

P.O. Box 44001
Lemon Cove, CA 93244-0001
July 29, 2009

Mr. Jensen Uchida SJXVL Project (08-05-039)
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104-4207

Dear Mr. Uchida:

I applaud your planning and design acumen in the recommendation of the utilization of the existing right-of-way for the Cross-Valley Loop. This concept reduces EMF exposure to nearby residents of the existing line by more than 80%, provides APLIC*-approved lines that are more friendly to all avian species, especially large raptors, and places the perceived burden on those who reap the greatest benefit from the line. The major shortcoming is that it does not extend farther to the north, to areas void of habitation and cultivation, thus fully exploiting the existing right-of-way through the valley floor. What assurances do we have from Southern California Edison Corporation that the existing lines, as they approach their 100 year anniversary, are compatible with the environment which has grown up around them? Quite bluntly, are they safe? Perhaps this is an investigation germane to the environmental process, as should deficiencies be discovered, those facts would have a bearing on the decision making process. In light of the fact that the Rector-North right-of-way will need rebuilding at some point in the future, arguments against its utilization fall largely on barren ground. The need for integrating this corridor into the City of Visalia's urban fabric should be given much consideration, and given the city's testimony concerning its wishes to improve recreation and housing pattern planning, it would seem that the sooner these lines and their right-of-way could be improved/resolved, the better.

Countless hours of local collaboration and fact-finding have been devoted to arriving at a solution to this problem that is practical, equitable and that will withstand the immutable judgement of time. You have heard much about a locally developed work-around which avoids the impediments outlined in the Draft EIR for Route 3. This Route 3A plan, with its improvements, is consistent with common sense, State policy, and the principals of good design and conservation. Cost criteria design is a false bargain. The alternatives (other than 3 or 3A), only provide us with low initial cost, and make no mention of the bills that will have to be paid in the future: bills of mediocrity, bills of divided communities, and bills of damaged farms, neighborhoods, and vistas. The bills for poor design will keep on coming and never be paid in full.

* Avian Power Line Interaction Committee

Not included in your Draft EIR is a Green House Gas analysis for the City of Farmersville. Farmersville is what is called in popular parlance, a "Food Desert", a community without a major food retailer that would offer the competitive prices that many of us take for granted. Should the proposed project frustrate the community's ability to attract a full service food vendor by dividing and rendering undesirable the last convenient parcel of retail land, the concomitant GHG savings would also be frustrated. These savings are measurable and considerable. This community of 10,000 may conservatively generate 2000 trips per week to nearby markets to acquire food at competitive prices. The closest such markets are 2 miles away, at an optimistic 20 mpg. Thus, 2000 x 52 (wks/yr.) X 4 (miles/round trip) all divided by 20 (mpg.) and multiplied by 20 (lbs.of carbon dioxide/gallon of gasoline burned), and we arrive at 416,000 lbs. CO₂ or 208 tons of CO₂ or about 56 tons of pure carbon every year. To be sure, the Supermarket's GHG production is not calculated, but attrition, market efficiencies and forces, and organic growth should cancel much.

The concept of cumulative negatives has received much attention. I would like to posit there are cumulative positives created by route 3A. Rather than being a solution full of worse and less worse decisions, 3A actually visits benefits on many, has a supportive constituency of its own, and avoids a "death of one thousand cuts" solution that has been so common to our county and state.

Finally, there is a matter of some errata or inconsistencies in the Draft EIR. The Draft is in error in that it states that no daycare facility exists within ¼ mile of the Proposed Project. In at least one instance, a state-licensed one exists, and has existed for some years at 2490 Filbert Street in Exeter, approximately 500 feet from the centerline of Proposed Route 1. The Draft also fails to carefully delineate the routes and elevations of the myriad gravity-delivery agricultural water systems of the area, while simultaneously requiring 3 feet of cover over all utilities under the right-of-way. This may not be feasible with gravity-delivery systems. Additionally, in the Draft description of the land use planning policies, it states that no homes in Lemon Cove would be located to the south of the alignment. In fact, there are more than a dozen homes to the south and southeast of Proposed Route 1. I thank you for your continued diligence and scrutiny of this project.

Sincerely,

William Pensar