

# JEFFERSON PARK NEIGHBORHOOD ASSOCIATION



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

October 3, 2023

## TEP

ATTN: Midtown Reliability  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

To Whom It May Concern:

With the recent re-introduction of the 138 kV transmission line project, now named the TEP Midtown Reliability Project, the problem of overhead lines and massive poles has once again become one of our area's most critical matters. It is a serious and ongoing challenge for the center of the city, especially for our neighborhood. With the proposed Vine Substation remaining in approximately the same location (one block closer), lines coming into and exiting the facility could go right through Jefferson Park. We cannot emphasize enough the devastating effect this impending decision will have on our neighborhood.

Jefferson Park is a historic district and one of only two Neighborhood Preservation Zones (NPZ) in Tucson. Its residences, schools, health care facilities, churches, and contributing historic structures must be preserved. 138 kV poles and overhead lines run counter to all the efforts to preserve this unique part of Tucson. If these lines are permitted to be above-grounded through our community, it will greatly affect the quality of life, damage the historic integrity, the property values, and the viewshed.

It is simply inconceivable that lines and enormous poles will be allowed to pass above ground through a residential neighborhood and historic district, just a few feet from homes, churches, and a nursing home/rehabilitation facility. Jefferson Park should not be expected to shoulder the enormous burden of ensuring that the U of A, UAMC-Banner, and other neighborhoods enjoy upgraded, reliable electric service.

The neighborhood has been actively involved with this TEP issue since it was first introduced to the public in September 2019. We are members of the Undergrounding Coalition, which is comprised of eleven neighborhoods and three other organizations, representing some 25,000 citizens. As a group, we remain committed to ensuring that these lines are not placed overhead through the core of the city.

We expect TEP to 1. Follow the letter and intent of the plans in the study area. Several plans govern the city: Tucson's general plan (Plan Tucson) and the Major Streets and Routes Plan (MS&R Plan). Additionally, many neighborhoods, including ours, are incorporated in the University Area Plan (UAP), which "specifically directs that utility lines be placed underground where possible to mitigate impacts on adjacent uses" (ZE Decision dated 5-13-21; see also UAP at Policy No. 6). At the recent public meeting on September 21, 2023, when asked about following the UAP, a TEP spokesperson replied that he could not describe how TEP would follow the Plan

because there's not yet an official route. However, if the substation remains in the same location, lines will come in and out of the area covered by the UAP. 2. Move the substation to a more industrialized area, and then distribution lines could be placed underground at a fraction of the cost to provide power to neighborhoods. 3. Financially subsidize the cost of undergrounding lines through the heart of the city. The company's shareholders are certainly reaping the rewards of lucrative profits from their investment in TEP. 4. Collaborate with the U of A, who will be one of the greatest beneficiaries of the project, to be more actively involved in finding solutions. Potentially, they could contribute property for the substation in a more industrialized area of campus.

Jefferson Park steadfastly opposes any consideration of running overhead lines and massive poles through our neighborhood. They should not be placed in any residential neighborhood, and the substation should certainly be moved to a more suitable location. Undergrounding is the only consideration for the transmission lines in the heart of the city, thereby protecting the Tucson we want now and in the future. Thank you.

Sincerely,

The Jefferson Park Neighborhood Association

Cc: Mayor and Council  
JPNA Board

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