

**Subject:** FW: [EXTERNAL]Statement to Planning Commission- Proposed TEP Exceptions Study Session  
**Date:** Tuesday, March 15, 2022 at 7:35:49 PM Mountain Standard Time  
**From:** PlanningCommission  
**To:** Daniel Bursuck, Koren Manning

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**From:** COLLEEN NICHOLS <cnichols17@cox.net>  
**Sent:** Tuesday, March 15, 2022 7:32:40 PM (UTC-07:00) Arizona  
**To:** dan.bursuck@tucsonaz.gov <dan.bursuck@tucsonaz.gov>; PlanningCommission <PlanningCommission@tucsonaz.gov>  
**Cc:** John Schwarz <jes@email.arizona.edu>; James Head <jnhead2001@yahoo.com>  
**Subject:** [EXTERNAL]Statement to Planning Commission- Proposed TEP Exceptions Study Session

Dear Members of the Planning Commission,

We, the undersigned, constitute the Steering Committee of the Tucson Undergrounding Coalition. The Tucson Undergrounding Coalition consists of fourteen groups—eleven neighborhoods and three organizations—representing nearly 25,000 Tucsonans. The neighborhoods and organizations are: Catalina Vista, Feldman's, Iron Horse, Jefferson Park, Miles, Mountain/1<sup>st</sup>, Pie Allen, Rincon Heights, Sam Hughes, Samos, and West University plus the Historic Fourth Avenue Coalition, the Grant Road Coalition, and the Tucson Historic Preservation Foundation.

The City of Tucson enacted the gateway and scenic route regulations because the designated routes are especially important to the City's welfare, either aesthetically or economically or both, and thereby warrant safeguarding and special protection. As a result, care must be taken in creating exceptions to ensure that any single exception or any combination of exceptions added together protects and does not undermine the integrity of the route, *which should be a criterion itself written into any set of exceptions added to the Unified Development Code.*

There are also other compelling reasons to restrict exceptions to the gateway and scenic route regulations. In the case of TEP's Kino to DeMoss-Petrie project:

- Our in-depth analysis in our White Paper of a year ago (<http://www.jeffersonpark.info/tep-138-kv-poles.html>, pp. 3-5, 11-13) demonstrates that overheading the transmission lines of that project possesses the potential to reduce property values of Tucson homeowners and businesses within 750 feet of the proposed route to a degree that actually *equals* the extra cost for TEP to underground the project. Tucsonans will potentially pay the extra cost of undergrounding even if the project is constructed above ground.
- Overheading the proposed project cannot be made compatible with the historic areas and residential neighborhoods that it borders and crosses.
- There are numerous sensitive receptors the project passes along the route that will be closer to the transmission lines than TEP's own guidelines call for.
- Our analysis (<http://www.jeffersonpark.info/tep-138-kv-poles.html>, pp. 2-3) finds that the extra expense required to finance undergrounding the proposed route, when divided among all ratepayers (or taxpayers) and expensed in accordance with the time period in state law and regulations, would be small enough as to amount to less than one-twentieth of TEP's last rate increase. In reaching this conclusion, the analysis accepts and uses TEP's own cost estimates, even though those estimates may be inflated. There are also programs available to protect low-income ratepayers from any cost increase.

Thank you for your consideration.

Sincerely yours,  
James Head, Colleen Nichols, and John Schwarz

**Subject:** [EXTERNAL]Agenda item 3. Underground Transmission Line Relief Special Exception UDC Text Amendment (C8-22-04)  
**Date:** Wednesday, March 16, 2022 at 1:11:36 PM Mountain Standard Time  
**From:** Stephen Brigham  
**To:** PlanningCommission, Daniel Bursuck  
**CC:** COLLEEN NICHOLS, John Schwarz  
**Attachments:** 49063377-9F4B-4483-95F3-F29BEE0BFB85.jpeg, PastedGraphic-3.tiff

Regarding the subject Study Session considering special exception for the referenced Transmission line, I will not be able to attend or Zoom in to the meeting. However, I would like to offer consideration to the challenges we have experienced with these massive power poles in our RillitoBend Neighborhood (south of Prince, east of Campbell and south of the Rillito River). While we all lament the out-of-scale impact of the tall poles and lines, an equally difficult issue is the impact of the poles at the ground level—particularly at pedestrian areas—see the attached photo. In the subject area to be discussed at the Study Session tonight, allowing these poles to be installed above ground will have an equally damaging impact on the sidewalks and pedestrian/landscape elements at ground level. I do not recommend allowing any exception that would allow these transmission poles to be installed in any neighborhood area, scenic/gateway route that was not originally planned for this type of massive above ground utility infrastructure.

Thank you for consideration of these comments.





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