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Sent: Thursday, July 30, 2009 3:33 PM
To: San Joaquin Cross Valley Loop Project
Subject: Docket # A08-05-039 "San Joaquin Cross Valley Loop Transmission Project"

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Comments on the DEIR – July 30, 2009

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Thank you for all of your work on the DEIR and thank you for coming to Visalia on the 23rd to give us an opportunity to voice our opinions.

The purpose of my letter is to ask a number of questions, make comments and hopefully make this DEIR and future ones better. Please be patient with my views and comments. They may be long as my thinking is sometimes circular and complex.

I would like to talk about an easy section of the DEIR but being from NYC and having lived here only 5 years I have to question the aesthetic evaluation of the area. I have to respectfully disagree with your conclusion that all routes are the same. In fact I totally disagree and feel your conclusion and assumptions are totally in error and display faulty thinking and conclusions.

In the area of construction or farm land it's easy to evaluate the differences because there are numbers and comparisons to follow. **My question is when it comes to aesthetics do you have a matrix or formula or mathematical equation that you use? If not, why not.**

1. **How can adding an additional 17.4 miles of new power lines be esthetically the same as upgrading an existing ROW?** The old towers already exist. The impingement on sight already exist. So if you do not use the existing ROW and create a new 17.4 miles of power line, this fact of necessity has to be a negative. A new 17.4 miles will impinge on the landscape and aesthetics.

I would create a scale ie: Improving an existing ROW would be a +80 points for aesthetics. Creating a new 17.4 miles of power lines would be a -80 points against good aesthetics. **How can adding 17.4 miles not be considered as a negative?**

2. Route #1 would have 9.2 miles along hwy 198. Your report 4.1-18 says that 30,000 cars per day travel hwy 198 east of Lovers Lane. 30,000 cars per day X, s 365 days in the year = 10,950,000 cars a year. Let me spell it out for effect, **an**

extra 10 million, 950 thousand extra cars will be seeing the New power lines along route #1 each year. Each car will travel approximately 10 minutes along this stretch of road so multiply this factor in also.

How can an extra 10,950,000 cars seeing power lines for 10 minutes each not be considered a negative or less aesthetic?

3. Route #1 has 2 extra crossings of hwy 198. One in Exeter about 15 mile further East and closer to the Sierra Mountains and the other in Lemon Cove about 20 miles further East and closer to the mountains and National Parks. Two points here. The increased number of cars passing these two points has to be calculated into the equation. **How can 2 extra crossings of hwy 198 not be considered a negative?**

Also the closer you get to the foothills, the more beautiful the area becomes as evidenced by the process of making the eastern part of hwy designated as a Scenic Hwy. I would score these as a -15 aesthetically for the Exeter crossing and -20 for the Lemon Cove crossing to correspond to the number of miles closer to the mountains.

4. **A power line going through a small city like Farmersville has to have a larger percentage impact on its population.** I would say that 70% of the people will see and be negatively affected. Because of the much smaller number of square miles the city occupies, you literally will not be able to escape from the power lines. This would make it a -70 on my aesthetic scale. A smaller area, like a pebble being thrown into a small pond, will of necessity feel the biggest effects as the same pebble being thrown into a larger pond that's 12 times larger.

Visalia has 125,000 people in it. The number of square miles is much, much greater and the power lines are on the Eastern most point of the city of Visalia. I would give this a -20 on the aesthetics scale because at most it may effect 20% of the towns total population..

5. **The DEIR has NO chart showing on ONE page a graph of the height of the existing poles in the area in comparison to the new poles and towers being proposed.** A telephone pole is 40 feet, the height of the existing wood power lines some 60 and others 90 and the new proposed poles of 120 and 160 feet. If this DEIR is a public education document, the public should be graphically informed. Again here, I'd have to give the higher pole a higher negative on the aesthetic scale. I made my own chart which was one inch = ten feet and the scale of difference was drastic. These new poles are 3 and 4 times higher then most existing poles. They are actually monstrous in size in comparison to what currently exists in out area.

Most of the Local residents have no understanding nor comprehend the extreme height of these new poles and it should be clarified in one comparison size chart.

6. Are the “simulation” pictures in 4.1-3b etc based on a true mathematical scale and equation. **Have you verified that the scale of pole feet in each picture representation is accurately represented?** They appear to be fictitious, false and completely inaccurate. I would like to have an outside verification that we are not being misled. The new poles look exactly the same as the existing poles when they are double the size.

I saw no pole simulation pictures by existing community developments. If you are to be giving accurate representation on aesthetics why is there NO full community impacts pictures shown. Badger Hill is probably the only Community of 80+ homes that will be looking directly at a tower and poles or looking down at the tower and poles. There is No representation or simulation of this. Badger Hill is one of the most upscale communities of Tulare County, I would guess a \$100,000,000 million dollar complex and it has been totally neglected in the calculations.

My home sits at the 1,000 foot elevation level. Many homes are lower and much closer to the power lines

7. Route #1 would cut through 17.4 miles of mostly new ROW. Let’s say 15 miles of this new ROW is farm land. Our farm land here consists mostly of orange, peach, plum or walnut trees. **How can removing 15 miles of trees because it’s a new ROW not be considered more of an aesthetic negative?**

My impression of your conclusion in regard to Aesthetics, table 5-2 where you say that as far as esthetics go, **“there is no preference”** on any route proves, that your conclusion that **“all routes are created equally”** to me proves that the decision was not based on any logical calculations, reasoning or plain common sense.

What I hear as your reasoning is, “There are poles already in the area and the vista is large, so more pole won’t matter.” Your conclusion is based on an assumption and is truly faulty thinking.

If the addition of these new poles does not matter, do you know the saturation point or have a formula of when they will matter. If you were a photographer and tried to take a picture of the scenery without any power or telephone line in the picture you would have a different view.

The famed architect, Frank Lloyd Wright, fought against a power line project in Arizona. His point of view was that all power lines should be buried because they represented a serious blight to the landscape, beauty and aesthetics of the area. So it seems we have 2 totally contrasting points of view from no poles to adding more poles is just fine.

Both conclusions are subjective.

Evolution of thought is needed here. Once NYC (1900's) had an excess of wires above it's city streets until a major snow storm caused them all to come crashing down. They were then wisely put underground.

Once most major East coast manufacturing cities were dotted and filled with coal burning power plants. Then we learned about the health hazards' and pollution. We evolved into cleaner energy producing power plants.

A formula, matrix or scale of some kind is needed. We must evolve in this discussion on aesthetics. Your DEIR had no numerical listing of the number of complaints on aesthetics voiced before you in the November public hearing or in the written protest. When the Administrative Law Judge, the Honorable Hallie Yacknin was here, many voiced their opposition to route 1 over aesthetics. Maybe this gets registered in another section of the trial.

I am asking you to please reconsider your conclusion that there is no preference aesthetically on any route. Common sense would have to dictate that using an existing ROW vs creating a new 17.4 mile ROW would be detrimental to the aesthetics of the area. **I think you would have to, at the very least, declare that route #1 has a SLIGHTLY more negative effect on aesthetics as compared to the other routes.**

Using more of an existing ROW conforms and meets the Garamendi Principles in SB2431.

Thank you for your time and consideration. Please listen to the people in this area. Route #1 along a scenic highway which leads to the foothills and National Parks and crosses hwy 198 in two additional spots is essentially a negative on aesthetics as compared to using the existing ROW.

So I think you made a correct decision in your analysis in preferring another route besides route #1 but I essentially believe the condemnation against route #1 should be even stronger by claiming it has a more negative effect on the aesthetics then the other route.

Kind Regards,
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