

July 26, 2009

Via: Email (sjxvl@esassoc.com) and U.S. Mail

Mr. Jensen Ushida  
San Joaquin Cross Valley Loop Project  
c/o Environmental Science Associates  
225 Bush Street, Suite 1700  
San Francisco, CA 94104

**RE: Edison's San Joaquin Cross Valley Loop Application, A08-05-039  
Comments Regarding Draft Environmental Impact Report**

Dear Mr. Ushida:

We have farmed citrus in the area of the Proposed Project (Alternatives 1, 2 and 6) for over 20 years. We located in this area because of the prime agricultural soils, abundant water and scenic vistas. Several of our properties would be affected by the project and two of our citrus farms—20 acres of Cara Cara Navels and Grapefruit near Lindcove and 30 acres of Satsuma Mandarins in Lemon Cove-- are directly in the path of proposed Alternative 1. Following are our comments regarding the DEIR.

The DEIR concludes that the aesthetic impacts would not be significant. We very vigorously disagree. While visual impacts are attenuated with distance, such impacts will be very substantial and significant proximate to project. Within distances of no less than ¼ mile of the towers and lines, they would wholly dominate the views and vistas (now of agricultural land and the High Sierra). In other words, under any of the alternatives, at least 10 square miles (and probably more) would be significantly impacted. Public comments at scoping and other public meetings—and lesser home and land valuations in areas of major transmission lines-- make clear that these impacts are significant both qualitatively and quantitatively.

The DEIR correctly identifies the temporary and/or permanent removal of farmland as a significant impact of the project. We believe, however, that the DEIR materially understates both the direct and indirect impacts.

In discussing Impact 4.2-2, the DEIR states that SCE policy requires 50 foot maintenance buffer surrounding each pole/tower, yet for calculational purposes uses the much smaller “footprint” area because, in some instances in the past, SCE has not enforced “what should be maintenance areas...” This methodology improperly and inappropriately assumes no future enforcement of SCE's maintenance area regulations. Properly calculated, the “permanent” take of farmland for towers/poles and related maintenance areas would be at least 4 times greater than stated in the DEIR. All analyses of permanent impacts should be appropriately modified.

The DEIR states that the impacts on hydrology/groundwater would not be significant. Giving the scale of tower/pole subsurface construction and foundations, we question this conclusion. Many of the foothill wells in the path of the several alternatives are served by bedrock crack wells, not extensive aquifers. Disruptions of these “cracks” are will have significant impacts on local and, possibly distant, hard rock wells.

We likewise believe that many farm land impacts identified as “temporary” and “mitigable” in the DEIR would likely result in additional, substantial and permanent takes of farm land. For example, Alternative 1 proposed a 100 ft wide 660 ft long ROW along the north side of our Lemon Cove ranch. In that corridor we have, among other things, a well/pump/filtration station. It is debatable whether, in an area of hard rock groundwater, the well could successfully be relocated. Nor are alternative sources of water available (The DEIR’s statement that SCE could mitigate by providing other water is, simply put, wrong. There is no excess, but rather a deficit, of water in the affected areas.) The result of losing water is, of course, the indirect, but nonetheless permanent, “take” of farmland.

Other infrastructure impairments may likewise accentuate the “take” of farmland. For example, in the 660 ft corridor of our Lemon Cove ranch we have, in addition to the well/pump/filter station mentioned above, a pressure pipeline and an important surface water drain. Both must function to fully utilize the property. Without either, more land would be lost to fruitful production. Further, in our case as in many others, we have infrastructure located off our property, including a mile-long 6 inch transite pipeline providing our connection to the Lemon Cove ditch (at least half of which is directly under proposed route 1) and a major lift, pressurizing and filtration station which is likewise directly under the proposed route Further, the Lemon Cove Ditch supply pipeline also runs directly under proposed alternative 1. These many improvements are essential to our farming. Relocating any of those improvements would not only be extraordinarily expensive but, possibly, impossible (necessitating new easements and the like).

The above discussion of “indirect” damage to agricultural infrastructure makes clear to us that SEC has grossly underestimated the ROW acquisition and related costs in developed agricultural areas. The direct take of our Lemon Cove property would amount to a 660ft x 100ft corridor, approximately 1.5 acres. Assuming \$20,000 per acre, the cost would be about \$30,000. It is plain that the cost of mitigating “temporary” infrastructure impacts would be far greater. For example, drilling and developing a new well, if possible at all, would cost \$30,000 to \$80,000; replacing a 1 mile long, 6 inch pipeline would cost, installed, at least \$10,000 to \$20,000; and relocating a pumping, pressuring and filtration plant (assuming the necessary easements could be obtained) would cost, installed \$5,000 to \$10,000. In

other words, the costs to mitigate the indirect “temporary” impacts on our Lemon Cove farm would amount several times the costs of the “permanent” taking. We believe such multipliers are needed wherever the proposed project passes over developed, intensively-farmed lands.

Respectfully submitted,

By:

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