



PLANNING COMMISSION MEMORANDUM

Date: June 11, 2026 for June 17, 2026 scheduled meeting
To: Planning Commission
From: Koren Manning, Director of Planning and Development Services,
and Executive Secretary
Subject: C8-25-04 Large-Scale Data Center Regulations Unified
Development Code Amendment (Citywide)

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This Planning Commission item is to review revisions to a proposed code amendment to the Unified Development Code (UDC) to establish regulations and standards for large-scale data centers, based on public comments received by the Planning Commission at the Public Hearing held on this item on June 3, 2026. This amendment was initiated by Mayor and Council during their [August 6, 2025 study session](#). At that time, Mayor and Council directed City staff to develop regulations for this use. This request was part of the motion Mayor and Council adopted to not consider the proposed Project Blue data center annexation and Development Agreement. A Mayor and Council Study Session was held on [April 7, 2026](#) during which Mayor and Council provided feedback on the proposed code amendment. Two Planning Commission Study Sessions have been held, with the initial one taking place on September 17, 2025. A second Planning Commission Study Session was held on May 6, 2026 where additional feedback on the proposed code amendment was received. See materials from the [June 3, 2026 Planning Commission Public Hearing](#) for additional details on each of these items.

The proposed code amendment would establish a definition of large-scale data centers and establish use-specific standards. The proposed code amendment has been developed with input from a Technical Advisory Committee (TAC), four community engagement meetings and community survey, Planning Commission, and Mayor and Council feedback.

On June 3, 2026 Planning Commission held a Public Hearing on the proposed code amendment(Attachment A). Following the closing of the Public Hearing, the Planning Commission discussed and provided feedback on the proposed code amendment. The Planning Commission also requested that staff review public comments provided to the Commission during and preceding the Public Hearing and conduct additional research on aspects of the proposal.

Staff Recommendation

Staff recommends the Planning Commission make a recommendation to Mayor and Council to adopt the Unified Development Code Amendment to establish regulations for large-scale data centers as proposed.

Background

For background information on the public process prior to the June 17 public meeting, please reference the June 3, 2026 Planning Commission materials.

Planning Commission Public Hearing

On June 3, 2026, the Planning Commission held a duly noticed Public Hearing on proposed regulations for large-scale data centers. PDS staff presented the proposed regulations and provided an overview of the development of the proposed regulations, including a summary of the Technical Advisory Committee's work, community engagement efforts, feedback from public outreach, and changes made to the proposed code language based on feedback received at the May 6, 2026 Planning Commission Study Session. Following the presentation, staff answered questions and received feedback from the Planning Commission.

At the Public Hearing, 12 members of the public provided testimony. One speaker was in support of the proposed regulations for large-scale data centers, and 11 expressed varying degrees of opposition.

Following the closure of the Public Hearing, the Planning Commission discussed the proposal and posed questions of staff. Topics included:

- Discussion focused on legal considerations, state law, and the City's ability to regulate or prohibit large-scale data centers.
- Water-related questions included Large Water User requirements, reclaimed water, wells, and Tucson Water service-area limitations.
- The proposed one-half-mile setback was discussed in relation to noise, public health, heat, and other potential impacts.
- Additional information was requested on the basis for the setback and applicable noise or health standards.
- Review options discussed included Planned Area Developments, Planned Community Developments, Planning Commission review, community benefits, and negotiated project standards.
- Recommended revisions included clarifications related to open space, ownership, energy, generators, battery backup, load shifting, resident notification, decommissioning, native plant salvage, terminology, and typographical corrections.

Following public comment and deliberation, the Commission voted 10-0 to continue the item for up to 45 days to allow staff to incorporate comments raised by the Commission, including comments related to open space provisions, same or controlling interest language, energy updates, and other comments mentioned by the Commission during the meeting, into the next version of the proposed amendment (see Attachment A).

Present Consideration(s)

The proposed amendment to the Unified Development Code would establish a regulatory framework for large-scale data centers. The proposal introduces a definition for large-scale data centers and establishes where and how these facilities may be permitted, along with use-specific standards intended to address land use compatibility, environmental impacts, and operational considerations (Attachment D, Proposed Code Amendment Fact Sheet).

Large-Scale Data Centers Unified Development Code Proposal

Throughout the process of research, advisory input from the TAC, public input, and Planning Commission feedback, staff developed a proposal for UDC code changes. The proposal is based on best practices, regional considerations, and precedents already established in the UDC. Below is an overview of the proposed regulations and the most recent revisions (see draft code amendment in Attachment E).

Revisions since June 3, 2026 Planning Commission Public Hearing and Staff Responses to Key Topics Raised

Staff reviewed the items noted by the Planning Commission for follow-up, and conducted additional analysis on these items.

- Large-Scale Data Center Definition
 - Commissioners requested staff review the definition to ensure that the “same controlling ownership interest” language adequately addresses different ownership models.
 - Staff reviewed the definition, and recommend removing the term controlling interest, and rely on the existing definition for a Site contained within Section 11.4.20 of the Unified Development Code which reads:
 - “Site: The land area consisting of a portion of a lot, an entire lot, or contiguous lots, not including dedicated public property, designated for development as a single entity”
- Regulation of Backup Generators
 - Based on public feedback received, staff proposed updates to the draft regulations surrounding generator operation and battery backup. These include the following:
 - Proposed backup generators would be limited to backup use only and would not be permitted for routine or primary power generation.
 - Low-emitting generator models, defined as producing less than or equal to 100 kg CO₂e/kW, would be preferred.
 - Where higher-emitting generation is proposed, generator equipment would be required to meet Tier IV emissions standards.
 - Projects proposing generators would be required to incorporate battery backup as part of the overall backup power system.
 - Battery systems would be required to provide a minimum of two hours of storage capacity and serve as the first-line response during grid instability.
 - Facilities would be required to maintain the ability to disconnect electrical load from the grid upon request by the serving electric utility.
 - Applicants would be required to certify that generator operation would occur only at the request of the electric utility, during grid instability or power outages, or for preventive maintenance and periodic testing.
 - Non-emergency maintenance operations would be limited to 9:00 a.m. to 5:00 p.m., Mountain Standard Time, Monday through Friday.
- Open Space
 - Language was added to the proposed code amendment requiring that other uses such as natural areas, riparian corridors, or open space may warrant a separation distance of 2,640 feet (one-half mile), as determined by the Zoning Administrator in consultation with other City staff during review of a required Environmental Resource Report.
 - The proposed changes also clarify that lot coverage standards are proposed to help mitigate heat impacts.
- Studies regarding Noise Impacts
 - At the June 3, 2026 meeting, the Planning Commission requested that staff conduct additional research on the potential impacts of infrasound in relation to the proposed separation distances. Staff reviewed available information on infrasound associated with large wind turbines and large-scale data centers to determine whether peer-reviewed research or established standards provide clear guidance for separation distances. Staff

- was unable to identify any relevant standards or peer-reviewed research that establishes specific separation-distance parameters based on infrasound impacts.
- However, the proposed code language was updated to clarify that an assessment of infrasound must be included in the noise study required for any proposed large-scale data center.
 - Public Notification
 - Staff evaluated the suggestion to expand notice requirements to include all residents in a defined notice area rather than just property owners. Notification requirements in the UDC are based on the requirements of state statute, which establishes notice obligations tied to property ownership.
 - Wording of the proposed code amendment was changed to refer to notice recipients rather than property owners and to refer to the Public Notice requirements established elsewhere in the code so that if in the future the code is amended to broaden notice requirements, an amendment to the standards for Large Scale Data Centers would not be needed.
 - PDSO is currently working with the City IT Department to develop an opt-in electronic notification tool for any community member or interested party who wishes to receive notifications regarding land use requests in a given geography (i.e. neighborhood, Ward or citywide).
 - Review Process
 - Staff reviewed whether Planned Area Development or Planned Community Development requests for large-scale data centers could require Planning Commission review. The code requires that such requests be reviewed by the Zoning Examiner as well as Mayor and Council.
 - Staff determined that requiring Planning Commission review is not feasible because it would create a separate review process for one specific land use that varies significantly from the review process for other PAD and PCD developments. This distinction could raise legal concerns related to equal protection.
 - Separation Distances
 - PDSO staff conducted a geospatial analysis of sites within the City of Tucson which fall outside of the proposed separation distances of 2,640 feet from RX-1, RX-2, MH-1, MH-2, R-1, R-2, and R-3 residential zones and 1,000 feet from commercial and office zones (Attachment F).
 - Comments from Coalition for Sonoran Desert Protection
 - The Coalition for Sonoran Desert Protection transmitted a letter to the Planning Commission dated June 3, 2026 (Attachment C). In this letter, the Coalition made the following recommendations. Staff met with the Coalition for Sonoran Desert Protection to discuss their recommendation; responses are detailed below:
 - Add open space to the list of sensitive uses, including natural open space, riparian areas, and other similar areas.
 - The proposed regulations were revised to allow up to a one-half mile (2,640 foot) separation distance from natural areas, riparian corridors, or open space, based on environmental review, as determined by the Zoning Administrator in consultation with City staff.
 - Revise the lot coverage standard to allow a more flexible, site-specific approach informed by conservation tools, environmental review, and Mayor and Council approval.

- Staff recommends retaining the proposed 40% lot coverage standard, and clarified that it is intended to mitigate heat impacts.
- Add decommissioning requirements where appropriate, including remediation of environmental contamination and restoration or revegetation of disturbed areas.
 - Staff determined that decommissioning standards are beyond the scope of zoning regulations and recommended considering them as a potential condition for any proposed PAD or PCD for a large-scale data center.
- Replace separation distance with setback in the to align with UDC language and clearly distinguish between distance requirements and landscape borders.
 - Staff clarifies that the term setback is intentionally not used, as a setback refers to distance from a property line, not between uses.
- Reference the UDC landscape borders in the proposed amendment.
 - A reference to UDC Section 7.6.4 was added to the proposed code amendment language.
- Corrections
 - Staff corrected typos in the code noted by Commissioners.

Overview of Proposed Regulations

Definition and Size Threshold

Proposed Regulation: The proposed large-scale data center use would be defined as part of the Utility use group, and the definition includes both a square footage and a power consumption threshold, minimum floor area of 25,000 square feet, or power consumption of 20 Megawatts. This was reduced from the original proposal of 50 megawatts based on feedback received during the May 6, 2026 Planning Commission Study Session. The beginning of the proposed definition was also changed from “A facility” to “Any facility” based on feedback received. The proposed definition for a large-scale data center is as follows:

Any facility, multiple facilities, or portion of a facility on a contiguous site, and a gross floor area greater than 25,000 square feet or uses greater than 20 megawatts (MW) of energy, housing networked computer systems and/or telecommunications equipment used for remote storage, processing, and distribution of data. Large Scale Data Centers are permitted through adoption or major amendment of a Planned Area Development (PAD) or a Planned Community Development (PCD) and are subject to Use Specific Standards 4.9.11.D.

Review Process and Zoning

Proposed Regulation: Large-Scale Data Centers would be permitted through adoption or major amendment of a Planned Area Development (PAD) or a Planned Community Development (PCD). Large-Scale Data Centers would not be permitted as of right or through a special exception in any specific zone. Establishing or amending a PAD or PCD is a rezoning process subject to Mayor and Council review. This process includes a neighborhood meeting and a Zoning Examiner public hearing prior to Mayor and Council consideration, providing an opportunity for nearby residents and other stakeholders to review and comment on the request.

This proposal would require a higher level of review for large-scale data centers than most land uses in the UDC as it would only be allowed through a PAD or PCD. Generating Systems under the Utilities Use Group (i.e. power plants) are the only other land use defined in the code that is only permitted through a PAD or PCD.

Separation from Residential and other Non-Industrial Uses

Proposed Regulation: Must be located a minimum of 2,640 feet (one half mile) from residential zones as well as certain uses (nursing home, residential care facilities, educational uses) and 1,000 feet from commercial or office zones. These proposed separation distances were increased following the May 6, 2026 Planning Commission Study Session based on concerns expressed about noise and urban heat island effects.

Public Notice

Proposed Regulation: Require an enhanced public notice to recipients within a half mile, and all Neighborhood Associations within 2 miles, which is consistent with Planned Community Development notice requirements, for the required neighborhood meeting and public hearing before the Zoning Examiner. Additional notice is being proposed due to the broader impacts of large-scale data centers, and the typically low-density surrounding areas where large-scale data centers are likely to be proposed.

Water Supply Certification and Restriction on Potable Water Use

Proposed Regulation: Reaffirm requirements to comply with the City's Large Quantity Water User Ordinance. Additionally, if an applicant is not subject to the Large Quantity Water User Ordinance, the use of potable water for data center cooling is prohibited and an applicant is required to demonstrate access to an adequate water supply. A mitigation plan may also be required to address impacts during drought or local water emergency.

Energy Disclosure

Proposed Regulation: At the time of application, require that applicants demonstrate access to an adequate energy supply and disclose their proposed amount of energy and energy mix, including renewables.

Noise and Generators

Proposed Regulation: Applicants must provide an independent noise study as well as a noise mitigation plan at the time of application. The code establishes strict decibel limits at the property line and requires annual monitoring. For generators, only Tier IV or natural gas/dual-fuel generators would be permitted, with requirements for "battery-first" backup systems, limits on hours of maintenance testing, and prohibition of "load shifting". Additionally, data center operators could be required, at the City's discretion, to identify a point of contact for community concerns about noise or other negative impacts. This stipulation was added after receiving feedback from both the public at large and Mayor and Council.

The proposed code language also includes a provision that, upon request by City staff, the operator of a data center must provide an on-site neighborhood liaison to be available between the hours of 8:00 am and 10:00 pm Mountain Standard Time (MST) each day to respond to any complaints about noise emanating from the Data Center.

Maximum Height Limit

Proposed Regulation: Establish a 50 foot maximum height for large-scale data centers. This proposed standard was added following the May 6, 2026 Planning Commission Study Session. This standard is based on the maximum height permitted in the Park Industrial (P-I) zone.

Development Standards

Proposed Regulation: Require a 40-foot enhanced landscaping border and right-size parking

standards to reduce paved surfaces and mitigate urban heat island effects. The proposed width has been increased from 20 to 40 feet based on feedback received at the May 6, 2026 Planning Commission Study Session. Additionally, the proposal has been updated to add more specificity regarding environmental and plant salvage requirements.

Additional proposed regulations requiring sound blocking and screening for generators and other noise-producing mechanical equipment through solid screened walls or rooftop screening. Lot coverage is restricted to 40% where the remaining area must be dedicated to natural open space and any disturbed land not included in project site must be revegetated with native plantings.

In addition to the use-specific standards described above, any large-scale data center would also need to comply with all applicable regulations as established per the Unified Development Code – including the Native Plant Preservation ordinance, Commercial Rainwater Harvesting standards, Environmental Resource Zone (ERZ), and Watercourse Amenities, Safety, and Habitat (WASH) standards.

Plan Tucson Considerations *Plan Tucson* policies regarding Government, Climate, Water, Environment, Economy and Land Use have been considered in developing the proposed regulations. Relevant policies include:

Government 4: Provide diverse, well-resourced opportunities for productive public engagement throughout the planning and decision-making process of City initiatives that respect and accommodate disabilities and diverse cultural needs by implementing a variety of interactive methods and communication tools to maximize inclusive participation.

Climate 3: Use a variety of strategies to ensure that all residents benefit from initiatives aimed at resilience and sustainability.

Climate 6: Develop a regional collaborative approach with public and private partnerships to reduce energy consumption and transition to renewable energy sources.

Water 3: Encourage appropriate use of reclaimed water and other potable water alternatives.

Water 7: Encourage increased water efficiency in both existing and new private and public developments, promoting user-level conservation practices across all water use contexts by expanding effective water efficiency and conservation programs across all sectors.

Environment 8: Promote the designs of buildings and use of materials that mitigate or reduce noise pollution

Economy 13: Create a business supportive climate through investment in public infrastructure and services, through its regulations and policies, and in building public-private partnerships.

Land Use 6: Create a business supportive climate through investment in public infrastructure and services, through its regulations and policies, and in building public-private partnerships.

Land Use 12: Apply the Guidelines for Development Review to the appropriate Building Blocks in the Future Growth Scenario Map, included in chapter four, to evaluate and provide direction for annexations, plan amendments, rezoning requests and special exception applications, Board

of Adjustment appeals and variance requests, and other development review applications that require plan compliance.

Land Use 25: Work collaboratively with Arizona State Land Department, Pima County, and nearby major land users to identify strategic and appropriate land uses within the Southlands and Houghton Corridor area.

Attachments:

- A. June 3, 2026 Planning Commission Legal Action Report
- B. Zoning Administrator Determination Letter for Large-Scale Data Centers
- C. Compilation of All Public Comments as of June 9, 2026
- D. Proposed Code Amendment Fact Sheet
- E. Updated Draft Regulations for Large-Scale Data Centers
- F. Geospatial Analysis for Large-Scale Data Centers
- G. Large Quantity Water Users Ordinance