

EXHIBIT 8

TO COMPLAINT FOR SPECIAL ACTION

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



Special Exception Land Use Permit Application

**Midtown Reliability Project
749 E Broadway Blvd
Tucson, AZ, 85719**

Transmission structures within road right-of-way at
Euclid Avenue & East Broadway Boulevard

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

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Definitions

Project	The construction, operation, and maintenance of the Midtown Reliability Project (MRP) 138 kV transmission line structures crossing the Gateway Corridor Zone of Broadway Boulevard.
Subject Crossing	The Euclid/Broadway intersection where the MRP 138 kV transmission line will run north/south on Euclid Avenue and cross over the Gateway Corridor Zone of Broadway Boulevard.
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
ACAP	Arroyo Chico Area Plan
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
R-2	Residential Zone 2
SELU	Special Exception Land Use Permit
TEP	Tucson Electric Power Company
UAP	University Area Plan
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 curblane. This application is for one of the three perpendicular crossings of a GCZ on the Preferred Route. This Subject Crossing is located at Euclid Avenue and East Broadway Boulevard. Here the planned transmission line runs north to south on Euclid Avenue and crosses over the GCZ of Broadway Boulevard.

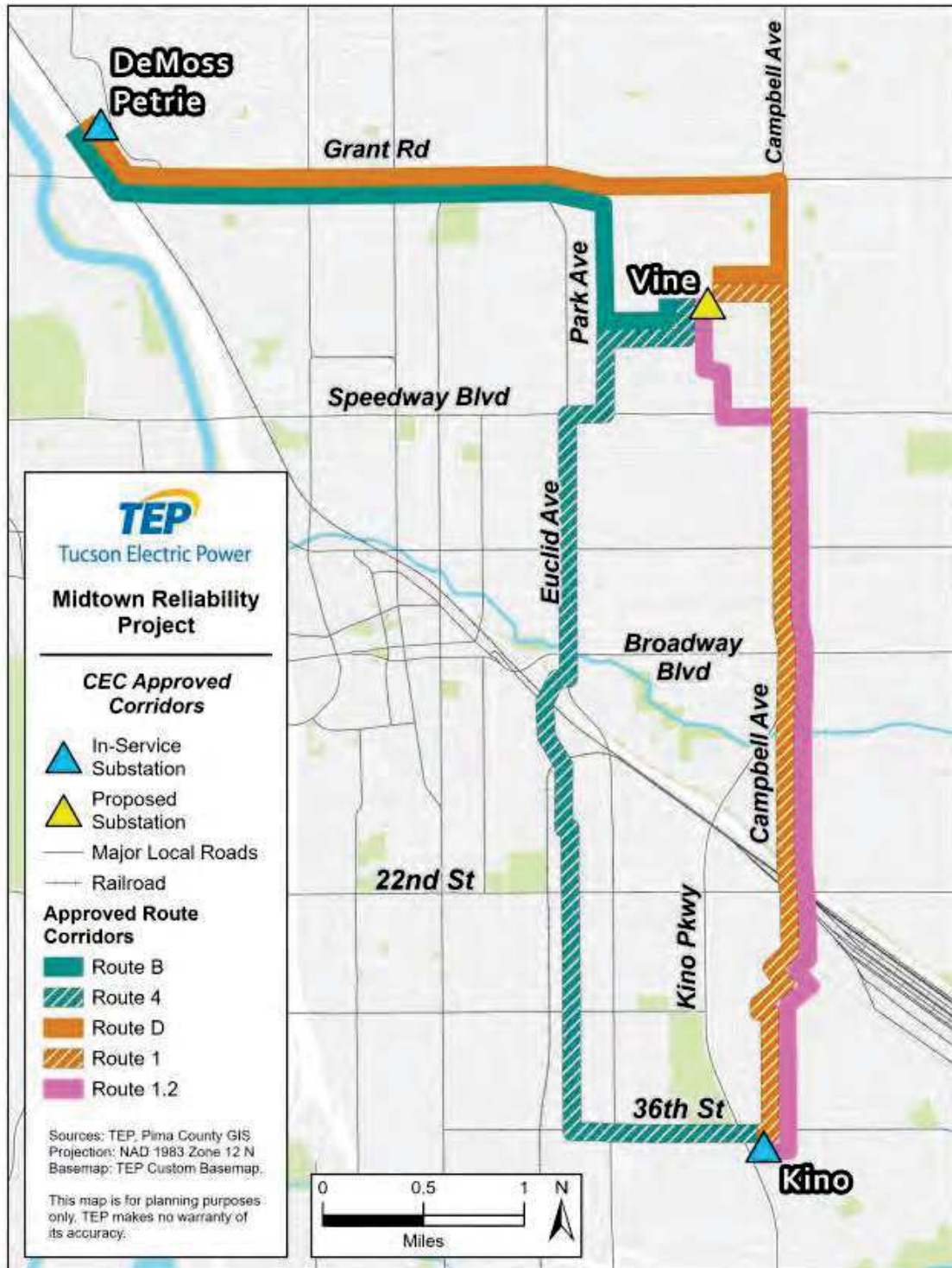
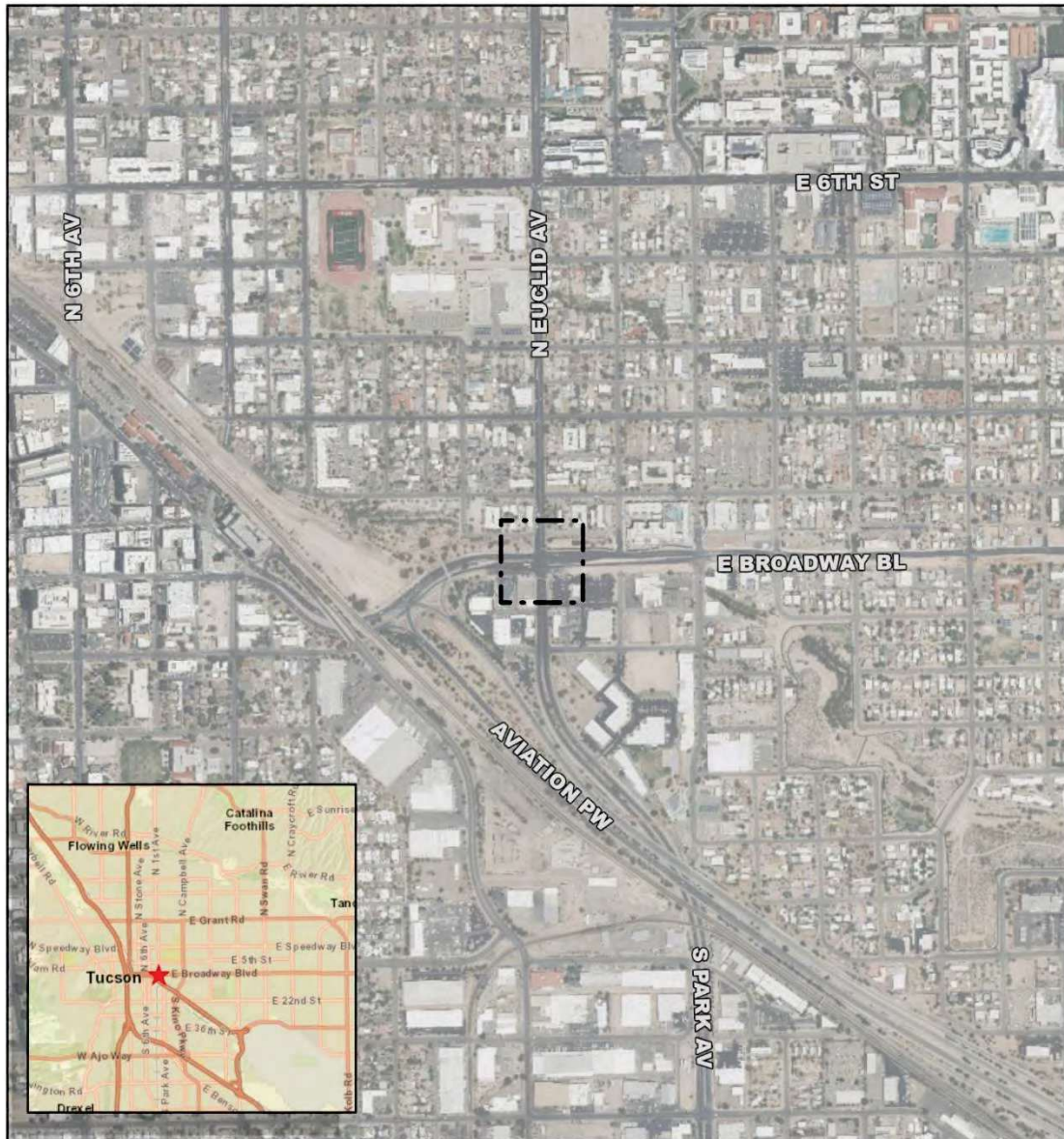


Exhibit i. Approved CEC Route Corridors



 Subject Crossing

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

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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, the University Area Plan, the Arroyo Chico Area Plan, and the COT Unified Development Code provided land use and development guidance for the Project. Project compliance with each of these plans is described in the following paragraphs.

B. Adopted Plan Policies

1. Plan Tucson

The Subject Crossing is located within the Downtown Building Block on the Future Growth Scenario Map in Plan Tucson ("PT"). The Downtown Building Block primarily consists of high-density residential housing, retail, and entertainment establishments. This Building Block's goal is to maintain the Downtown design character while encouraging appropriately scaled residential development and pedestrian-oriented land use revitalization.

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 North Euclid Avenue would be reduced, since the existing distribution lines and the joint-use attachers (communication wires) would be undergrounded after the transmission line is built. This supports PT's goals of design scale via cleaner viewsheds from the pedestrian orientation.

The Project complies with the following PT policies and supports the goals of the Downtown Building Block.

Land Use, Transportation & Urban Design

- LT23: Ensure that proposed land uses comply with all applicable Arizona Revised Statutes with respect to military and airport operations, coordinating with all stakeholders in planning for such uses by amending the Airport Environs Overlay Zone regulations in the event of future changes in mission and/or flight operations.

- 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

- LT28.3.3 Support upgrades to neighborhood infrastructure, including sidewalks and street lighting, which are compatible with the historic character.
- LT28.3.4 Support retail and other private sector development that will complement and support the existing Downtown fabric.
- LT28.3.14 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.

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. University Area Plan

The northern half of the Subject Crossing is located within the University Area Plan (“UAP”). Its purpose is to provide land use policy direction and design guidelines for development that protect the character, identity and quality of life of its neighborhoods. The UAP supports coordination between government agencies and utility providers on the planning and development of projects to maximize efficiency while minimizing neighborhood disruption. The UAP also encourages consultation with neighborhood association representatives in the early stages of project planning to ensure projects are designed to enhance the character and quality of each neighborhood.

Section 3: Land Use and Development

Goal: Support new development which serves to enhance the character and quality of University Area

neighborhoods.

- 3.A.3: Support new development on the perimeter of residential areas which serves to protect and enhance the quality of life for neighborhood residents.
- 3.A.4: Demonstrate sensitivity to surrounding uses in the design, location, orientation, landscaping, screening, and transportation planning of new development, as outlined in the General Design Guidelines.

Section 6: Public Services

Goal: Ensure an adequate supply of high-quality public services to meet the current and projected needs of University Area residents and businesses.

- 6.3: Encourage government agencies and utility providers to coordinate the planning and development of projects in order to maximize efficiency while minimizing neighborhood disruption.
- 6.4: Encourage government agencies and utility providers to consult with representatives from registered neighborhood associations and Historic District Review Boards in the early stages of project planning to ensure that projects are designed to enhance the character and quality of each neighborhood.

TEP has been engaging with the public regarding the MRP transmission line siting project since Spring 2023. This Subject Crossing is part of that larger outreach effort that includes representatives of neighborhoods in central Tucson near the MRP study area. Twenty-one neighborhoods chose to participate in a neighborhood advisory group. This group of engaged residents ensured local input was gathered and reflected in the transmission line route. Potential neighborhood enhancements were also brainstormed with the neighborhood advisory group, and local improvements such as public art and chicanes were suggested. TEP has also engaged with various agencies including the City of Tucson and Pima County to coordinate and met the various needs of TEP's project with minimal or no impact on the city or county's projects.

This project complies with the University Area Plan.

3. Arroyo Chico Area Plan

The southern half of the Subject Crossing is located within the Arroyo Chico Area Plan ("ACAP"). Its purpose is to preserve the natural open space of the Arroyo Chico and to protect the integrity of existing neighborhoods while encouraging a mix of residential, industrial, and business uses in the area. The Subject Crossing falls in the ACAP's subarea: "Industrial Areas."

INDUSTRIAL AREA 1: EUCLID-PARK TRANSITION

Sub-Goal: Allow commercial and industrial infill development which is compatible with the San Antonio Neighborhood and the Gateway Route status of Broadway.

- Policy 1. Protect the Miles and San Antonio Neighborhoods from any negative impacts of industrial development along Park Avenue.
- Policy 2. Visually screen industrial development along Broadway.
 - Require compliance with the Gateway Route guidelines specified in the Major Streets and Routes Plan or Gateway Route ordinance, when adopted.

The MRP will setback the structures at the Subject Crossing a minimum of 150-feet to comply with the GCZ ordinance for Broadway Boulevard.

This project complies with the Arroyo Chico Area Plan.

4. 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 Euclid Avenue & Broadway Boulevard is C-3. 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 undergrounded 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. Euclid Avenue road ROW is 80' wide. 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, industrial, and residential. Adjacent zoning designations are as follows:

- North- C-3 and R-3
- East- C-3
- South- C-3 and I-1
- West- C-3

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

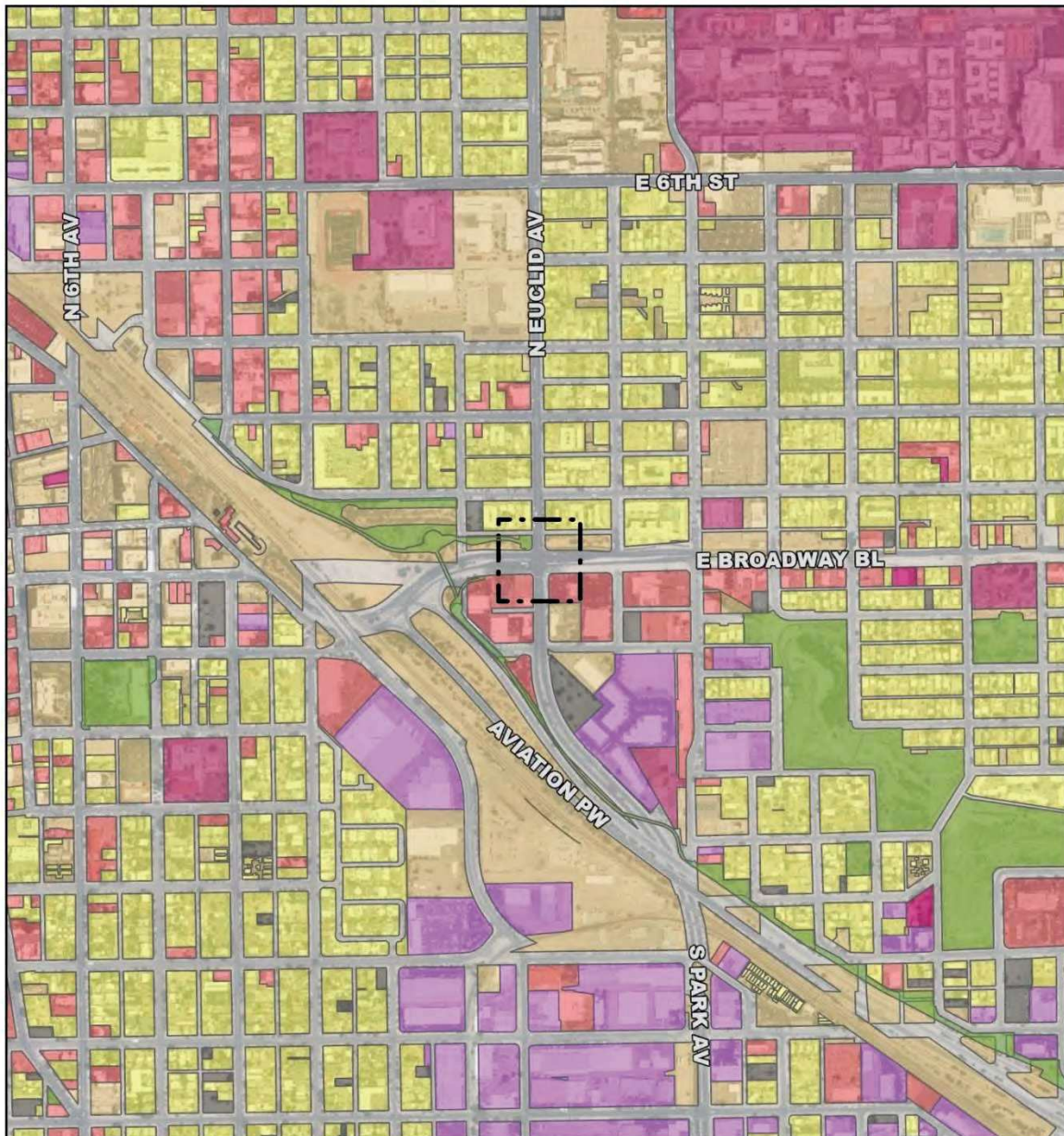
The Subject Crossing runs through a developed arterial street. South of Broadway Boulevard, there is open space adjacent to the crossing, and the southerly structure of the crossing would be located next to a parking lot. North of Broadway Boulevard, there is open space for approximately 120' north, then one-story tall residential houses are adjacent to the road ROW.

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 is an existing billboard on the southwest corner of the Subject Crossing. No billboards are proposed as part of this project.



 Subject Crossing

Land Use

 Residential

 Commercial

 Industrial

 Vacant Land

 Miscellaneous

 Parks

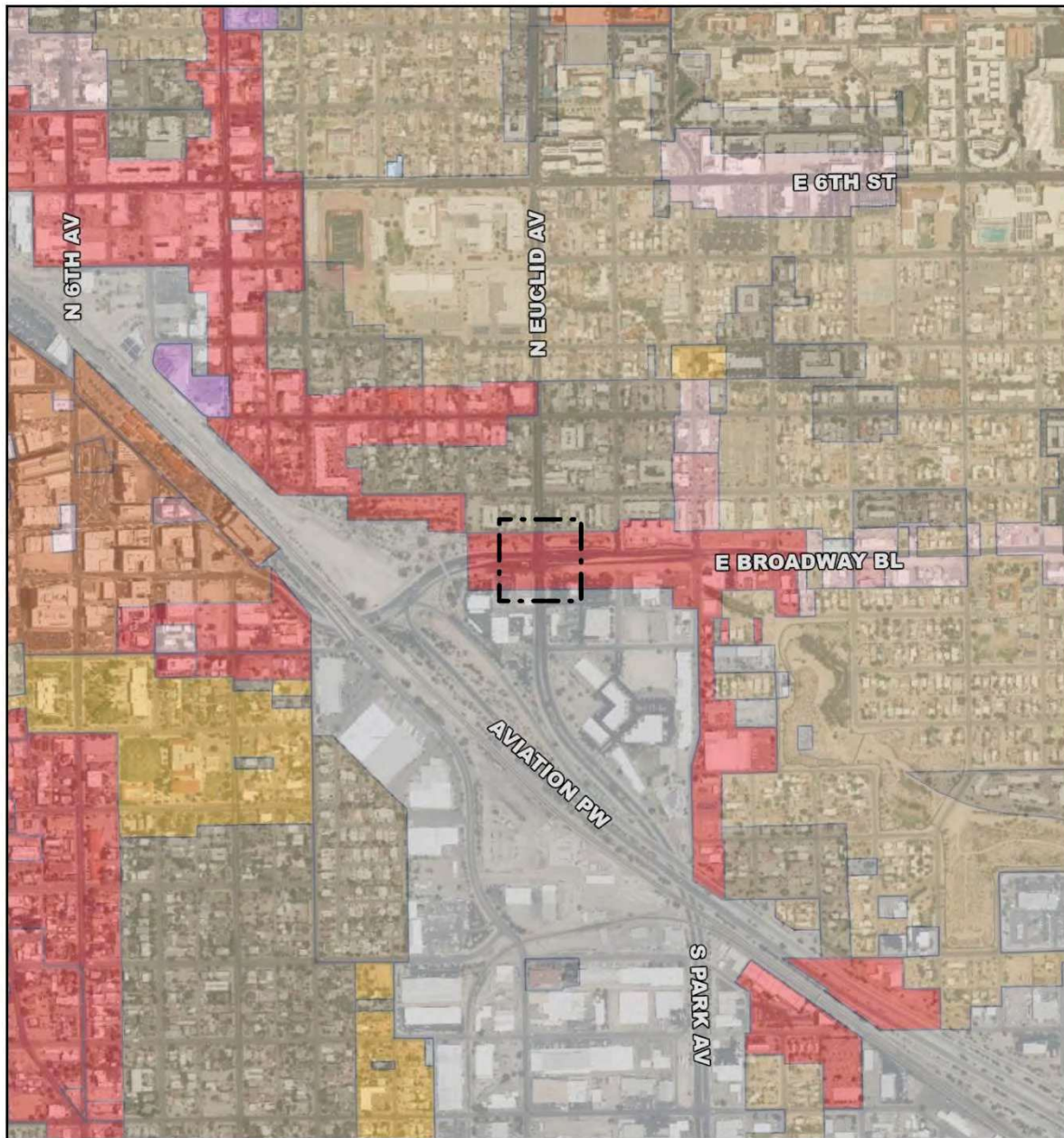
 Educational Facilities

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

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Feet
1 Inch = 1,000 Feet



Exhibit 2. Generalized Land Use



 Subject Crossing

ZONING

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

 C-2; HC-2

 C-3; HC-3; HLC-3; UC-3

 Other Zoning

 PAD; HL-PAD

 HP; P

 I-1

 I-2

 O-3; HO-3

 OCR-2; HOCR-2

 P-I

 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

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1 Inch = 1,000 Feet



Exhibit 3. Zoning

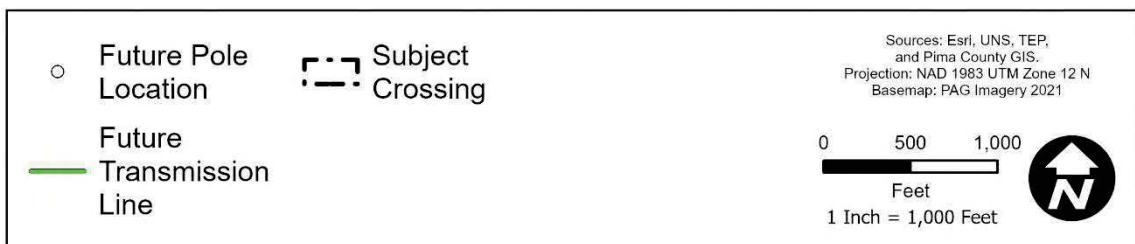
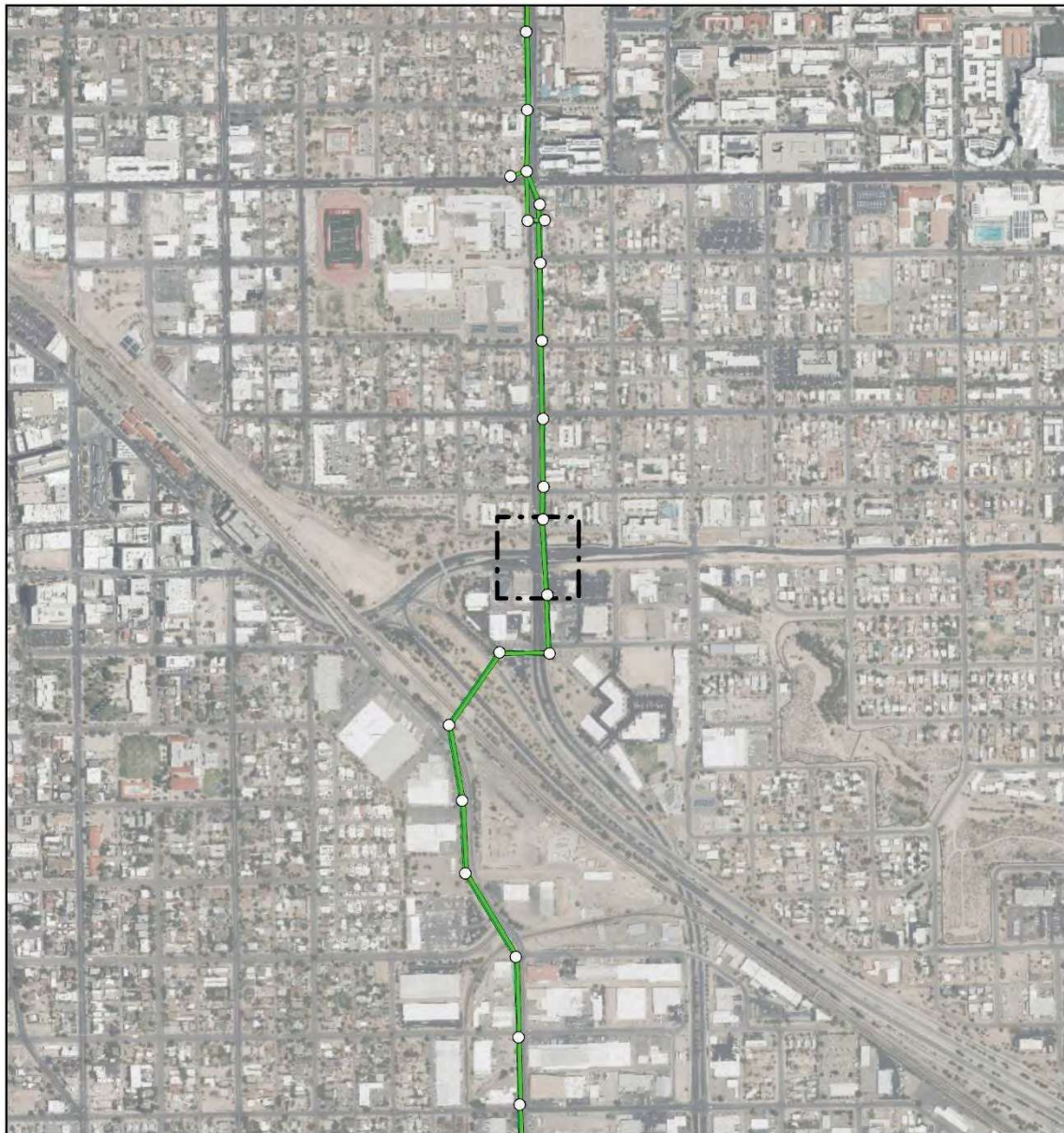


Exhibit 4. Preliminary Engineering of Preferred Route at Subject Crossing

B. Circulation and Trips

1. Major and Local Streets

North and South Euclid Avenue is a City of Tucson owned arterial street consisting of an asphalt finished road measuring approximately 70 feet wide from curb-to-curb. Road ROW for Euclid Avenue is 80 feet wide. East Broadway Boulevard is a gateway arterial street. From curb-to-curb East Broadway Boulevard measures approximately 125 feet wide. Road ROW for Broadway Boulevard is 80 feet.

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

North and South Euclid Avenue both have two turn lanes. One as the middle lane to allow for left turns and one as the furthest right lane.

East Broadway Boulevard has three turn lane. There are two turn lanes are in the middle of the street between a median and painted traffic divider to allow for left turns. There is one additional turn lane as the furthest right lane. The turn lanes are mirrored on the east and west side of Euclid Avenue.

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 north, east, south, and west of the Subject Crossing.

There are existing driveways on the south side of East Broadway Boulevard to allow street access into the existing businesses.

A connection onto the Aviation Bikeway exists on the northwest corner of the Subject Crossing. The Aviation Bikeway runs parallel to South Euclid Avenue until crossing over Euclid Avenue and paralleling east Aviation Parkway.

No new curbs, driveways, sidewalks, or bike paths are proposed as part of this project.

5. Traffic Signals within One Mile

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

- E 2nd St & N Mountain Av
- E 2nd St & N Park Av
- E 5th St & N Euclid Av
- E 6th St & N 2nd Av
- E 6th St & N 4th Av
- E 6th St & N 4th Av

- E 6th St & N Euclid Av
- E 6th St & N Fremont Av
- E 6th St & N Highland Av
- E 6th St & N Park Av
- E 6th St & N Stone Av
- E 6th St & N Warren Av
- E 7th St & N 7th Av
- E 7th St & N Euclid Av
- E 9th St & N Euclid Av
- E 14th St & S 6th Av
- E 15th St & S Kino Pw
- E 18th St & S Park Av
- E 20th St & S 6th Av
- W 6th St & N 9th Av
- W 6th St & N Ash Av
- W 18th St & S 6th Av
- W 20th St & S 6th Av
- E Alameda St & N 6th Av
- E Alameda St & N Stone Av
- E Aviation Pw & S Kino Pw
- E Broadway Bl & E Aviation Pkwy Westbound Off Ramp
- E Broadway Bl & E Toole Av
- E Broadway Bl & N Cherry Av
- E Broadway Bl & N Euclid Av
- E Broadway Bl & N Highland Av
- E Broadway Bl & N Park Av
- E Broadway Bl & S 4th Av
- E Broadway Bl & S 5th Av
- E Broadway Bl & S 6th Av
- E Broadway Bl & S Scott Av
- E Broadway Bl & S Stone Av
- E Congress St & N 4th Av
- E Congress St & N 5th Av
- E Congress St & N 6th Av
- E Congress St & N Scott Av
- E Congress St & N Stone Av
- E Pennington St & N 6th Av
- E Pennington St & N Stone Av
- E Pennington St & N Toole Av
- E University Bl & N 4th Av
- E University Bl & N 6th Av
- E University Bl & N Euclid Av

- E University Bl & N Park Av
- W Alameda St & N Church Av
- W Broadway Bl & S Church Av
- W Congress St & N Church Av
- W Cushing St & S Stone Av
- W Franklin St & N Stone Av
- W Pennington St & N Church Av

A selection of traffic signals is depicted on *Exhibit 5: Circulation*.

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

There are three public transit stops at the Subject Crossing. North of Broadway is a Sun Tran stop serving Route 1: Swan/29th Street and Route 6: Tohono Center. East of Euclid is a Sun Tran stop with bus pull-out serving Route 8: Broadway/Houghton & Udall Station and Route 108X. West of Euclid is a Sun Tran stop with bus pull-out serving Route 1, Route 6, Route 8, Route 25, and Route 108X (all routes to Downtown.). Approximately one-tenth of a mile north, east, and south of the Subject Crossing are additional public transit stops serving the same routes as previously listed.

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 are currently planned that are expected to affect the Project.

The Prop 407 Arroyo Chico Greenway, still in pre-design at the time of writing this application, will be on the northeast corner of the Subject Crossing. The MRP is not anticipated to have any impact on the planned C.I.P.

The Prop 411 Residential Projects along East Hughes Street (Buell's Addition / Drake's Addition & C.O.T. Resub) are both still in pre-design at the time of writing this application, and both C.I.P.s fall north of the Subject Crossing. Neither C.I.P. is anticipated to have an impact on the MRP and vice versa.

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
N Euclid Avenue (2023)	13,576	13,634
S Euclid Avenue (2023)	8,748	9,405
	Average Daily Trips Eastbound	Average Daily Trips Westbound
Broadway Boulevard (2024)	16,104	15,310

Major Street within One Mile	Average Daily Trips Northbound	Average Daily Trips Southbound
S Granada Avenue (2023)	2,596	2,472
S Stone Avenue (2023)	1,098	4,022
S 6 th Street (2023)	3,310	1,530
S 4 th Avenue (2023)	1,010	562
S Kino Parkway (2023)	15,381	15,957
	Average Daily Trips Eastbound	Average Daily Trips Westbound
E Speedway Boulevard (2024)	18,387	22,583
E 6 th Street (2024)	8,779	8,775
E 22 nd Street (2023)	16,463	17,249

9. Trip Generation Calculations

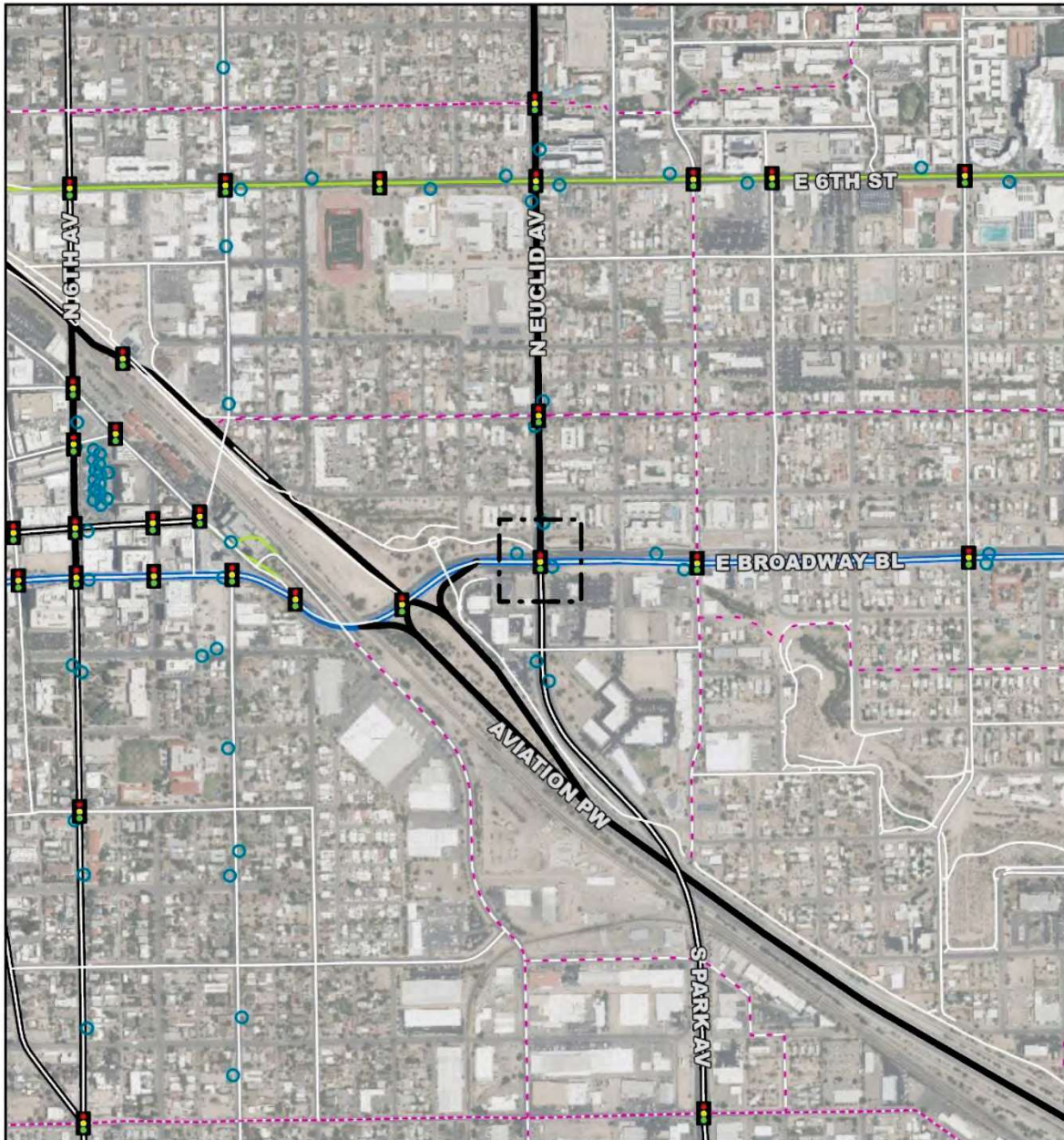
The Subject Crossing is for the installation of two transmission structures associated with the larger Midtown Reliability Project 138 kV transmission line. Once construction of the line is complete, vehicle trips to the Subject Crossing structures will be annual for routine transmission line maintenance 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

A 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 4 portion. Route 4 (5 miles in total length) passes through the boundaries of five previously recorded archaeological sites (see Table 8 in *Appendix B*). No archaeological sites are present at the Subject Crossing. Tierra recommended a cultural monitor be present for any ground-disturbing activities at two of the five sites in Route 4. Tierra determined that not all the sites present required monitoring due to several of the sites being deemed ineligible for inclusion in the National Register of Historic Places (NRHP) or eligible but altered by modern construction therefore not warranting monitoring. 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 4 portion. The Architecture Company determined that of the route alternatives between Vine Substation and Kino Substation, Route 4 would have the second 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 Sunshine Mile Historic District and borders the Historic Ironhorse and Pie Allen neighborhoods at the Subject Crossing, Route 4 has the least number of contributing properties that are located along the route and is mostly located on Arterial Streets. Additional rationale for Route 4 can be found on page 43 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

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

D. Hydrology & Drainage

1. On-site and Off-site Drainageways

At the Subject Crossing, there are drainages for stormwater runoff in the road median of East Broadway Boulevard, on North Euclid Avenue, and drainage grating paralleling the crosswalk on the south side of Broadway Boulevard. No retention/detention basins are present.

The Arroyo Chico Wash runs underground beneath the Subject Crossing. The wash flows underground from South Park Avenue northwesterly to North 1st Avenue.

2. 100-Year Floodplains

The Arroyo Chico Wash runs from the southeast to the northwest under the Subject Crossing. The Wash connects two FEMA AE Zones, but 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 04019C2277L) issued by the Federal Emergency Management Agency (FEMA) on and effective June 16, 2011 and revised to reflect the letter of map revision effective June 13, 2016 (*Appendix C*). A review of the FRIM 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

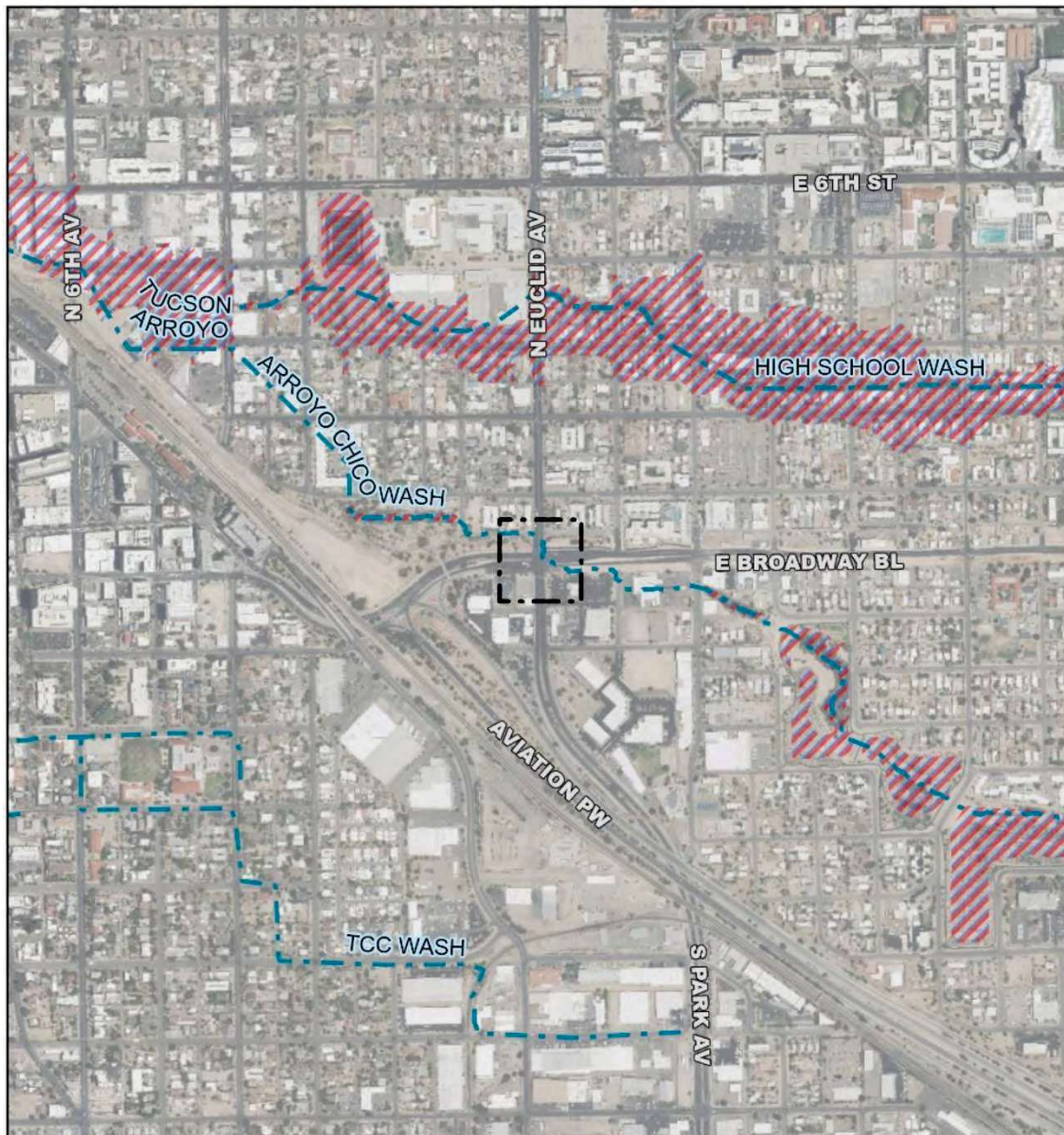
At the Subject Crossing, there are drainages in the road median of East Broadway Boulevard, on North Euclid Avenue, and drainage grating paralleling the crosswalk on the south side of Broadway Boulevard. No retention/detention basins are present.

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, parks, and libraries are within 1 mile of the Subject Crossing:

Schools

- City High School (Charter)
- Ha San Preparatory and Leadership School (Charter)
- Highland Free School (Charter)
- Imago Dei Middle School (Charter)
- Mansfeld Middle School (Public)
- Mexicayotl Academy (Charter)
- Miles E.L.C. K-8 School (Public)
- Paulo Freire Freedom School (Charter)
- Project More High School (Public)
- Roskrige K-8 School (Public)
- Safford K-8 School (Public)
- Tucson High School (Public)
- Tucson International Academy-Broadway (Charter)
- University of Arizona (Public)

Parks

- Armory Park
- Arroyo Chico
- Aviation Greenway
- Catalina Park
- El Presidio Plaza
- Iron Horse Park
- Jacome Plaza
- Jardin Cesar Chavez
- La Placita Park
- Presidio San Agustin del Tucson
- San Antonio Park
- Santa Rita Park
- Stevens Plaza
- Viente de Agosto Park

Libraries

- Joel D. Valdez Main Library
- Law Library and Resource Center

2. Pedestrian and Bike Routes

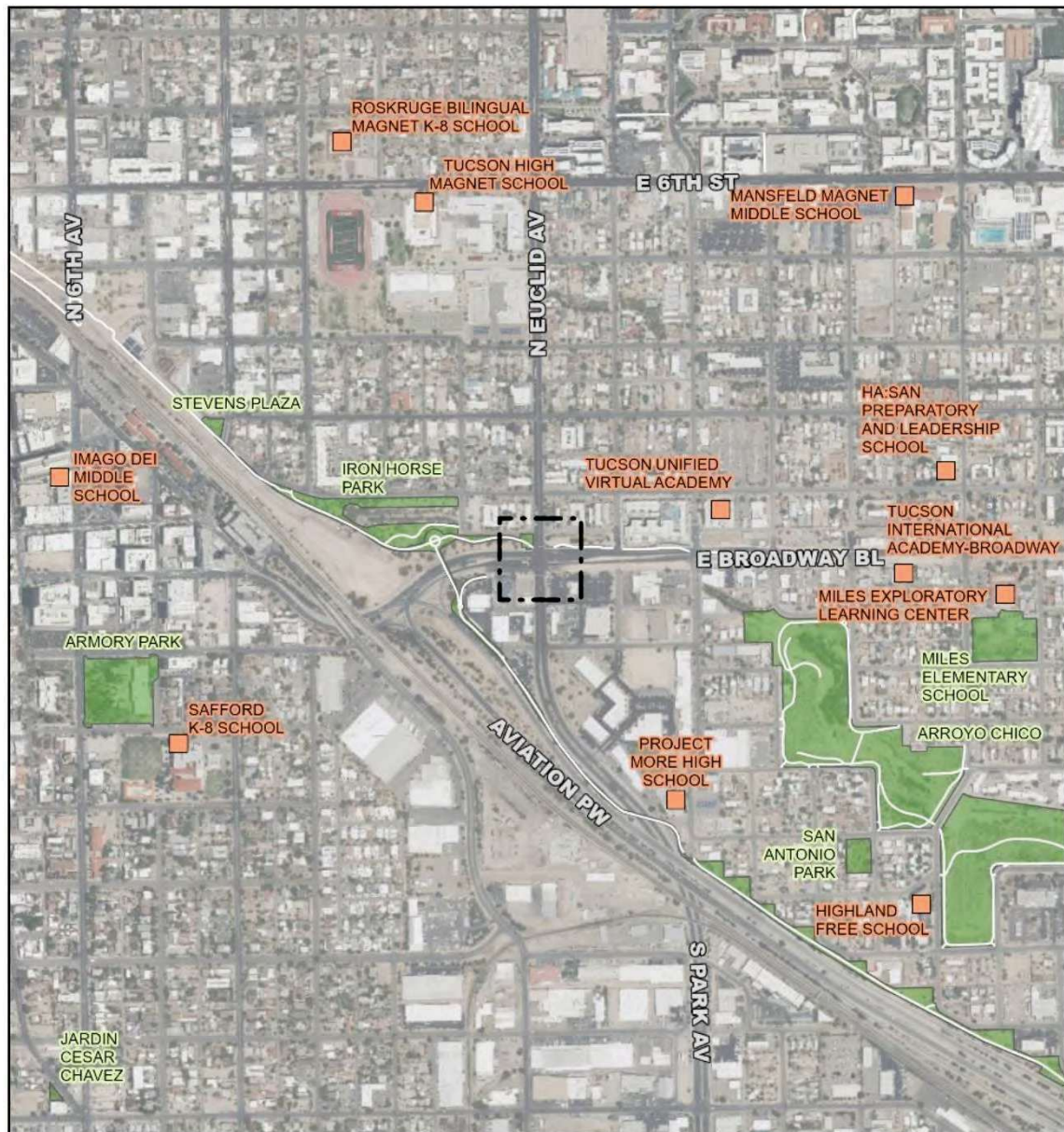
There are no existing bike lanes or routes on Euclid Avenue at the Subject Crossing. Broadway Boulevard has dedicated bike lanes running east and west at the Subject Crossing.

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

3. Trail and Trail Access Points

On the northwest corner of the Subject Crossing at Ironhorse Park is a paved trail that connects to the Diamondback Bridge and Aviation Greenway. No new bike routes or lanes are being proposed as part of this project.

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 Subject Crossing has been developed and is 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 are no landfills on the Subject Crossing or within a mile of the site. There are also no contaminated lands or ADEQ superfund sites on the Subject Crossing, but there are two Water Quality Assurance Revolving Fund (WQARF) sites within a mile of the site. One is named Park-Euclid and was listed in 1999, and the other is named 7th Street & Arizona Avenue and was listed in 2000.

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 at the Subject Crossing.

H. Utilities

The Subject Crossing is within Tucson Water's obligated service area, and sanitary sewer pipes are present both north and south of Broadway Boulevard on East Hughes Street and East McKey Street respectively.

The Subject Crossing is within TEP's service area, and an existing 13.8 kV distribution line runs north on Euclid Avenue and spans over Broadway Boulevard.

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

North of the Subject Crossing is a landscaped park, Ironhorse Park, but the park offers minimal screening value.

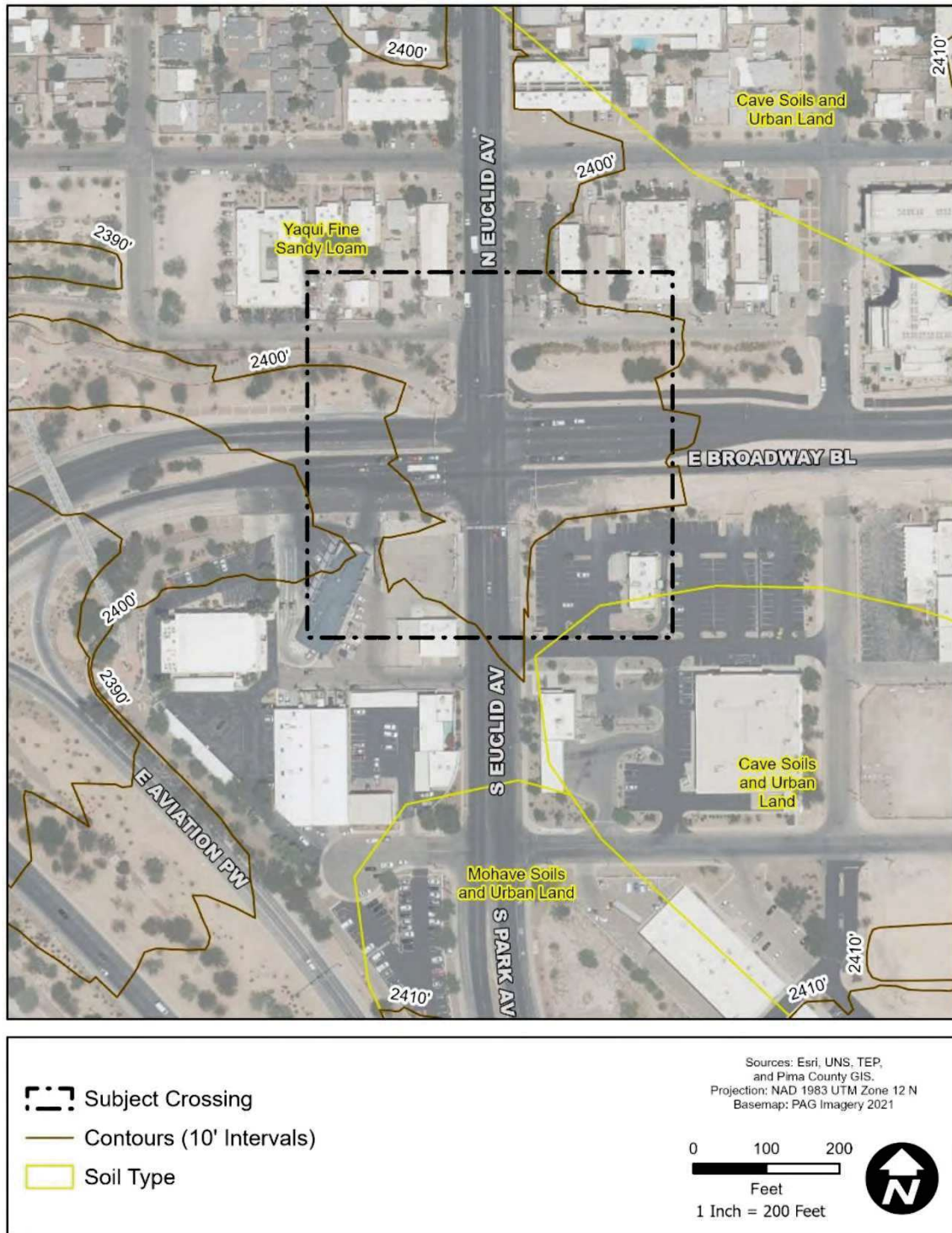


Exhibit 8. Topography & Soils

J. Views

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

Views to the north of the Subject Crossing are residential. Views to the east of the Subject Crossing are residential and 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 south from the northeast corner of Broadway and Euclid.



View of Subject Crossing looking south from the crosswalk on Euclid.



View of Subject Crossing looking north from the southwest corner of Broadway and Euclid.



View of Subject Crossing looking south from the northwest corner of Broadway and Euclid.

Views Surrounding the Subject Crossing



View from Subject Crossing looking north from the northeast corner of Broadway and Euclid.



View from Subject Crossing looking north from the southwest corner of Broadway and Euclid.

2. Description of Views Depicted in the Photo Simulations

Photo Simulation 1, Looking North on Euclid Avenue (Exhibit. 9)



Midtown Reliability Project - E. Broadway Blvd./N. Euclid Ave.

Key Observation Point (KOP) #1



Current Condition



Simulated Condition

Route 4 - Weathered Finish



Photo Simulation 2, Looking east on Broadway Boulevard (Exhibit. 10)



Midtown Reliability Project - *E. Broadway Blvd./N. Euclid Ave.*

Key Observation Point (KOP) #2



Current Condition



Simulated Condition

Route 4 - Weathered Finish



Photo Simulation 3, Looking south on Euclid Avenue (Exhibit. 11)

TEP Tucson Electric Power
Midtown Reliability Project - E. Broadway Blvd./N. Euclid Ave.

Key Observation Point (KOP) #4



Current Condition



Simulated Condition

Route 4 - Weathered Finish

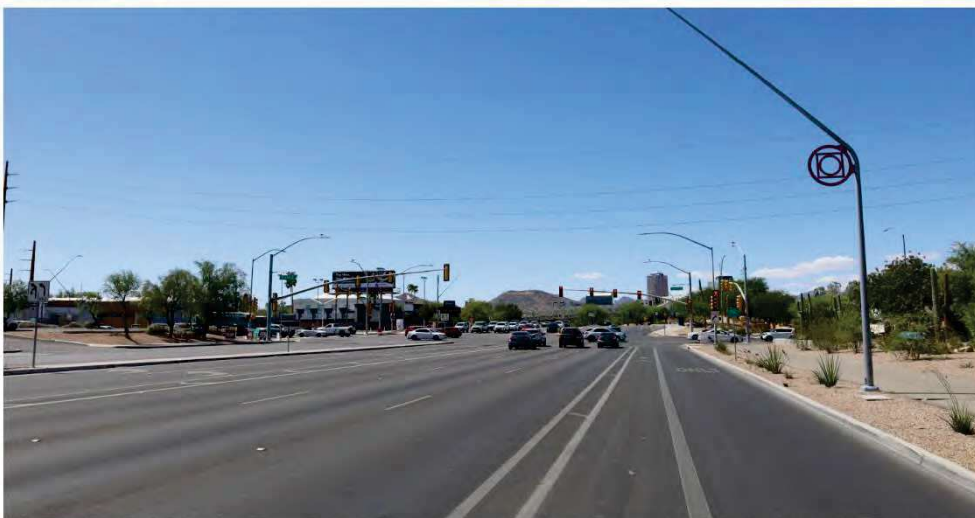
Photo Simulation 4, Looking west on Broadway Boulevard (Exhibit 12)

TEP Tucson Electric Power
Midtown Reliability Project - E. Broadway Blvd./N. Euclid Ave.

Key Observation Point (KOP) #5



Current Condition



Simulated Condition

Route 4 - 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 predominantly commercial or residential 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.

E. 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 north on Euclid Avenue and spans over Broadway Boulevard.

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 Euclid Avenue.

4. REFERENCES

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