Draft Environmental Impact Report Comments

From: Joyce Frazier, 19599 Ave 376[P.O. Box 713] Woodlake, CA 93286

It is clear from the report that there are no good alternatives to the location of the Cross Valley Loop [note all non-line alternatives have been rejected not withstanding the Nation's need to produce clean energy] Anyone in its path will be severely impacted aesthetically, culturally, and agriculturally, and biologically, with a permanent unmitigable increase in air and noise pollution resulting from the installation and maintenance of the line.

The fault in the report is that it so blithely mitigates with words the actual damage it reports. For example, in the Biological resource section, it acknowledges that Route 2 is home to the fairy shrimp, vernal pools, special status plants like Hoovers spurge, the western spadefoot frog just like Route 3. Somehow, with "mitigation", the report wipes out Route 2's ability to claim a Class 1 classification - while retaining that category for Route 3 simply because one mile of the Stoney Corral reserve is encroached upon. It would appear as is often stated in the report, that the actual transmission line path is not final for any of the alternatives. Hence, it can be changed. It would be possible to "mitigate" the biological Class 1 effect on Route 3 by simply going around Stony Corral. At that point, as in any chess game, we would be equally impacted biologically speaking and there would be no preference for Route 3.

One highlight of the report showing some intellectual honesty, was the finding that Route 3 has the least impact on agriculture primarily due to the remoteness of the area and the lesser amount of farmland affected [16.7 acres]

Another highlight in the report is EIR's acknowledgement that while it identified Route 2 as environmentally superior alternative, it was possible that the "Commission could balance the importance of each impact area differently and reach a different conclusion.

Indeed this letter attempts to encourage that rebalancing. I strongly disagree with the report's conclusion that choosing Alternate Route 2 would "have a minimal long-term impact on residents or other sensitive land uses."

The report itself acknowledged Class 1 irreparable harm to Route 2 farm land which includes 9.5 acres of prime farmland, 0.6 acres of farmland of statewide importance and 13.8 acres of unique farmland for a total of 23.9 acres. In comparison, Route 3 loses only 6.6 acres of prime farmland, 0.9 acres of farmland of statewide importance, and 9.2 acres of unique for a total of 16.7 acres.

The report erroneously downplays the effect on Woodlake residents adjacent to the proposed powerline. I am directly in the path of the Route 2 powerline and do not believe that the effect will ever be minimal. The proposed line will pass within walking distance of a number of rural residences, including mine. It will be impossible to ignore, get used to, or avoid day after day and year after year. Clearly Route 3 has less impact on housing and population and should be selected as the preferred route.

Another weakness in the report is to downplay the effect on human health of the hazards of living in close proximity to such a huge electric and magnetic field year after year, day after day. Even though PG&E and the California Public Utilities Commission seem content to "mitigate" rather than eliminate the risk, Appendix B of this report notes that three CDHS scientists in 2002 felt that to "one degree or another" they believed that EMFs can cause some degree of risk of childhood leukemia, adult brain cancer, Lou Gehrig's disease, and miscarriage. Similarly, in 2002, the World Health Organization's (WHO) IARC concluded: "ELF magnetic fields are possibly carcinogenic to humans" based on consistent statistical associations of high-level residential magnetic fields with the doubling of risk of childhood leukemia.

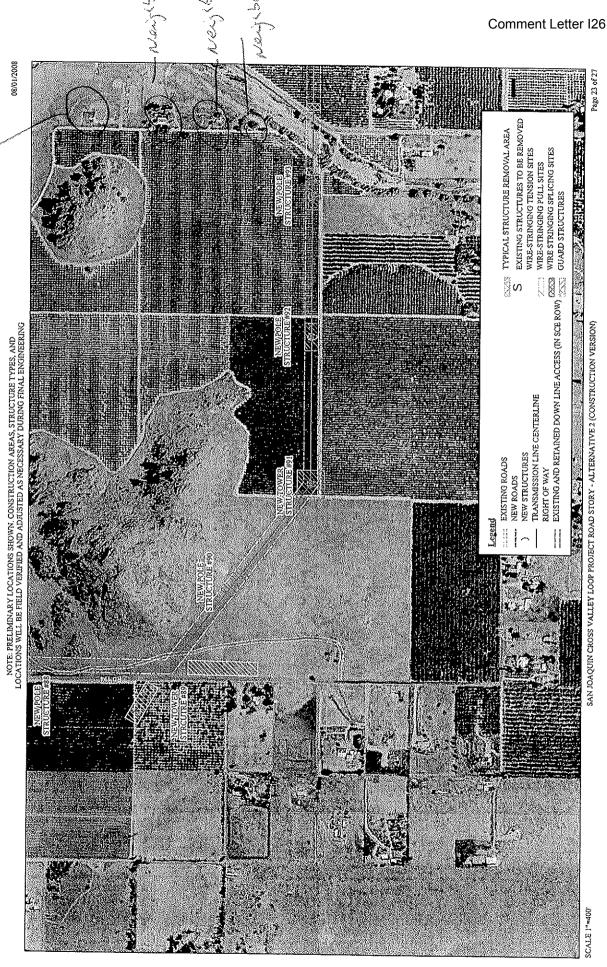
In Conclusion

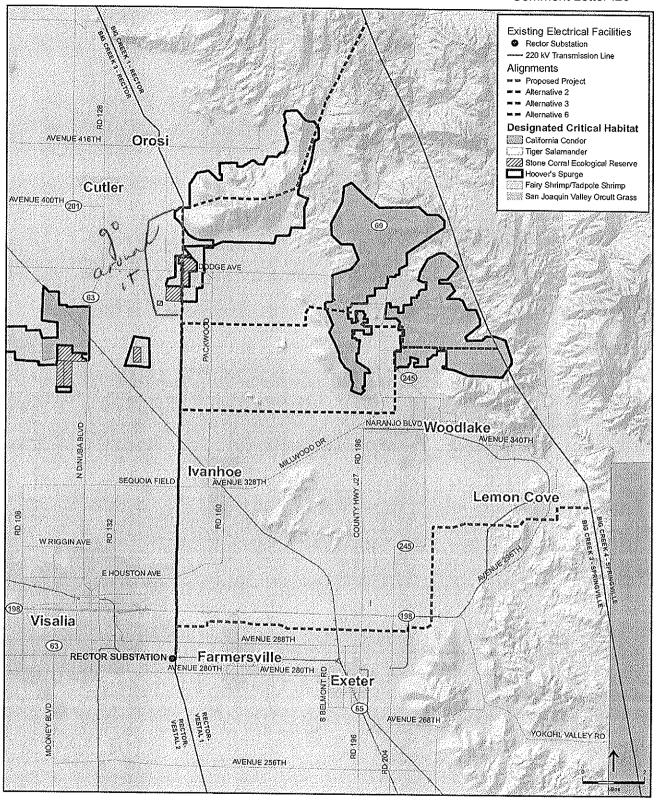
In selecting the appropriate route, this commission should rebalance the equation and select Route 3 as the preferred route because of the substantial unmitigated impact on agriculture and human life along Route 1, 2, and 6. A simple rerouting of Route 3 in relevant locations would mitigate to Class 2 any impact on the fauna and flora located in the Stone Corral Ecological Reserve.

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Figure 4.4-4
Designated Critical Habitat