



---

# MEMORANDUM

---

Date: August 28, 2025

To: The Honorable Chair and Members  
Pima County Board of Supervisors

From: Jan Leshner   
County Administrator

Re: **Additional Information for Board of Supervisors September 2, 2025 Agenda - Item #12 on Proposed Policy for Environmental Impact Reviews of Economic Development Projects**

At the Board of Supervisors July 1, 2025 Meeting, direction was provided to the County Administrator to prepare a policy to require the completion of Environmental Impact Reviews for economic development projects. Attached for the Board's consideration is a draft *Board of Supervisors Policy 31.4 Enhanced Due Diligence Process for Pima County Economic Development Projects* (Attachment 1).

The purpose of the policy is to create a comprehensive project profile report through acquiring detailed information on an economic development prospect and performing thorough internal and external reviews including preliminary evaluation of site characteristics and layout, infrastructure needs and capacity, resource consumption and availability, environmental and climate impacts and other development related elements.

The proposed approach will incorporate an additional level of early and enhanced project due diligence to the existing lifecycle of an economic development project, which generally consists of:

- Receipt, initial research and response to a Request for Information (RFI)
- Possible site visit and "down selection"
- Consideration and discussion of project needs and requirements
- Negotiation of general terms and preparation of detailed term sheet
- Preparation and distribution of transaction documents
- Consideration of approval
- Project implementation

The enhanced due diligence process would be activated upon any of the following actions:

- "Down select" notification from an economic development prospect indicating that Pima County is being advanced for consideration
- Site visit request from an economic development prospect

2025-08-28 10:53:33 AM  
JL

The Honorable Chair and Members, Pima County Board of Supervisors

**Re: Additional Information for Board of Supervisors September 2, 2025, Agenda - Item #12  
on Proposed Policy for Environmental Impact Reviews of Economic Development  
Projects**

August 28, 2025

Page 2

- Additional due diligence meeting request from an economic development prospect
- Execution of a Non-Disclosure Agreement (NDA) pursuant to Board of Supervisors Policy 31.3

Upon activation of the enhanced due diligence process, information will be collected from the economic development prospect for review using a standardized questionnaire format. The collected information will be distributed to internal County departments and external agencies for review and comment, resulting in preparation of a preliminary project report incorporating a project profile, review findings and recommendations.

If there is an active Non-Disclosure Agreement in place, the report will adhere to the NDA terms related to disclosure of confidential information. If necessary, additional information can be provided to the Board of Supervisors in accordance with proposed draft *Board of Supervisors Policy 31.3 Use of Non-Disclosure Agreements (NDAs) in Economic Development Projects*.

The Policy does include required public disclosure of the project details no less than 90 days prior to any requested approval or vote by a County public body (i.e. Planning and Zoning Commission, Board of Supervisors, etc.).

Adherence to Pima County Board of Supervisors Rules and Regulations, Section Q, Economic Development Oversight and Confidentiality, which requires the County Administrator to make the Chair of the Board of Supervisors aware of potential economic development projects will also be maintained.

As a prospective project advances and additional data collection and review occur, the Board of Supervisors will periodically be provided updated reports, including the results of an economic benefit analysis once performed and an environmental justice review if conducted. The guiding framework for the elements of preliminary and additional reviews and reports is captured in the attached Pima County Economic Development Project Reference Sheet (Attachment 2). The type of data collected, and reviews performed, may vary based on the specifics of a project.

JKL/anc

**Attachments**

c: Carmine DeBonis, Jr., Deputy County Administrator  
Steve Holmes, Deputy County Administrator  
Heath Vescovi-Chiordi, Director, Economic Development Department

# ATTACHMENT 1



# PIMA COUNTY, ARIZONA BOARD OF SUPERVISORS POLICY

**Subject:** Enhanced Due Diligence Process for Pima County Economic Development Projects

**Policy  
Number**

31.4

**Page**

Page 1 of 5

## **I. Purpose**

The enhanced due diligence process establishes a comprehensive project profile report by acquiring detailed information from economic development prospects and conducting additional thorough internal and external reviews in advance of other required regulatory compliance and permitting reviews of Pima County and other agencies.

This process will provide an additional preliminary evaluation of site characteristics and layout, infrastructure needs and capacity, resource consumption and availability, environmental and climate impacts and other development related elements to ensure initial project feasibility and compatibility and provide the Board of Supervisors information needed to enable sound policy making decisions.

## **II. Process Activation**

The enhanced due diligence process would be activated upon any of the following actions:

- “Down select” notification from an economic development prospect indicating that Pima County is being advanced for consideration
- Site visit request from an economic development prospect
- Additional due diligence meeting request from an economic development prospect
- Execution of a Non-Disclosure Agreement (NDA) pursuant to Board of Supervisors Policy 31.3

## **III. Key Project Evaluation Areas**

Throughout the enhanced due diligent process which includes both preliminary and additional reviews, the following key items related to the prospective economic development project will be evaluated and potential impacts assessed:

- Site Analysis: Site related effects and mitigation including physical site characteristics, development constraints, comprehensive plan and zoning designations and any required changes, noise generation, compatibility with surrounding land uses and facilities, etc.
- Environmental Impact Review: Potential environmental and climate effects and mitigation requirements, including compatibility with air and water quality standards, and the Pima County Climate Action Plan; Additionally, depending on the project specifics, an environmental justice review may be conducted



## PIMA COUNTY, ARIZONA BOARD OF SUPERVISORS POLICY

**Subject:** Enhanced Due Diligence Process for Pima County Economic Development Projects

**Policy  
Number**

31.4

**Page**

Page 2 of 5

- Cultural Resources and Historic Preservation Review: Potential cultural and historic resources effects and mitigation requirements
- Species Protection and Conservation Land Review: Potential species and conservation effects and mitigation requirements including impact on biological and ecological (fauna/flora) communities, natural open space and aesthetic resources, etc.
- Infrastructure Capacity Assessment: Assessment of existing infrastructure and requirements to support project demands including transportation systems and traffic, sewer conveyance and treatment systems, drainage and flood control systems, etc.
- Resource Impact Evaluation: Assessment of water, energy, and other resource requirements, availability and impacts
- Public Health: Potential public health effects and mitigation requirements

#### IV. Preliminary Information Collection and Distribution

Preliminary information will be collected from the economic development prospect for review using a standardized form generally in the format of the attached questionnaire and distributed for review as follows:

- Preliminary Project Questionnaire: A standardized form will be provided to the economic development prospect to gather details on the project specifications, operational requirements, timeline expectations, resource needs, etc.
- Information Distribution: The Pima County Economic Development Department will compile the prospect-provided information and distribute to appropriate internal and external review entities. Input received will be compiled into a project profile report.
- Follow-up Requests: After distribution of the initial information, the Economic Development will coordinate any needed follow-up requests and clarification of information amongst the project prospect, internal departments, external agencies and others.

The County Administrator is authorized to update the questionnaire format as necessary to ensure collection of sufficient and pertinent information to inform the Board of Supervisors.



## PIMA COUNTY, ARIZONA BOARD OF SUPERVISORS POLICY

<b><u>Subject:</u> Enhanced Due Diligence Process for Pima County Economic Development Projects</b>	<b>Policy Number</b>	<b>Page</b>
	31.4	Page 3 of 5

### V. **Pima County Department Review**

Information collected as part of the enhanced due diligence process will be distributed to the following Pima County departments for the noted reviews and preparation of written comments:

- **Pima County Department of Environmental Quality (PDEQ):** Air quality, climate, overall environmental compliance assessment with relevant departments, dust activity permit, asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements, etc.
- **Regional Flood Control District (RFCD):** Site planning to avoid flood hazards or identification of any flood mitigation needed; help avoid Flood Control Resource Areas, stormwater management requirements, etc.
- **Development Services Department (DSD):** Zoning compliance, permitting requirements, land use compatibility, etc.
- **Regional Wastewater Reclamation Department (RWRD):** Water and wastewater service capacity and infrastructure assessment, etc.
- **Conservation Lands and Resources Department (CLR):** Assess for presence of resources that require avoidance or planning to comply with all adopted policies on Cultural Resources and Conservation Lands, including the Conservation Lands System, Sonoran Desert Conservation Plan, Multi-Species Habitat Conservation Plan, etc.
- **Other Departments:** As determined necessary based on project specifics

### VI. **External Agency Coordination**

Information collected as part of the enhanced due diligence process will be distributed to the following external agencies for input:

- **Utility Providers:** Electric, gas, telecommunications service availability and capacity analysis, including identification of all relevant water sources, energy demand and generation requirements
- **Municipal Jurisdictions:** Coordination with applicable cities and towns on requirements for regulatory compliance and service provision



## PIMA COUNTY, ARIZONA BOARD OF SUPERVISORS POLICY

**Subject: Enhanced Due Diligence Process for Pima County Economic Development Projects**

**Policy  
Number**

31.4

**Page**

Page 4 of 5

- Tribal Jurisdictions: Coordination with applicable tribal jurisdictions on requirements for regulatory compliance and service provision
- Other Agencies: As determined necessary based on project specifics

### **VII. Documentation and Preliminary Reporting**

The Economic Development Department is responsible for compiling the information provided by internal departments and external agencies into a preliminary project report incorporating a project profile, including a description of the project; the project purpose and need; economic, environmental and social characteristics, benefits and impacts; and review findings and recommendations. The detailed review comments from internal departments and external agencies will be attached to the report.

If there is an active Non-Disclosure Agreement in place, the report will adhere to the NDA terms related to disclosure of confidential information. If necessary, additional information can be provided to the Board of Supervisors in accordance with Board of Supervisors Policy 31.3 Use of Non-Disclosure Agreements (NDAs) in Economic Development Projects.

Adherence to Pima County Board of Supervisors Rules and Regulations, Section Q, Economic Development Oversight and Confidentiality, which requires the County Administrator to make the Chair of the Board of Supervisors aware of potential economic development projects will also be maintained.

### **VIII. Additional Review and Reporting**

As a prospective project advances, and following the preliminary project report, additional data collection and review will occur, and the Board of Supervisors will periodically be provided updated reports, potentially including but not limited to:

- An economic benefit analysis upon receipt of sufficient data to perform one, including growth-inducing aspects of the project
- An environmental justice review, as warranted based on project specifics
- Identification of overall short-term, long-term, and cumulative economic benefits and environmental impacts
- Information on the use and conservation of energy, including impacts on non-renewable resources



## PIMA COUNTY, ARIZONA BOARD OF SUPERVISORS POLICY

**Subject: Enhanced Due Diligence Process for Pima  
County Economic Development Projects**

**Policy  
Number**

31.4

**Page**

Page 5 of 5

- Information on solid waste management and adherence to applicable requirements
- Details on acquisitions of public lands and associated impacts or benefits
- Measures to minimize environmental impacts, including reducing climate impacts such as the effects of extreme heat, and increased risk of wildfires and flooding
- A description of any reasonable alternatives considered within the control of the project sponsor

### **IX. Public Disclosure Period**

Public disclosure of the project details shall occur no less than 90 days prior to any requested approval or vote by a County public body (i.e. Planning and Zoning Commission, Board of Supervisors, etc.).

### **X. Fees**

County Administrator may establish a fee structure to cover staff resources required to implement this Policy, as deemed necessary.



**PIMA COUNTY ECONOMIC DEVELOPMENT  
PRELIMINARY PROJECT QUESTIONNAIRE**

***This document is intended as a working tool to create a preliminary project profile report. Information requirements will vary based on project type, development stage, and data availability. Not all sections need to be completed for initial intake. This process is a preliminary gathering and reviewing of information to help determine initial project feasibility and impacts and occurs prior to other required regulatory review and permitting.***

Project Name: \_\_\_\_\_ Date: \_\_\_\_\_

Applicant: \_\_\_\_\_

Developer: \_\_\_\_\_

Contact: \_\_\_\_\_ Phone: \_\_\_\_\_ Email: \_\_\_\_\_

**PROJECT OVERVIEW**

Project Type:

☐ Manufacturing ☐ Advanced/Emerging Technology ☐ Aerospace/Defense ☐ Logistics ☐ Healthcare  
☐ Other: \_\_\_\_\_

Site Information:

• Location/Address: \_\_\_\_\_

• Site Area: \_\_\_\_\_ acres Parcel #: \_\_\_\_\_

• Current Zoning: \_\_\_\_\_ Current Use: \_\_\_\_\_

Project Scale:

• Building Area: \_\_\_\_\_ square feet Investment: \$ \_\_\_\_\_

• Employment: \_\_\_\_\_ jobs Timeline: \_\_\_\_\_

Project Description:

---

---

---

---

## INFRASTRUCTURE NEEDS OVERVIEW

### Utilities & Services:

☐ Standard utility connections adequate ☐ Special utility requirements ☐ On-site generation needed

### Transportation:

☐ Existing access adequate ☐ Road improvements needed ☐ Major transportation study required

### Water:

☐ Water Service Provider \_\_\_\_\_

☐ Groundwater

Arizona Department of Water Resources Groundwater Right # \_\_\_\_\_

Well Registry # \_\_\_\_\_

☐ Surface Water

Arizona Department of Water Resources Certificate # \_\_\_\_\_

Estimated demand/use: \_\_\_\_\_ GPD

#### Water Use Type

☐ Industrial Process ☐ Commercial/Office Use ☐ Other Use

If other, explain use:

---

---

---

### Wastewater:

☐ Special treatment required

☐ Estimated demand/use: \_\_\_\_\_ GPD

## ENVIRONMENTAL & REGULATORY CONSIDERATIONS

### Environmental Quality Factors:

☐ Standard environmental quality review ☐ Special environmental quality studies needed ☐ Protected resources present



Cultural Resources and Historic Preservation Review:

☐ Standard cultural/historic review ☐ Special cultural/historic studies needed ☐ Protected resources present

Species Protection and Conservation Land Review:

☐ Standard conservation review ☐ Special species or conservation studies needed ☐ Protected resources present

Permits & Approvals:

☐ Standard development permits ☐ Special use permits required ☐ State/federal coordination needed  
☐ Public engagement required ☐ Public engagement recommended

**COUNTY POLICY ALIGNMENT**

Strategic Plan Consistency:

☐ Aligns with Pima Prospers ☐ Supports Climate Action Plan ☐ Compatible with Conservation Lands

Economic Development Priority:

☐ Target industry sector ☐ High-wage employment ☐ Innovation/technology focus

**PRELIMINARY ASSESSMENT**

Project Benefits:

☐ Job creation ☐ Tax base expansion ☐ Infrastructure improvements ☐ Supply chain development

Potential Considerations:

☐ Environmental review needed ☐ Community outreach recommended ☐ Special studies required

Additional Notes:

---

---

Submitted by: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_



**FOR COUNTY USE ONLY**

Received: \_\_\_\_\_ Coordinator: \_\_\_\_\_ Review Date: \_\_\_\_\_

Project Classification:

☐ Standard Review ☐ Enhanced Review ☐ Complex Project

Administrative Actions:

☐ County administration briefing ☐ Communications coordination ☐ NDA requested

Next Steps:

☐ Additional information needed ☐ Detailed requirements provided ☐ Internal agency review ☐ External agency review

**Notes:**

---

---

---

---

---

---

---

# ATTACHMENT 2



## **PIMA COUNTY ECONOMIC DEVELOPMENT PROJECT REFERENCE SHEET**

### *Detailed Technical Information (Project-Dependent)*

This reference sheet provides detailed technical requirements that may be needed based on specific project characteristics. Requirements will vary by project type, scale, and complexity.

### **SITE CHARACTERISTICS**

#### *Detailed Site Information:*

- Comprehensive Plan Designation
- Topographic conditions (slopes, washes, arroyos)
- Known constraints (regulatory floodplains, regulated riparian habitat, cultural, biological, mining claims, easements)
- Special districts (airport environs, historic, overlay zones, scenic corridors)

### **INFRASTRUCTURE REQUIREMENTS (Project-Specific)**

#### *Water Supply & Wastewater*

- Water Provider: Tucson Water, Metropolitan Water Improvement District, Other Water Provider, Private Well, Multiple Sources
- Daily Water Demand: Gallons per day (GPD), Peak Demand: Gallons per minute (GPM), Fire Flow Requirements
- Wastewater Details: Provider, Daily Flow (GPD), Connection Point (Manhole #)
- Pretreatment Requirements: Type and specifications
- Special Discharges: Cooling tower blowdown, process water

#### *Transportation & Access (Traffic-Generating Projects)*

- Access Roads: Primary and secondary access points

- Traffic Analysis: Daily trips, AM/PM peaks, heavy vehicle percentage
- Study Requirements: Transportation Impact Study, ADOT coordination
- Roadway Improvements: New construction or modifications needed

#### *Utilities*

- Electrical: Provider (Tucson Electric Power, Trico, etc.), Load requirements (KW/MW)
- On-site Generation: Type and capacity
- Natural Gas: Southwest Gas requirements
- Telecommunications: New infrastructure needs

### **ENVIRONMENTAL CONSIDERATIONS**

#### *Air Quality & Emissions*

- Potential to Emit (tons/year of Criteria Air Pollutants (CAPs) and Hazardous Air Pollutants (HAPs)
- Total acres of development - Fugitive dust activity permit
- Asbestos NESHAP (i.e. existing commercial, industrial building with demo/tenant improvements)
- Greenhouse Gas Emissions: Annual CO<sub>2</sub> equivalent (tons)
- Air Pollution Control: Equipment and mitigation measures

#### *Environmental and Cultural Resources*

- Biological Resources: Protected species habitat, riparian areas, Conservation Land System areas, landscape connectivity
- Land Conservation Resources: Land disturbance thresholds (acres), proximity to sensitive areas
- Cultural Resources: Archaeological sites, historic buildings and structures
- Floodplain Analysis: FEMA zones, floodway impacts, TECH-114 reports
- Air Quality: Air emissions requirements and permitting

- Resource Consumption and Climate Impacts: Water use thresholds (source and acre-feet/year), energy use thresholds (MW) and generation sources, climate impacts
- Noise Assessment: dB levels and impact zones

*Waste Management (Industrial Projects)*

- Solid Waste: Type and volume (tons/year)
- Hazardous Waste: Generation, storage, handling requirements
- Special Waste: Category and disposal needs
- Recycling/Diversion: Plans and requirements

**REGULATORY REQUIREMENTS** (Project-Specific)

*Federal / State Permits*

- United States Army Corps of Engineers 404 Permit
- Arizona Department of Environmental Quality Permits
- Mine Inspection
- Federal Aviation Administration clearances
- Endangered Species Act
- Arizona Antiquities Act

*County Permits / Reviews*

- Conditional Use Permit
- Comprehensive Plan Amendment or Rezoning
- Design Review
- Grading
- Right-of-Way Use Permit

- Cultural Resources Protection (Policy 3.17), County Conservation Lands (Policy 3.20), Conservation Restrictive Covenants

## **DEVELOPMENT PROGRAM DETAILS**

### *Building Components*

- Office, Manufacturing, Warehouse square footage
- Building heights (stories/feet)
- Parking spaces and loading docks
- Open space/landscaping percentages
- Outdoor activities and storage

## **DEPARTMENT-SPECIFIC REVIEWS (As Required)**

### *Agency Reviews*

- Pima County Department of Environmental Quality (PDEQ) Environmental Review: Air quality, emissions, climate impacts, Resource Conservation and Recovery Act
- Regional Wastewater Reclamation Department (RWRD) Capacity Investigation: Wastewater flow analysis and connections
- Regional Flood Control District (RFCD) Drainage Review: Floodplain analysis and stormwater management
- Department of Transportation (DOT) Transportation Impact Study: Traffic generation and roadway impacts
- Cultural Lands & Resources Department (CLR) Cultural Resources and Historic Preservation Review: Archaeological and historic preservation
- Cultural Lands & Resources Department (CLR) Natural Resources Assessment: Biological resources and Conservation Lands System compatibility
- Other Internal or External Agencies: Tribal, Fire Districts, School Districts, etc.

## **POLICY CONSISTENCY EVALUATION**

### *County Plans Assessment*

- Pima County Climate Action Plan: Consistency with Green House Gas (GHG) reduction goals
- Pima County Economic Development Plan: Alignment with priorities
- Conservation Lands System (CLS): Compatibility assessment
- Pima Prospers Comprehensive Plan: Land use designation consistency
- Floodplain Management Plan: Consistency with management policies

### *Environmental Justice Considerations*

- Proximity to disadvantaged communities
- Disproportionate impact assessment
- Community engagement requirements

## **ECONOMIC IMPACT ANALYSIS**

### *Detailed Economic Metrics*

- Average salary ranges
- Annual tax revenue projections
- Capital investment breakdown
- Construction employment estimates
- Supply chain opportunities
- Workforce training components

*This reference sheet should be consulted based on project characteristics identified in the Project Intake Sheet. Not all sections will apply to every project.*