

# WALLACE RANCH WATER COMPANY

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July 24, 2009

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

Re: San Joaquin Cross Valley Loop Transmission Project, Draft EIR

The Wallace Ranch Water Company submits the following comments regarding the San Joaquin Cross Valley Loop Transmission Project, Draft Environmental Impact Report (DEIR).

The Wallace Ranch Water Company owns water delivery systems within the boundaries of the Proposed Project. Specifically, Wallace Ranch Water Company owns an underground water distribution line that appears to run under Structure # 91 and then runs east within the proposed right of way toward Structure # 92. We understand from the section in the DEIR that indicates the requirements for uses within the proposed right of way, found on page 2-40 of the DEIR, that facilities within the right of way must be perpendicular to the centerline of the right of way. The Wallace Ranch Water Company underground facilities would run parallel to the transmission lines and therefore would apparently need to be relocated, should the Proposed Project be the route selected.

The DEIR does not provide adequate description of the water delivery systems in the project area, does not identify or quantify the number of systems that would need to be

relocated, or provide mitigation to the impacts that would be created by the Proposed Project that can be shown to be feasible to implement. The DEIR merely states that the issues of water supply and delivery will be addressed and solved during the construction phase of the project. The DEIR does not address the issues that could affect the ability to replace displaced water systems. For example, it may not be a simple matter to drill replacement wells that can provide the water volume and quality of existing wells, as the character of the aquifer varies throughout the region. Also, existing water delivery systems run through easements on private property. The DEIR does not discuss the complexities or impacts to Farmland of acquiring new easements for water systems owned by water companies through private property owned by others. The DEIR does not identify the impacts to loss of Farmland that would occur with the relocation of water distribution systems. The DEIR should be amended to include a full discussion of water issues and impacts associated with the Proposed Project.

The DEIR identifies that each of the Project Alternatives considered are environmentally superior to the Proposed Project. Each of the alternatives utilizes existing public utility right of way to a much greater extent than the Proposed Project. Of the alternatives, the Wallace Ranch Water Company requests that Alternative 3, as modified to avoid sensitive habitat in the Stone Corral Ecological Reserve, be selected as the ultimate Project. This will greatly reduce impacts to Farmland, water systems and agricultural resources from what is being considered in the Proposed Project.

Sincerely,



David Cairns, Secretary/Manager

Wallace Ranch Water Company

Contact Information:

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