

EXHIBIT 7

TO COMPLAINT FOR SPECIAL ACTION

FRANTI III HOLDINGS, LLC, ET AL V. CITY OF TUCSON



Special Exception Land Use Permit Application

**Midtown Reliability Project
2411 N Oracle Road
Tucson, AZ, 85705**

Transmission structures within road right-of-way at
North Oracle Road & West Grant Road

Submitted to:
City of Tucson
Planning and Development Services Department
201 North Stone Avenue
Tucson, Arizona 85701

Prepared by:
Tucson Electric Power
3950 East Irvington Road
Tucson, Arizona 85714
(520) 884-3642

October 29, 2024

TABLE OF CONTENTS

Definitions.....	
Acronyms.....	
Executive Summary	
1. INTRODUCTION AND POLICY.....	
A. Subregional, Area, and/or Neighborhood Plans.....	
B. Adopted Plan Policies.....	
1. Plan Tucson	
2. Unit 6 Neighborhood Plan	
3. Zoning Code	
C. Conflicts with Adopted COT Ordinance or Policy	
2. SITE ANALYSIS.....	
A. General.....	
1. Table of Contents	
2. Project Location Map	
3. Generalized Land Use Map	
4. Property Boundary Dimensions	
5. Existing Zoning	
6. Location, Size, and Height of Adjacent Existing Buildings.....	
7. Location, Size, and Hieght of Adjacent Existing and Proposed Buildings On-Site.....	
8. Billboards	
B. Circulation and Trips	
1. Major and Local Streets.....	
2. Existing and Proposed Curb Cuts and Access Drives	
3. Deceleration and Turn Lanes	
4. Existing and Proposed Curbs, Driveways, Sidewalks, and Bike Paths	
5. Traffic Signals within One Mile	
6. Nearest Existing and Proposed Public Transit Stops and Park-and-Rides.....	
7. Projected Date of Any Improvements in the COT Capital Improvement Program (C.I.P.)	
8. Existing Traffic Counts on Major Streets within One Mile.....	
9. Trip Generation Calculations	
C. Cultural Resources	
D. Hydrology & Drainage.....	
1. On-site and Off-site Drainageways	
2. 100-Year Floodplains.....	

3. Environmental Resource Zone and Watercourse, Amenities, Safety, and Habitat Drainageways....	
4. Erosion Hazard Setback Areas	
5. Peak 100-Year Event Flow	
6. Existing Condition and Locations of Proposed Retention/Detention Areas.....	
7. Applicable Floodplain and Wash Ordinances and Codes	
E. Schools, Recreational, and Cultural Facilities	
1. Locations of Schools, Parks, Libraries, and Public Land.....	
2. Pedestrian and Bike Routes	
3. Trail and Trail Access Points.....	
F. Soils	
1. Heavily Disturbed Area	
2. Hazardous Materials On-site	
3. Landfill Sites or Hazardous Materials within 1 Mile.....	
4. Other Existing Facilities/Operations within 1 Mile	
G. Topography	
1. Topographic Contours or Spot Elevations	
2. Hillside Development Zone.....	
H. Utilities	
I. Vegetation	
1. Existing On-site Vegetation.....	
2. Existing Landscaping and Screening	
J. Views	
1. Description of Views out of the Site to Surrounding Area	
2. Description of Views Depicted in the Photo Simulations	
3. PLAN PROPOSAL	
A. Building Layout	
B. Design Compatibility	
1. Privacy for Adjacent Residences	
2. Compatibility with Climate and Surrounding Area	
3. Energy Conservation	
4. Building Setbacks	
5. Transition of Building Height and Number of Stories	
6. Transition of Density	
7. Landscaping and Screening Mitigation for Noise and Visibility	
8. Street Improvements	

9. Defensible Space Techniques	
10. View Corridors.....	
11. Changes in Elevation	
C. Hydrology & Drainage.....	
1. Proposed Drainage Solution	
2. Post-development Water Discharge On-site and Off-site.....	
D. Landscaping and Screening	
E. Lighting.....	
F. Pedestrian Access	
G. Signs	
H. Topography	
I. Traffic & Trip Generation	
J. Undisturbed Areas.....	
K. Utilities	
1. Proposed Changes to Utilities and Easements and New Utilities and Easements.....	
2. Additional Utility Information.....	
L. Vehicular Use Area.....	
4. REFERENCES	

LIST OF PHOTOS

Photo 1. Example of a Steel Riser Pole.....	
---	--

LIST OF EXHIBITS

Exhibit i. Approved CEC Route Corridors.....	
Exhibit 1. Subject Crossing Location Map.....	
Exhibit 2. Generalized Land Use.....	
Exhibit 3. Zoning.....	
Exhibit 4. Preliminary Engineering of Preferred Route at Subject Crossing.....	
Exhibit 5. Circulation.....	
Exhibit 6. Hydrology and Drainage	
Exhibit 7. Schools, Parks, and Libraries.....	
Exhibit 8. Topography and Soils	
Exhibit 9. Photo Simulation No. 1, Looking North on Oracle Road	
Exhibit 10. Photo Simulation No. 2, Looking east on Grant Road	
Exhibit 11. Photo Simulation No. 3, Looking south on Oracle Road.....	
Exhibit 12. Photo Simulation 4, Looking west on Grant Road.....	

APPENDICES

Appendix A. Midtown Road ROW Research	
Appendix B. Cultural Resources Survey Report	

Appendix C. Historic District Analysis
Appendix D. FEMA FIRM 04019C1688L & 04019C2276L
Appendix E. Photo Simulation Package
Appendix F. Neighborhood Meeting Summary
Appendix G. General MRP Comments

Definitions

Project	The construction, operation, and maintenance of the Midtown Reliability Project (MRP) 138kV transmission line structures crossing the Gateway Corridor Zone of Oracle Road.
Subject Crossing	The Oracle/Grant intersection where the MRP 138 kV transmission line will run east to west on Grant Road and cross over the Gateway Corridor Zone of Oracle Road.
Midtown Reliability Project Study Area	The approximately 16.5 square mile area surrounding the TEP Area Study Load Center that was considered for the interconnecting Vine substation and the subject of the line siting analysis, cultural resources, and biological studies. The study area is roughly bounded by Fort Lowell Road on the north, Country Club Road on the east, 36 th Street on the south, and 4 th Avenue/Aviation Parkway/I-10 on the west.

Acronyms

A/NRHP	Arizona/National Register of Historic Places
CEC	Certificate of Environmental Compatibility
C.I.P.	COT Capital Improvement Program
COT or City	City of Tucson
ERZ	Environmental Resource Zone
FEMA	Federal Emergency Management Agency
FIRM	Federal Insurance Rate Map
GCZ	Gateway Corridor Zone
kV	kilovolt
LT	Plan Tucson's Land Use, Transportation, & Urban Design Policy
MRP	Midtown Reliability Project
PT	Plan Tucson
OCR-2	Office, Commercial, Residential Zone 2
R-2	Residential Zone 2
SELU	Special Exception Land Use Permit
TEP	Tucson Electric Power Company
UDC	Unified Development Code
WASH	Watercourse, Amenities, Safety, and Habitat

Executive Summary

In determining where to locate new energy infrastructure, Tucson Electric Power Company ("TEP") considers the projected energy needs of nearby residential and commercial customers, anticipated economic development, proximity to existing equipment, project costs, geography, the environment, public input and other factors.

The Midtown Reliability Project (MRP) will upgrade Midtown Tucson's antiquated and overloaded 46 kilovolt (kV) sub-transmission system to a much more flexible and robust 138 kV system. This upgrade is urgently needed to replace older, lower-voltage equipment that cannot keep pace with the increasing energy use in central Tucson. Peak power demand in the area is reaching the maximum capacity of the current system, reducing reliability of the electric grid. Management of the heavily-loaded system requires significant patchwork expenditures to compensate for the system's age. Without the MRP, TEP will face ever increasing challenges to reliably serve customers in the area and risks the future growth potential of Midtown.

The MRP team completed a comprehensive siting study that included public outreach to develop ten route alternatives to present to the Arizona Power Plant and Transmission Line Siting Committee (the Line Siting Committee). The Line Siting Committee approved four route alternative segments and created a fifth route alternative segment that was also approved. Routes B and 4 were combined to form TEP's preferred alternative route, see Exhibit i, to construct an 8.5-mile 138 kV line that will connect the DeMoss-Petrie Substation to the planned Vine substation to the Kino Substation.

Along with the new transmission line, TEP has committed to retiring 19 miles of the old 46 kV sub-transmission lines as well as undergrounding distribution lines that are in the same corridor as the Preferred Route.

TEP's CEC authorizing the Preferred Route includes a finding that requires TEP to file for a special exception of the GCZ at each crossing as described in the Unified Development Code. This Application is submitted in compliance with those CEC requirements.

The Unified Development Code (UDC) section 5.5 states that transmission lines perpendicularly crossing a GCZ may be built overhead after following the zoning examiner special exception land use procedure (UDC 3.4.3). Special exception criteria D states the poles for overhead transmission lines must be set back 150' from the GCZ curblineline. This application is for one of the three perpendicular crossings of a GCZ on the Preferred Route. This Subject Crossing is located at North Oracle Road and East Grant Road. Here the planned transmission line runs east to west on Grant Road and crosses over the GCZ of Oracle Road.

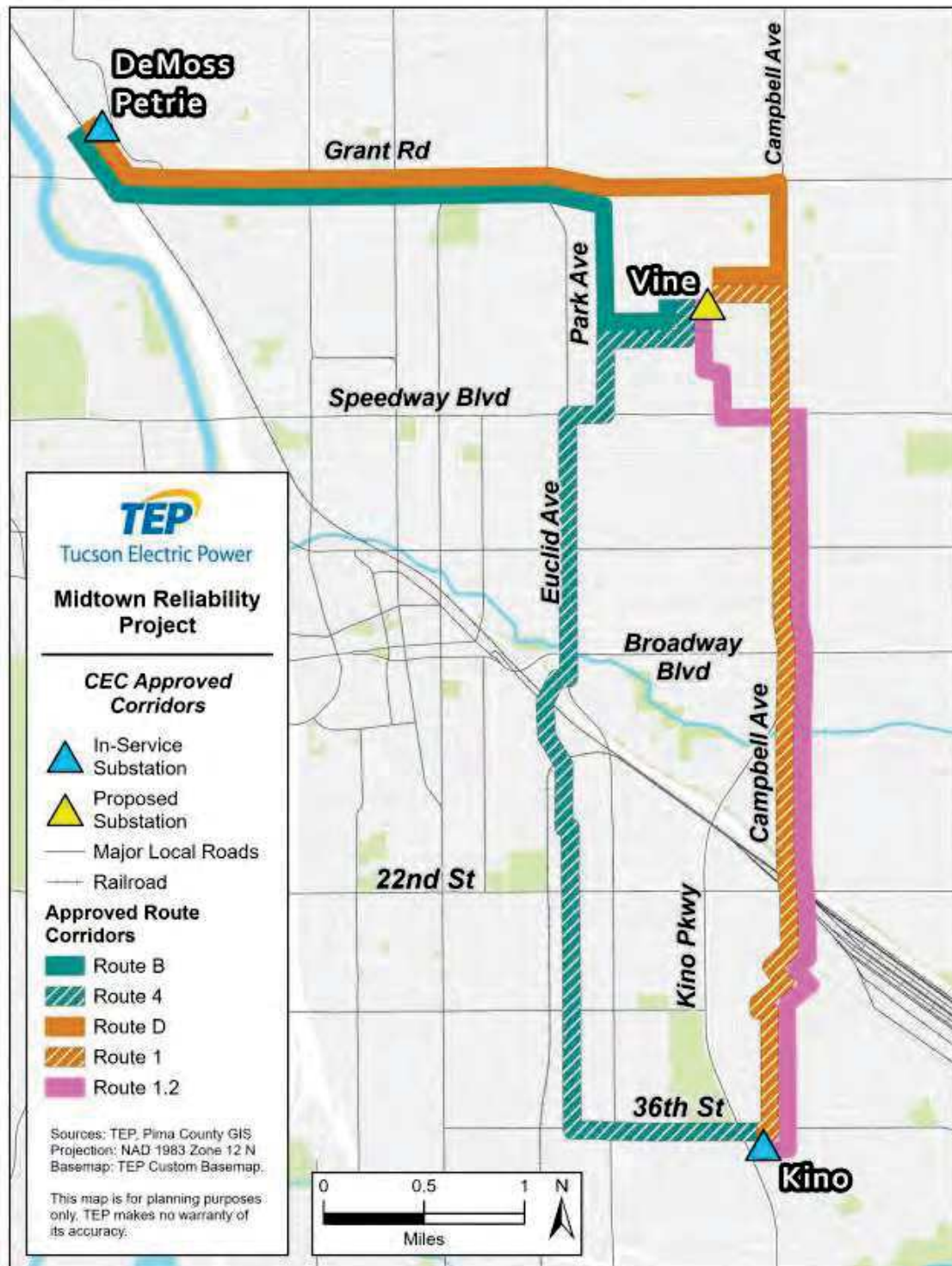
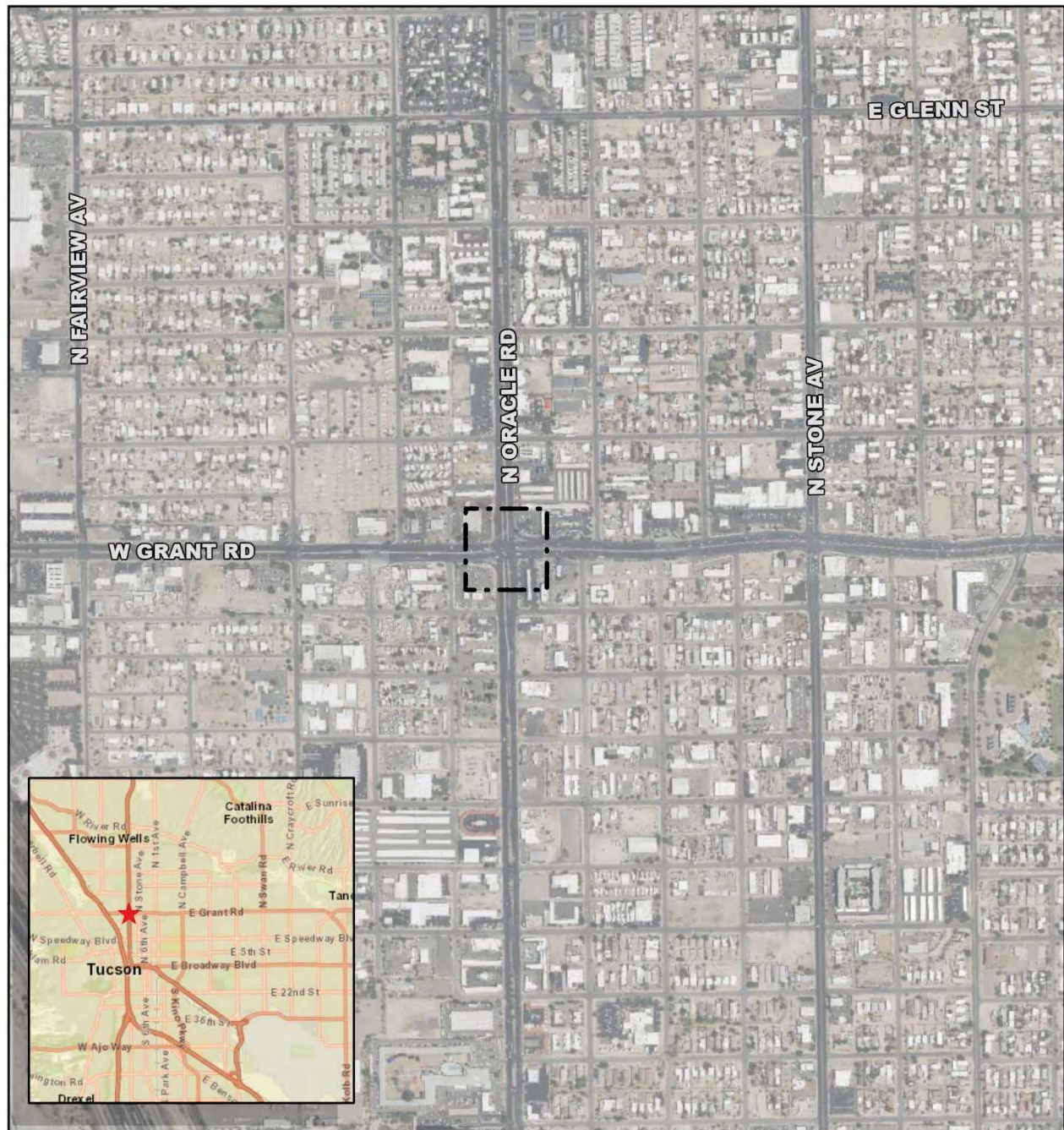


Exhibit i. Approved CEC Route Corridors



 Subject Crossing

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 500 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 1. Subject Crossing Location Map

1. INTRODUCTION AND POLICY

This report is intended to demonstrate compliance with the general procedures and application submittal requirements necessary to process a Special Exception Land Use (SELU) permit pursuant to the City of Tucson Unified Development Code (UDC) Article 3 and Administrative Manual Section 2. This report is generally organized to follow the provisions outlined in Section 2-03.4 for Preliminary Development Package (PDP) Content Requirements.

The Project complies with the COT's General Plan and zoning regulations and will comply with all relevant land use standards and regulations. The following sections are intended to demonstrate that the Project meets the intent of plan policies.

A. Subregional, Area, and/or Neighborhood Plans

Plan Tucson and the COT Unified Development Code provide land use and development guidance for the Project. The Unit 6 Neighborhood Plan runs adjacent to Route B4. Project compliance with each of these plans is described in the following paragraphs.

B. Adopted Plan Policies

1. Plan Tucson

The Subject Crossing (Grant/Oracle) is located within the Mixed-Use Centers Building Block on the Future Growth Scenario Map in Plan Tucson ("PT"). The Mixed-Use Centers Building Block primarily consists of residential, retail, and public gathering spaces. This Building Block's goal is to promote neighborhood-scale activity centers particularly with various modes of transportation available to reach said activity centers.

PT also supports environmentally sensitive design that protects the integrity of existing neighborhoods, complements adjacent land uses and enhances the overall function and visual quality of the street, adjacent properties, and the community. The Subject Crossing is within commercial zoning and is adjacent to industrial and residential zoning. A transmission line is compatible to the industrial and commercial zoning. Visual clutter in the view corridor of Grant Road would be reduced, since the existing 46 kV lines and the joint-use attachers (communication wires) would be removed or undergrounded after the transmission line is built. This supports PT's goals of neighborhood design that enhances the visual quality of the street.

The Project complies with the following PT policies and supports the goals of the Mixed-Use Centers Building Block.

Land Use, Transportation & Urban Design

- LT27: Using existing neighborhood, area, and other specific plans as the starting point, undertake an inclusive public process to explore the concept of developing and implementing planning and service areas to coordinate and enhance land use planning, infrastructure improvements, and public service delivery.
- LT28: Apply Guidelines for Development Review (Exhibit LT-11) to the appropriate Building Blocks in the Future Growth Scenario Map 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.

Applicable Guidelines for Development Review

- LT28.6.8 Consider public-private partnerships and shared investments in connection with future street projects. When right-of-way acquisition diminishes market viability for affected businesses, expansion to additional parcels to provide consolidated access and improved parking, including shared parking and other site amenities, may be considered.
- LT28.6.11 Support environmentally sensitive design that protects the integrity of existing neighborhoods, complements adjacent land uses, and enhances the overall function and visual quality of the street, adjacent properties, and the community.
- LT28.6.12 Support infill and redevelopment projects that reflect sensitivity to site and neighborhood conditions and adhere to relevant site and architectural design guidelines.
- LT28.6.13 Protect established residential neighborhoods by supporting compatible development, which may include other residential, mixed-use infill, and appropriate nonresidential uses.

Public Infrastructure, Facilities, & Cost of Development Policies (PI)

- PI1: Invest in highest priority needs to manage and maintain public infrastructure and facilities that are fundamental to economic development and to sustaining and enhancing living conditions in the community.
- PI2: Prioritize major public infrastructure investments in developed areas and for improvements of the existing infrastructure.
- PI3: Expand the use of state-of-the-art, cost-effective technologies and services for public infrastructure and facilities.
- PI7: Coordinate with utility companies and other public service providers for the planning of infrastructure, facilities, and services, making sure infrastructure and facility construction is sensitive in design and location to environmental and historic resources.

2. Unit 6 Neighborhood, Land Use, and Circulation Plan

The Unit 6 Neighborhood, Land Use, and Circulation Plan borders the southwest corner of the Subject Crossing. The main goal of this Neighborhood Plan is to create balance between residential, commercial, and industrial uses in the neighborhood. The Unit 6 Neighborhood Land Use Plan map places industrial uses on the west and north perimeter of the neighborhood bordering Interstate 10 and Grant Road. The Subject Crossing and future MRP 138 kV transmission line complies with the Unit 6 Neighborhood Plan since the transmission line will fall in the industrial and commercial land uses and locations of the neighborhood plan.

3. Zoning Code

The COT UDC, Administrative Manual, and the Technical Standards Manual was adopted on January 2, 2013, replacing the Land Use Code, Development Standards, and the development review procedures in Chapter 23A of the Tucson Code.

The underlying zoning at the intersection of Grant & Oracle is C-2. This zone allows for retail and business uses. Utility land uses such as a distribution system and renewable energy generation are also permitted under this zoning. UDC Section 4.8.6 outlines the permitted used in commercial and mixed-use zones.

The Subject Crossing is also within a Gateway Corridor Overlay Zone. The purpose of the GCZ is to establish design standards to meet economic goals of underlying plans in the area (i.e. the Major Streets & Routes Plan and the General Plan.) UDC Section 4.9.11.A outlines the use-specific standards applicable to utilities in the GCZ.

C. Conflicts with Adopted COT Ordinance or Policy

TEP's Preferred Route for an overhead 138 kV transmission line is in conflict with the GCZ. The objective of this application for a special exception land use permit is to demonstrate that an overhead transmission line is less intrusive than an underground line with risers, see *Photo 1*. An overhead transmission line better aligns with the stated goals of the GCZ achieving a more favorable visual impression (see *Appendix E* for photo simulations of the overhead transmission line.)

Photo 1. Example of a Steel Riser Pole (necessary if the 138 kV transmission line is underground at the intersection.)



2. SITE ANALYSIS

A. General

1. Table of Contents

A table of contents is included at the beginning of this document.

2. Project Location Map

Please see *Exhibit 1: Subject Crossing Location Map* showing the location of the Subject Crossing.

3. Generalized Land Use Map

Please see *Exhibit 2: Generalized Land Use* map for a map showing the land uses surrounding the Subject Crossing.

4. Property Boundary Dimensions

The Subject Crossing will be built in road ROW. Grant Road road ROW is 60' wide west of Oracle Road and 80' wide east of Oracle Road. Please see *Appendix A: Midtown Road Research* for details.

5. Existing Zoning

Existing zoning of the Subject Crossing and adjacent land is depicted on *Exhibit 3: Zoning*. The Subject Crossing is zoned commercial. Adjacent zoning designations are as follows:

- North- C-2 and R-2
- East- C-2 and I-1
- South- I-1, OCR-2, and C-3
- West- C-1, C-2, and R-2

6. Location, Size, and Height of Adjacent Existing Buildings

The Subject Crossing runs through a developed arterial street. The businesses that surround the Subject Crossing and within a mile of the intersection of N. Oracle Road and E. Grant Road consist of one-story buildings such as a grocery store, a gas station, auto care and tire shops. Further from the Subject Crossing, there are multilevel developments such as housing and motels.

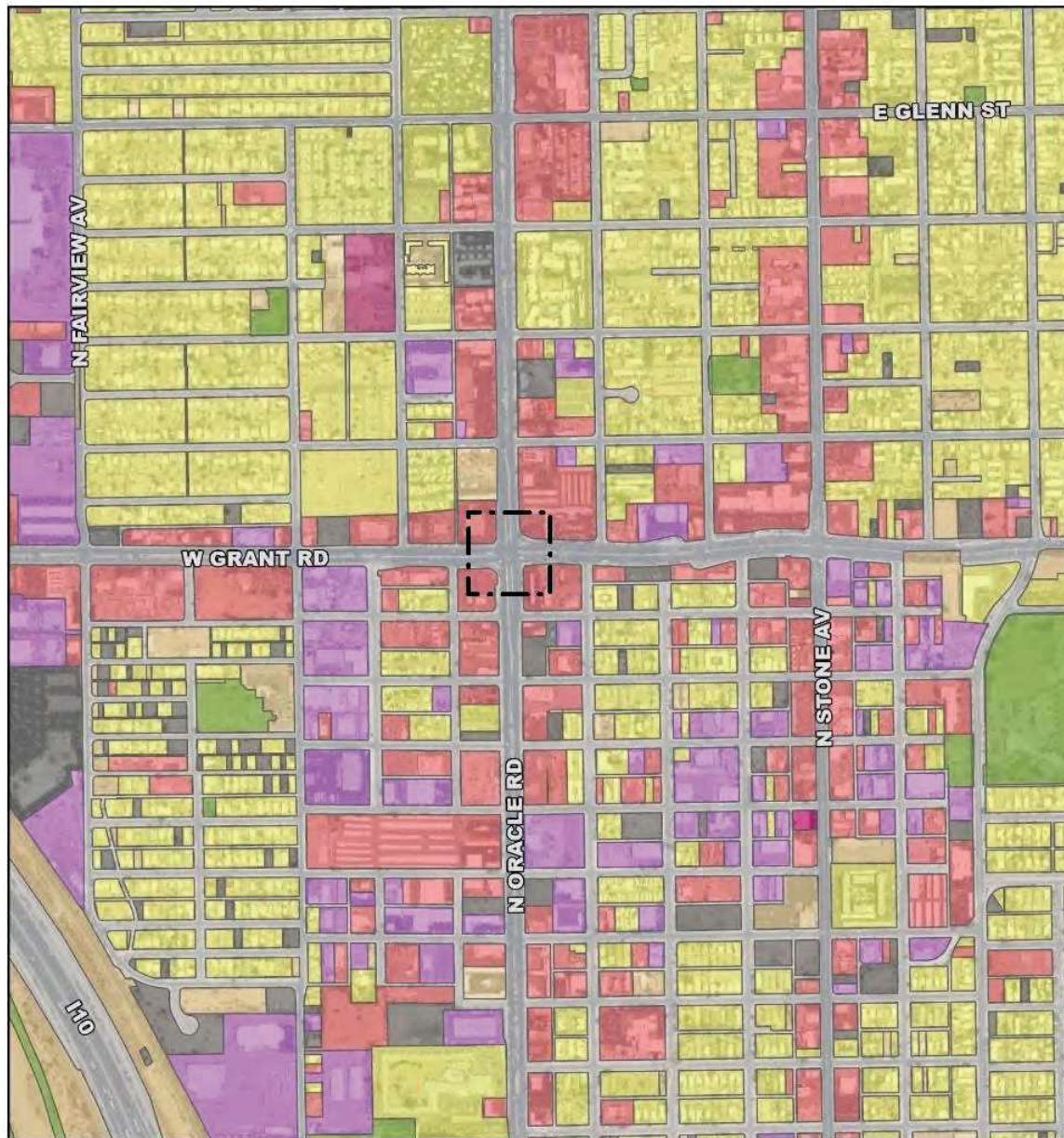
7. Location, Size, and Height of Existing and Proposed Buildings On-site

There are no existing buildings on the Subject Crossing in road ROW. No new buildings are proposed as part of this project.

8. Billboards

There are no billboards at the Subject Crossing. There are three billboards south of the Subject Crossing with the nearest approximately 400 feet from the Subject Crossing. These include billboard #00395 on the east side of the road at the address 2280 N. Oracle Road. Billboard #00441 on the east side of the road at the address 2042 N Oracle. Billboard #001582 on the west side of the road at the address 401 W. Flores St. There is one billboard approximately 750 feet north of the Subject Crossing: billboard #002641 on the west side of the road at the address 2501 N. Oracle Rd.

No billboards are proposed as part of this project.



 Subject Crossing

Land Use

 Residential

 Commercial

 Industrial

 Vacant Land

 Miscellaneous

 Parks

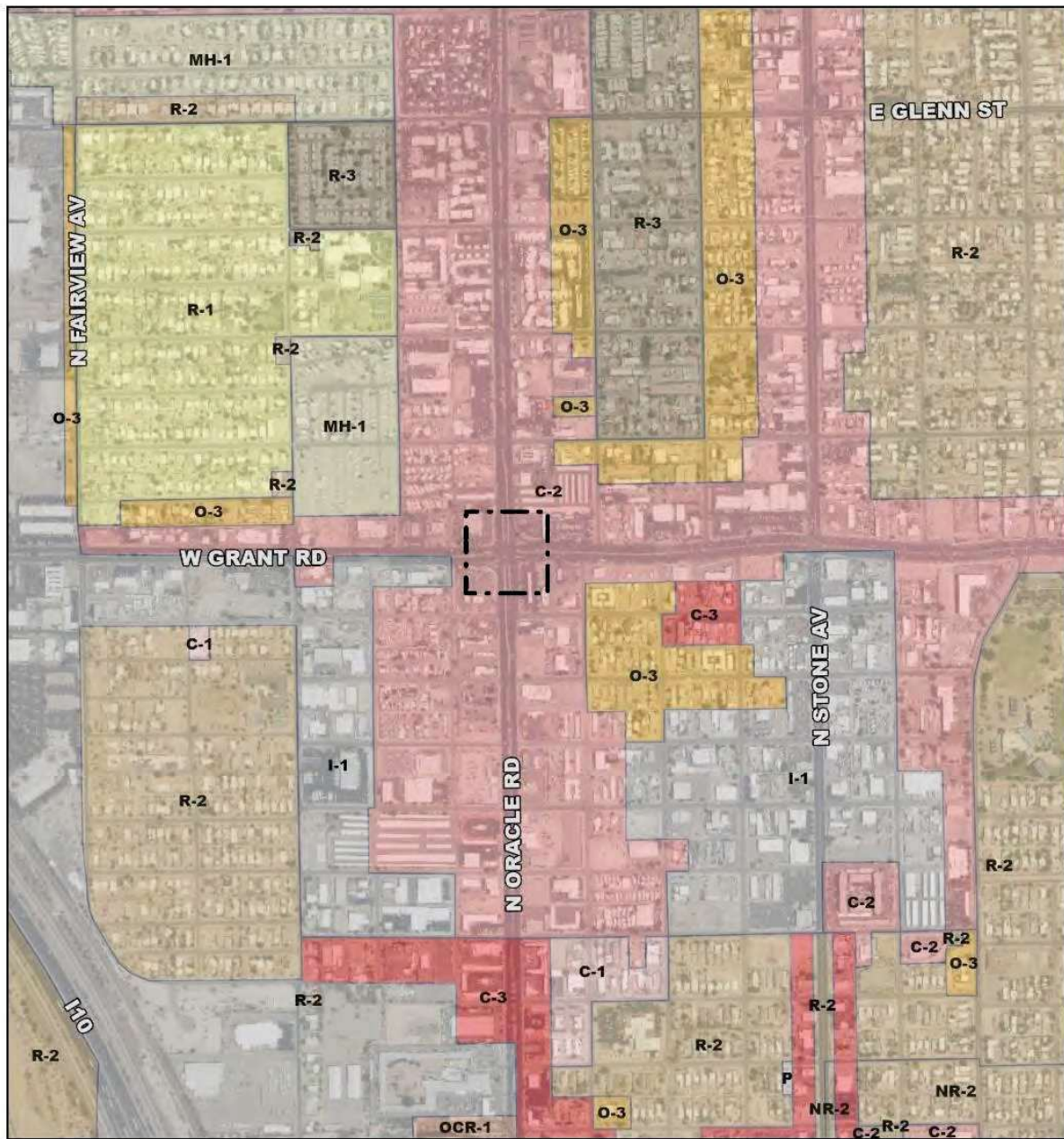
 Educational Facilities

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 2: Generalized Land Use



Subject Crossing

ZONE

C-1; HC-1; HLC-1;
UC-1; UHC-1
 C-2; HC-2

C-3; HC-3; HLC-3;
UC-3
 HP; P
 I-1
 MH-1
 O-3; HO-3

OCR-1
 R-1; HR-1; NR-1
 R-2; HLR-2; HR-2;
NR-2
 UR-3; NR-3; HR-3;
R-3

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 500 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 3: Zoning

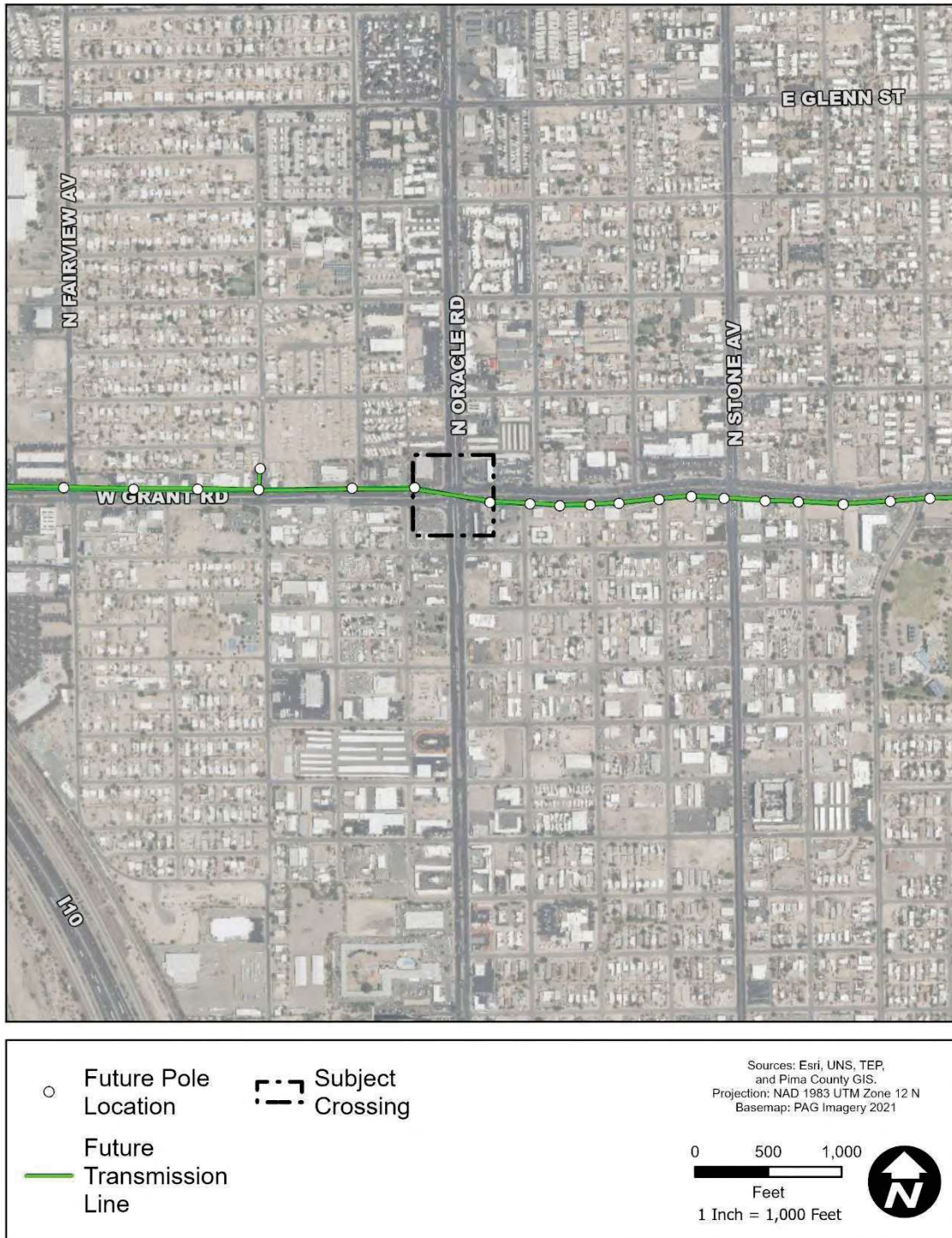


Exhibit 4. Preliminary Engineering of Preferred Route at Subject Crossing

B. Circulation and Trips

1. Major and Local Streets

The Subject Crossing consists of West Grant Road and North Oracle Road. Both roads consist of an asphalt finish. West Grant Road (east of Oracle Road) is a City of Tucson owned arterial street that measures 120 feet wide from curb-to-curb. Road ROW for Grant Road east of Oracle Road is 80 feet wide. West Grant Road (west of Oracle Road) is a Pima County owned arterial street. Road ROW for Grant Road west of Oracle is 60 feet wide. North Oracle Road is a Pima County owned gateway arterial street. North Oracle Road measures 125 feet wide from curb-to-curb. Road ROW for Oracle Road is 80 feet wide.

Major and local streets abutting the Subject Crossing are depicted on *Exhibit 5. Circulation*.

2. Existing and Proposed Curb Cuts and Access Drives

There are existing curb cuts at each corner of the Subject Crossing for pedestrian crosswalks. No new curb cuts or access drives are proposed as part of this project.

3. Deceleration and Turn Lanes

Oracle Road is a six-lane street with three traffic lanes that travel north and south bound. There are two additional lanes that are designated for left turns onto West Grant Road. There is a right turn lane at the intersection northbound to head west bound on Grant Road. Along Grant Road there are three traffic lanes that travel east to west bound. At the intersection of North Oracle Rd and West Grant Road there are no turn left turn lanes on either east or westbound. Traffic is fast paced and typically has a constant flow.

No new deceleration or turn lanes are being proposed as part of this project.

4. Existing and Proposed Curbs, Driveways, Sidewalks, and Bike Paths

There are existing curbs and sidewalks on both sides of the road along North Oracle and Grant Road. There are non-protected bike lanes along Grant Road, but there are no designated bike paths around the Subject Crossing.

5. Traffic Signals within 1 mile of project site.

Traffic signals within one mile of the Subject Crossing on are located at:

- W Grant Rd & N Oracle Rd
- W Grant Rd & N 10th Av
- W Grant Rd & N 14th Av
- W Kelso St & N Oracle Rd
- W Miracle Mile & N Oracle Rd
- W Grant Rd & N Fairview Av
- W Grant Rd & N 15th Av
- W Grant Rd & W I10 Frontage Rd
- W Grant Rd & E I10 Frontage Rd

- W Grant Rd & N Forbes Bl
- E Grant Rd & N Stone Av
- W Grant Rd & N Estrella Av
- E Grant Rd & N Fontana Av
- W Grant Rd & N Los Altos Av
- E Grant Rd & N 1st Av

A selection of traffic signals is depicted on *Exhibit 4: Circulation*.

6. Nearest Existing and Proposed Public Transit Stops and Park-and-Rides

Four public bus stops are located at the Subject Crossing approximately 200 feet from the center of the intersection. The bus stops to the immediate east and west of the intersection serve Sun Tran Route 9: Udall Station. The bus stops to the immediate north and south of the intersection serve Sun Tran Route: 10 – Downtown and Route 16: Downtown. A detailed list of public transit stops within a mile of the Subject Crossing are below:

North of intersection on the East side of the road TDOT Bus Stop Oracle/Grant (stop id 157), west side of the road TDOT Bus Stop Oracle/Jacinto (bus stop id 11384), east side of the road TDOT bus stop Oracle/Jacinto (stop id 11413), west side of the road Oracle/Glen (stop id 11383), east side of the road TDOT bus stop Oracle/Glen (stop id 11414), east side of the road TDOT bus stop Oracle/Blacklidge (stop id 12150), west side of the road TDOT bus stop Oracle/Blacklidge (stop id 12246) east side of the road TDOT Bus stop Oracle/Ft. Lowell (stop id 12151).

West of Intersection on Grant, west side of the road TDOT Bus Stop Grant/Oracle (stop id 184), east side of the road TDOT bus stop Grant/15th Av (stop id 12405), west side of the road TDOT bus stop Grant/15th Av (stop id 12393), east side of the road TDOT bus stop Grant/Fairview (stop id 12404), west side of the road TDOT bus stop Grant/Fairview (stop id 12394), east side of the road TDOT bus stop Grant/Forbes (stop id 12403), east side of the road bus stop Grant/Forbes (stop id 12395).

South of Intersection, on west side of the road TDOT Bus stop Oracle/Grant (stop id 116), on the east side of the road TDOT bus stop Oracle/Rillito (stop id 16156), TDOT Bus stop Oracle/Flores (stop id 16200), west side of the road TDOT Bus stop Oracle/Flores (stop id 16200), TDOT Bus Stop Oracle/Plata (stop id 14843), SW of intersection TDOT Bus Stop Oracle/Lee (stop id 11388), SE of intersection TDOT bus stop Oracle/Lee (stop id 11409), west side of road TDOT Bus stop Main/Mabel (stop id 11389), east side of road TDOT bus stop Main/Mabel (stop id 11408), east side of road TDOT Bus Stop Main/Speedway (stop id 11407).

East of Intersection, on the south side of the road TDOT Bus stop Grant/Oracle (Stop id 187), west side of the road TDOT bus stop Grant/Stone (stop id 12391), west side of the road TDOT bus stop Stone/Grant (stop id 14189), east side of road TDOT bus stop Grant/Stone (stop id 12407), west side of road TDOT bus stop Grant/Fontana (stop id 11975), east side of the road TDOT bus stop Grant/6th Av (stop id 12408) east side of road TDOT bus stop Grant/3rd Av (stop id 12409), west side of road Bus Stop TDOT Grant/1st Av (stop id 11973), east side of road TDOT bus stop Grant/1st Av (stop ID 14914),

east side of the road TDOT Bus stop 1st Av/Grant (stop id 12084), on the west side of the road TDOT bus stop Cherry bell/22nd St (stop id 16).

There are no park-and-rides within the Subject Crossing.

No public transit stops, or park-and-rides are being proposed as part of this project.

7. Projected Date of Any Improvements in the COT Capital Improvement Program (C.I.P.)

No C.I.P projects that are currently planned are expected to affect the Project.

There are no active Prop 407 projects at the Subject Crossing.

The Prop 411 project of Highland Park Addition/Bronx Park addition, Coronado Heights, and Miracle Mile Manor/ Miracle Mile Addition was approved by the Independent and Accountability Commission in 2023. The treatment plan is for Preservation. The MRP is not anticipated to have any impact on the planned C.I.P.

8. Existing Traffic Counts on Major Streets within One Mile

Most recent available traffic counts from Pima Association of Governments for the Subject Crossing streets are as follows:

Subject Crossing Street	Average Daily Trips Northbound	Average Daily Trips Southbound
North Oracle Road (2023)	11,898	13,489
	Average Daily Trips Eastbound	Average Daily Trips Westbound
East Grant Road (2023)	15,313	20,992

Major Street within One Mile	Average Daily Trips Northbound	Average Daily Trips Southbound
N Stone Ave (2024)	9,331	8,786
N 1 st Ave (2023)	13,401	15,048
	Average Daily Trips Eastbound	Average Daily Trips Westbound
W Fort Lowell Rd (2023)	6,670	8,536
E Speedway Boulevard (2024)	18,387	22,583

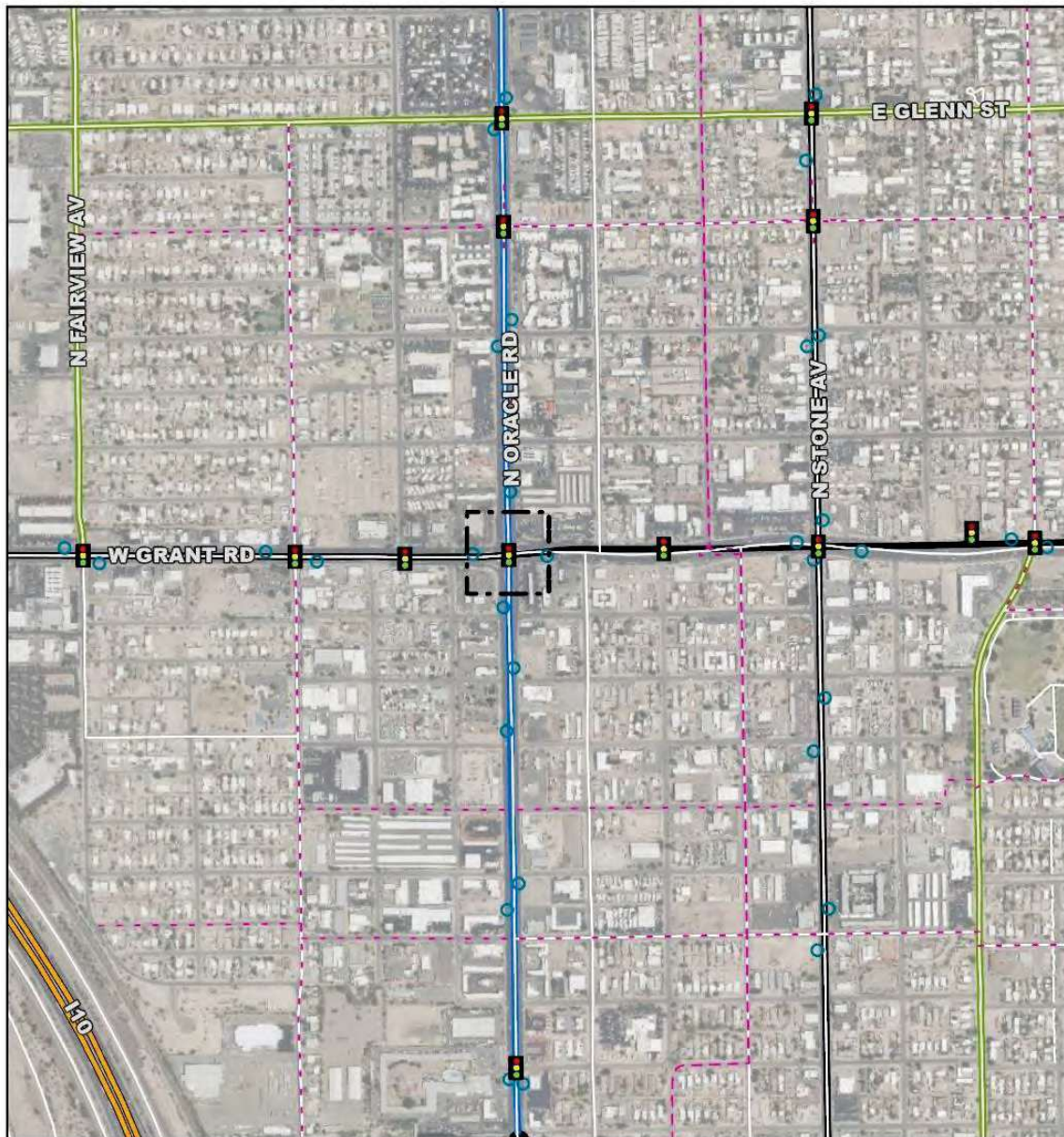
9. Trip Generation Calculations

The Subject Crossing is for the installation of two transmission structures associated with the larger Midtown Reliability Project 138 kV transmission line. Once construction of the line is complete, vehicle trips to the Subject Crossing structures will be annual for routine transmission line maintenance and inspections. Emergency trips may be made to resolve outages. No negative impacts to the neighborhood's traffic and circulation patterns are anticipated.

C. Cultural Resources

Class I cultural resources survey (a cultural resources records search), was conducted by Tierra Right of Way Services (Tierra) for all the Midtown Reliability Project's transmission line route alternatives, see *Appendix B*, in April and May 2024. The Subject Crossing is part of Route B4 and lies in the Route B portion. Route B (2.1 miles in total length) passes through the boundaries of two previously recorded sites (see Table 16 in *Appendix B*). One archaeological site is present at the Subject Crossing. This is site AZ FF:9:17(ASM) which is historic State Route 80 and an in-use feature today known as Oracle Road. Tierra determined that this site is eligible for inclusion in the National Register of Historic Places (NRHP), but the site segment coincident with the Route B corridor is non-contributing to the NRHP eligibility and does not warrant monitoring of ground-disturbing activities. For the other site present on Route B but outside of the Subject Crossing, Tierra did recommend a cultural monitor be present for any ground-disturbing activities. TEP will ensure any necessary monitors are present for ground-disturbing activities to protect the cultural resources within the Midtown Reliability Project's transmission line route.

A Historic District Analysis was conducted by The Architecture Company for all the Midtown Reliability Project's transmission line route alternatives, see *Appendix C*, in April and May 2024. The Subject Crossing is part of Route B4 and lies in the Route B portion. The Architecture Company determined that of the route alternatives between DeMoss Petrie Substation and Vine Substation, Route B would have the least amount of impact on historic architecture (contributing structures and districts). This was determined through a historical architecture analysis. This analysis identified eight criteria that each route alternative was ranked by. Criteria included: whether the route was bisecting or bordering a historic district, the street designation, and historic properties and infrastructure within an 800' buffer of the route. Further details on the methodology and all eight criteria can be found in *Appendix C*. Although the Preferred Route (B4) bisects the Miracle Mile Historic District at the Subject Crossing, Route B has the least number of historic districts being bisected as well as bordered out of all route alternatives between DeMoss Petrie Substation and Vine Substation. Additional rationale for Route B can be found on page 44 of the Historic District Analysis (*Appendix C*).



-  Subject Crossing
-  Traffic Signal
-  Transit Stops
-  Bicycle Boulevard

- Bicycle Routes (White)
-  Arterial Street
-  Gateway Arterial Street
-  Collector Street
-  Interstate

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 500 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 5: Circulation Trips

D. Hydrology & Drainage

1. On-site and Off-site Drainageways

At the Subject Crossing there are drainages for stormwater runoff on the northwest corner of the intersection and to the east of the Subject Crossing on the north and south side of West Grant Road. No retention/detention basins are present and no new drainages or retention/detention areas are being proposed as part of this project.

2. 100-Year Floodplains

The Subject Crossing is determined to be FEMA Zone X (see *Exhibit 6: Hydrology & Drainage*). This was confirmed by a review of the Effective Flood Insurance Rate Map (FIRM) (Panel 04019C1688L & 04019C2276L) issued by the Federal Emergency Management Agency (FEMA) on and effective June 16, 2011 and revised to reflect the letter of map revision effective March 26, 2018 and effective November 9, 2026 respectively (*Appendix D*). A review of the FIRM determined that the site is not currently within a FEMA Floodplain. The Subject Crossing is located within FEMA Zone X (minimal flood hazard). Zone X is an “area determined to be outside the 500-year flood and protected by levee from 100-year flood” (FEMA). The Subject Crossing is located outside of the FEMA regulated floodplain, and, therefore, the development will not need to account for the requirements presented in Tucson Code Chapter 26.

3. Environmental Resource Zone (ERZ) and Watercourse, Amenities, Safety, and Habitat (WASH) Drainageways

The Subject Crossing is not within an ERZ nor are there designated WASH ordinance watercourses present at the Subject Crossing. Nor are there proposed ERZ or proposed WASH watercourses at the Subject Crossing. This means that the Subject Crossing complies with Tucson Code 29, Article VIII (WASH regulations).

4. Erosion Hazard Setback Areas

The Subject Crossing is not subject to an Erosion Hazard Setback (EHS). Therefore, the project will not need to account for the requirements presented in Tucson Code Chapter 26, as these are not applicable.

5. Peak 100-Year Event Flow

The Project Site is not subject to 100-year event flows.

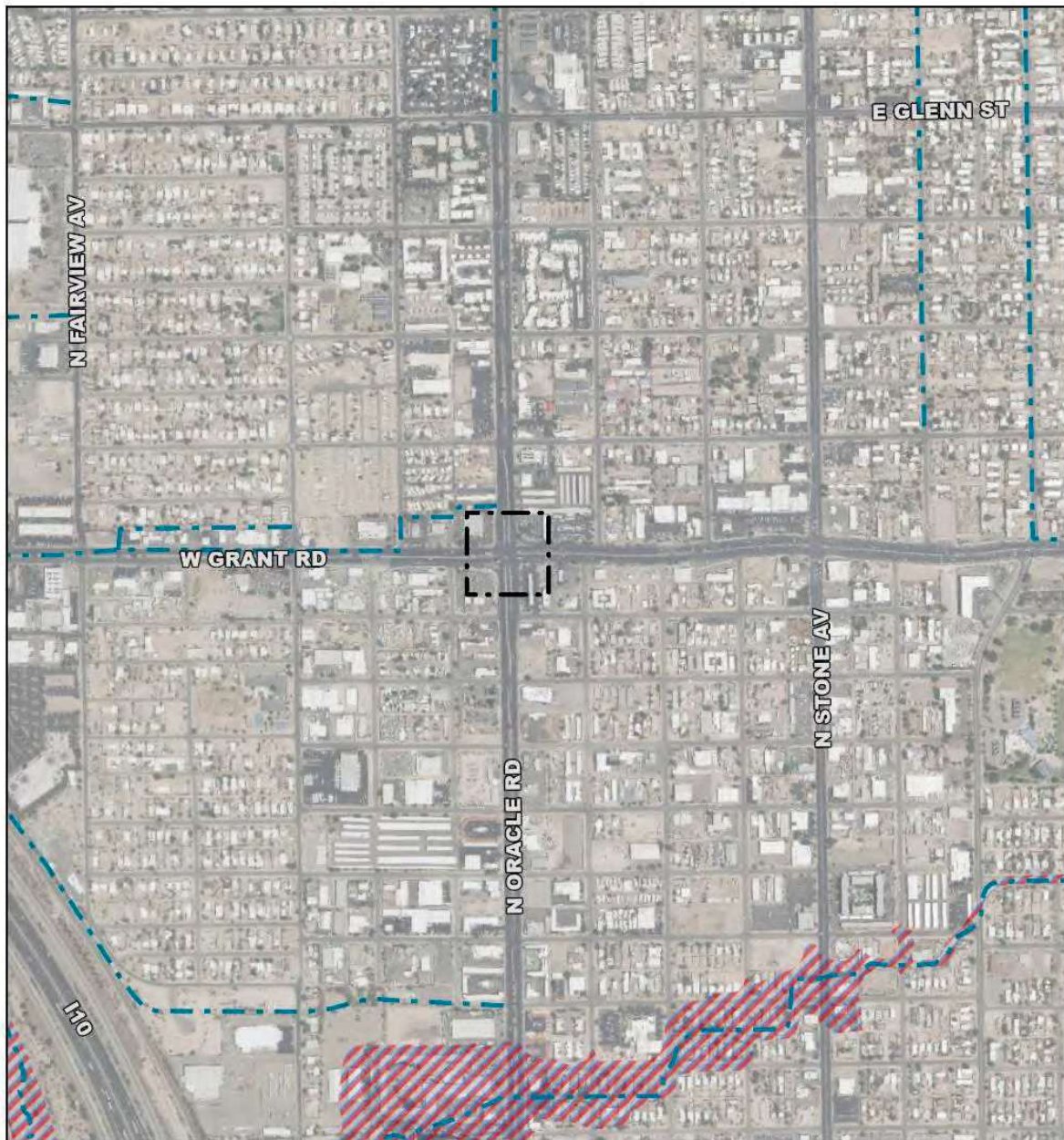
6. Existing Condition and Locations of Proposed Retention/Detention Areas

At the Subject Crossing there are drainages for stormwater runoff on the northwest corner of the intersection and to the east of the Subject Crossing on the north and south side of West Grant Road. No new drainages or retention/detention areas are being proposed as part of this project.

7. Applicable Floodplain and Wash Ordinances and Codes

The proposed project was designed to be in compliance with the following Sections of the Tucson Code

- Tucson Code, Chapter 26, Floodplain and Erosion Hazard Management
- Tucson Code, Chapter 23, Land Use Code (LUC), Article II Division 8, Section 2.8.6
- Tucson Code, Chapter 29 Article VIII, Wash Amenities, Safety, and Habitat (WASH) Regulations



-  Subject Crossing
-  Washes
- FEMA Flood Hazard Zones
-  Zone AE

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 500 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 6: Hydrology & Drainage

E. Schools, Recreational, and Cultural Facilities

1. Locations of Schools, Parks, Libraries, and Public Land

The following schools and parks are within 1 mile of the Subject Crossing:

Schools

- Keeling Elementary School (Public)
- Nash Elementary School (Public)
- Ace Charter High School-Downtown (Charter)
- Pima Partnership High School (Charter)
- Pima Partnership Academy Middle School (Charter)
- Pima Community College Downtown Campus (Public)
- The Catholic University of America-Tucson (Public)

Parks

- Laguna Park
- Keeling Desert Park
- Jacinto Park
- Balboa Heights Park
- Richey Elementary School
- Manuel Valenzuela Park
- Mansfield Park
- North 6th Avenue Dog Park
- Fransico Elias Esquer Park

Libraries

There are no city or county owned libraries within 1 mile of the Subject Crossing.

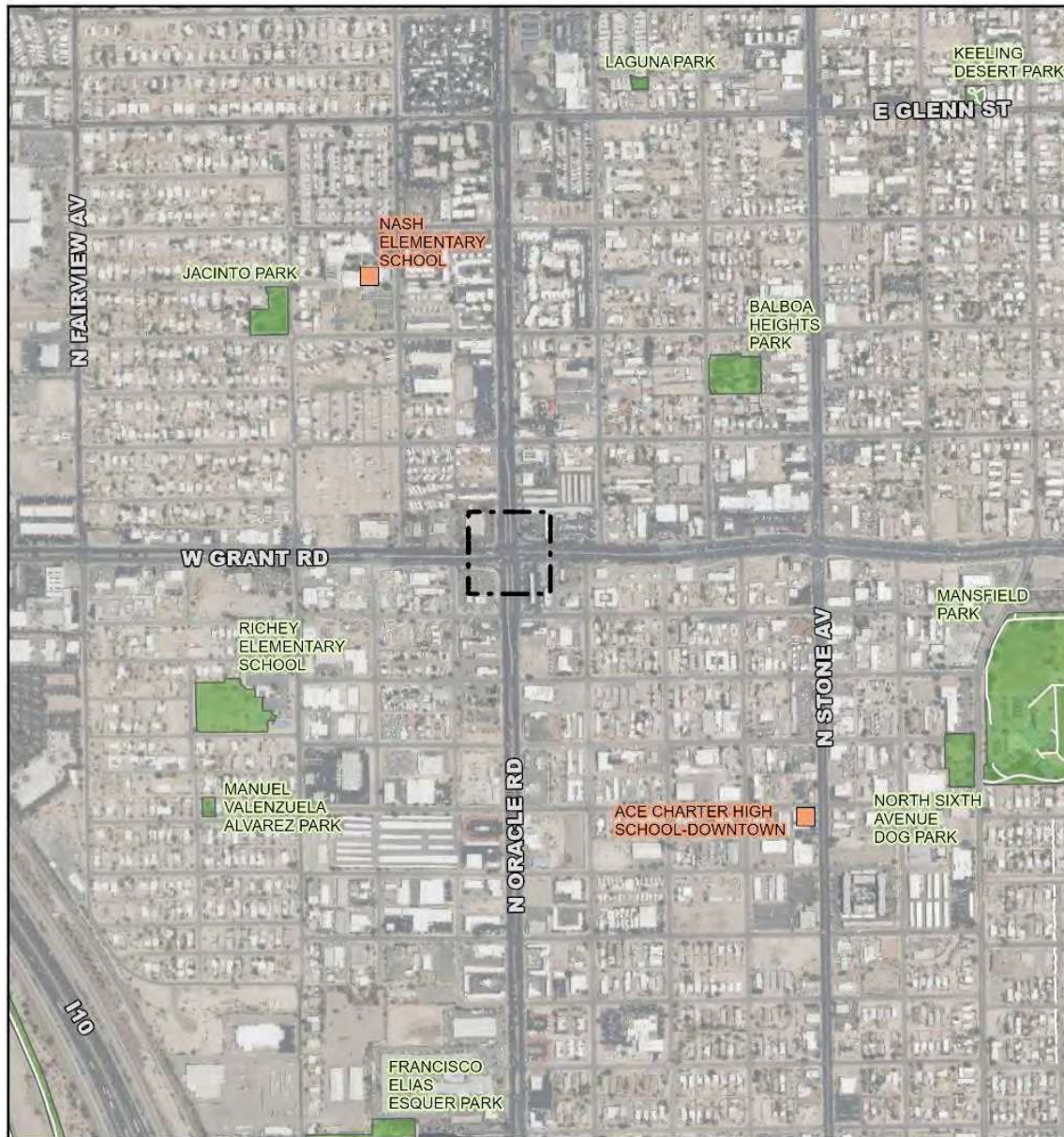
2. Pedestrian and Bike Routes

West Grant Road and North Oracle Road have dedicated bike lanes running east/west and north/south at the Subject Crossing.

No new bike routes or lanes are being proposed as part of this project.

3. Trail and Trail Access Points

There are no trails or trail access points at the Subject Crossing. Parks and greenways are shown on *Exhibit 7: Schools, Parks, and Libraries*.



 Subject Crossing

 Schools

 Trails (White)

 Parks

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 500 1,000
Feet
1 Inch = 1,000 Feet



Exhibit 7: Schools, Parks, and Libraries

F. Soils

1. Heavily Disturbed Area

As shown in *Exhibit 8: Topography & Soils*, the entire Subject Crossing has been developed and is entirely covered with buildings and pavement.

2. Hazardous Materials On-site

The Subject Crossing is within road ROW, and there are no hazardous materials on-site at the Subject Crossing.

3. Landfill Sites or Hazardous Materials within 1 Mile

There is an inactive landfill site named State Pit that is owned by the City of Tucson one mile from the Subject Crossing. There are also no contaminated lands or ADEQ superfund sites on the Subject Crossing, but there is one Water Quality Assurance Revolving Fund (WQARF) site within a mile of the site. This site is named Stone & Grant and was listed in 2017.

4. Other Existing Facilities/Operations within 1 Mile

There are no other existing facilities/operations, such as power plants, airports, sewage treatment plants, etc., within one mile that may impact the Subject Crossing.

G. Topography

1. Topographic Contours or Spot Elevations

As shown in *Exhibit 8: Topography & Soils*, the Subject Crossing is completely developed and flat with minimal change in elevation across the Subject Crossing.

2. Hillside Development Zone

The Subject Crossing is not located within the Hillside Development Zone, and there are no slopes 15 percent or greater on the Property.

H. Utilities

The Subject Crossing is within Tucson Water's obligated service area, and sanitary sewer pipes are present on West Grant Road and on the east side of North Oracle Road.

The Subject Crossing is within TEP's service area, and an existing 13.8 kV distribution line runs east on West Grant Road.

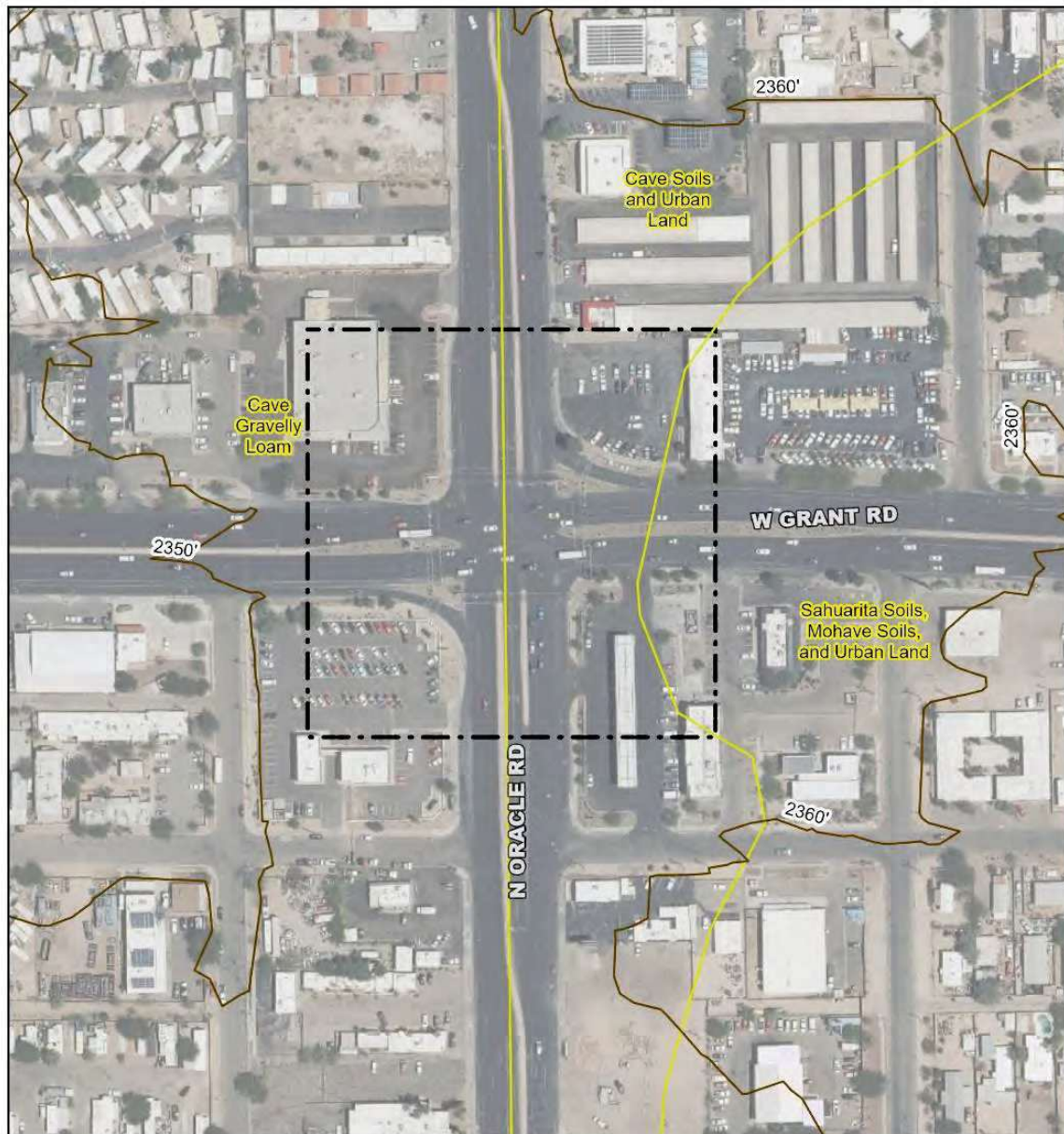
I. Vegetation

1. Existing On-site Vegetation

The Subject Crossing has been completely developed and no longer contains any vegetation in its natural state.

2. Existing Landscaping and Screening

The subject crossing has been fully developed and is now surrounded by a mix of commercial and residential businesses. Landscaped medians are present on West Grant Road. The medians offer minimal screening value.



- Subject Crossing
- Contours (10' Intervals)
- Soil Type

Sources: Esri, UNS, TEP,
and Pima County GIS.
Projection: NAD 1983 UTM Zone 12 N
Basemap: PAG Imagery 2021

0 100 200
Feet
1 Inch = 200 Feet



Exhibit 8: Topography & Soils

J. Views

1. Description of Views out of the Site to Surrounding Area

Views to the north of the Subject Crossing are commercial. The Catalina Mountains are visible in the distance. Views to the east of the Subject Crossing are commercial. The Rincon Mountains are visible in the far distance. Views to the south of the Subject Crossing are commercial. Views to the west of the Subject Crossing are commercial. The Tucson Mountains are visible in the distance.

Views of the Subject Crossing



View of Subject Crossing looking west from the northeast corner of Oracle and Grant.



View of Subject Crossing looking east from the northwest corner of Oracle and Grant.

Views Surrounding the Subject Crossing



View from Subject Crossing looking east from the northeast corner of Oracle and Grant.



View from Subject Crossing looking west from the northwest corner of Oracle and Grant.

1. Description of Views Depicted in the Photo Simulations

Photo Simulation 1, Looking North on Oracle Road (Exhibit. 9)

TEP Tucson Electric Power
Midtown Reliability Project - N. Grant Rd. / N. Oracle Rd.

Key Observation Point (KOP) #1



Current Condition



Simulated Condition

Route B - Weathered Finish

Photo Simulation 2, Looking east on Grant Road (Exhibit. 10)

TEP Tucson Electric Power
Midtown Reliability Project - N. Grant Rd. / N. Oracle Rd.

Key Observation Point (KOP) #2



Current Condition



Simulated Condition

Route B - Weathered Finish



Photo Simulation 3, Looking south on Oracle Road (Exhibit. 11)

TEP Tucson Electric Power
Midtown Reliability Project - *N. Grant Rd. / N. Oracle Rd.*

Key Observation Point (KOP) #3



Current Condition



Simulated Condition

Route B - Weathered Finish



Photo Simulation 4, Looking west on Grant Road (Exhibit. 12)

TEP Tucson Electric Power
Midtown Reliability Project - N. Grant Rd. / N. Oracle Rd.

Key Observation Point (KOP) #4



Current Condition



Simulated Condition

Route B - Weathered Finish

3. PLAN PROPOSAL

The Midtown Reliability Project will upgrade Midtown Tucson's antiquated and overloaded 46 kV sub-transmission system to a much more flexible and robust 138 kV system. This upgrade is urgently needed to replace older, lower-voltage equipment that cannot keep pace with the increasing energy use in central Tucson because the aged and outdated Midtown system is at or near capacity. Peak power demand in the area has nearly reached the capacity of the current system, which reduces reliability of the electric grid and requires significant patchwork expenditures to compensate for the system's age. The existing Midtown 46 kV system has little to no contingency reserve, creating circumstances that challenge TEP's ability to serve customers in the area reliably and adversely impact the future growth potential of Midtown.

The proposed 8.5-mile 138 kV line will interconnect with 473 miles of existing 138 kV overhead lines that provide reliable service to TEP's customers. The existing 138 kV system includes the recently completed Irvington-to-Kino line. The Midtown Reliability Project is simply a continuation of that line north from the Kino Substation to the DeMoss Petrie Substation – tying Midtown into a looped system with access to regional generation and transmission resources.

TEP's CEC authorizing the Preferred Route includes a finding that requires TEP to file for a special exception of the GCZ at each crossing as described in the Unified Development Code. This Application is submitted in compliance with those CEC requirements.

The Unified Development Code (UDC) section 5.5 states that transmission lines perpendicularly crossing a GCZ may be built overhead after following the zoning examiner special exception land use procedure (UDC 3.4.3). Special exception criteria D states the poles for overhead transmission lines must be set back 150' from the GCZ curblane. As seen in *Exhibit 4: Preliminary Engineering at the Subject Crossing*, TEP will set the transmission structures a minimum of 150' away from the GCZ curblane to satisfy the special exception criteria.

A. Building Layout

No buildings are proposed as part of this project, and no buildings will be added to the Subject Crossing.

B. Design Compatibility

1. Privacy for Adjacent Residences

The Subject Crossing is part of the MRP 138 kV transmission line. No landscaping or screening is built under or in front of structures to reduce interference risks with the transmission lines and to allow for maintenance access. Privacy for adjacent residences will be maintained as poles will be sited in road right-of-way.

2. Compatibility with Climate and Surrounding Area

The structures of the Subject Crossing will be made compatible with the climate and surrounding area by using steel structures. An effort will be made to accommodate pole color preferences of specific neighborhoods should they desire a structure be a color different than TEP's standard of rust-colored weathering steel poles to better match the character of the neighborhood.

The steel poles also are compatible with the climate because steel poles are more resilient and maintain a longer lifespan in the heat and monsoons than other materials, such as wood.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(2).

3. Energy Conservation

The Subject Crossing is part of the MRP 138 kV transmission line. The transmission line will replace aging 46 kV assets and increase electrical reliability in the midtown area. Upgrading from 46 kV to 138 kV will reduce the number of outages and outage time as well as increase system capacity for rising energy demands, particularly in the summer when temperatures are frequently over 100° F. The structures of the transmission line minimally contribute to the urban heat island effect. Additionally, the 138 kV line would also allow over 19 miles of 46 kV lines to be removed, in turn, reducing the amount of infrastructure in neighborhoods that can trap heat and contribute to the urban heat island.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(3).

4. Building Setbacks

No buildings are proposed as part of this project.

5. Transition of Building Height and Number of Stories

No buildings are proposed as part of this project, and no buildings will be added to the Subject Crossing. Subject Crossing structures will be placed in road ROW and will not require compliance with building height transition requirements.

6. Transition of Density

No buildings are proposed as part of this project, and no buildings will be added to the Subject Crossing. There is no transition of density associated with this project.

7. Landscaping and Screening Mitigation for Noise and Visibility

No landscaping or screening is proposed as part of this project.

8. Street Improvements

No street improvements are anticipated for the development of this Project.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(8).

9. Defensible Space Techniques

Defensible space techniques will be implemented via fire and vegetation management techniques. These techniques create and maintain open space around the transmission structures. This helps to prevent vegetation from growing and nearing the lines enough to arch and cause a fire. Additionally, open spaces around the pole ensures there are clear lines of site along the street which creates a safer environment due to increased visibility.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(9).

10. View Corridors

View corridors are described in Section 2.J.

As demonstrated in the Subject Crossing photo simulations, this project will not change the longer-range view corridors.

As shown in the photos provided in Subsection II.J (Views), the views from the Subject Crossing are commercial buildings. Views of the Rincon Mountains to the east will remain unchanged, and views of the Tucson Mountains to the west will also remain unchanged.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(10).

11. Changes in Elevation

Changes in elevation are discussed in Section 3.H and depicted in *Exhibit 7: Topography & Soils*.

C. Hydrology & Drainage

1. Proposed Drainage Solution

No changes to the existing drainage are proposed as part of this project.

2. Post-development Water Discharge On-site and Off-site

No changes to the on- and off-site water discharge will occur as part of this project.

D. Landscaping and Screening

No landscaping or screening is proposed as part of this project.

B. Lighting

No lighting will be installed as part of this project.

F. Pedestrian Access

No new pedestrian access will be created as part of this project. Pedestrian access at the Subject Crossing will remain the same as existing pedestrian access.

G. Signs

No permanent signage will be installed as part of this project.

H. Topography

No significant changes in elevation or grading are anticipated for the development of this Project.

This section addresses the Design Compatibility requirements outlined in UDC § 2-03.4.3.B(11).

I. Traffic & Trip Generation

This project (Subject Crossing) is for the installation of two transmission structures and electrical conductors associated with the larger Midtown Reliability Project 138 kV transmission line. Once construction of the line is complete, vehicle trips to the Subject Crossing structures will be annual for routine transmission line maintenance and inspections. Emergency trips may be made to resolve outages. No negative impacts to the neighborhood's traffic and circulation patterns are anticipated.

J. Undisturbed Areas

The Subject Crossing is developed and completely covered with impervious surfaces which has left no undisturbed areas on the site.

K. Utilities

1. Proposed Changes to Utilities and Easements and New Utilities and Easements

There is an existing TEP 13.8 kV distribution line at the Subject Crossing, but no easements are impacted by the new structures at the Subject Crossing. The Project is the construction of a new 138 kV transmission line and as such all proposed improvements are related to utilities.

2. Additional Utility Information

a) Estimated Number of Residents That Will Live On-site.

Not applicable. No residential use is being proposed.

b) Water Service Provider

The Subject Crossing is currently in the Tucson Water service area. No water service is required for this project.

c) Existing Infrastructure

The Subject Crossing is within TEP's service area, and an existing 13.8 kV distribution line runs east along West Grant Road.

d) *Public Sewer Connection*

The Project will not connect to the public sewer or have on-site sewage disposal.

L. Vehicular Use Area

No designated vehicular use areas are required. TEP vehicles will access the transmission poles at the Subject Crossing via Oracle and Grant.

4. REFERENCES

City of Tucson, Planning Department. (1976). "Unit 6 Neighborhood Land Use & Circulation Plan."

Accessed from:

<https://www.tucsonaz.gov/Departments/Planning-Development-Services/Neighborhood-Resources/Area-Neighborhood-Plans> on August 19, 2024.

City of Tucson, Planning Department. (2013). "Plan Tucson: City of Tucson General & Sustainability Plan 2013."

Accessed from: <https://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-2> on September 11, 2024.

Pima Association of Governments (2024). Traffic Count (TCDS). Accessed from:

<https://pag.public.ms2soft.com/tcds/tsearch.asp?loc=Pag&mod=TCDS> on August 9, 2024.

The Architecture Company. (2024). "TEP Midtown Reliability Project: Historic District Analysis."

Tierra Right of Way Services. (2024). "Tierra Archaeological Report No. 2024-053."