FREQUENTLY ASKED QUESTIONS: PROPOSED CODE AMENDMENT ON LARGE-SCALE DATA CENTERS

1. **How many data centers currently exist in the City, and how large are they?**

There are currently at least six data center facilities that serve as a primary use currently operating within the city. Based on available information, the facilities range in size from approximately 3,200 square feet to approximately 39,000 square feet, with several in the 3,000–4,000 square foot range and others in the 17,000–39,000 square foot range. Where specified, portions of these buildings are dedicated to computer room or data storage space, while others are classified more generally as office, commercial storage, or warehouse uses.

2. **Is there a difference between a large-scale data center and a hyperscale data center?**

There is no official definition for a hyperscale data center, but they are traditionally very large, ranging from 100,000 square feet to over 1 million square feet. They are often built as campuses, and not single buildings. A large-scale data center, as defined in the City's draft standards, is proposed to be defined as a facility over 50,000 square feet with no upper size limit. This definition would include hyperscale data centers. This proposed definition would ensure that the more stringent regulations for large-scale data centers are not applied to smaller-scale facilities which generate minimal community impact.

3. **What would the application and review process be for a large-scale data center under the proposed zoning amendment?**

Under the proposed zoning amendment, large-scale data centers would be reviewed through an established public review process already used by the City for significant development requests. Specifically, these projects would require review through a Mayor and Council Special Exception under Section 3.4.4 of the City's Unified Development Code (UDC). This process is designed to ensure transparency, public participation, and careful evaluation before any decision is made.

The review process includes several steps that are open to the public, including the following, which are also detailed in the graphic below.

- The applicant must hold an advertised neighborhood meeting, where nearby residents, property owners, and other interested community members can learn about the proposal, ask questions, and provide feedback.
- The project would be considered at a Zoning Examiner public hearing. A public hearing is a formal meeting where testimony and comments are accepted from the

applicant, City staff, and members of the public, and where the Zoning Examiner evaluates the request against the criteria in the Unified Development Code.

- After the hearing, the Zoning Examiner provides a recommendation to the Mayor and City Council.
- Mayor and Council then the full record and make the final decision at a public Mayor and Council meeting.

Neighborhood meeting	Application Submittal	Public Notice of Zoning Examiner Public Hearing	Zoning Examiner Public Hearing	Zoning Examiner Recommend-ation	Mayor and Council Decision
• A neighborhood meeting is required – property owners and Neighborhood Associations must be invited	• A pre-application meeting with staff is required	• Proposed notice to properties within ½ mile and Neighborhood Associations within two miles			

As part of the proposed amendment, the City is also recommending a larger public notification area than is normally required, ensuring that more nearby property owners and residents are informed of proposed data center applications. It is proposed that the standard notice of all property owners within 400-feet of a proposed data center be increased to ½ mile (2,640 feet) and that all neighborhood associations within two miles of a site be notified, instead of the standard one mile.

All application materials and supporting information submitted as part of this process would become part of the public record, meaning that the proposal, supporting studies, and staff analysis would be available for public review. This ensures that the Mayor and City Council have the information they need to evaluate the request and determine whether it meets the City's standards and community goals.

Importantly, sending a request to Mayor and Council for consideration does not mean it is automatically approved. The process is designed to allow elected officials to review the full record, consider staff analysis, hear public input, and ultimately decide whether to approve, modify, or deny the request based on the adopted criteria in the Unified Development Code.

In some cases, a large-scale data center could also be proposed as part of a Planned Area Development (PAD) or Planned Community Development (PCD). These zoning tools follow a similar public review process that includes neighborhood notification, public hearings, and final consideration by the Mayor and City Council.

4. **How was the 50,000 square foot size threshold for the proposed definition determined?**

City staff reviewed the size and location of existing data centers in Tucson and found that all currently operating facilities are below 50,000 square feet. Facilities of this size tend to integrate into existing developed areas and generally require a lower level of infrastructure and utilities. By contrast larger facilities – such as hyperscale data centers have infrastructure needs and potential impacts which are significantly different from those built in Tucson to date. Data centers over 50,000 square feet generally align with energy use that can significantly impact the local electric grid.

5. **What enforcement mechanisms are in place to ensure a data center meets all zoning and development standards?**

Before a facility can begin operations, it must complete the City of Tucson's plan review and inspection process. During development, City reviewers evaluate the project plans to ensure compliance with applicable zoning regulations, building codes, and development standards. Construction is then subject to multiple inspections by City staff. A Certificate of Occupancy (CofO) is only issued after inspectors verify that the building and site improvements have been constructed in accordance with the approved plans and all applicable codes. A facility cannot legally operate without receiving this approval.

After a site is operational, the City of Tucson's Code Enforcement Division investigates potential violations of city codes, including zoning regulations and property maintenance requirements. Community members may submit complaints if they believe a property is not complying with applicable standards. Code Enforcement staff review complaints and may conduct site inspections to determine whether a violation exists.

If a violation is identified, the City may issue a notice of violation requiring corrective action within a specified timeframe. If the issue is not resolved, the City may pursue additional enforcement measures, which can include legal citation and referral to the Tucson City Court for further action. These enforcement tools help ensure that properties remain in compliance with zoning and development standards and protect the health, safety, and welfare of the community.

6. **What additional guardrails does a community have to address the impacts of large-scale data centers outside of zoning regulations?**

The City's Large Water Users Ordinance requires that any new or expanded development served by Tucson Water that is expected to use more than 7.8 million gallons (10,000 Ccf) of water per month must submit and receive Mayor and Council approval of a water conservation plan. This plan must demonstrate that at least 30% of proposed water use

will come from reclaimed sources. Failure to comply with the standards of the Large Water Users Ordinance will result in fines and potential suspension of service if corrective action is not taken. Facilities may also be subject to standards from Pima County Department of Environmental Quality (PDEQ), which monitors air pollution and emissions from generators. Additionally, Community Benefit Agreements, while not a part of this process, can be negotiated between a developer and the community. Finally, the proposed Data Center regulations includes multiple opportunities for public engagement regarding a potential data center development.

7. **What noise standards would apply to data centers under the proposed zoning regulations?**

Under the proposed regulations, applicants must provide an independent noise study and noise contour exhibit at the time of application to demonstrate the potential impacts on the surrounding area. The proposed regulations would require that data centers adhere to existing decibel limits at the property line as outlined within the City's Code of Ordinances, which require that the sound at the property line does not exceed 55 to 65 db., depending on the time of day. Additionally, enhanced setbacks are proposed to further insulate surrounding land uses from noise impacts.

8. **Can the City consider requiring a developer-funded public health impact assessment for large-scale data centers, similar to required traffic or acoustic studies, to evaluate heat, air quality from generators, noise-related health impacts, and emergency service impacts?**

The Mayor and Council have the authority to negotiate various community benefits or additional levels of review as a condition for approval. Within the proposed UDC amendment, any proposed data center would require a noise study with a noise contour exhibit in addition to meeting existing City noise standards at their property line and pay for any mitigation infrastructure.

9. **How does the proposal address co-locations and Power Coupling?**

Some data centers operate using a colocation structure. This usually occurs when a business rents space inside a third-party data center facility to house their own servers and networking equipment, rather than building and maintaining their own data center. Like other land uses in the City, an entity is allowed to occupy space and bring and manage their own equipment from a rented space. There is nothing proposed in the zoning code to prohibit this practice. Power Coupling is outside of the purview of zoning regulations and is typically defined and managed by Tucson Electric Power.

10. **How are water and energy use regulated?**

The City's role is to ensure that proposed facilities are consistent with adopted water supply planning, infrastructure capacity, and sustainability goals. The City will review whether adequate electrical infrastructure is available before approving a project. This may include coordination with the electric utility to confirm grid capacity, substation upgrades, and transmission improvements. The applicant must certify access to adequate energy supply at the time of application. Applicants must discuss the proposed energy mix, including renewables, in their application. The applicant is required to certify access to an adequate water supply at the time of application. Prohibit the use of potable water for data cooling. Adhere to the Large Quantity Water User Ordinance: Projects projected to use 10,000 centum cubic feet (CCF)(approx. 7.48 million gallons) or more on a monthly average must submit a Sustainable Water Service Application and a Water Conservation Plan for Mayor & Council approval.

11. **Can we prohibit data centers outright in the City?**

Data centers (as a land use) are already permitted under existing code; as such, it would be challenging for the City of Tucson to ban them outright. However, by establishing standards for their development, the City would be better able to guide how and where they are built and to place Tucson-specific guardrails on their potential impacts preventing outcomes inconsistent with the community's values and needs.

12. **What are the benefits of large scale data centers?**

Large-scale data centers, operated by major cloud and technology companies, can offer meaningful economic and infrastructure benefits for cities when thoughtfully planned and integrated into the community. These facilities often represent substantial private investment, bringing construction activity, long-term operational spending, and increased demand for local services. While the number of permanent on-site employees is typically limited, data centers still support job creation through construction, skilled trades, technical operations, and a range of indirect roles in maintenance and supply chains.

Over time, these developments can contribute to the local tax base through property and equipment-related revenues, helping fund public services such as infrastructure, public safety, and community programs. They can also serve as a catalyst for infrastructure improvements, particularly in electrical systems, broadband connectivity, and transportation access. These upgrades often extend beyond the site itself, benefiting nearby businesses and residents.

The presence of a large-scale data center can strengthen a city's role within regional and national digital networks, improving connectivity and making the area more attractive to technology companies, startups, and research institutions. This can support broader economic diversification and help position the city as part of a growing digital economy. In

many cases, operators also pursue sustainability goals, investing in renewable energy projects that can contribute to local clean energy development.

Additionally, data centers are often located on large or underutilized industrial sites, helping activate land that may otherwise remain vacant or underperforming. When aligned with local planning goals, this can support more efficient land use and long-term development strategies.

Cities typically balance these benefits with considerations such as energy demand, water use, and overall land efficiency. With clear policies and careful siting, large-scale data centers can be a valuable component of a city's economic and infrastructure landscape.