



# MEMORANDUM

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DATE: May 13, 2025  
For May 29, 2025 Hearing

TO: Jim Mazzocco  
Zoning Examiner

FROM: Koren Manning   
Planning & Development Services  
Interim Director

SUBJECT: REZONING – PLANNING & DEVELOPMENT SERVICES REPORT  
TP-MOD-0924-000009 Los Reales PAD – Major Change (Ward 5)

**Issue** – This is a request by The Planning Center, on behalf of the City of Tucson for a Major Change to the Los Reales PAD (PAD-14). The proposed change will add additional parcels to the PAD boundary, reflect the current conditions of the site and surrounding area. The proposal also streamlines PAD districts to reflect the vision for the Los Reales Sustainability Campus and establish conceptual activity areas within the campus district. These areas extend within the updated PAD boundaries. It also makes various changes to development regulations within the PAD.

The proposed update would also change the name of the Los Reales PAD to the Los Reales Sustainability Campus PAD.

The Los Reales PAD is an approximately 1094-acre campus located between Swan Road and I-10, extending approximately 1.25 miles south of Los Reales Road. The modification request would add approximately 55 acres to the PAD area.

**Planning & Development Services Recommendation** – The Planning & Development Services Department recommends approval of the major change to the Los Reales PAD.

## **Background Information**

Existing Land Use: Waste Disposal

### Zoning Descriptions:

*Existing:* Planned Area Development (PAD): Enables and encourages comprehensively planned development in accordance with adopted plans and policies. The PAD is a zoning classification which provides for the establishment of zoning districts with distinct standards. A PAD may have land use regulations different from the zoning regulations in the Unified Development Code (UDC), any other PAD District, or other zoning districts. When a provision in a PAD varies from the UDC, the provisions in the PAD shall govern.

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

**Previous Cases on the Property:**

C9-06-05 Los Reales PAD:

The Los Reales PAD was approved by Mayor and Council on June 6, 2006 to create the original 1,094-acre PAD area, establishing a contiguous development area and guide future development of the Los Reales waste processing center, with specific use and development standards to fulfill the land use goals of *Plan Tucson* and the *Rincon/Southeast Subregional Plan*. It created the development framework for sustainable landfill operations serving the City of Tucson, locating it nearby to transportation corridors including Interstate-10, Swan and Craycroft Roads, and Los Reales Road.

**Related Cases:**

None.

**Applicant's Request** – Amend the Los Reales PAD to add approximately 55 acres to the PAD, and change the name of the Los Reales PAD to the Los Reales Sustainability Campus PAD. It also translates the original PAD districts to new PAD Activity Areas within the Sustainability Campus District. The reimagining of the Los Reales PAD into the Los Reales Sustainability Campus helps to achieve the goals of the City's Climate Action and Adaptation Plan, *Tucson Resilient Together*.

Specific language of the PAD amendment is available in the case documents.

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

**Plan Tucson:** The proposed site is within an area identified in *PT* as “Existing Neighborhoods.” Existing Neighborhoods are primarily developed and largely built-out residential neighborhoods and commercial districts in which minimal new development and redevelopment is expected in the next several decades. The goal is to maintain the character of these neighborhoods, while accommodating some new development and redevelopment and encouraging reinvestment and new services and amenities that contribute further to neighborhood stability. This proposal complies with *Plan Tucson* policies and guidelines.

**Rincon/Southeast Subregional Plan:** This PAD complies with the Rincon/Southeast Subregional Plan. The subject property is shown on the land use map as landfill or reserved for future landfill expansion. The *Regional Plan* identifies the Los Reales PAD area as Map Detail #9, and Map Detail #11.

Part of the Los Reales PAD lies within Map Detail #9, designated as Urban Industrial land use in the PAD area. Map Detail #11 identifies the entire district as planned heavy industrial, consistent with the I-2 zoning that existed prior to PAD-14's adoption, and for landfill use.

**Public Input** – The consultant/applicant held a neighborhood meeting on November 12<sup>th</sup>, 2024 at Lauffer Middle School to discuss the proposed amendment to the Los Reales PAD to develop the Los Reales Sustainability Campus as envisioned. The meeting was noticed with neighborhood labels generated by the City of Tucson 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, 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 area directly south of the subdivision consisted of Open Space and Recreation District and that the 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 and the City of Tucson does not have the authority to make alterations to or close that 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 and the existing characteristics would have to remain.

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

The process for submitting the request for review, 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 PAD document.

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

**Discussion** – In 2020, the City declared a Climate Emergency in response to the growing impact of climate change on the everyday lives of Tucsonans and the infrastructure and functions of the City's services. This declaration acknowledged the realities of climate change, directed the City to develop a climate action and adaptation plan, instructed all departments to align their efforts with the Paris Agreement, and committed to carbon neutrality across City operations by 2030. The climate action plan born from this declaration is now known as Tucson Resilient Together, adopted by the Mayor and Council in March 2023. Tucson Resilient Together sets clear, actionable steps and goals the City is undertaking to achieve net zero emissions by 2030, such as planting a million trees, transitioning to using renewable energy for transit and updating development regulations and City building standards to help achieve carbon neutrality. Creating a Zero Waste Plan is another critical component to the City becoming a model of climate resiliency.

As part of the Tucson Resilient Together action plan, ESD was tasked with 1) attaining 50 percent waste diversion by 2030 and 2) achieving zero waste by 2050. To help achieve these goals, ESD created the Zero Waste Roadmap to identify several ways the City can reduce waste through new and expanded services,

partnerships, and programs. A significant part of the zero waste initiative is the continued and improved operations of the landfill.

In 2021, the Los Reales Landfill was renamed the Los Reales Sustainability Campus, and a strategy was devised setting forth very specific goals to optimize the sustainability operations of the landfill, maximize economic development opportunities, and ultimately shift the perspective of the landfill from not only being a waste management facility but also a recreation and a community open space asset. In order to achieve this, the PAD is being modified.

The modification request to the Los Reales PAD would incorporate the vision of the future for the Los Reales landfill and the proposed sustainability changes to the PAD. It also incorporates discussion of new city plans and ordinances since the PAD's adoption, and updates the project location map.

The following changes are being proposed to the Los Reales PAD by the applicant:

- Changes to PAD Development Regulations are proposed, reflecting provisions of the Unified Development Code as opposed to the Land Use Code. Additional permitted uses are included such as composting, which was previously prohibited.
- Maximum building heights are increased from 40 to 140 feet within the Sustainability Campus District to align with the underlying zoning and surrounding industrial-zoned properties, and to encompass the height of the landfill, methane flare, and other potential equipment. Maximum building heights in the *Open Space + Recreation District* were reduced from 40 feet to 30 feet.
- Perimeter yard standards were established, as well as revisions to landscape border and screening standards to more closely align with Unified Development Code standards and in-review Capital Improvement Projects.
- Provisions for trails within open space and landscape borders.
- Changes are proposed to drainage requirements and motor vehicle and bicycle parking. The section on the mitigation of visual impacts and associated proposals for grading and revegetating capped landfill areas were also removed.
- The implementation section was modified to include additional administrative amendment processes to provide flexibility in development planning as the vision for the *Sustainability Campus* evolves.
- The PAD site inventory is revised to include parcels added to the PAD and to reflect changes to the site and surrounding area.
- It streamlines the PAD districts to reflect the vision for the Los Reales Sustainability Campus and establishes conceptual activity areas within the campus district. The *Waste Disposal District* becomes the *Waste Reclamation Activity Area*, catering to waste disposal needs while adhering to sustainable practices. The boundary area of this district is conceptual to reflect the changing dynamics of waste management best practices over time.

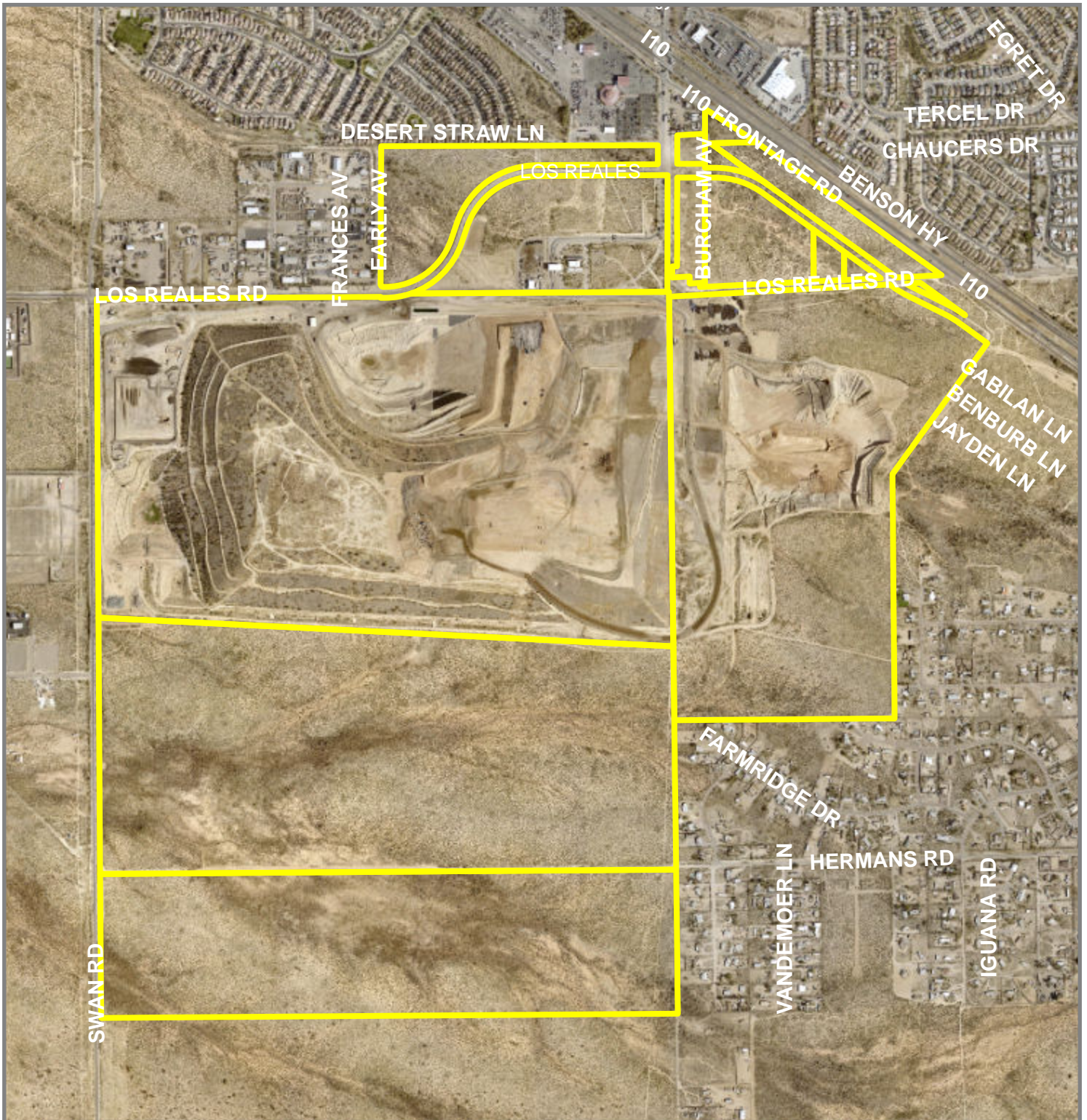
- ◇ The *Community Resource Center District* is translated into two new districts, *Community Resources Activity Areas* and *Eco-Commerce Activity Areas*.
- ◇ *Community Resources Activity Areas* are intended to foster public engagement and education on sustainable practices and effective waste management. *Eco-Commerce Activity Areas* are designed to accommodate compatible businesses such as solid waste/resource management companies, re-use stores, and material processing/manufacturing facilities.
- ◇ The *Stormwater and Ancillary Uses District* is deprecated in the *Sustainability Campus*, as activities that were to occur in this district now occur through most of the site, with *Community Resources* and *Eco-Commerce Activity Areas* facilitating many of the non-infrastructure uses suggested.
- ◇ The *Open Space District* becomes the *Open Space + Recreation District*, containing areas providing for the preservation of critical floodplains and riparian habitat with active/passive recreation provisions. This district also provides a substantial buffer from landfill and waste reclamation operations while providing recreation facilities including natural trails, multi-use paths and a large community recreation area.
- ◇ The *Reserved District* has been incorporated into the *Eco-Commerce Activity Area*, providing a greater range of land uses while still allowing for necessary Tucson Water infrastructure.
  - Exhibits III.A.1, .2, .3, and .4 illustrates open space and recreation areas bordering all single-family residential land use areas. These open space areas would include areas of natural vegetation with walking trails, as well as park and amenity areas located nearby to residential land uses north and east of the campus. These park areas may include shade ramadas, playgrounds, dog parks, and sports fields or volleyball and basketball courts.
  - To the north, there is also a community resources activity area near the adjacent residential use, which would include facilities for fostering public engagement and education about sustainable practices and effective waste management. This area would be anchored by an education resource center and a tree-growing center.

**Conclusion** – The applicant’s request increases the size of the PAD area consistent with plan policy while also providing development restriction zones around existing residential and civic use areas.

The proposed major change to the Los Reales PAD is consistent with, and supported by, the policy direction provided by *Plan Tucson* and the *Rincon/Southeast Subregional Plan* and meets the intent of the Los Reales PAD. Approval of the major change is appropriate.



# TP-MOD-0924-000009 Los Reales PAD



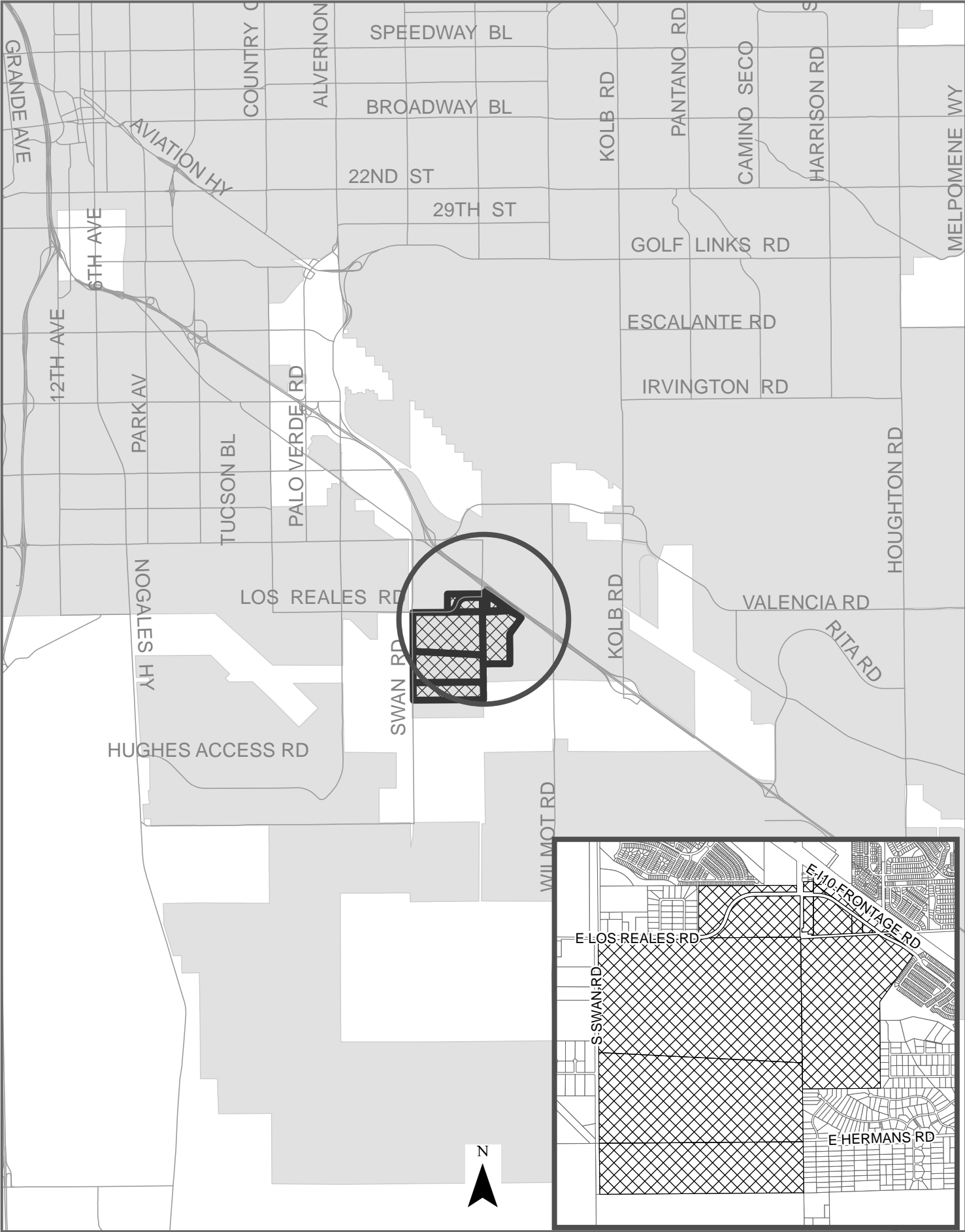
 Area of Rezoning

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

0 625 1,250 Feet  
1:15,345

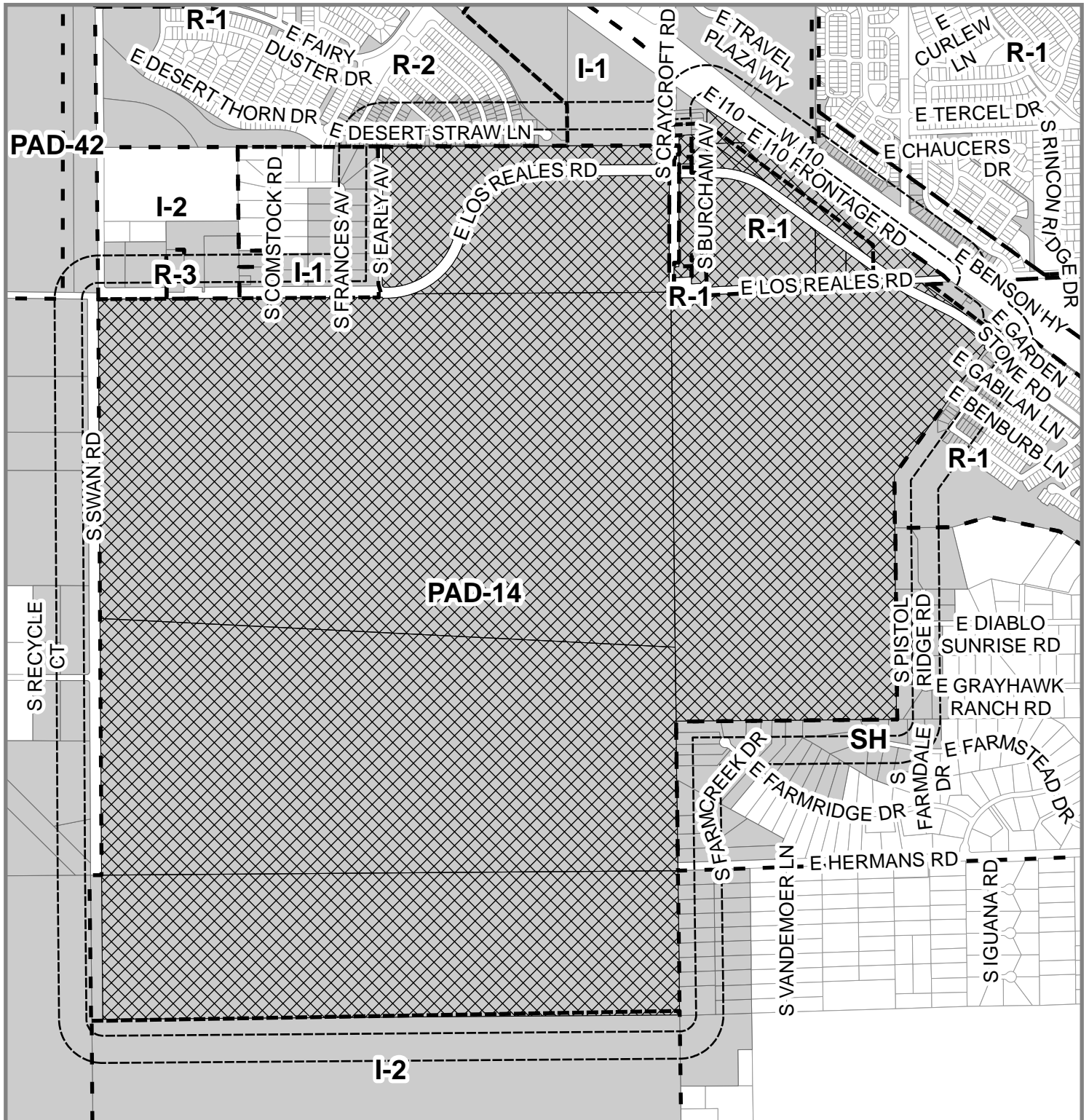


TP-MOD-0924-000009 Los Reales PAD





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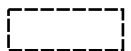
Area of Rezoning



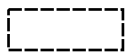
Zone Boundaries



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







## **CITY OF TUCSON PUBLIC HEARING NOTICE**

County Assessor records indicate that you are an owner of property located within 400 feet of a parcel(s) that is being considered for a Special Exception.

The Zoning Examiner, on behalf of the Mayor and Council, conducts a public hearing and considers testimony for each special exception in the City of Tucson. The Zoning Examiner may impose reasonable limitations on the number of speakers and the length of the testimony.

After the Public Hearing, the Zoning Examiner issues written reports with findings of fact and a recommendation. A preliminary report is issued five working days after the close of the public hearing. A final report is issued 14 days after the close of the public hearing and transmitted to the Mayor and Council. Any person may request a public hearing before Mayor and Council provided the written appeal is filed with the City Clerk within 14 days after the close of the Zoning Examiner's public hearing. The Mayor and Council make the final decision on all rezoning requests.

### **PUBLIC HEARING INFORMATION**

Date: **Thursday, May 29, 2025**

Time: 6:00 PM

Location: Mayor and Council Chambers, First Floor of City Hall, 255 West Alameda Street, Tucson, AZ

The public has the following options to provide comment to the Zoning Examiner:

- 1) Members of the public may submit written comments prior to the hearing by sending an email to [TucsonRezoning@tucsonaz.gov](mailto:TucsonRezoning@tucsonaz.gov). The email should include the Zoning Examiner public hearing date, the case number or name, and your name. **Written comments must be received no later than 5:00 pm, May 28, 2025.**
- 2) Individuals wishing to speak during the hearing should submit a written request to [TucsonRezoning@tucsonaz.gov](mailto:TucsonRezoning@tucsonaz.gov). **Written request should be received by no later than 5:00 pm, May 28, 2025.** The email should include the Zoning Examiner public hearing date, your name, and your phone number. Individuals wishing to speak but who did not submit a prior written request will be provided instructions by the Zoning Examiner at the time of the hearing on how to provide comments.

### **APPLICANT**

Lexy Wellott  
The Planning Center  
2 E Congress St #600  
Tucson AZ 85701

### **PROPOSED REZONING/EXCEPTION**

**Case:** TP-MOD-0924-000009 Los Reales PAD – E Los Reales Rd, PAD Zone, Major Modification to Zoning Conditions, (Ward 5)

**Requested Zoning Change:** Major Modification to C9-06-05 for the future planning of the Los Reales Sustainability Campus.

**Location Description:** 5115 E Los Reales Rd.

**Proposed Development:** Long-term planning land use and development standards update for the Los Reales Sustainability Campus.

**Notificación de Audiencia Pública del Examinador de Zonificación**

**Para oír y tomar en reconsideración el siguiente caso:** TP-MOD-0924-000009 Los Reales PAD – E Los Reales Rd, PAD, Major Modification to Zoning Conditions (Ward 5)

**Cambio de Zonificación Solicitada:** Modificación Mayor al C9-06-05 para la planificación futura del Los Reales Sustainability Campus.

**Ubicación:** 5115 E Los Reales Rd.

**Desarrollo Propuesto:** Actualización de los estándares de uso del suelo y desarrollo de planificación a largo plazo para del Los Reales Sustainability Campus.

*Si usted desea este documento escrito en español, por favor llame al número de teléfono: 520-791-5550*

For further information, please call Reviewer at 520-837-6952 or write to Planning & Development Services Department (PDSD) – Entitlement Section, P.O. Box 27210, Tucson, AZ 85726

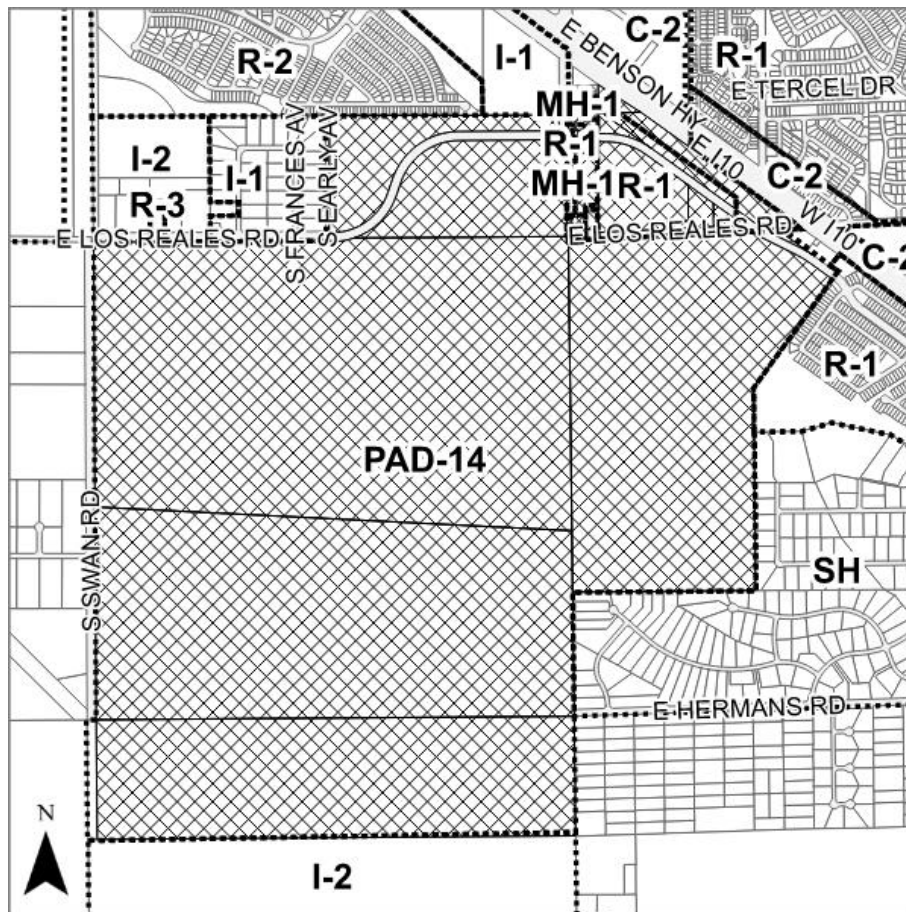
**ZONING DISTRICT NARRATIVE SUMMARIES**

For a complete description, refer to Unified Development Code, Chapter 23, Tucson Code, Section 4.3, which can be found at:

[https://codelibrary.amlegal.com/codes/tucson/latest/tucson\\_az\\_udc/0-0-0-1953#JD\\_UDCsec.4.3](https://codelibrary.amlegal.com/codes/tucson/latest/tucson_az_udc/0-0-0-1953#JD_UDCsec.4.3)

**Current Zoning:**

**PAD – Planned Area Development:** *The purpose of the Planned Area Development (PAD) zone is to enable and encourage comprehensively planned development in accordance with adopted plans and policies. The PAD is a zoning classification which provides for the establishment of zoning districts with distinct standards.*



**TP-MOD-0924-000009**

For further information, please call Gabriel Sleighter (520-837-6952) or write to Planning & Development Services Department – Rezoning Section, 201 N. Stone Avenue, P.O. Box 27210, Tucson, AZ 85726

Additional information about this project, including the staff report to the Zoning Examiner and the Preliminary Development Plan, will be posted on the web by 5:00 PM, May 13, 2025 at <https://www.tucsonaz.gov/pdsd/public-hearing-agenda-materials-rezoning-special-exceptions-original-city-zoning>

**Approval – Protest Form**



If you wish to submit a written protest or approval, this form is provided for your convenience. Print your comments below, sign your name, and mail to the City of Tucson Planning and Development Services Department, Entitlements Section, 201 N. Stone Avenue, P.O. Box 27210, Tucson, Arizona 85726-7210. The number of approvals and protests along with protest calculations will be reported at the Zoning Examiner’s public hearing. This form is not the City of Tucson Public Hearing Notice.

Protests from 20% of the property owners within 150’ of the whole perimeter of the property being rezoned, including BOTH 20% of the property by area and 20% of the number of lots with 150’, require an affirmative vote of  $\frac{3}{4}$  of the Mayor and Council (5 of 7 council members) to approve the Original City Zoning translation. Public rights-of-way and the area/lot of the proposed rezoning are included in the protest calculations. Calculations will be provided to the Mayor and Council.

**Case: TP-MOD-0924-000009 Los Reales PAD – E Los Reales Road, PAD-14 (Ward 5)**

\_\_\_\_\_

Property Owner(s) (PLEASE PRINT)

☐

APPROVE the proposed rezoning/special exception

☐

PROTEST the proposed rezoning/special exception

**Reason:**

OWNER(S) SIGNATURES	PLEASE PRINT PROPERTY ADDRESS	PLEASE PRINT YOUR MAILING ADDRESS

Date \_\_\_\_\_

Place  
Stamp  
Here

City of Tucson  
**Planning and Development Services Department**  
Entitlements Section  
201 N. Stone  
P.O. Box 27210  
Tucson, Arizona 85726-7210

TP-MOD-0924-000009 GS

Expose this flap - Affix stamp and return

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City of Tucson  
Planning and Development Services  
Department - Entitlements Section  
201 N. Stone Avenue  
P.O. BOX 27210  
Tucson, Arizona 85726-7210

TP-MOD-0924-000009 GS

IMPORTANT REZONING NOTICE ENCLOSED





May 13, 2025

**Subject: TP-MOD-0924-00009, Los Reales PAD – E Los Reales Road, Major Modification to Zoning Conditions (Ward 5)**

Dear Neighborhood Association Representative:

A Zoning Examiner's public hearing has been scheduled on Date for a Special Exception or Rezoning request on a site located at 5115 E Los Reales Rd. This is a Special Exception or Rezoning land use request in the PAD zone for a Major Modification to PAD-14, the Los Reales PAD.

**The Zoning Examiner's public hearing is scheduled for Thursday, May 29, 2025, at 6:00 P.M.**

The public has the following options to provide comment to the Zoning Examiner:

- 1) Members of the public may submit written comments prior to the hearing by sending an email to [TucsonRezoning@tucsonaz.gov](mailto:TucsonRezoning@tucsonaz.gov). The email should include the Zoning Examiner public hearing date, the case number or name, and your name. Written comments must be received no later than **5:00 pm, May 28, 2025**.
- 2) Individuals wishing to speak during the hearing should submit an email request to [TucsonRezoning@tucsonaz.gov](mailto:TucsonRezoning@tucsonaz.gov). Written request should be received by no later than **5:00 pm, May 28, 2025**. The email should include the Zoning Examiner public hearing date, your name, and your phone number. Individuals wishing to speak but who did not submit an email prior written request will be provided instructions by the Zoning Examiner at the time of the hearing on how to provide comments.

The file is available for review on the website at by 5:00 PM, May 13, 2025, at: <https://www.tucsonaz.gov/Departments/Planning-Development-Services/Public-Meetings-Boards-Committees-Commissions/Zoning-Examiner>

If you need additional information, please contact Gabriel Sleighter, 520-837-6952, [Gabriel.sleighter@tucsonaz.gov](mailto:Gabriel.sleighter@tucsonaz.gov).

Sincerely,

Gabriel Sleighter  
Lead Planner  
Planning and Development Services Department

Attachment: Aerial and Maps