

**William McCay Nevins
Adele Forbes Morse Nevins
3006 Picholine Drive
Livermore, CA 94550-9677
925 245-0252
wmnevins@gmail.com
dellienevins@aol.com**

June 21, 2009

Mr. David Young
NEPA Document Manager
Western Area Power Administration
114 Parkshore Drive
Folsom, CA 95630

CERTIFIED MAIL — RETURN RECIEPT REQUESTED

Dear Mr. Young:

We understand that TANC proposes to build a 600 mile long high voltage transmission line to bring “green” power from Lassen County, south to Tracy, and then through the Livermore Valley to Newark and Santa Clara. We live in the South Livermore Valley and believe that the TANC TTP West transmission line would have an unacceptable impact on the Livermore Valley. Our alarm at the prospect of another line of unsightly high voltage transmission towers marching through the scenic South Livermore Valley motivates the comments in this letter. While we are mainly concerned with the impact of this project on the South Livermore Valley, we understand that residents from Lassen County south as far as Modesto have similar concerns regarding the impact of this ill-conceived project on their environment. We sympathize with their concerns, and trust that, after carefully considering all comments, the entire TANC TTP project will be abandoned.

You must address the following issues:

- 1) **CONSIDER THE “NO PROJECT OPTION”.** Will any public interest be served by the construction of the TANC power line?
 - a. **THERE IS NO “GREEN” POWER IN LASSEN COUNTY.** At present there is no significant source of “green” power in Lassen County. No

argument has been presented that Lassen County is particularly suitable for the type of solar and wind power plants envisioned in the TANC proposal. In fact, Lassen County ranks at the bottom overall in the RETI study referred to in the TANC documents for renewable energy yield versus cost.¹ This RETI study concludes that the overwhelming majority of California's most economical and least environmentally destructive wind, biomass, geothermal and large solar sits in the Mojave Desert and its surrounding mountains. Clearly, "green" power does not need to be located in Lassen County. It could be located closer to the proposed end user (Santa Clara, in the case of the TANC TTP West Segment), thereby reducing the costs of building transmission lines and reducing transmission losses after they are constructed. If the primary purpose of the TANC TPP West Segment is to transmit "green" power from Lassen County to the Bay Area (as represented to the public by TANC representatives at the May 27th 2009 public meeting in Livermore and in the handout titled "TANC Transmission Project"²), it would appear that this project amounts to a \$1.6B subsidy of Lassen county land owners by the rate payers of TANC TTP participants — that is, the utility rate payers of the Sacramento Municipal Utilities District, the Modesto Irrigation District, the Turlock Irrigation District, and the Cities of Santa Clara and Redding. Why should these citizens pay higher electric rates to subsidize those Lassen County landowners who imagine that they can benefit from generating and selling renewable energy?³

¹ See http://www.energy.ca.gov/reti/documents/phase2A/2009-06-03_PHASE_2A_DRAFT_REPORT_APPENDICES.PDF for RETI's conclusions regarding desirable sources of renewable power in California.

² The one-page handout, "TANC Transmission Project," is available at <http://www.tanc.us/content/view/102/82/> where it is denoted "Fact Sheets 03-25-09"

³ It has recently been brought to our attention that, under Federal Energy Regulatory Commission rules, the cost of the TANC power lines may be born by all

- b. **CONSIDER LOCAL GENERATION.** The \$1.6B estimated cost of the proposed TANC power line might, instead, be employed to subsidize the installation of “green” power near Santa Clara (or Redding, Modesto, Sacramento, Turlock, or other end users). Silicon Valley industries are currently working hard to develop photovoltaic solar panels with the goal of an installed cost of \$1/Watt.⁴ Urban power generation with photovoltaics is already happening in the Santa Clara Valley — Google recently installed “solar trees” which generate 1.6 MW of solar photovoltaic power over a parking lot at their Mountain View headquarters.⁵ A 10 MW solar photovoltaic installation will be completed in Chicago later this year.⁶ We understand that Santa Clara consumes far more than 1.6 MW, but they also have far more than one parking lot or flat-topped building where a photovoltaic array might be installed. A study focused on urban generation of alternative energy in the San Diego area concludes that a “\$700 million budget would incentivize the installation of 1,030 MW of photovoltaics”.⁷ Hence, we can reasonably expect that a subsidy of \$1.6B would lead to the installation of more than 2 GW’s of solar power near where it will be used. Why isn’t this an environmentally (and economically) preferable solution? The sun shines just as brightly in the Bay Area and Central Valley as it does in Lassen County; and the wind blows here as well.
- c. **IS THERE REALLY ANY NEED FOR MORE GREEN ENERGY IN SANTA CLARA?** Silicon Valley Power (owned by the City of Santa Clara) already exceeds the State of California’s 2020 goal of getting

utility users in Northern California — all the more reason to stop this ill-thought-out project!

⁴ See, for example, <http://www.solarplaza.com/article/solar-module-sales-price-of-1-per-watt-no-longer> for a discussion of solar power costs.

⁵ See <http://science.qj.net/Google-headquarters-will-be-running-on-solar-energy/pg/49/aid/69654>.

⁶ See http://www.gearthblog.com/blog/archives/2009/04/largest_proposed_urban_solar_power.html.

⁷ See “Full Report” tab at <http://www.sdsmartenergy.org/smart.shtml>. The cost of subsidizing photovoltaics is discussed in Sec. 10.2.2 on pg. 49.

20% of its power from renewable sources. They presently get about 30% of their power from renewables.⁸ At present, none of the “green” power marketed by Silicon Valley Power comes from Lassen County. Some is generated locally in the Bay Area (Mountain View, Santa Clara, and Solano County), and the rest is imported from Southern California. Silicon Valley Power aggressively markets its renewable energy at a higher rate than conventional electric power,⁹ and evidently views the TANC TTP West as a means of expanding this revenue stream. In the event that demand for “green” power should exceed Silicon Valley Power’s supply at some time in the future, Silicon Valley Power can solve this problem by simply cutting back on their aggressive efforts to market “green” power. I can understand that selling “green” power may be part of Silicon Valley Power’s business plan — even municipal utilities are in business to make money (as demonstrated by their behavior during the California electricity crisis of 2000 – 2001). What’s less obvious is why their strictly economic interest in “green” power should allow TANC to acquire land from unwilling sellers in the South Livermore Valley through the process of Eminent Domain, and use this land for a purpose utterly inconsistent with the South Livermore Valley Area Specific Plan.

- d. **ALTERNATIVE SUPPLIERS OF GREEN ENERGY.** At present, TANC is not the major supplier of electrical power to the Bay Area. The major supplier of electrical power to the Bay Area is Pacific Gas and Electric (PG&E). PG&E has announced plans to both generate green energy

⁸ See <http://www.siliconvalleypower.com/res/?sub=renewfaq> for a breakdown of Silicon Valley Power’s energy supplies into conventional and renewable power.

⁹ See <http://www.siliconvalleypower.com/bus/?doc=greenbus> for an example of Silicon Valley Power’s marketing of “green” energy.

itself, and partner with others to generate green energy.¹⁰ One assumes that much of this electrical power is destined for the Bay Area since this is where many of PG&E's customers are located. One also expects that PG&E plans more renewable energy generation for the same reason emphasized by TANC's representatives — the need to meet the State of California's mandated goal of generating 20% of the energy consumed from renewables by 2020. If PG&E is prepared to meet Bay Area demand for "green" energy, the proposed TANC TTP West transmission line is unnecessary.

- e. **DELAY THE TANC PROJECT.** The TANC TTP projects should be delayed until the State of California develops a comprehensive plan for upgrading its power transmission system. Given the absence of existing sources of "green" power in Lassen County which might be transmitted to the Bay Area, the existence of viable alternative sources of "green" power (local generation and reduction of demand for green power consistent with the 2020 goal of 20% renewable power), and the likely competition with the TANC project from the incumbent utility in the Bay Area (PG&E) it would appear prudent for the State of California to develop a comprehensive plan for upgrading the State's power transmission system before considering approval of the TANC TTP West transmission line. It is unacceptable to string multiple high voltage transmission lines through scenic areas, like the South Livermore Valley, to satisfy the ambitions of every consortium of power companies seeking to benefit from possible increases in demand for electric power in the Bay Area.

¹⁰ See, for example, http://news.cnet.com/8301-11128_3-10171036-54.html and http://www.greencarcongress.com/2007/02/pacific_gas_and.html for some recent examples of PG&E's renewable energy projects.

2) **ALTERNATIVE ROUTES.** In the unlikely event that any interest remains in the proposed TANC TTP West transmission line after considering the very attractive “no project” option, it is necessary to consider alternative routes because the proposed routes through the South Livermore Valley present an unacceptable visual blight to the scenic South Livermore Valley.

a. **LOCATE THE TRANSMISSION LINE UNDERWATER.** The TANC transmission line could be routed through Solano County to Suisun Bay, underwater through the Carquinez Straights to the San Francisco Bay, South (still underwater) to Mountain View, and finally overland to Santa Clara. High voltage DC transmission lines have been located underwater in the past — the NorNed HVDC link, which connects the power grids of Norway and The Netherlands through the North Sea using a 580 km underwater HVDC cable with a rated capacity of 700 MW, was commissioned in 2008.¹¹ Less ambitious is the Trans Bay Cable Project, a 53 mile long underwater HVDC cable system over a route similar to the one we propose here. The Trans Bay Cable Project runs between Pittsburg (on the Suisun Bay) and San Francisco with a rated capacity of 400 MW. It began construction on Dec. 15, 2007 with completion scheduled for 2010.¹² Underwater HVDC transmission lines have low visual impact. The Trans Bay Cable Project passed an extensive environmental review. Clearly, this is a practical method of transmitting power. PG&E showed consideration for Bay Area cities by putting its line to San Francisco underwater and out of sight. Perhaps TANC could do the same with its line to Santa Clara?

¹¹The NorNed underwater HVDC transmission project is described at <http://www.abb.com/cawp/gad02181/8c5558c304d0eb13c1256f77003a33a1.aspx>

¹² Information about the Trans Bay Cable Project may be found at <http://www.transbaycable.com/> and <http://eastbay.bizjournals.com/eastbay/stories/2007/12/17/story7.html>.

b. **LOCATE THE TRANSMISSION LINE SOUTH OF MT. HAMILTON.** All of the routes proposed for the TANC TTP West transmission line pass through the scenic South Livermore Valley, blighting our landscape and thereby presenting an unacceptable environmental impact. An alternative route for an above ground transmission line, which would not have an unacceptable visual impact, would be through the largely uninhabited area south of Mt. Hamilton. The power could be routed south from Tracy on the existing transmission lines generally parallel to Interstate 5 past Santa Nella; Then west, generally parallel to Highway 152, to the Santa Clara Valley; and finally north through the Santa Clara Valley to Santa Clara. This route offers greater justice, in that those who might benefit from the proposed transmission lines (the residents of the Santa Clara Valley) would suffer the visual impact of these unsightly power lines. Perhaps this would diminish their enthusiasm for this unnecessary project?

c. **ROUTE THE TRANSMISSION LINE OVER MT. HAMILTON.** Alternatively, the power could be routed south from Tracy on the existing transmission lines generally parallel to Interstate 5 until it reaches Patterson; then west generally parallel to Highway 130 until it reaches the Santa Clara Valley near Alum Park. From there it would travel further west through the Santa Clara Valley to the City of Santa Clara. This route would minimize the suburban area outside of the City of Santa Clara suffering the visual impact of the unsightly proposed TANC TTP West transmission lines.

3) **MITIGATION OF THE VISUAL IMPACT.** In the extremely unlikely event that neither the “no project” option nor one of the very attractive alternative routes described above are chosen, it would become necessary to mitigate the visual impact of the unsightly TANC TTP West transmission lines as they pass through the scenic South Livermore Valley. Development in the South Livermore Valley is governed by the South Livermore Valley Area Specific

Plan.¹³ The South Livermore Valley Area Specific Plan was adopted in 1993 to ensure an orderly development of the South Livermore Valley. This award-winning plan allows limited residential development consistent with maintaining a healthy wine industry in the Livermore valley.¹⁴ Its successful implementation has preserved a bucolic paradise on the fringe of the metropolitan Bay Area.



The proposed TANC TTP West Transmission lines are utterly inconsistent with this plan in that they would introduce an unacceptable visual blight to the scenic South Livermore Valley. The picture above shows the view from the corner of Hansen Road and Arroyo Road, looking south toward Wetmore Road. This scenic vista is typical of the South Livermore Valley wine country.

¹³ Information about the South Livermore Area Specific Plan can be found at <http://www.ci.livermore.ca.us/CDD/Planning/planning.html> .

¹⁴ See <http://www.lvwine.org/> for information about how the Livermore Valley wine industry has thrived under the South Livermore Area Specific Plan.

The two proposed routes for the TANC TTP transmission lines cross near the corner of Arroyo Road and Wetmore Road. They then pass through this viewshed from left to right immediately in front of the viewer. If these transmission lines are built, this viewshed will be changed from the Arcadian paradise pictured above to something more like an industrial park.

There is, fortunately, some room for compromise. The South Livermore Valley has the misfortune of already having several high voltage transmission lines which cross the South Livermore Valley on routes somewhat South of those proposed by TANC (one of these lines is visible in the background of the picture above). Naturally, the residents of the South Livermore Valley would like these unsightly transmission lines removed from their viewshed. A solution which would be consistent with the South Livermore Valley Area Specific Plan, and offer advantages to all parties, would be for TANC to pay for placing both the proposed TANC TTP West high voltage transmission line and the existing high voltage transmission lines underground, thereby improving the aesthetic values of the South Livermore Valley while allowing TANC to use what they evidently see as the most desirable route for the TTP West transmission lines.

We believe that the TANC TTP West segment is unnecessary and that the proposed routes are inconsistent with the South Livermore Valley Area Specific Plan because the proposed transmission lines would be an unacceptable visual blight on our beautiful valley. We trust that, after all comments are considered, this ill-conceived project will be abandoned.

Sincerely yours,

William & Adele Nevins
3006 Picholine Dr.
Livermore, CA 94550

cc: The Honorable Dianne Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104

Congressman Jerry McNerney
5776 Stoneridge Mall Road - #175
Pleasanton, CA 94588

Senator Loni Hancock
1515 Clay Street - Suite 2202
Oakland, Ca 94612

Assemblymember Joan Buchanan
State Capitol
P.O. Box 942849
Sacramento, CA 94249-0015

Supervisor Scott Haggerty
1221 Oak Street - Suite 536
Oakland, CA 94612

Marc Roberts, Community Development Director
City of Livermore
1052 South Livermore Avenue
Livermore, CA 94550-4899

City of Pleasanton
City Manager Nelson Fialho
P.O. Box 520
Pleasanton, CA 94566

Chris Chandler, Executive Director
Livermore Valley Winegrowers Association
3585 Greenville Road, Suite 4
Livermore, CA 94550

Dick Ryon, President
Friends of the Vineyards
P.O. Box 1191
Livermore CA 94551-1151

Ms. Sharon Burnham
Tri-Valley Conservancy
1736 Holmes Street
Livermore, CA 94550