



**JEFFERSON PARK
NEIGHBORHOOD ASSOCIATION
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April 13, 2021

Planning and Development Services Department
 201 N. Stone Ave.
 Tucson, Arizona 85726

RE: Case: SE-20-16, TEP request for Special Exception Land Use Permit

To Whom It May Concern:

The Jefferson Park neighborhood has numerous concerns regarding this project. Although mentioned only once in the application, Jefferson Park is situated immediately north of the proposed UA North Substation, now known as the Vine Substation. It will sit on the border of our neighborhood, a National Historic District. We have reviewed the document and would like to bring to your attention the following:

Walls: New walls should match the southwestern most walls, be the same height, and be sound proofed when necessary. They should have weepholes, which direct run-off into appropriate catchment systems.

Traffic: The application notes that traffic will be reduced by removing the current U of A Facilities Management buildings and replacing them with a lower intensity use. However, this is inaccurate since the new Facilities Management site and building is moving less than one block away. The same amount of traffic or more will move through the area on a daily basis. Mitigation and traffic calming on Vine should be required, such as a landscaped traffic circle collecting stormwater, at Vine Avenue and Lester Street.

View Corridors: The application notes that the structure will be “on the edge of residential use,” but if the poles remain above ground, regardless of the route, they will go right through residential areas and very likely, in the case of two of the routes, directly through our historic neighborhood. Poles should be placed underground.

Also noted, the Gantry crane with the canopy will be 25' in height, exceeding the height of the surrounding 13.5' masonry wall by an additional 11.5'. This will certainly impact the view of residents from west looking to the east and will affect the sight line of the residents looking from north to south.

TEP is asking for an exception to the 20' buffer on the north side due to the existence of buildings. However, if these buildings are removed, a 20' landscaped buffer should be required in order to shield the neighborhood view of the station.

Hydrology and Drainage: On page 45, the application states “Post-development drainage conditions will resemble existing drainage conditions. The total runoff exiting the Property is expected to be less than or equal to existing conditions...” Exhibit III.C (p47 clearly shows that the run -off is intended to enter Cherry Avenue straight into Jefferson Park. The run-off from impervious surfaces in Banner and the U of A through the Cherry street dead end,-continues to be

a serious problem for the neighborhood. Therefore, any water (not the existing conditions) from the Substation should be directed with the use of weepholes into stormwater basins. The “existing conditions” are very poor, and this is an opportunity to provide some relief. In spite of the fact that Ring Road is considered a “private road” we believe the mitigation for water run off supersedes the UDC rule. The REQUEST FOR RELIEF from the 20’ setback must not be granted and TEP should be directed to create basins and landscape to absorb ANY run-off from the property onto the Ring Road. Below, please find a photo of the flooding at the Cherry-Linden intersection.



Cherry and Linden one block south of Ring Road. The water continues through the wash on the west side then through the neighborhood.

Safety The proposed use of SF6 Gas remains an area of great concern for Jefferson Park. On page 32 of the application, TEP notes, “TEP currently operates a GIS substation near downtown Tucson using SF6, and there have been no leaks or other safety concerns over its 10-year life. In addition, the UA operates a 46kV GIS substation south of this Property at the southeast corner of N. Vine Avenue and E. Lee Street. This substation also uses SF6, and there have been no leaks or other safety issues associated with this substation.” We are grateful that there have been no leaks at either location. However, this larger station utilizing more SF6 is a serious gamble. For the record, the “SF6 gas is the most potent greenhouse gas in existence-in fact, 23,900 times more potent than carbon dioxide.” (New York Times, June 14, 2013, Section A). TEP continues to say that there is no other option, though our studies indicate there is research to show there are other countries who have banned the gas. TEP continues to state that there is no problem, and they will be able to address any leaks. Before making any decision, we request that you, the Zoning Examiner, ask that TEP provide a thorough and comprehensive report citing multiple, updated sources on the pros and cons of the use of SF6 Gas, and most importantly, its use and safety in densely populated urban settings.

We appreciate the opportunity to once again share our concerns with the Zoning Examiner. The choice of this specific site in the midst of an urban area and heavily populated neighborhoods, Banner Hospital to the east, and U of A properties nearby, seems a poor and risky choice. As we stated in our prior communication, the selection of the 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 and businesses. 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. Primarily, we urge you, the Zoning Examiner, to deny the SELUP, and to require TEP seek a far more safe, less disruptive site. Please consider the comments and requests in this letter regarding the substation to mitigate its disruptive presence, should it move forward. Thank you.

If you have questions or concerns, you may contact Colleen Nichols, cnichols17@cox.net or Joan Daniels, jdchama@msn.com, project representatives for the neighborhood. Thank you.

Very Truly Yours,

Colleen Nichols and Joan Daniels

Cc: JPNA Board, Ward III, Ward VI, Underground Coalition members