



**JEFFERSON PARK  
NEIGHBORHOOD ASSOCIATION  
P.O. Box 41243, Tucson, AZ 85717**

[www.jeffersonpark.info](http://www.jeffersonpark.info)

March 23, 2021

PDSD  
201 N. Stone Avenue  
Tucson, AZ 85726

**RE: Zoning Request- Case Number SE-20-16**

TEP request for Special Exception Land Use Permit

**The Jefferson Park Neighborhood Association** would like to express its ongoing concerns regarding this project. Jefferson Park is immediately north of the proposed UA North Substation, now known as the Vine Substation, which will sit on the border of our neighborhood, a National Historic District.

**Choice of Site** –TEP’s listed “sensitive sites” are among others, hospitals. It is inexplicable that this enormous substation placement is directly adjacent to a hospital, a densely populated residential area along its western border, and only a half block from our neighborhood, a historic district. The choice of this location by TEP will inevitably result in 138kV poles running directly through our area.

**Use of SF-6 Insulating Gas** - Attached is a 2019 letter from TEP, which responded to a letter provided by JPNA. The JPNA communication listed studies indicating that 1) SF6 Gas is a greenhouse gas and 2) that SF6 Gas is dangerous. TEP’s initial information on SF6 provided only two reviews, both with link errors-one a Toshiba sales website advertisement and the other, an EPA report whose purpose is “to identify, recommend, and implement cost-effective solutions to reduce or eliminate SF6 emissions.” TEP states that JP provided studies, which did not present clear evidence, but then, TEP specifically addressed leaks. So, by their own admission, leaks may occur and are potentially dangerous. Please note once again that immediately west of and north of the substation are residences and the proposed site is adjacent to a hospital.

**Pathway of 138kV 75+ foot poles** -Two of the three options for the pathway of the 138kV poles leading from the proposed substation run directly through this Historic District on residential streets, surrounded by homes. TEP will present their “preferred route”, of the three, to the ACC in August, but have not yet revealed their choice publically.

Currently, eleven neighborhoods and 3 public entities, representing some 20,000+ citizens, have formed an “Undergrounding Coalition”, requesting that the project be slowed to find better routes, and that all lines be placed underground.

We appreciate the opportunity to share our views with the Zoning Examiner. The choice of this specific site was conducted without public input, and information shared only after its purchase by TEP, and with plans well underway. The entire project, the Kino to DeMoss-Petrie 138kV Transmission Line Project, will cut through the very heart of the city and will impact countless homes, businesses and Tucson’s very identity! It is extremely controversial, and to date, there are 1080 pages of comments regarding this project on the TEP website. We continue to try to work with TEP to choose a solution that provides greater safety and is more amenable to the community. We urge you, the Zoning Examiner, to deny the SELUP, and require TEP seek a far safer, less disruptive site. Thank you.

Jefferson Park Neighborhood Association

Cc: Underground Coalition members, JPNA Board, Ward III, Ward VII  
Enc.: TEP response to Jefferson Park re SF-6 gas

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