately 1.6 acres (the “Property”) on N. Vine Avenue near its intersection with E. Lee Street and adjacent to N. Ring Road, which is a private roadway serving the Banner Campus (see PDP Map).

The Project is requesting use-specific standard modifications for a 13.5’ enhanced-design security wall and a 0’ wall setback adjacent to industrial and transportation land uses. TEP is providing the additional information for the Zoning Examiner’s consideration of SELU conditions.

A. UDC 3.4 Special Exception Land Uses – ZE Authority to Apply Conditions

The Zoning Examiner has the discretion to modify structural and vegetative screening standards with *reasonable and appropriate conditions* on the SELU permit.¹ The Zoning Examiner’s (“ZE”) authority in the SELU process is stated:

UDC 3.4.6 Conditions of Approval

A. Authority to Apply Conditions.

In approving an application, the PDS Director, the Zoning Examiner, or the Mayor and Council may impose such reasonable and appropriate conditions and safeguards as are necessary to ensure compliance with the criteria for approval. Conditions and safeguards may also be imposed to reduce or minimize any potentially injurious effects on adjacent properties; the character of the neighborhood; or the health, safety, or general welfare of the community. Such conditions may include, but are not limited to:

- 1. Structural or vegetative screening greater than that required by the landscaping and screening standards of the UDC to buffer the surrounding land use from the proposed use;*
- 2. Limitations on the height, size, or illumination of signs more restrictive than the applicable requirements of the Tucson Sign Code;*
- 3. Limitations on the conduct of the proposed use, such as, but not limited to, hours of operation, or use of loudspeakers or external lighting, as necessary to protect; and,*
- 4. Dedication of necessary right-of-way for streets, alleys, drainageways, and utilities.*

¹ UDC § 3.4.6.A.1.

B. Reasonable and Appropriate Modifications of the 1) Wall Height and 2) 0' Wall Setback

TEP is requesting two use-specific standard modifications: 1) a perimeter wall height increase from 10 feet to 13.5 feet, and 2) a setback reduction on the north, east and south from 20' to 0'.

The first modification is to increase the perimeter wall height to 13.5'. The applicable use-specific standards for Distribution Systems specify that the height of the perimeter wall must be 10 feet in height where contiguous to a residential zone.² In accordance with federal critical infrastructure protection ("CIP") standards³, TEP must ensure the protection of its electric infrastructure. TEP has conducted an in-depth review of these CIP standards, specifically related to the prevention of physical breaches of their substation facilities. From that review, TEP has developed security standards that include the use of minimum 12-foot-high masonry security walls around its electric power substations. Further, TEP has agreed with the UA to match the 13.5' perimeter wall height, and the red-brick material and style of the wall surrounding the UA's 46 kV GIS substation. This wall is located south of the Property at the southeast corner of N. Vine Avenue and E. Lee Street (*see PDP Map and DRB Materials*).

The second modification requests relief from the 20-foot setback on the north, south and east to construct the perimeter wall on the property lines⁴. Although those perimeters are adjacent to residential zones, the land uses on the north, south and east are similar to or more intense than the proposed Vine Substation use (*see PDP Map*). The north perimeter wall is adjacent to the UA recycling center, the east perimeter wall is adjacent to Ring Road, and the south perimeter wall is adjacent to a 46 kV substation. The 0' wall setback replicates the existing location of the perimeter fencing, preventing an indefensible space between the contiguous uses, improving the safety of the public.

The requested modifications to the use-specific standards are reasonable and appropriate to mitigate any injurious effects on adjacent properties and the public along with providing increased security for the operating substation. Both modifications are contextual design solutions that improve the existing conditions and provide enhanced aesthetic architectural elements to the urban landscape.

Sincerely,



Brian Pugh, AICP
Consulting Project Manager

Attachment

cc: Mr. Jared Dickinson (via email)
Environmental & Land Use Planner, Land Resources
Tucson Electric Power Company

² UDC § 4.9.11.A.9 & 10.

³ Federal Energy Regulatory commission ("FERC") has tasked the North American Reliability Corporation ("NERC") with the obligation to create mandatory electric reliability standards governing the protection of critical electric infrastructure in the United States. These Critical Infrastructure Protection ("CIP") standards are applied to all built electric system facilities, including TEP's existing and future 138kV, 345kV and 500kV substations within the City.

⁴ UDC § 4.9.11.A.1.

