
From: Mary Amanda Gorden [mailto:magorden@msn.com]
Sent: Friday, July 31, 2009 3:56 PM
To: San Joaquin Cross Valley Loop Project
Subject: CPUC A.08--05-039

To: Mr. Jensen Uchida
San Joaquin Cross Valley Loop Transmission Project
c/o Environmental Science Associates
225 Bush Street
San Francisco, CA 96104-4207
sjxvl@esassoc.com

Subject: CPUC A.08-05-039
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Date: July 31, 2009

From: Mary A. Gorden
P.O. Box 44066, Lemoncove, CA 93244
559/597-2373
magorden@msn.com

Gorden Ag has farmland affected by each route. I am a retired historian/archaeologist. I will speak to the value of cultural resources and community values of the people in the area affected by the proposed lines.

DEIR General Comments:

The DEIR inadequately addressed the significant prehistoric sites and historic infrastructure of the farm land, assuming that all cultural resources (4.5) can be mitigated to less than significant, and by doing so dismisses the prevailing Community Values of the Foothill communities. Community values are rooted in the prehistoric and historic past and are a component of a person's identity. The term, Community Values, implies rootedness, a home place which has deeply felt emotional attachments that are concurrent with kinship ties and friendships. At the two public SCE meetings held in Visalia, many of the comments reflected the community values that Sierran foothills residents hold. Native Americans expressed their attachment to the land and the concern that their burial and sacred sites be respected. The agricultural community has spoken out about their concerns. Community members formed P.A.C.E to give a united voice in opposition to SCE's proposed routes.

Landscape archaeology can be thought of as the face of a place. It encompasses the environment, as well as the people and their culture. In addition to the physical environment, landscape archaeology is concerned with the location in which people live their lives. Trees, rocks and buildings are viewed as meaningful things that are located ontologically and experientially in people's lives and social practices. Farming

communities, farm companies, irrigation districts, and multigenerational farm families are some components in the Tulare County foothills that define an archaeological landscape. Alternates 1, 2 and 6 have a built environment made up of outbuildings, such as barns and water towers, frost protection equipment, wells and irrigation systems. A number of these elements are historic.

Negative cumulative social impacts:

1. The junction of Hwy. 198 and 65 is an example of encroaching urbanization and industrialization. As noted by the DEIR, “The visual quality from these viewsheds is considered indistinctive due to the industrial nature of the foreground views as well as the lack of natural or cultural resources that are typical of this region” (4.1-10). The industrial nature of the view is primarily due to the Venida substation, an SCE installation. The proposed 120 - 160' foot towers will add to the “industrial nature of the view” as they traverse the landscape. This will result in a significantly cumulative impact.
2. The industrial towers will contribute to viewshed degradation. Loss of views of the foothills and Sierra Nevada Mountains impacts our community values. We appreciate the view. It is a part of who we are.
 - a. Alt. 1 requires two new SR 198 crossings, in addition to the existing right-of-way crossing. Two major new 220 KV crossings of this scenic corridor are extremely disruptive.
 - b. “Existing transmission lines, as well as other existing utility structures, are established features within the study area’s landscape setting” (4.1-2). What SCE fails to note is that the existing transmission lines, existing utility structures, homes, farm buildings or orchards are nowhere near as tall as the proposed 120-160' transmission towers that, will indeed, tower over the existing landscape.
3. Loss of farm land and farm related jobs impacts our historic way of life and, in turn, our community values. People’s testimony at the SCE meetings revealed that the encroaching transmission towers and electric lines threaten to degrade their way of life . These feelings are heightened by the language in the DEIR that trivializes our resources and states that almost every resource can be mitigated to a level of insignificance. Our rural land owners will give up their land and disrupt their lives so SCE can transmit power to the cities. The transmission lines benefit others, not us.
4. The following are some examples of the potential problems to prehistoric cultural resources.
 - a. CA-TUL-16 along Alt. 1 “may be within the alignment and could potentially be impacted by the Proposed Project” (4.5-14). Comparing DEIR Figure 2-3b with the site report US Geological Survey, Exeter Quadrangle 7.5 minute map and the site map included in the Site Survey Record for Tul-16, it is a high probability that the transmission lines transect the site and the position of the new tubular steel pole is slated to be built on the northeast portion of the site, which will cause considerable subsurface disturbance.
 - b. The line on Alt. 2 and 4, where they join, the DEIR states that “A greater portion of Alternate 2 runs through the more sensitive foothill areas than the Proposed Project. In addition, Alternative 2 runs through less developed land and therefore

may contain a greater number of unrecorded archaeological resources.” I agree with these statements and would add that the area along Alt. 2 contains eight known sites. Three of which have village names, *Awnew*, *Wipanche*, and *Wuknow*. This area has special significance as the Yokuts creation place. Also included in named places along the SCE route is *Bawsu*, a spirit who lived in a certain hill (Latta 1977: 11-13, 184 and Gayton 1948:59). The DEIR is distressingly casual concerning the importance of these sites to the Native Americans and to the impact of their destruction on the community values that these sites embody. Foothill Yokuts have not been extensively studied, which makes the known sites more significant than might be otherwise.

Incrementally cumulative impacts:

1. Transmission towers and electric lines are growth-inducing where they cross or parallel small parcels because this acreage is no longer economically viable as farm land and will be sold or converted into housing or other commercial uses, 4.2.5 (4.2-16 – 4.2-17).
2. Degradation of the viewshed, which has already been compromised by the transmission lines and facilities.

Mitigation Measures to minimize impact:

Create the Agricultural Advisory Committee as proposed by the Tulare County Farm Bureau and the California Farm Bureau Federation to deal with mitigation issues.

Alternate 3, with mitigation or avoidance of the vernal pools near Seville, should be chosen because it follows the existing rights-of-way, with the least impact to crops, farm infrastructure, historic and prehistoric cultural resources and community values.

REFERENCES CITED

- Gayton, Anna H. 1948. *Yokuts and Western Mono Ethnography*. University of California Publications in Anthropological Records, X., Berkeley.
- Latta, Frank F. 1977. *Handbook of Yokuts Indians*. Santa Cruz: Bear State Books.