

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

Southern California Edison's San Joaquin Cross Valley Loop Transmission Project
CPUC A.08-05-039
SCH #: 2009091090

From: James M. Gorden, P.O. Box 44066, Lemoncove, CA 93244.
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I grow citrus and olives adjacent to the Applicant's desired route and also within the Big Creek-Rector right-of-way, West of Ivanhoe. As an agriculturalist, I would like to speak briefly to the Ag. Resources section of the DEIR, and as a homeowner to the community values and aesthetics.

DEIR General Comments:

The DEIR assumes that impacts to the agricultural infrastructure except permanent conversion of farmland and Williamson Act contracts can be mitigated, 4.2-3 (4.2-14). The DEIR also assumes that orange and other citrus trees under transmission lines would not be adversely affected (4.2-4). The DEIR deals rather casually and imperfectly with these impacts, 4.2.2 (4.2-9 -4.2-14). The impacts of the proposed project on Alternatives 1, 2 and 6 using real conditions on the ground represent substantial negative physical and economic effects.

The DEIR did not adequately evaluate the significant irreversible changes to the irrigation system's infrastructure on Alt 1, 2 and 6. Water transportation systems not only supply water for irrigation, but are also necessary for frost protection. The evaluation was deeply flawed because the hydrology of the area and the built water infrastructure were not addressed. For example, the DEIR assumed that wells within the new right-of-way could be replaced. Water sources cannot be moved casually and in some cases the destruction of a well may not be able to be mitigated.

1. Number of acres involved was under estimated, Table 4.2-4 (4.2-11) – Table 4.2-11 (4.2-24).
 - a. Farm equipment for pruning, weed and pest control must be restricted in the right of way, making it unsafe for farm workers. Harvesting equipment, such as picking ladders in the right of way is another example of unsafe working conditions.
 - b. Equipment to repair and maintain irrigation systems cannot be used under or immediately next to the SCE right of way due to unsafe working conditions.
 - c. Destruction of wagon wheel wells affects many acres, not just the acreage under the right of way.
2. Small parcels that lose acreage due to the right of way, may no longer be economically viable. Implementation of Mitigation Measure 4.2-5 (4.2-16) is inadequate in real life practice.
 - a. Farming is less efficient, due to percentage of land taken out of production.
 - b. Reconfiguring the irrigation system needs to be evaluated as to its possibility, and effect on the agricultural resource.
3. Built and growing agricultural infrastructure:
 - a. Expense of rerouting the irrigation systems and digging new wells was not considered.
 - b. Historic wagon wheel wells cannot be replaced today because of OSHA requirements.
 - c. Due to hydrology in the foothills, there is no guarantee any replaced well will have water or be equal to the well being replaced.
 - d. The mechanism for replacing wells and rerouting irrigation systems is not only inadequate, it is impractical. See Mitigation Measure 4.2-5 (4.2-16). Edison’s cost to replace wells and vital parts of the system were not considered.
 - e. Much of the built water system is historic. Though not part of a historic district, facilities of the Lemon Cove Ditch Company, Wallace Ranch Water Company, Rocky Hill Ditch, Exeter Irrigation District, and Stone Corral Irrigation District may be impacted in varying degrees by alternatives 1, 2, and 6. Most of these facilities have been in place for more than fifty-five years, and some are more than one hundred years old. Impacts to these facilities, some of which are buried, and out of sight, should be considered.
 - f. Neglected to analyze need to upgrade the historic Big Creek Rector line and the cost saved over time, as well as safety issues.
4. Community Values - Aesthetics:
 - a. The DEIR takes a very biased view when describing resources that are valued by the local communities and people living in the area potentially affected by Alt. 1, 2, and 6. DEIR description of Hwy. 198/65 intersection is “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.

- b. Highway 198 from Visalia to Lemon Cove provides the most dramatic views of the Sierra Nevada Range from the valley floor to the crest of the Sierra, available on a State Highway approach anywhere on the West slope of the Sierra. The Kaweah River Valley provides the most abrupt transition from Valley to peaks anywhere on the 400 mile extent of the West side of the range making the views on the clearest days, of snow-capped peaks, with a foreground of fruit laden orange trees, truly spectacular. If it is not considered a State or National treasure it is considered a treasure by those of us who live nearby. The 120-160 foot towers will be extremely unsightly as they will be visible from a significant distance due to their height. In addition, the preferred route of the applicant requires two new crossings of this State Highway at points with spectacular view sheds to the East.
- c. The tabular viewer sensitivity findings (4.1-2) indicate that alternates 2, 3, and 6 all cross SR 198 (these crossings would be via the existing right-of-way). The DEIR does not make it clear that Alt. 1 will require two new crossings, in addition to the existing right-of-way crossing which would remain intact. Two major new 220 KV crossings of this scenic corridor are extremely disruptive.

Negative cumulative economic and social impacts:

1. Lost crop land results in loss of farm income.
2. Loss of farming and related jobs is a loss of a historic way of life and will impact our community values.
3. Loss of crop land has direct impact on citrus industry. Foothill citrus on Alt 1, 2, and 6 is part of the country’s largest producer of fresh citrus and a significant contributor to the local economy. Citrus land cannot be replaced or replicated.
4. Loss of view shed of the foothills and Sierra Nevada Mountains will impact our community values. We appreciate the view and are glad to live here. It is a part of who we are.
5. Only Alt. 1 requires two new SR 198 crossings, in addition to the existing right-of-way crossing which would remain intact. Two major new 220 KV crossings of this scenic corridor are extremely disruptive.

Incrementally cumulative impacts:

1. Number of acres to be destroyed was under estimated, Table 4.2-4 (4.2-11).
2. Growth-Inducing because small parcels no longer economically viable as farm land may be sold for housing or other commercial uses, 4.2.5 (4.2-16 – 4.2-17).
3. Did not evaluate status of land that would be taken out of Williamson Act.
4. The Big Creek Rector line is old and needs to be updated. We do not feel that the DEIR deals adequately with this factor. Following the same line will save money over time, will raise the height of the conductors, result in lower EMF levels on the ground and in general avoid most of the adverse impacts to agriculture, scenic values, and the local economy caused by the other alternatives..

Mitigation Measures to minimize impact:

1. Avoid impact.(preferred)
2. Set aside lost farming acreage (2 to 1).
3. SCE pay farmers for replacements of wells and irrigation systems.

The conclusion is that Alternate 3, with mitigation or avoidance of the vernal pools near Seville, should be chosen because:

1. Affects fewer land owners.
2. Affects less farmland and agricultural infrastructure. The agricultural infrastructure has been built around the Big Creek Rector right-of-way for nearly one hundred years
3. Big Creek Rector line is old and needs to be updated. Re-cycling and upgrading the existing line will be cheaper to do now than later.
4. Updating the towers on the Big Creek Rector line will increase the safety for the workers who farm in or next to the right of way and those who maintain it.
5. Decreases the current footprint on the Big Creek Rector line because the proposed towers are stronger and wider apart.
6. Following the current Big Creek Rector line, Alt. 3, will lower costs over time because the total miles of right of a way that would need to be maintained is less than if an additional line (Alt 1, 2, or 6) were added.
7. Requires no new crossings of the scenic Highway 198 approach to the Sierra Nevada Range and Sequoia National Park.
8. Will result in lower long term adverse economic impacts on the local community than the alternatives.

Docket Number A-08-06-039

I am James Gordon residing at 20151 Avenue 296 Exeter, California. I request the impact study for the Route One SCE 200kV transmission line from Lemon Cove to the Rector Substation include the following two issues.

1. The number of permanent jobs lost by the removal of fruit and nut trees, the cost to the public of providing income support and worker retraining.
2. The reduced number of out-of-area visitors to Exeter due to towers degrading the town's renown charm resulting in a decline of retail, service, and hospitality sales, negatively impacting commercial property values and sales tax revenues..

I would advise the consultants that permanent job losses caused by Route One are readily determined from administrative data. The University of California Cooperative Extension Service has recent publications detailing labor production costs per crop per acre. The numeric ratio of packer/shipper jobs to production jobs can be obtained from California Citrus Mutual for the number of jobs at packer/shippers, and compared against data compiled by EDD's Labor Market Information Division. Unfortunately, there are no surplus jobs in production agriculture in the region to which these workers can turn, Surface water curtailment and land subsidence causing stress on underground supplies have already fallowed or retired hundreds of thousands of acres and the loss of over ten thousand agricultural production jobs. Forecasts indicate that in least in the short term – 3-5 years there is little or no hope for a turnaround. However, Route One jobless workers are eligible for benefit and retraining programs. Their demographic description indicates they have on average 6 years of public school education, lack English language fluency, and lack job skills outside of agriculture. Public retraining costs per this type of worker range from \$2,500 to \$10,000 depending on current demand occupations. Major job training agencies use an estimate of \$5,500 per worker when applying for retraining funds. An argument that there will not necessarily be increased public costs as these workers will simply compete for existing slots with other workers may not have validity as there is ample history either of court orders or legislative appropriations to provide additional funding for permanent job loss when due to government action.

I was CEO of the nonprofit organization chosen by FEMA and the Governor's Office of Emergency Services to run the 1998-99 citrus freeze mitigation program. Until then such programs were handled by State or

local government. The facts were that there was one field worker and one industry worker per affected acre (transportation, processing, and packing) who lost their jobs and were eligible for and received government assistance. The Draft EIR projects a loss of approximately 30 acres. Area growers testified the loss is likely ten times that. Once the acreage loss is determined multiple that by two workers x \$5,500 each worker for the cost to the government for training for jobs in demand in the local economy. This does not even considering costs to the unemployed worker, his or her family, and the communities in which they are integral to the local economy, plus the additional societal interventions often required when families disintegrate or fall on hard times due to lacking a job for family support.

On the second issue, the City of Exeter is a gem. One national magazine ranked it as one of America's 100 most desirable places to live. Another ranked it is one of California's top five places, and first among its small towns. Yet, another rated it as the "Prettiest Painted Town in the Southwest (ahead of Carmel and Taos). Its slogan is "Small Town Charm". Will the transmission towers marching along the Highway 198 scenic corridor leading to Exeter and under which one crosses to get to its commercial district have a negative impact on its retail sales? To find this answer the Exeter Chamber of Commerce surveyed its members by mail followed by in-depth interviews of those businesses not entirely dependent on the locals – boutiques, antique shops, cute restaurants, wine bars and the like. Findings included:

- No business owner believed they would lose customers due to the industrial feeling brought about by the towers.
- The majority estimated that between 30% and 50% of their customers were from out of the area many traveling 50-100 miles.
- These customers discovered these businesses only after deciding to visit Exeter because of its renowned charm wandering into the business, enjoying Exeter and regularly returning for visits, shopping and relaxation.
- The business owners estimated whether an industrial feel to the area caused by the transmission towers would reduce the number of customers who just wandered in because of Exeter's small town charm. The majority estimated a 25-50% decline in future customers.
- It is likely that a consultant could obtain information from communities who were similarly impacted to find out what actual reductions would result.
- The impact whatever it is would be felt only over a period of time. Obviously, if it reduced sales by more than 10% or up to 25% it would have a profound impact on retail, hospitality and service

- businesses. Few exceed \$100,000 in gross sales, and negative growth would impact the number of business closures, commercial property vacancies, and a loss of “Small Town Charm”.

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Submitted on July 31, 2009 by: James Gordon, 20151 Avenue 296, Exeter, CA 93221, (559) 901-4926, cmonluke@aol.com