



Cochise County

Development Services
Planning Division

Public Programs...Personal Service
www.cochise.az.gov

APPLICATION FOR A VARIANCE

Applicant's Name: _____

Name of All Property Owner(s) _____

Mailing Address:

Street # Town State Zip code

Subject Property Address (if different than mailing address):

Street # Town State Zip code

Email Address: _____

Phone Number: _____

Tax Parcel Number: _____

Current Zoning Designation: _____

Area of Parcel (to the nearest tenth of an acre): _____

Which provision(s) of the Zoning Regulations are you seeking a variance from? _____

Variance is defined in the Cochise County Zoning Regulations as a deviation from the terms of the Cochise County Zoning Regulations when, owing to peculiar conditions, a strict interpretation would work an unnecessary hardship, if in granting such Variance the general intent and purposes of the Zoning Regulations will be preserved.

The Zoning Regulations are generally intended to yield results that are in compliance with all other applicable laws. A request for a "reasonable accommodation" in these regulations, pursuant to any Federal or State housing law or other similar legislation, as may be necessary to afford an equal opportunity to housing under any such law, shall be considered to be an appropriate condition for a Variance from the strict application of these Zoning Regulations. The Board of

Bisbee Office
1415 Melody Lane, Building F
Bisbee, Arizona 85603
520-432-9300
520-432-9278 fax
planningandzoning@cochise.az.gov

Adjustment is authorized to grant any such variance, to the extent that any such accommodation is required pursuant to any applicable State or Federal law.

It shall be the responsibility of the Applicant to submit any studies and/or data necessary to demonstrate the effectiveness of the alternative conditions. Any decision of the Board of Adjustment allowing a variance shall be considered for revocation by the Board of Adjustment if substantial construction, in accordance with the plans for which such Variance was granted, has not been initiated within 12-months of the date of approval, building permit issuance, or if judicial proceeding to review the Board of Adjustment's decision has been instituted, 12-months from the date of entry of the final order in such proceedings, including appeals. Additionally, if any of the conditions of the Variance approval are not complied with within 12-months or within the time period set by the Board, it shall be revoked after 30-calendar days' notice to the owner and Applicant, unless a request for a review hearing before the Board of Adjustment is made by the Applicant within this 30-calendar day appeal period. The Board of Adjustment may grant reasonable extensions to the time limits upon a hearing pursuant to a timely written request by the Applicant.

Appeal procedures: Any person aggrieved by a decision of the Board of Adjustment may at any time within 30-calendar days of such decision appeal to the Superior Court, and the matter shall be heard in like manner as appeals from courts of justices of the peace.

To qualify for a variance, the property must demonstrate that owing to peculiar conditions, a strict interpretation would work an unnecessary hardship and if in granting the variance the general intent and purposes of the zoning ordinance will be preserved.

Required Submittals

1. This application
2. A site plan - see our website for an example site plan: <https://www.cochise.az.gov/development-services/variance>
3. Processing Fee

Describe all **existing** structures/uses present on the subject parcel. Note: the size and location of existing structures must be shown on the accompanying site plan.

Describe all **proposed** structures/uses on the parcel that to be placed on the parcel. Note: the size and location of proposed structures must be shown on the accompanying site plan.

What is the reason for this request (select one):

There is a special circumstance associated with my property - such as its size, shape, topography, location, or surroundings - that deprives the property of privileges enjoyed by other property of the same classification in the same zoning district.

I wish to appeal the interpretation of a zoning regulation, by the zoning administrator or other County official (please submit an "Appeal to the Board of Adjustment Application").

Describe how this request brings you to parity with property owners within your zoning district and does not provide an advantage or special privilege over and beyond what is provided to other lots in the same zoning designation.

It is the responsibility of the applicant to submit any studies and/or data necessary to demonstrate the effectiveness of the alternative conditions. Generally, the variance, if granted, should be the minimum variance that will afford relief and it should provide the least possible modification of the zoning regulations provisions that are in question. State any potential impacts caused by the application of your variance and how you intend to minimize these impacts on neighboring properties.

State how the proposed variance is consistent with the general **intent and purpose** of the Zoning Regulations.

Describe, in detail, the special circumstances that are associated with, and unique to, your property that do not allow it to develop in the same manner as other properties within the same zoning district.

The undersigned hereby certifies that to the best of his/her knowledge and belief the data submitted on the attached application for a variance from the terms of the Cochise County Zoning Regulations are true and correct.



Applicant Signature

Date



Variance Application
Cochise County Zoning Regulations
Article 604.02 Maximum Wall Height

Submitted to:
Cochise County
Development Services Department
1415 Melody Lane, Building F
Bisbee, AZ 85603

Prepared By:
Tucson Electric Power
4346 E Irvington Rd.
Tucson, Arizona 85714
(520) 633-8693

March 21, 2023

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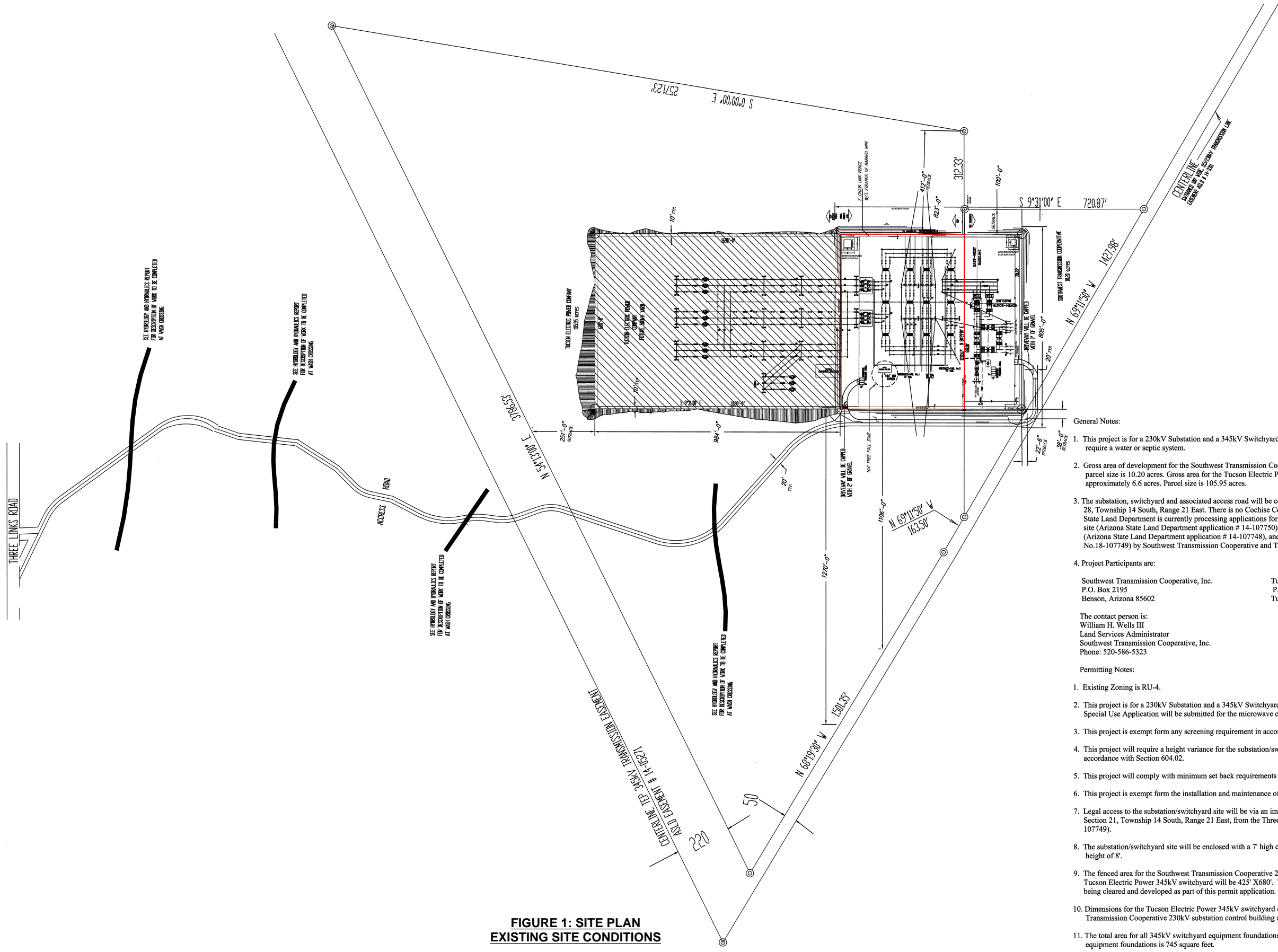
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SITE PLAN

Figure 1: Site Plan Existing Conditions

Figure 2: Site Plan Proposed Condition

Figure 3: Wall and Gate Detail



LEGEND

- WASH
- FUTURE DEVELOPMENT
- CUT & FILL
- 345-KV SWITCHYARD



General Notes:

1. This project is for a 230kV Substation and a 345kV Switchyard with a 104' high microwave communication tower and will not require a water or septic system.
2. Gross area of development for the Southwest Transmission Cooperative, Inc. 230kV substation is approximately 3.4 acres. The parcel size is 10.20 acres. Gross area for the Tucson Electric Power Company 345kV switchyard and communication tower is approximately 6.6 acres. Parcel size is 105.95 acres.
3. The substation, switchyard and associated access road will be constructed on Arizona State Trust Land located in Section 21 and 28, Township 14 South, Range 21 East. There is no Cochise County Assessors Parcel Number for these parcels. The Arizona State Land Department is currently processing applications for the Southwest Transmission Cooperative, Inc., 230kV substation site (Arizona State Land Department application # 14-107750), Tucson Electric Power Company 345kV switchyard site (Arizona State Land Department application # 14-107748), and a joint application (Arizona State Land Department application No.18-107749) by Southwest Transmission Cooperative and Tucson Electric Power for the access road.
4. Project Participants are:

Southwest Transmission Cooperative, Inc. P.O. Box 2195 Benson, Arizona 85602	Tucson Electric Power Company P.O. Box 711 Tucson, Arizona 85702
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The contact person is:
William H. Wells III
Land Services Administrator
Southwest Transmission Cooperative, Inc.
Phone: 520-586-5323
5. Permitting Notes:
 1. Existing Zoning is RU-4.
 2. This project is for a 230kV Substation and a 345kV Switchyard with a 104' high microwave communication tower. A separate Special Use Application will be submitted for the microwave communication tower.
 3. This project is exempt from any screening requirement in accordance with Section 604.06
 4. This project will require a height variance for the substation/switchyard steel structures and microwave communication tower in accordance with Section 604.02.
 5. This project will comply with minimum set back requirements in accordance with Sections 604.03 and 1813.03.
 6. This project is exempt from the installation and maintenance of landscaping in accordance with Section 1806.02 - A.2.
 7. Legal access to the substation/switchyard site will be via an improved existing road south across Arizona State Trust Land in Section 21, Township 14 South, Range 21 East, from the Three Links Road. (Arizona State Land Department application # 18-107749).
 8. The substation/switchyard site will be enclosed with a 7' high chain link fence with three strands of barbed wire, for an overall height of 8'.
 9. The fenced area for the Southwest Transmission Cooperative 230kV substation will be 220' X 680'. The fenced area for the Tucson Electric Power 345kV switchyard will be 425' X 680'. Tucson Electric Power Company's future 500kV yard area is not being cleared and developed as part of this permit application.
 10. Dimensions for the Tucson Electric Power 345kV switchyard control building are 32' X 54'. Dimensions for the Southwest Transmission Cooperative 230kV substation control building are 26' X 18'.
 11. The total area for all 345kV switchyard equipment foundations is 2,590 square feet. The total area for all 230kV substation equipment foundations is 745 square feet.

**FIGURE 1: SITE PLAN
EXISTING SITE CONDITIONS**

NO.	DATE	REVISION	BY	APPD.	NO.	DATE	REVISION	BY	APPD.
P1	07/09/03	PRELIMINARY DESIGN	HS	BW					
A	07/23/08	INCORPORATED PER DCN # 08/39	JS	BW					

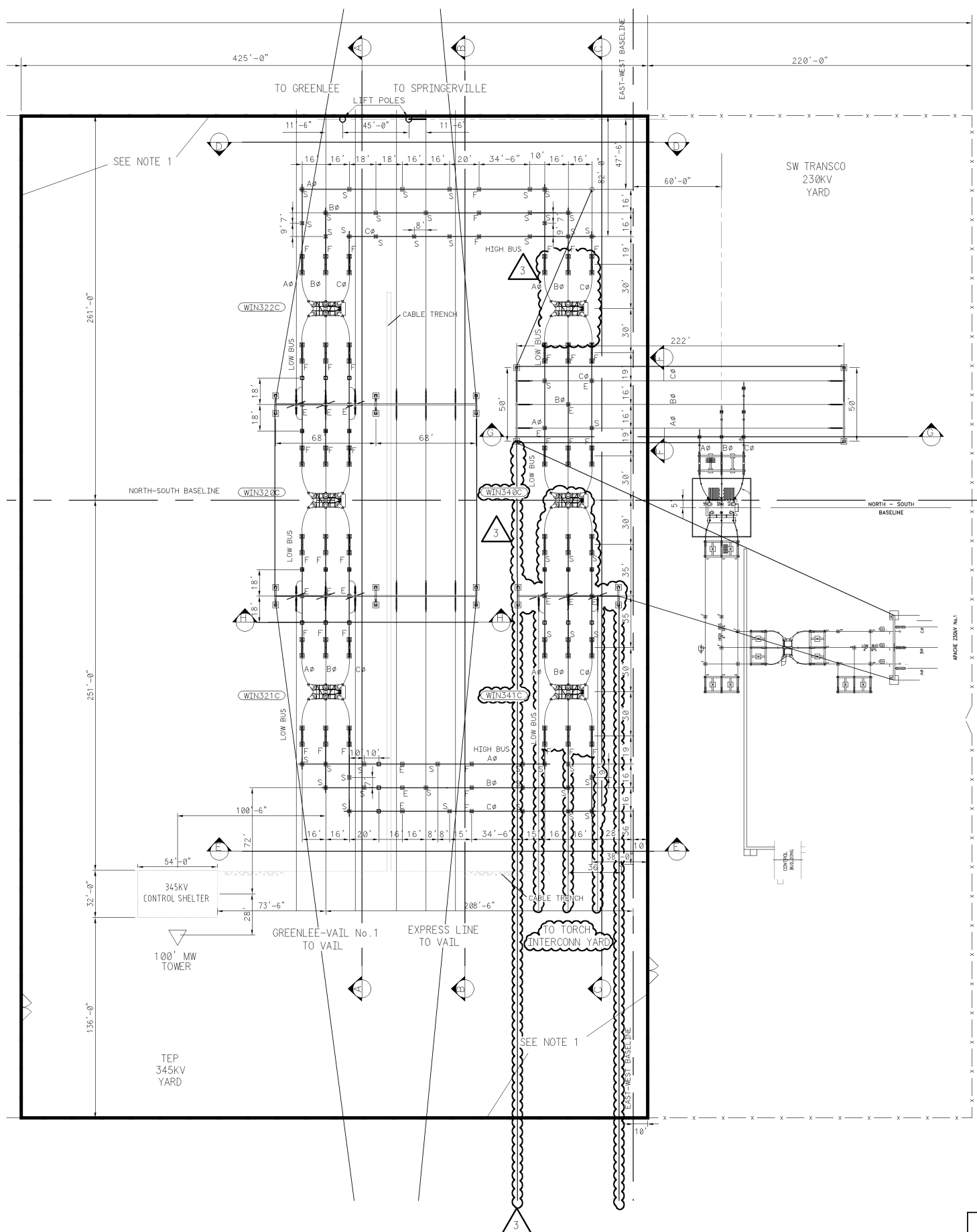
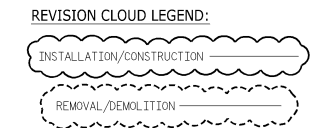
REFERENCE	DRAWINGS

NOTES

APPROVAL BY REGISTERED ENGINEER(S)	DATE 07/09/02	WINCHESTER 230KV SUBSTATION AND 345KV SWITCHYARD SITE PLAN
NAME / TITLE	SCALE 1"=150'-0"	
APPROVED BY	DATE	

REVISIONS

0-	08/28/03	ISSUED FOR BID
1-	10/27/03	ISSUED FOR CONSTRUCTION
AS BUILT PER 3392.10/ EC60440 L.ROBINSON/ S.SMITH 6-13-07		
DATE	ENG	TECH
5/23/2014	J. HODURFT	M. RODRIGUEZ
DESCRIPTION:		
ISSUED FOR SCOPE DOCUMENT		
TORCH RENEWABLE ADDITION		
JOB #7038.30, TGEN128		



NOTES

- 4" AGGREGATE BASE TO EXTEND 3'-0" OUTSIDE FENCELINE ON THE NORTH, EAST & WEST SIDE FENCE, AND TO EXTEND TO THE FENCELINE ONLY TO THE SOUTH.

BUS SUPPORT CODE
 S-SLIP
 F-FIXED
 E-EXPANSION

REFERENCE DRAWINGS

03-01-0261	ULTIMATE 230/345/500KV ARRANGEMENT
03-01-0262	345KV YARD SECTION A-A (DETAIL "A")
03-01-0263	345KV YARD SECTION B-B
03-01-0264	345KV YARD SECTION C-C
03-01-0265	345KV YARD SECTION D-D & E-E
03-01-0266	345KV YARD SECTION F-F, G-G, H-H
03-01-0267	345KV YARD GROUNDING PLAN
03-01-0268	345KV YARD GROUNDING PLAN AREA A
03-01-0269	345KV YARD GROUNDING PLAN AREA B
03-01-0270	345KV YARD GROUNDING PLAN AREA C
03-01-0271	345KV YARD GROUNDING PLAN AREA D
03-01-0272	345KV YARD GROUNDING PLAN AREA E
03-01-0273	345KV YARD GROUNDING PLAN AREA F
03-01-0274	GROUNDING DETAILS
03-01-0276	345KV YARD CONDUIT PLAN
03-01-0277	345KV YARD CONDUIT PLAN
03-01-0278	345KV YARD CONDUIT PLAN
03-01-0279	CONDUIT DETAILS
03-01-0299	BILL OF MATERIAL

BEING REVISED / UNDER CONSTRUCTION
 R.E. L. LICON JOB # 7038.30
 TECH./DFTR. M. RODRIGUEZ/POWER REV. # 3
 CHECK WITH R.E. BEFORE PRINTING OR REVISING

ISSUED FOR CONSTRUCTION
 1/3/04

FIGURE 2: SITE PLAN PROPOSED CONDITION

AutoCad

SCALE: 1" = 40'-0"	DATE: 10/27/03
TECH. S. CHASE	DATE: 10/27/03
DFTR. S. CHASE	DATE: 10/27/03
CHDR. P. REAVIS	DATE: 10/27/03
ENG. APP. R. FARRAR	DATE: 10/27/03

Tucson Electric Power Company
 TUCSON, ARIZONA
TITILE: INITIAL 345KV GENERAL ARRANGEMENT
 Winchester Substation

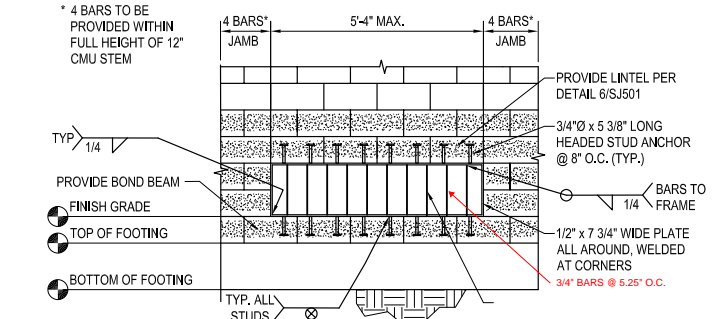
TRSQ

03-01-0260		
REV	CODE	TYPE
3	3251	EEL
SHEET		

REVISIONS

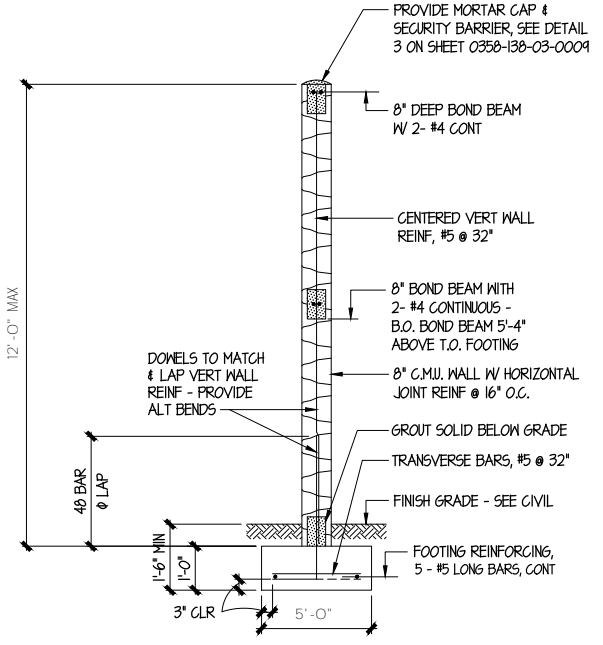
DATE	ENG	TECH	REV
7/2020	T. JOHNSON	T. RAMIREZ	00

DESCRIPTION:
ISSUED FOR CONSTRUCTION
JOB: 10017.00/03HIN02/6173244
HARRISON SUBSTATION



SECURITY BARS AT DRAINAGE OPENING - TYPE I
SCALE: NTS

1



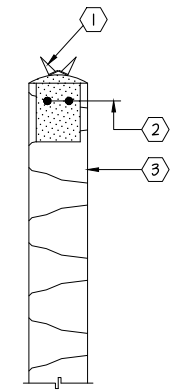
SINGLE CURTAIN 8\"/>

C.M.U. SCREEN WALL - SINGLE CURTAIN
SCALE 1/2\"/>

2

KEYNOTES

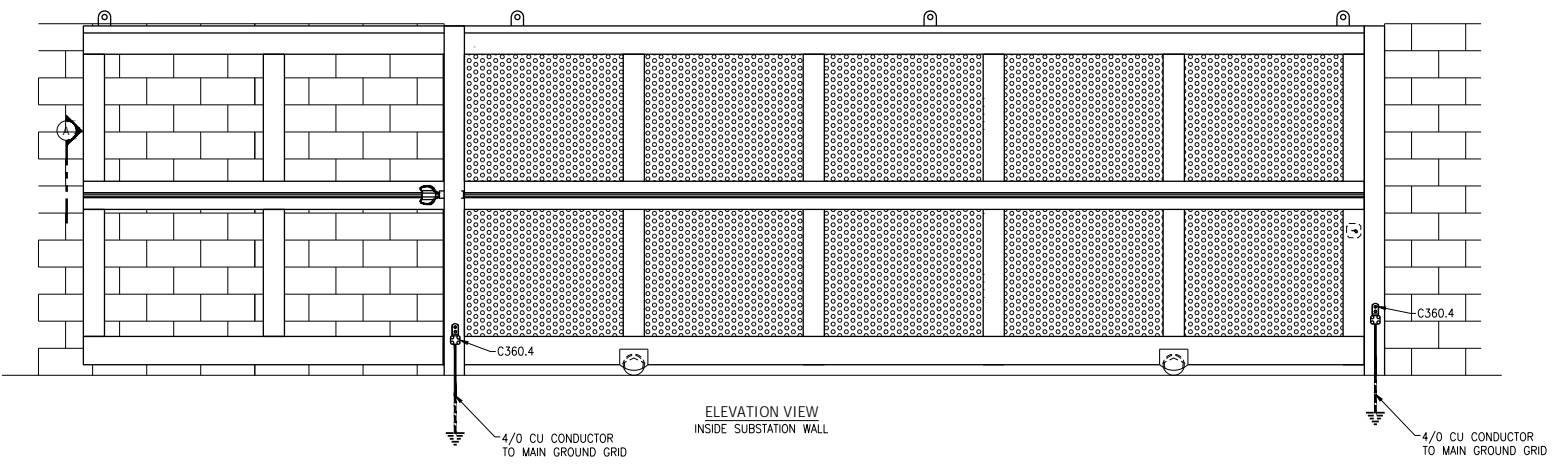
- 1 STAINLESS STEEL CONTINUOUS 3D SECURITY BARRIER, ULTRA BARRIER OR APPROVED EQUAL. REFER TO NOTES FOR SPECIFICATIONS.
- 2 8\"/>



SECTION

ULTRA BARRIER SECURITY CAP
NO SCALE

3



G14 MANUAL ROLLING GATE GROUNDING DETAIL
SCALE: NTS

FIGURE 3: WALL AND GATE DETAIL

AUTOCADD

Tucson Electric Power Company
TUCSON, ARIZONA
TITLE: WALL ELEVATIONS
CMU SCREEN WALL SECTION DETAILS
SUBSTATION

TRSO	T10S,R10E,S23
REF #	
DWG #	0358-138-47-0003
REV	00
SHEET	S04

VARIANCE NARRATIVE

Introduction

The project site is the existing 6.6-acre (287,931 square foot) Tucson Electric Power (TEP) 345-kilovolt (kV) Winchester Switchyard located within the northeast quarter of Section 14 of Township 14- South, Range 21-East of the Gila, and Salt River Meridian. More specifically located at 2633 East 3-Links Road in Cochise County, Arizona. The switchyard is adjacent to a 3.4-acre, 230-kV substation owned by the Southwest Transmission Cooperative, Inc. and is part of a larger 105.95-acre parcel leased from the Arizona State Land Department (ASLD). Constructed in 2003, the Winchester Substation connects regional Extra-High Voltage (EHV) transmission lines connecting the Arizona-New Mexico-Southern Nevada Power Area, a subregion of the Western Interconnection. This subregion is the geographic area containing the electric grid in the western part of North America.

The Federal Energy Regulatory Commission (FERC) order No. 706 *Mandatory Reliability Standards for Critical Infrastructure Protection*, tasked the National Energy Regulatory Commission (NERC) to create mandatory electric reliability standards which govern the protection of critical electric infrastructure in the United States, known as the Critical Infrastructure Protection Standards (CIP). These standards are applied to all bulk electric system facilities. Based on recent TEP facility assessments, the Winchester Substation met the threshold for CIP standards for physical security CIP-014 which identifies transmission facilities that if rendered inoperable or damaged as a result of a physical attack of sabotage could result in widespread instability, uncontrolled separation, or cascading within an interconnection.

To comply with the CIP Standards, TEP request a variance to Article 604.02 of the Cochise County Zoning Regulations governing the maximum wall height in the Rural Residential-4 zone. The requested protections for the Winchester Substation call for a new 12-foot Security wall with an *Ultra-Barrier* security cap and is the standard package TEP implements for all CIP-014 rated substations.

Application Questions

1. Describe all existing structures/uses present on the subject parcel. Note: the size and location of existing structures must be shown on the accompanying site plan.

The existing use of the 6.6-acre site is a TEP owned and operated 345-kV electrical switchyard. Existing facilities on site include switchgear, breakers, lightening arresting static masts, a communication tower and all associated equipment required for the operation of the switchyard. Electrical facilities are depicted in Figure 1: Site Plan- Existing Condition.

2. Describe all proposed structures/uses on the parcel that are to be placed on the parcel. Note: the size and location of proposed structures must be shown on the accompanying site plan.

A 12-foot grout filled, cinder masonry block wall with Ultra-Barrier is proposed to replace the existing chain-link fencing along the perimeter of the switchyard. Additional proposed upgrades to the site include an advanced perimeter detection system, cameras, and anti-vehicle ramming entry points. These proposed upgrades are designed to meet and comply with CIP-014. Proposed wall location and wall details are depicted in Figure 2: Site Plan Proposed Condition.

3. Describe how this request brings you to parity with property owners within your zoning district and does not provide an advantage or special privilege over and beyond what is provided to other lots in the same zoning.

The Winchester Substation is a unique land use in the RU-4 Zone and as such, is subject to strict federal regulatory compliance. The NERC required CIP-014 standard for the electric transmission system is a matter of national security and is not considered an advantage or special privilege over and beyond what is provided to other lots within the RU-4 Zone

4. It is the responsibility of the applicant to submit any studies and /or data necessary to demonstrate the effectiveness of the alternative conditions. Generally, the variance, if granted, should be the minimum variance that will afford relief and it should provide the least possible modification of the zoning regulation provision that in question. State any potential impacts caused by the application of your variance and how you intend to minimize these impacts of neighboring properties.

TEP's physical security standards for CIP-014 rated transmission facilities call for a 12-foot wall around the perimeter of the site and to be topped with Ultra-Barrier. A 12-foot wall is ideal because a shorter wall is more easily bypassed by a buddy assisted lift, standard height ladder, or a truck parked in reverse at tail gate height. Increasing the wall beyond these common items requires the suspect to increase their capabilities and bring tools beyond what is normal. Once a person breaches inside they now must figure a way to get out. The 12-foot height creates a formidable obstacle for them on both sides causing the intruder to rethink their attempt and again bring more tools. The height of equipment within the switchyard is often 10-15 feet or higher. The 12-foot height protects approximately 80% or more of the vital equipment and blockhouse, shielding it from ballistic damage and visibility. TEP physical security standard calls for a 12-foot wall because it provides sufficient protection and is more affordable. For comparison, other utility companies have opted for 14-foot or higher block walls. The 12-foot wall represents an acceptable level of risk and a compromise with common zoning regulations.

5. State how the proposed variance is consistent with the general intent and purpose of the zoning regulations.

Section 604.6 of the Cochise County Zoning Regulations states that whenever a non-residential use abuts an area designated as Rural Residential (RR), the developed area of the non-residential site shall be screened with a 6-foot-high solid screen. The proposed physical security enhancements to the site maintain the intent of the zone and simply requests a taller screen.

6. Describe, in detail, the special circumstances that are associated with, and unique to, your property that do not allow it to develop in the same manner as other properties within the same zoning district.

The special circumstance of the Winchester Substation is that the electrical transmission facility is required to meet NERC CIP-014 Standards for physical security. The Winchester Substation, if rendered inoperable or damaged as a result of a physical attack could result in widespread instability, uncontrolled separation, or cascading within an interconnection. The potential regional power outage could result in the loss of life and considerable financial costs. If the facility were to be developed in the same manner as other properties in the RU-4 zone, the site would be vulnerable to attack and fail to meet federal regulatory requirements.