

August 7th, 2025

To: Melissa Manriquez, Clerk of the Pima County Board of Supervisors

From: Supervisor Jennifer Allen
Pima County Supervisor for District 3 and Vice Chair of the Pima County Board of Supervisors
33 N. Stone Ave, 11th Floor
Tucson, AZ 85701

Re: Zoning for Data Centers

Dear Melissa,

Please add the following item to the Addendum Agenda for the August 18th, 2025 Board of Supervisors meeting:

Discussion/Direction/Action: Directing Development Services Department staff to initiate a zoning code text amendment requiring additional review and public processes on CI-2 zoned parcels for data centers and other large-scale users of water and electricity.

Thank you,

Supervisor Jennifer Allen

MEMORANDUM

Date: August 13, 2025

To: Jan Leshar, Pima County Administrator
Melissa Manriquez, Clerk of the Pima County Board of Supervisors

From: Jennifer Allen, District 3 Supervisor and Vice Chair

Re: Zoning Updates for Data Centers and Large Utility Users

As data centers continue to expand in Arizona and across the country, a growing number of jurisdictions are establishing regulations that ensure public participation and transparency, as well as protections for water use, energy consumption, air quality, noise abatement, and design standards. Arizona cities and towns including Marana, Phoenix, Chandler, Mesa, Tempe, Coolidge, Avondale, Glendale, and most recently, Tucson, are enacting new regulations that address where it makes sense for data centers to locate, how they are built, and their impact on neighborhoods, water, energy demand, and other areas.

After talking with officials from some of the communities listed above, along with environmental organizations, Pima County Development Services Department, the County Attorney's Office, and others, we are proposing that Pima County begin the zoning code text amendment process to enact similar regulations that ensure we are not caught flat footed when future proposals for data centers arrive.

Currently, data centers are allowed "by-right" on some industrially zoned parcels, meaning they would require no review or recommendation by the Planning and Zoning Commission or approval from the Board of Supervisors prior to construction. The proposed code text amendment, in keeping with recent changes by municipalities in Arizona and other states, would require data centers and other large water and electricity users to obtain Conditional Use Permits. This means any data center wanting to set up shop in Pima County would, at minimum, go through an extensive staff review process, be presented to the Planning and Zoning Commission and the Board of Supervisors, and would require public hearings at both the Commission and Board levels. Any such permit application should also address concerns related to noise; water use and conservation; energy use, generation and conservation; the use of back-up generators; design and aesthetics; and community engagement.

This proposal complements our related guidance to Pima County Administration to conduct environmental impact reviews of proposed economic development projects as well as reforms to the use of non-disclosure agreements as part of economic development projects. We expect Development Services staff will work alongside other departments, as relevant, including Economic Development, Environmental Quality, Flood Control, Conservation Land and Resources, Health Department, County Attorney, as well as the City of Tucson and community organizations.

Given the growing ubiquitousness of AI in our every day lives, it is imperative that Pima County get ahead of the curve and define the process and expectations for large utility users and data centers. Our future depends on it.