



# Zoning Examiner

## PRELIMINARY REPORT

June 5, 2025

Linda Morales  
The Planning Center  
2 E. Congress, Suite 600  
Tucson, AZ 85701

**SUBJECT: REZONING – TP-MOD-0924-000009 Los Reales PAD – Major Change (Ward5)**

**Public Hearing: May 29, 2025**

Dear Ms. Morales,

Pursuant to the City of Tucson Unified Development Code and the Zoning Examiner's Rules and Procedures (Resolution No. 9428), this letter constitutes written notification of the Zoning Examiner's summary of findings for the major change amendment to the rezoning TP-MOD-0924-000009 - Los Reales PAD (Ward 5).

At the expiration of 14 days after the conclusion of the public hearing, the Zoning Examiner's Report to the Mayor and Council (including background information, public hearing summary, findings of fact, conclusion, recommendation, and public hearing minutes) shall be filed with the City Manager. A copy of that report can be obtained from the Planning and Development Services Department (520-791-5550) or the City Clerk. If you or any party believes that the Zoning Examiner's recommendation is based on errors of procedure or fact, a written request to the Zoning Examiner for review and reconsideration may be made within 14 days of the conclusion of the public hearing.

The public hearing held by the Zoning Examiner shall constitute the public hearing by the Mayor and Council. However, any person may request a new public hearing before the Mayor and Council. A request for a new public hearing must be filed in writing with the City Clerk within 14 days of the closing of the Zoning Examiner's public hearing.

**REZONING – TP-MOD-0924-000009 Los Reales PAD – Major Change (Ward 5)**



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## SUMMARY OF FINDINGS

### **Applicant's Request of a Major Change to the Los Reales PAD Rezoning –**

The Planning Center, on behalf of the City of Tucson, is requesting a Major Change to the Los Reales Planned Area Development (PAD-14). This proposed amendment will expand the existing PAD boundary by approximately 55 acres and rename it the Los Reales Sustainability Campus PAD.

The updated PAD reflects the City's vision for a sustainability-focused campus that supports the goals outlined in the City's Climate Action and Adaptation Plan, *Tucson Resilient Together*. Key elements of the proposal include incorporating new parcels, translating the original PAD subareas into conceptual activity areas within the expanded Sustainability Campus District, and updating land use and development regulations to align with current site conditions and future sustainability objectives.

The approximately 1,094-acre site and added acreage is located with Swan Road to the west, I-10 to the northeast, Los Reales Road and Garden Stone Drive running east/west within the northern boundary, existing residential development to the east, and vacant Pima County land to the south of the amendment area,

### **Zoning and Land Use Background Information -**

Existing Land Use: The Los Reales Landfill was established in 1967 and is presently the City of Tucson's primary waste disposal facility.

#### Zoning Descriptions:

Subject Property: The subject property is zoned Planned Area Development (PAD). A PAD is a zoning classification designed to enable and encourage comprehensively planned projects aligned with adopted plans and policies. PADs establish distinct zoning districts with unique standards and may have land use regulations that differ from the Unified Development Code (UDC) or other zoning districts. When a PAD provision conflicts with the UDC, the PAD's regulation takes precedence.

#### Surrounding Zones and Land Uses:

North: I-1, R-2; Industrial, single-family residential  
East: R-1; Single-family residential  
South: R-1, I-2; Single-family residential, vacant  
West: CI-2 County Industrial; vacant, industrial



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## Previous Cases on the Property:

### *C9-06-05 Los Reales PAD:*

On June 6, 2006, the Mayor and Council approved the Los Reales PAD. The 1,094-acre PAD area established a contiguous development zone. The PAD was designed to guide the future development of the Los Reales waste processing center, setting specific use and development standards for a sustainable landfill operation serving the City of Tucson. The PAD was intended to fulfill the land use goals in Plan Tucson and the Rincon/Southeast Subregional Plan, using its location near transportation corridors including Interstate-10, Swan and Craycroft Roads, and Los Reales Road.

## Related Zoning Cases:

None.

**Land Use Planning Considerations** – *Plan Tucson (PT)* and the *Rincon Southeast Subregional Plan, Map Detail #11 (RSSP)* provide policy direction for the Major Change site.

Plan Tucson: The proposed site is in an area designated in *PT* on its Future Growth Scenario Map as “Existing Neighborhoods.” Existing Neighborhoods which refer to the build-out of residential neighborhoods and commercial districts with minimal new development and redevelopment was used to identify the landfill and surroundings as also existing without intended major changes.

But as the applicant noted, the landfill was part of the City’s Climate Action and Adaptation Plan and is in alignment with *PT* policies such as Energy and Climate Readiness policy EC-1 that encourages new facilities and operations to use the best energy efficiency and conservation practices, also, the Public Infrastructure policy P-1 that encourages investing in facilities that are fundamental to economic development and sustaining and enhancing living conditions in the community.

In summary, this proposal complies with *Plan Tucson* policies and supports a sustainable growth strategy for the City’s future.

Rincon/Southeast Subregional Plan: The Los Reales PAD Major Change site complies with the *Rincon/Southeast Subregional Plan*. The subject property is shown on the *Subregional Plan* as a landfill or reserved for future landfill expansion. The *Subregional Plan* identifies the Los Reales PAD area as Map Detail #9, and Map Detail #11 with an industrial land use designation and to the northeast corner with a multi-functional corridor designation.



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**Neighborhood Meetings Public Input** – The consultant/applicant held a neighborhood meeting on November 12<sup>th</sup>, 2024, at Lauffer Middle School to discuss the Major Change to the Los Reales PAD as the proposed Los Reales Sustainability Campus. The meeting was noticed with neighborhood labels generated by the City of Tucson’s Planning and Development Services Department.

Letters were sent to all property owners within 400 feet of the property and all neighborhood associations within one mile of the property.

In addition to a representative from The Planning Center, a representative from the City of Tucson Environmental and General Services Department (EGSD), and eight individuals attended the meeting.

Concern was expressed about waste reclamation operations occurring within 50 feet of Rancho Valencia residences. It was explained that the proposed area directly south of the subdivision consisted of an Open Space and Recreation District and that the proposed PAD will not allow waste processing operations to occur directly behind residences.

Concern was also raised about the I-10 frontage road being closed and removing access to nearby properties. It was explained that ADOT controls the frontage road, and the City of Tucson does not have the authority to make alterations to the roadway.

Neighbors asked if the recreational amenities were being proposed or in the design stage and expressed concerns about light pollution. It was explained that the recreational amenities are still in the early phases and the actual amenities to be provided have not been determined at this time.

Neighbors expressed concern about drainage on the east side of the Campus. It was noted that drainage would be changed but any future improvements would be fully compliant with City ordinances.

Concern was expressed that the recreation areas will attract unwanted activities. The EGSD representative explained that the City will control the property to ensure safety is maintained.

The process for continued review, involves a hearing before the Zoning Examiner, and the eventual public meeting before the Mayor & Council was outlined for the attendees. Attendees also requested copies of the presentation and the proposed PAD document.

A second neighborhood meeting was noticed and scheduled for March 26, 2025, also at Lauffer Middle School. No members of the public attended and after fifteen minutes the meeting was concluded.



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## Context and Key Proposals of the PAD Major Change -

### Context of the Major Change:

- In 2020, the City of Tucson declared a Climate Emergency, committing to carbon neutrality by 2030 and aligning efforts with the Paris Climate Agreement.
- This led to the *Tucson Resilient Together* Climate Action and Adaptation Plan (adopted March 2023), setting goals like achieving net zero emissions by 2030 through various actions, including a Zero Waste Plan.
- As part of the Zero Waste initiative, the Environmental Services Department (ESD) is working to achieve 50% waste diversion by 2030 and zero waste by 2050.
- The Los Reales Landfill was renamed the Los Reales Sustainability Campus in 2021, with a strategy to optimize sustainability operations, maximize economic development, and develop recreation/open space.
- This PAD Major Change attempts to incorporate the vision for the Los Reales Sustainability Campus, reflecting proposed sustainability changes, integrating new City plans/ordinances, and updating the project's areas layout.

### Key Proposed Changes:

- **Development Regulations:** Updated to reflect the Unified Development Code (UDC) instead of the old Land Use Code, adding permitted uses like composting (previously prohibited).
- **Building Heights:** Increased maximum height in the Sustainability Campus Districts from 40ft to 140ft to align with surrounding industrial zoning and accommodate site structures (landfill height, methane flare, equipment). Maximum height in the Open Space + Recreation District to be reduced from 40ft to 30ft.
- **Perimeter & Landscape Standards:** Establishment of perimeter yard standards and revisions to landscape border/screening standards to align with UDC and planned Capital Improvement Projects (CIPs).
- **Trails:** Inclusion of provisions for trails within open space and landscape borders.
- **Site Standards:** Changes proposed for drainage requirements and motor vehicle/bicycle parking.
- **Visual Impact Mitigation:** Removal of the section on mitigating visual impacts, including proposals for grading and revegetating capped landfill areas. These items are handled elsewhere in the proposed PAD document.
- **Implementation Flexibility:** Modification of the implementation section to add administrative amendment processes, allowing flexibility as the Sustainability Campus vision evolves.
- **Site Inventory:** Revised to include parcels added to the PAD boundary and reflect current site/surrounding conditions.



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- **District Streamlining & Activity Areas:**
  - Overall PAD districts streamlined to align with the Sustainability Campus vision.
  - Conceptual activity areas established within the Campus district.
  - The **Waste Disposal District** becomes the conceptual **Waste Reclamation Activity Area**, focusing on disposal with sustainable practices.
  - The **Community Resource Center District** is split into two new areas: **Community Resources Activity Areas** (for public engagement/education) and **Eco-Commerce Activity Areas** (for compatible businesses like resource management, re-use stores, material processing/manufacturing).
  - The **Stormwater and Ancillary Uses District** is removed as its activities are integrated across the site, with non-infrastructure uses facilitated by the new activity areas.
  - The **Open Space District** becomes the **Open Space + Recreation District**, preserving floodplains/habitats while adding active/passive recreation, providing a perimeter buffer, and including trails, paths, and a community recreation area.
  - The **Reserved District** is incorporated into the **Eco-Commerce Activity Area**, expanding potential land uses while still accommodating Tucson Water infrastructure.
- **Residential Interface:** Open space and recreation areas bordering single-family residential zones (as illustrated in Exhibits III.A.1-.4) will include natural vegetation, walking trails, and park amenities (shade ramadas, playgrounds, dog parks, sports fields/courts).
- **Northern Community Resources Area:** A specific Community Resources Activity Area near residential use to the north will focus on public education/engagement, anchored by an education resource center and a tree-growing center.

## **Zoning Examiner's May 29, 2025, Public Hearing -**

On May 29, 2025, a public hearing was held on the Los Reales PAD Major Change. There were two speakers, viz, the City of Tucson's Director of Environmental Services and the planning consultant representing the applicant.

Planning and Development Services staff gave the staff recommendation for approval and reported that there were four letters of protest that mainly expressed concerns about noise, increased dust, traffic, odors and potential environmental factors creating health concerns. The letter of approval stated that progress is acceptable if it follows regulations.

The following points were discussed at the public hearing:

The Major Change originated as policy direction to staff to update the waste management policies of the current landfill stemming from the previously mentioned Climate Action and Adaptation Plan.



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The Sustainability Campus is a part of the Climate Emergency Declaration and the resulting Climate Action and Adaptation Plan. The overall intent is to continue as a traditional landfill while simultaneously evolving toward a multifunctional campus involving waste reclamation, community resource and education, eco-commercial activity and an open space and recreation area.

This updated strategy contains features to maximize the flexibility of developing the Sustainability Campus to follow best practice of waste management and expand the related functions and land uses of the site to complement the waste management use.

The methane flare was brought up as a potential concern and the plan is to ensure the design captures natural gas and has the least amount of impact on surrounding land uses as to odors and glare.

Building height was also brought up since the increase is to 140 feet. The plan is to ensure maximum flexibility for future development. The Unified Development Code's I-1 zone allows some land uses to have 140-foot building height, so there is a precedent for this height in an industrial zone and area.

Odor controls and litter were discussed, and both will have mitigating strategies to reduce them to be contained within the site.

Zero waste was discussed as a philosophical change in the operational strategy to the traditional landfill. It was clear that this direction in diverting the waste stream will take time and the buy in of the community to achieve the overall sustainability design that is the goal of the Sustainability Campus. It was mentioned that this strategy is built upon the six R's of the zero waste concept that includes the following: *rethink* - encourage products to be produced and consumed to reduce dependence on waste materials, *reduce* - minimize the amount of waste generated, *reuse* - extend the life of products, *repurpose* - find new uses for old items *recycle*- process materials into new products, and *rot* or compost - return organic materials to the earth.

There was a discussion of the growth of residential development to the east of the site over several decades and is continuing currently. The open space and recreation areas are intended to provide natural open space buffers up to 480 feet to the residential areas to the east, south and northeast along with functional recreation areas as part of the future of the entire Sustainability Campus. Further, steps will be taken to mitigate those functions of the Campus that could have nuisance features to be contained within the site.

There were no further comments from the public at the hearing and the hearing was closed.





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## **CONCLUSION AND RECOMENDATION**

Conclusion – The applicant’s request for a Major Change to the PAD is a reasonable update to an existing zoning district that comprises the Los Reales Sustainability Campus PAD.

The Major Change conforms with the adopted Climate Action and Adaptation Plan and the policies of *Plan Tucson* and the *Rincon/Southeast Subregional Plan*. The Major Change has provisions establishing a framework of special areas and policy direction that meet the City’s sustainability goals and objectives in addressing community infrastructure and climate change resilience as well as protecting and supporting nearby residential land uses.

Recommendation – The Zoning Examiner recommends approval of the Major Change for the Los Reales Sustainability Campus PAD.

Sincerely,

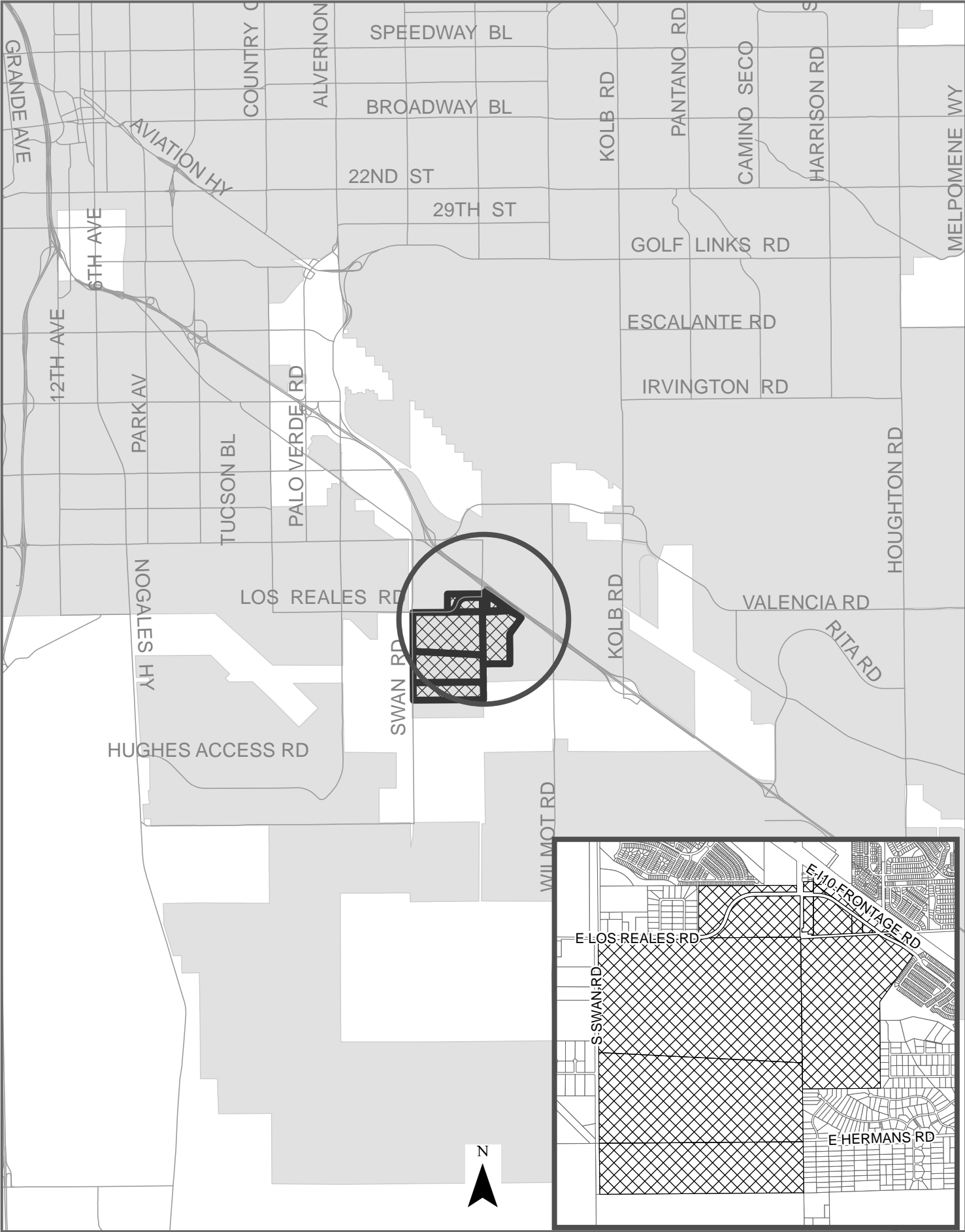
Jim Mazzocco  
Zoning Examiner

## **ATTACHMENTS:**

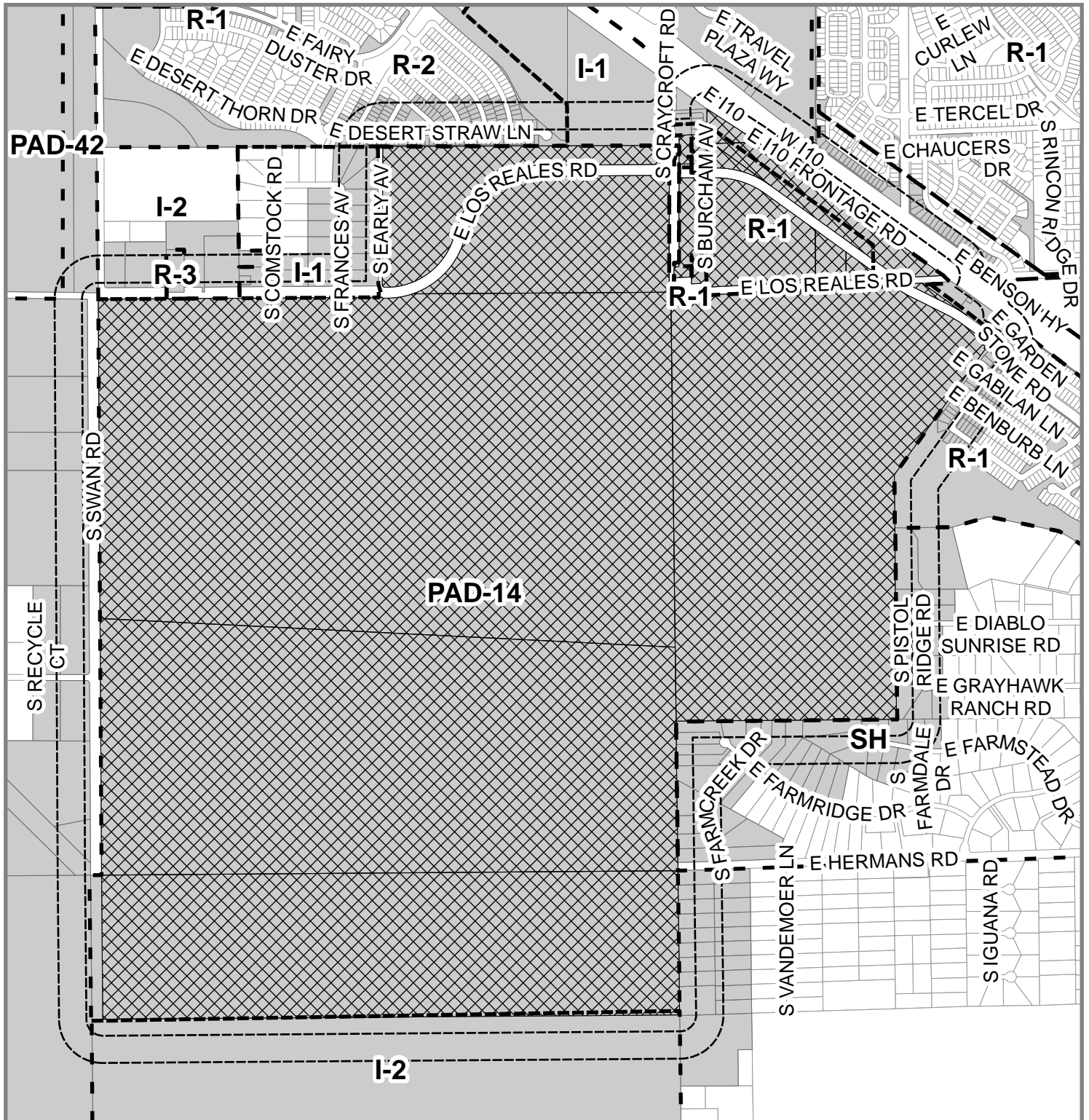
Case Location Map  
Rezoning Case Map  
Aerial Map  
Cc: Mayor and Council



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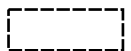
Area of Rezoning



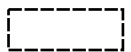
Zone Boundaries



Properties Notified



400' Notification Area



Protest Area (150 ft. Radius)

Address: 7323 S SWAN RD  
 Base Maps: Twp. 1503 Range 1402 Sec. 27  
 Twp. 1503 Range 1402 Sec. 26  
 Twp. 1503 Range 1402 Sec. 25  
 Twp. 1503 Range 1402 Sec. 23  
 Ward(s): 5

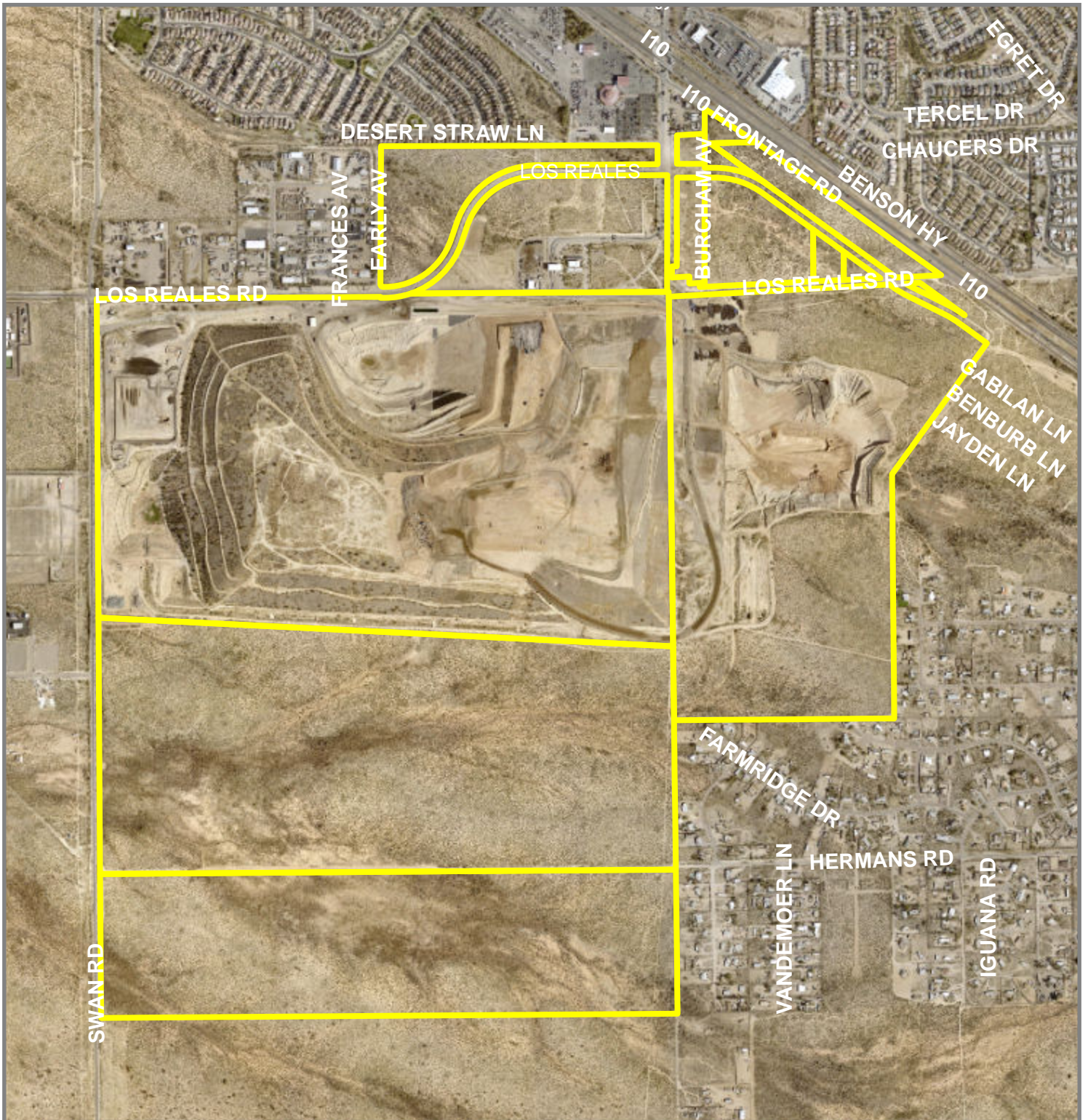
0 620 1,240 Feet

1:15,345





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0 625 1,250 Feet  
1:15,345

