

Written comments on the DEIR for
SCE's San Joaquin Cross Valley Loop Project, A0805093
July 30, 2009

Trudy Wischemann
P.O. Box 1374
Lindsay, CA 93247
(559) 562-9095

Dear Mr. Uchida,

I live in Lindsay and consider myself a resident of the Tulare Lake Basin. I have a BS in Conservation of Natural Resources and an all-but-thesis Masters in Environmental Planning from UC Berkeley. I am a writer and researcher on farm structure, land tenure, and rural community development as well as local history. I actively advocate for rural life in this county. I have a weekly column called "HomePages" in the *Foothills Sun/Gazette* where I pursue those subjects in print.

Last September I presented comments on this project at the scoping session in Farmersville where I spoke to two large concerns. The first was the visual impact of Route 1, what is now being called the Proposed Project route. The second was the potential loss of farms and farmland, not only from the construction of the project but from the growth-inducing aspects particularly of Route 1, which appears inordinately convenient for the construction of the J.G. Boswell corporation's proposed Yokohl Ranch development.¹ That development will not only convert Yokohl Valley from rural to urban, redirect agricultural water rights to urban uses, and dewater the canal-lined farmlands below Terminous Dam, but will also trigger the development of those downstream farms into subdivisions and strip malls. In my comments I also suggested that the No Project Alternative be given real consideration.

The Draft EIR does not address any of my concerns.

1. Visual Resources.

The finding of no significant impact of Route 1 on the visual resources of this small, intimate region, which are minimized under the heading of "aesthetics," simply means that you don't know what you're looking at. The Kaweah is the only river in the San Joaquin Valley where you can look right up into its headwaters as you drive toward it, and see where all the water and soil has come from. This fertile basin was the most densely populated region in North America before the arrival of Columbus. It was the first area of the entire San Joaquin Valley to be settled by white folks because the Kaweah is a distributary stream and it was easy to dig the canals and bring water from the Four Creeks to many non-riparian acres. (See

¹ Since that project has already been given two green lights by our county Board of Supervisors, I think it definitely should be considered in the evaluation of growth impacts, whether you are required to do so by CEQA or not.

William L. Preston's *Vanishing Landscapes: Land and Life in the Tulare Lake Basin*, U.C. Press, 1977 for the best developmental history of this area.)

Once past the Big Creek-Rector lines, the views we have from Highway 198 east of Visalia - views of farms and tree-lined canals and channels of the Kaweah, then looking up into that watershed and the Sierra - are precious to most of us who live in this region, not just those who live in the electrical needs area. They are also part of the tourists' experience as they drive to Kings Canyon and Sequoia National Parks. What we all see, particularly from the two overcrossings, are views of a pastoral ecology that includes modern humans, as well as a sense of what the early explorers and settlers might have seen when it was pristine. By and large, it is still a landscape free of the urban/industrial presence these transmission lines represent. Perhaps those overpass views are only a minute or two in length, but those are precious minutes that many of us look forward to on our commutes to the city of Visalia. They provide perspective on a real alternative to the industrialized farming regions to the west, perspective that is enormously needed in this region .

The term "visual resources" goes far beyond mere aesthetics. It includes things that are historically and culturally meaningful, as well as those things that teach us what it means to be human. This landscape isn't just aesthetically pleasing: it is eye food for the soul.

And it was to the earliest explorers, as well as the first settlers, who noted its natural abundance with relish and sometimes passionate vision. For instance, read these words of James H. Carson, a cousin of Kit Carson's, a few days after his arrival in the Four Creeks region:

"(The Kaweah) can be heard when you have gone a few miles in among the Buttes at its entrance on the plain, thundering from the rocky heights of the sun-capped Nevada. Its waters, as if tired of their task, seem to stop to rest in a beautiful small lake, formed amongst the conical hills.

These hills divide the waters (of the Kaweah) at the foot of the Lake into the four streams known to the traveler on the plains as the Four Creeks. These Creeks meander thro' a heavily timbered and beautiful country, some 25 miles, where they empty their waters into the (Tulare) Lake.

Allow me here to digress for a few moments from the tenor of these sketches, and you who admire the beauties of nature, untouched by the hands of man, accompany me to the top of the conical hill that raises its head near the mountain - far above the rest that surround it - and there view the fancy pencilings of the finger of the unseen Hand that formed from chaos this, the most lovely spot in California. Now from its top we see around us a hundred conical hills rising from the plain, smooth and diagrammatically shaped, as if done by the chisel of the artist. Here, too, the Sierra Nevada rises abruptly from the plains - its wall-like rugged sides running almost perpendicularly up, until its spiral peaks are capped with the eternal snows that shine with dazzling brightness from the rays of the rising sun....Here, on the green plain, from where the Buttes rise, can be seen here and there the broad, low-spreading branches of the evergreen oak. The stillness of nature around is only broken by the

thunder of the waters of (Kaweah) River as they come through the rocky gorges of the mountain passes; but, here at our feet, their white foam has died away, and in this crystal lake, where fish of a thousand species sport, they seem to stop and rest before they hurry on to their destination. Now, let us turn and look westward. The oaks, in their majesty, thickly cover the plain for miles around, and stretch away to the shore of the Tulare Lake. Amongst them and through high green grass, meander the Four Creeks. To the right, at the distance of 25 miles, runs the belt of timber, marking the course of Kings River to the lake. On the left is seen, at the distance of 20 miles, the broad body of timber that marks the course of Tule River. The body of land, thus bounded, is the best in the valley - well timbered and watered, and covered with the finest grass in California. Stretching beyond this to the west lie the placid blue waters of the Tulare Lake, whose ripples wash the foot of the low hills of the coast range - the blue tops of which set a boundary to the scene." (From *Bright Gem of the Western Seas: California 1846-1852*, Great West Books 1991, pp. 59-60.)

Carson was not the naturalist that John Woodhouse Audubon was, or the scientific observers that Fremont and Derby were, but he accurately interpreted the tremendous value of this unique place. Please note the photocopy of a drawing of the exact place Carson is standing when he wrote the above description: with the exception of the dam and the small farms on that land, it doesn't look much different now.² It is possible to imagine what Carson saw then while looking at the current landscape now.

The DEIR indicates that there is no significant impact of Route 1 in terms of aesthetics, but that finding is simply wrong. The imposition of this highly industrialized - and highly corporate - form across this scrap of what's left of that rural landscape, a pastoral ecology where humans and other beings still coexist in some kind of productive harmony - would be a desecration, the loss of a landscape that is sacred to many of us who live here and much admired by those who come to see the grandeur of the peaks behind it. The finding of insignificance on Route 1 is one made in ignorance of our history, our community values and the meaning of the term "visual resources."

² From Wallace Smith's *Garden of the Sun: A History of the San Joaquin Valley, 1772-1939*, Second Edition, Edited and Revised by William B. Secrest, Jr., Linden Publishing, Fresno, CA 2004, p. 53.



The "Four Creeks" area of Tulare County, home to many Yokuts tribes, in its pristine state and as recorded by the Pacific Railroad Survey in the 1850s. *Pacific Railroad Surveys*, volume V.

From Wallace Smith's *Garden of the Sun: A History of the San Joaquin Valley, 1772-1939*, Second Edition, Edited and Revised by William B. Secrest, Jr., Linden Publishing, Fresno, CA 2004, p. 53. The hills in the foreground are the Venice Hills.

2. Agricultural Resources.

When it comes to agricultural resources, the DEIR also minimizes my concerns by reducing farms and agricultural viability to the mere calculation of acres of farm land that would be lost under the four scenarios. The Proposed Project (Route 1) is more costly in even this measure than the others, but the numbers suggest that anybody worrying about 2.9 acres of this and 13.0 acres of that, is picking at straws.

The real potential impact to “agricultural resources” will come from what it does to the farms and the farm people: whether the right of way splits their parcels in difficult ways, whether the line reduces their property values and thus their ability to get production loans, dries up a well at an inopportune time, or impinges in other ways on their ability to farm efficiently. But those things aren’t considered in the agricultural resources section. A few, however, are found in other sections.

For instance, the hazards to crop dusters are listed under Hazards and Hazardous Materials. The DEIR notes that nationwide over the first 11 months of 2008, 63% of all cropdusting crashes were a direct result of having struck a power line or pole. After noting that some of the biggest dangers occur with new rights-of-way and the creation of right angles, the DEIR states that “the Proposed Project (Route 1) would represent a potentially significant hazard to aerial sprayers because it would create a right angle to the existing Big Creek-Rector transmission lines within an agricultural use, and it would result in approximately 15.5 miles of new 120- to 160-foot poles/towers and conductors within or immediately adjacent to existing agricultural fields, orchards and vineyards where no such structures currently exist.” Unbelievably, the report then decides this danger is mitigable simply by informing all the local pilots of the location of the new lines.

Obviously whoever wrote this section does not live in an agricultural area. Crop dusters don’t bite the dirt because they don’t know where the lines are: they die because they miss, they have an accident. My small community of Lindsay has lost 2 pilots to power lines in the last 20 years, and their stories have not been forgotten. But the DEIR does not calculate the potential cost in lives to this deadlier route, much less the cost to farmers of this increasingly difficult way of getting one’s crops sprayed.

The same problem is true with the potential impact on farmers’ wells. What little evaluation was done is to be found in the Hydrology and Water Quality section, where the possibility of temporary dewatering and possible groundwater contamination was considered, but found insignificant, while the impact of those insignificances on the farms and farms families was not evaluated at all.

There is no cumulative impact on agriculture evaluated using even the few shards of potential impacts identified in other sections. The DEIR is significantly inadequate in terms of evaluating impacts on agricultural resources.

3. No Project Alternative.

My third complaint is that the No Project alternative has not been evaluated seriously. In every paragraph where it is discussed, the authors simply say there would be no impact because there would be no project. As of this writing, we do not have even the smallest idea what the costs might be of the no project alternative, or the potential benefits. On page ES-11, **Class IV: Beneficial impacts** are listed, but not one shows up in this document. If Edison isn't allowed to build this project, perhaps land developers won't risk their capital to build subdivisions because of the uncertain supply of electricity. That could be a beneficial impact.

The finding that this project will not induce growth is a joke, especially Route 1. The dismissal of Alternative Route 4 from consideration, which according to one county supervisor was received as an affront by representatives of the Boswell corporation when they saw that line on the map, only adds credence to local perceptions that Route 1 is preferred because it will make it much easier to sell electricity to the 40,000 new residents of Boswell's planned city called Yokohl Ranch. It is disingenuous to claim otherwise.

C. Conclusion: What this Draft EIR has done is dis-integrated our environment into shreds called "major issue area categories," which is opposite the original intention of an EIR. It's like what happens when you start to unravel a rope. Imagine that we are this piece of rope, which has strength when all the strands are wound together. But when you start to unravel it, you can say "Look here, this strand is weak, I can break that, it has no importance - and the same goes for that one, and that one...." Those threads *are not* the rope, you *can* unravel it - but then you don't have a rope.

As I said last September, I cannot stress enough the importance of keeping the land between Visalia and Terminus Dam in its current state of development as rural farm land for the way it constantly reminds us who and where we are, and what we have: the incredible productivity of this land and water and the hands that work it. This land, that water, and those hands are God's Providence, His way of caring for us. As a people I think we are desperately in need of learning that, and this is the place where it still could happen. But not if you make it easy for Boswell, and harder for the little guys who are still trying, and are actually *able* to make it on 40 acres or 160 of this incredibly fertile, well-watered land.

Please review your determinations of insignificance of impacts on visual resources and agricultural resources by giving them deeper, more thorough examination. Please also expand and amplify the No Project alternative. Look also at the differences in parcel size and ownership between Routes 1 and 3. You'll see that far fewer *farmers* are impacted by Route 3 than Route 1, with no corners for those cropdusters to get caught on. Those cropdusters' wives will thank you, as will I.

Yours sincerely,

Trudy Wischemann

