

**California Citrus Mutual Comments to The California Public Utilities Commission
July 23, 2009
Visalia, California**

Subject: Southern Calif. Edison's San Joaquin Cross Valley Loop Transmission Project
CPUC A.08-05-039
SCH #: 2008081090

DRAFT ENVIRONMENTAL IMPACT REPORT - Dated June 2009

Presenter: Bob Blakely, Director of Industry Relations
Representing: California Citrus Mutual
Located: 512 N. Kaweah Ave., Exeter, California

California Citrus Mutual (CCM), is the voice of the California citrus industry. CCM is a voluntary grower association of over 2100 members. Many of whom are family farmers in Tulare County and who stand to be impacted by this project. I appreciate the time and effort that has gone into the preparation of this draft EIR. I also appreciate this opportunity to comment on the EIR and the direct impact the project will have on citrus in Tulare County and more broadly on the California citrus industry. CCM members will be negatively impacted by any of the alternatives currently proposed for this project.

California and specifically the Central Valley is the world's largest producer of fresh citrus; supplying 80% of the fresh citrus produced in the U.S. Citrus production in California is primarily confined to a narrow band, approximately 10 miles wide and 200 miles long running along the foothills on the east side of the San Joaquin Valley. This is a unique microclimate of soil, water and temperature ideal for citrus production that is not duplicated anywhere else in California. It is truly an endangered industry. This project will eliminate land from citrus production that cannot be replaced.

There is a provision of the Williamson Act which may prohibit SCE from taking prime Ag land within the agricultural preserve. Section 51290, a) states, "It is the policy of the state to avoid, whenever practicable, the location of any federal, state, or local public improvements and any improvements of public utilities, and the acquisition therefor, in agricultural preserves."

All three of the alternatives currently being proposed for the SJVLTP will negatively impact prime irrigated, primarily citrus, Ag land. A California Citrus Impact Analysis and Policy Simulation conducted by Arizona State University determined that the California citrus industry represents nearly \$1.8 billion of economic value to the California economy and almost 15,000 jobs. Additionally, the industry represents \$825.6 million of direct economic output and \$1.633 billion when all upstream suppliers and downstream retailers are included, employing a total of nearly 25,000 direct and indirect workers. The study looked at the impact of losing 1,000 acres of oranges in one year, on the total California economy, and the orange sub-sector and found the loss in economic benefit to California to be substantial. Some \$4.39 million in total output for

the industry and \$7.4 million less activity for the state as a whole. Each 1,000 acres lost takes with it some 220 jobs and nearly \$1 million in annual state tax revenue. The long-term effect would be many times this. These dollar figures do not include the loss in aesthetic value of orchards or the environmentally beneficial sequestration capacity of the citrus trees.

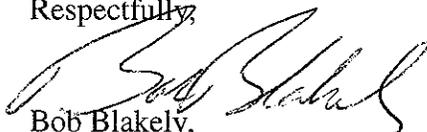
CCM is opposed to the taking of any citrus acreage for additional rights-of-way where existing rights-of-way may be utilized to the same end. Additionally, when existing rights would be utilized for the SJVLTP, Southern California Edison should work with growers to minimize loss of production and the economic impact on affected growers. Growers in the existing right-of-way have recently sustained economic losses due the NERC mandate, which required growers to provide access and to remove trees in proximity of the existing towers within the right-of-way. In many cases this resulted in loss of trees not in the existing right-of-way. Growers within the affected right-of-way will be subjected to additional compounded losses as a result of the SJVLTP. As the old towers are removed growers will be left with unplanted areas where productive trees were recently removed. They will, in all probability, be required to remove additional trees for the new, albeit, fewer towers. Had Southern California Edison been more forward looking the economic loss to growers and a public relations nightmare could have been avoided.

Table 5-1 of the Draft EIR summarizes the significant unmitigable environmental impacts of each alternative. The statement under each alternative states in part: "Significant unmitigable impacts on agricultural resources include permanent removal". In the course of rendering a decision California Citrus Mutual requests that the CPUC reject the San Joaquin Cross Valley Loop Transmission Project.

Alternatively, if the CPUC determines the project is essential, it would be the desire of the citrus industry that the CPUC require Southern California Edison to construct the SJVLTP along a route that minimizes the taking of additional prime Ag land for new right-of-way, but instead utilizes only existing right-of-way wherever possible. Further, the CPUC should direct SCE to work with affected growers to retain and/or reestablish as much vital production acreage within the right-of-way as possible and still comply with the DHS and NERC requirements.

Thank you for this opportunity to provide these comments.

Respectfully,



Bob Blakely,
Director of Industry Relations

cc Mr. Jensen Uchida, San Joaquin Cross Valley Loop Transmission Project