

LRP Orange Co.

P O Box 48, Ivanhoe CA 93235

July 20, 2009

Jensen Uchida
San Joaquin Cross Valley Loop
Transmission Project
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104-4207

Mr. Uchida,

My name is Larry Peltzer, I'm a Citrus Grower and current Vice President of the Tulare County Farm Bureau. There are areas of concern which we would like to address with you and I have listed them as follows:

The EIR does not adequately identify, address or define mitigation measures to offset impacts to farmland. The agricultural mitigation measures referenced throughout the EIR are deficient and incomplete. In addition the EIR does not take in to consideration cultural practices for ag and impacts/disruption to activities such as pest abatement, dust control management, aerial applications, and other activities which may be restricted to a great degree under and around the transmission lines.

The EIR does not speak to the impacts associated during construction phase, and how agricultural lands in the path of construction will be impacted.

We know that in today's climate, Greenhouse Gas Emissions must be part of all environmental studies and reports. The EIR does not adequately account for the impact of construction and the GHG emissions that will result from construction, or the removal of trees that scrub the air of CO2.

Irrigation of agricultural lands will be significantly impacted on certain properties, and the feasibility of being able to replace and relocate the wells would be extremely costly and in some cases not possible. This is an unavoidable, significant, and immitigable impact not appropriately addressed in the EIR.

Quality of life impacts: rural families and farm properties impacted by the route will likely experience a quality of life impact. Not only aesthetics, but also loss of productivity on farm lands which will reduce profitability and may eliminate jobs in the community if acreage has to be removed from production.

The Route 3 alternative has not been thoroughly explored and assessed for feasibility. It stops short with a statement made on page 5-7 which indicates that due to the sensitive nature of habitat in the Stone Corral Ecological Reserve that a bypass was not feasible. There is significant evidence being introduced by PACE (at the July 23 hearing) that a "work around" the ecological reserve is possible and feasible.

Furthermore, the Route 3 choice would be particularly advantageous for also reducing exposure to Electric and Magnetic Fields (EMF). Even though health and safety risks to humans associated with EMF are unclear, and the EIR does not specifically address them as a health/safety risk to humans, the information we have about EMF is inconclusive and therefore should not be dismissed entirely.

Logically, the existing Rector Line will have to be upgraded sometime in the future, and since it currently cuts right through the Stone Corral Ecological Reserve, the question we should be asking is why not address a feasible alternative NOW and develop a proactive solution to adopting Route 3 and upgrading the Rector Line in the future with the same sound environmental stewardship plan with a defensible EIR now versus waiting until later to address the ecological reserve.

Route 3 (as stated on 3-15 of the EIR) meets both basic project objectives, and meets all legal, regulatory, and technical feasibility criteria. Route 3 would result in the permanent removal of fewer acres of farmland than the Proposed Project (Route 1) and impacts would be generally similar on Cultural Resources as to the Proposed Route (Route 1). The only major issue on page 3-16 regarding why Route 3 was not provided more consideration is because of the vernal pools, and PACE has a workaround alternative to address this.

In 1988 the California legislature approved Senate Bill 2431 (Chapter 1457, Statutes of 1988) and this law known as the Garamendi Principles identified the following values. These values should be incorporated into the CPUC's final decision and you may want to references (items 1-2) in the EIR comments too.

In recognition of the value of state's transmission system and the need for effective long-term transmission corridor planning, in SB 2341 the Legislature declared that it is in the best interests of the state to conduct transmission siting according to the following principles:

1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
2. When construction of new transmission lines is required, encourage expansion of existing right-of-way, when technically and economically feasible.
3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons as determined by the appropriate licensing agency.

We ask that you take these areas of concern and seriously consider them before making any dramatic decision that will seriously affect the livelihood of family farming in this region.

Sincerely,

A handwritten signature in cursive script that reads "Larry R. Peltzer". The signature is written in black ink and is positioned above the printed name and title.

Larry R. Peltzer
Owner