

Thursday, May 26, 2022 at 12:47:12 Mountain Standard Time

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**Subject:** [EXTERNAL] Letter to the Planning Commission, 2022-5-16  
**Date:** Monday, May 16, 2022 at 9:30:43 AM Mountain Standard Time  
**From:** COLLEEN NICHOLS  
**To:** PlanningCommission, Daniel Bursuck, Koren Manning  
**CC:** John Schwarz, James Head, Bill Craig

Dear Members of the Planning Commission:

We, the members of the Undergrounding Coalition Steering Committee, would like to thank you for the time you have put into this difficult and often intricate problem.

Regarding your meeting on the gateway/scenic route issue this past Wednesday evening, May 11, 2022, several Commissioners requested that the Planning and Zoning staff pay attention to the four criteria that the Steering Committee recommended to be inserted and added to the list of criteria. As a result, we wanted you to have a copy of those criteria. The four new criteria we propose, 12-l to 12-o, are listed at the bottom.

We don't intend any of the criteria as necessarily final language. We see them instead as a way to facilitate discussion about matters that must be tackled for any final decision to be optimal. Indeed, the four criteria attempt to answer a variety of questions that Commissioners themselves raised during Wednesday night's discussion.

We would like to say something about our criterion 12-l in particular. We realize the way that 12-l is written may well require more definition (as do several of TEP's proposed criteria, too). We recommend something along the lines of 12-l because exceptions for the corridors are apparently going to be determined as they relate to individual segments of the corridors. We have demonstrated elsewhere that TEP's stated criteria in combination, when applied to individual segments, could easily permit above-ground construction of industrial-sized power lines that would cover more than half—or even all—of a gateway or scenic corridor. Among other things, we recommend criterion 12-l to make sure that consideration of the overall purpose and integrity of the gateway or scenic route in question must be an essential part of the calculus when individual segments are being considered.

We are most willing to answer any questions you may have or provide any information that is at our disposal.

Sincerely yours,

John Schwarz, Colleen Nichols, Jim Head, and Bill Craig

**Criteria:**

12-l. The effects that can be expected from permitting any of the exceptions listed herein or any combination of those exceptions when added together must remain consistent with the overall purpose and integrity of the gateway/scenic route, unless it is technologically impossible and/or clearly financially cost prohibitive.

12-m. Notwithstanding any of the above criteria, above ground transmission lines are not allowed in or alongside historic areas (as defined by or listed in the National Register of Historic Places, properties or districts, City of Tucson Historic Preservation Zones, City of Tucson Historic Landmarks, or Neighborhood Preservation Zones).

12-n. A utility cannot obtain relief from Gateway/Scenic ordinances by routing through adjacent residential neighborhoods.

12-o. Any new above-ground utility structure that is permitted must be designed, constructed, and also maintained to be as unobtrusive as possible.