

Mr. Jensen Uchida
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July 23,2009

Good evening, my name is Joe Ferrara, the purpose of this statement is to provide comment regarding the DEIR that has been prepared on the Southern California Edison San Joaquin Cross Valley Loop KV Transmission Line Project. My wife Mary and I are landowners adjacent to the Proposed Route 1. I am a member of a farming family that has farmed in the Exeter to Lemon Cove corridor for ninety years. I believe that my general knowledge of this area and the hydrological issues that are specific to this area give me the necessary background to make the following observations and statements. I appreciate the opportunity to speak to you this evening.

In reviewing the DEIR that has been prepared for this project I was pleased to note the recognition of wells, pipelines and other structures (etc-----) in section 4.7-11 that will be impacted by the proposed Route 1 ROW. My concerns are with the general statement found in the DEIR (section 4.11a and 4.11b) concerning mitigation measures that would be implemented to address these concerns.

It is my experience and observations that lead me to believe that the general statement concerning the engagement of a qualified water well drilling contractor to relocate those impacted wells and thus mitigate this issue is much too a simplistic approach. I believe many of the wells within and in close proximity to the ROW on Proposed Route#1 can not be duplicated and thus mitigation will not be possible as described in the statement as presented.

It is general knowledge in the local agricultural community that any attempt at well drilling in locations east of Road 196 to the north, northeast, east and southeast of Exeter can yield very mixed results. This area has been an established permanent crop area dating back to the early 1900's, but total

development of the area did not occur until after the formation of the Exeter Irrigation District in the late 1930's and the completion of the Friant-Kern Canal in the early 1950's. These events brought the addition of surface water to the area to help stabilize the overdraft of the underground aquifer.

In attempting to drill a replacement well , it is not an uncommon experience to move over 50 feet from what has been a productive well for fifty to seventy years and drill what we describe as a "duster" or dry hole. It is not uncommon to drill several such holes and not find a location that provides the quantity of water that was available in the original location. This was the experience of many farmers in the early development period, and that was the reason that much of this area was not developed until supplemental water was brought into the area.

Unlike the farming areas between Exeter and Visalia, the aquifers to the east and northeast of Exeter are very shallow, small in volume and specific in location. The general geology of the area does not allow for deep drilling in many instances. The wells in this area typically have volume yields in the one hundred to three hundred gallons per minute range. The development of low-volume irrigation technology gives us the ability to utilize these small volume wells to successfully farm the permanent crops that you find in our area. We are fortunate to be able to supplement these wells with Exeter Irrigation District (EID) water or other surface water sources to help stabilize our ground water levels. Reports show average static groundwater in 1921 was 59 feet, in 1947 static groundwater at 105 feet and the most recent measurements within the Exeter Irrigation District show an average of 65.9 feet.

Recent Federal Court rulings, continued litigation, and environmental settlements have the potential to reduce the total amount of supplemental water available to this area. These issues, along with continued drought conditions threaten are ability to maintain adequate ground water for our crops.

All of the issues above mentioned lead me to be very concerned about the thought of the abandonment of a good, well proven , productive well that has given good service to a farmer for many years. We are

always concerned that such a well will collapse, or for some other reason become nonperforming. The fear that a replacement well will not be as productive is a reality that we all face. We do not have the luxury to just move over a few feet and drill a replacement well of like quantity. Several attempts may be necessary to replace a current productive well with no guarantee that a new equally productive well will be developed.

The moving of pipelines, pumping stations and other filtration equipment necessary to deliver water to our crops are also concerns that are mentioned in the mitigation measures. There is no mention of the possibility that it may take more than one well to replace an existing well. The need for an additional well or wells could require a total redesign of an irrigation system. There is no mention of the added long-term costs associated with additional equipment that may be necessary. These costs would include, but not limited to, additional maintenance, power costs and additional SCE standby charges.

I think it is important to note that there has been no mention of the Exeter Irrigation District's distribution system. The District encompasses approximately 12,700 irrigated acres, and also includes the majority of the city limits of Exeter. Exeter Irrigation District is comprised of approximately 15,200 acres in total. The entire system includes approximately sixty miles of underground pipeline ranging from twelve inches to forty-two inches in diameter. The depth of the District pipelines range between five feet to fourteen feet. The district has approximately four hundred sixty-eight meters, serving three hundred ninety customers. In addition, the District has many turnouts, air vents, pumping stations, and reservoirs as part of the infrastructure. Total replacement cost for the district infrastructure is estimated to be at least one hundred million dollars. The proposed SCE Route 1 runs adjacent to, crosses several times and is in close proximity of District pipelines and above ground infrastructure. A thorough survey of the impacts that the proposed route would have to the entire Exeter Irrigation District's distribution system needs to be conducted. In discussions with Exeter Irrigation District management I have been

informed that no inquiries by either Southern California Edison Co. or Environmental Science Associates have been made concerning any potential environmental impacts that proposed Route #1 would have to the Exeter Irrigation District. This system was professionally engineered, and designed by the Bureau of Reclamation. The infrastructure of the Exeter Irrigation District has served the agricultural community of this area for almost sixty years. Major design changes to the underground pipelines or above ground infrastructure that would impact the ability to deliver water efficiently would have to be mitigated.

I also have concern that in statement areas 4.7-11 and 4.7-11b there is no mention of wells that are adjacent to, or in close proximity to the proposed ROW. There is real concern that there are many wells that are just outside of the ROW that will be impacted because of the future inability to have them worked on due to the potential of induced voltages. There seems to be contradictory information within the text of the DEIR about distances required for work and maintenance. We also continue to get indications from our pump service contractors that lead us to believe that their insurance requirements exceed the Cal OSHA Title 8 requirements mentioned in the DEIR. I believe that the area just outside of the ROW will have as many impacted infrastructure issues as exist under the proposed ROW. I believe a complete study of this issue is a necessity.

I feel that a complete review of the hydrology of the area east and northeast of Exeter along the proposed ROW is a necessary addition to the EIR for the Proposed Route 1. I also believe that my concerns that center on a landowner's ability to service equipment, wells or do pipeline work that are adjacent to, as well as, within the proposed ROW should be studied. Detailed descriptions of what is allowable should be included in the final EIR. The Exeter Irrigation District, Friant Water Authority, Kaweah Delta Water Conservation District, Bureau of Reclamation, Lemon Cove Ditch Co., Wallace

Ranch Water Co., and Foothill Ditch Co. should all be consulted on the environmental impacts that Proposed Route 1 will have on the infrastructure, and operations of each of these entities.

I have used as sources of information many reports, studies, and publications concerning the geology and hydrological issues of the area that the Proposed Route 1 travels across. To assist in your discovery of environmental impacts to the ground water along Proposed Route 1 I believe that these same reports, studies, and publications would be helpful in development of the Final Environmental Impact Report for this project. The reports are: 1.) "Technical Studies in Support of Factual Report Exeter Irrigation District" by United States Department of the Interior, Bureau of Reclamation Region II, November 1949. 2.) "A Report on the Feasibility of Water Supply Development" East Side Division Central Valley Project California, by United States Department of the Interior, Bureau of Reclamation, Region 2, Sacramento, California 1962. 3.) "Five Year Water Update, Agricultural Water Management Plan", Exeter Irrigation District, December 2004. 4.) "Water Resources Investigation of the Kaweah Delta Water Conservation District, Final Report" December 2003, Revised July 2007 by Fugro West, Inc. 5.) "Report on Investigation of the Water Resources of the Kaweah Delta Water Conservation District" by Bookman and Edmonston, February 1972. 6.) Estimated Costs To Replace Existing Water Wells, Pump Electrical Service, Deep Well Turbine Pumps, Irrigation Filter Stations, Booster Pumps and Pipeline Infrastructure by Kaweah Pump, Inc. July 2009. 7.) Exeter Irrigation District Depth to Static Groundwater Report, February 2009. I would be pleased to assist you in obtaining these reports and publications, if needed. I would also like to deliver tonight a report of the depth to static groundwater measurements made by the Exeter Irrigation District starting in 1953 to the present, and a map of the Exeter Irrigation District.

It is my belief that your investigation of the fragile groundwater conditions that exist on the Proposed Route #1 is just beginning. The hiring of qualified well drilling contractor is not the solution to mitigating

many of the well locations that will be impacted by the proposed route. I feel that many of these wells can not be duplicated. The loss of a good productive well will cause the loss of highly productive agricultural ground, and leave the property owner with a devalued piece of property.

I urge the continued search for a way to mitigate the environmental issues on Route #3, as stated in the filings by PACE (July 20, 2009). The modification of Route #3 to avoid the environmentally sensitive areas cited in the DEIR would allow for the maximum use of the existing SCE Right-of-Way, which is the intent of Senate Bill 2431 (SB2431, Chapter 1457, Statutes of 1988, Garamendi), "Garamendi Principles". Route #3 is still the most logical route and is in the best interest of the state. Thank you,

A handwritten signature in black ink that reads "Joseph E. Ferrara". The signature is written in a cursive, flowing style.

Joseph E. Ferrara

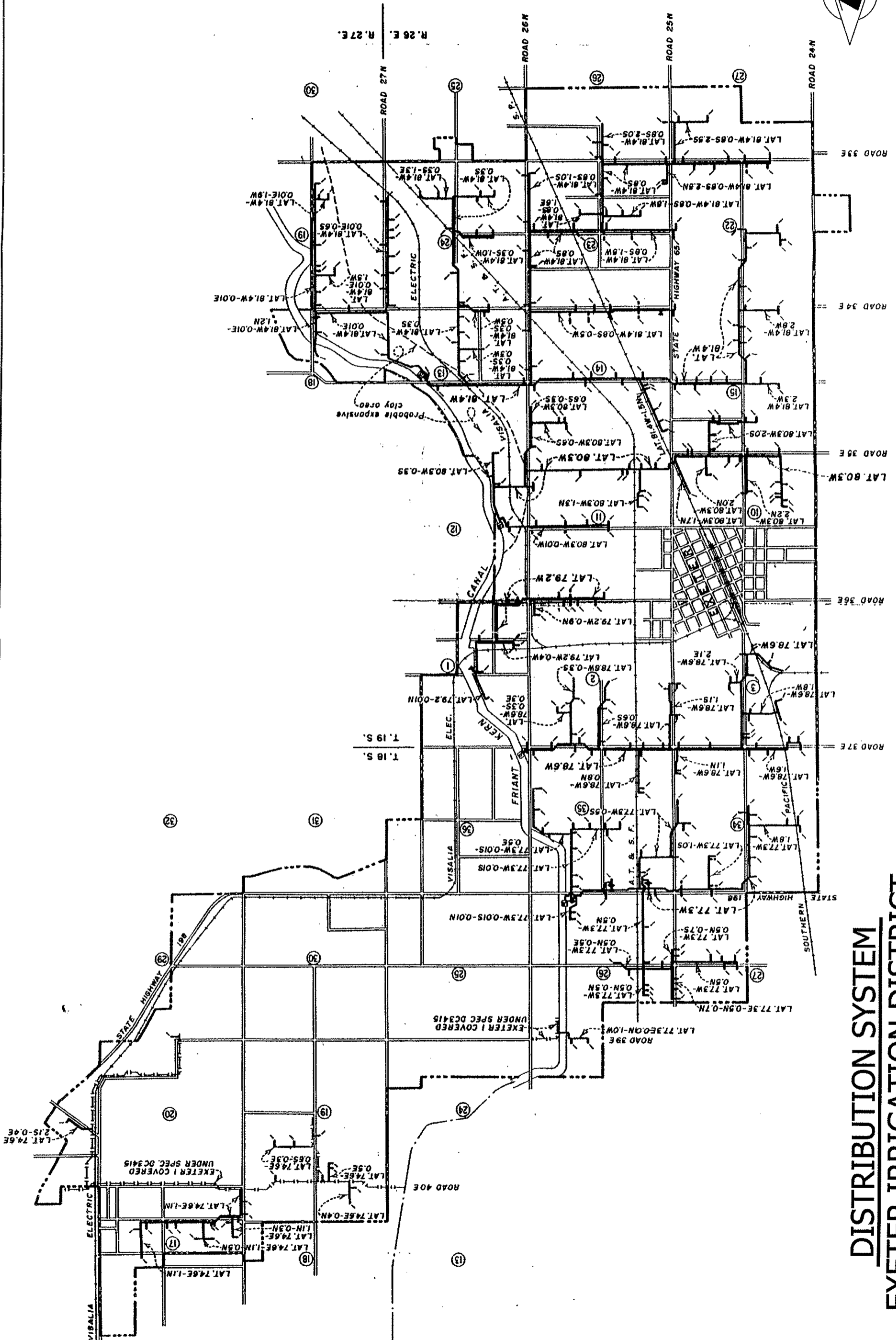
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EXETER IRRIGATION DISTRICT
DEPTH TO STATIC GROUNDWATER

| YEAR | SPRING (FEBRUARY) MEASUREMENTS | | | FALL (OCTOBER) MEASUREMENTS | | |
|------|---|---|-----------------------------------|---|---|-----------------------------------|
| | North of Ave. 288 T18S Depth to G.W.(Ft.) | South of Ave. 288 T19S Depth to G.W.(Ft.) | DISTRICT Depth to G.W.(Ft.) | North of Ave. 288 T18S Depth to G.W.(Ft.) | South of Ave. 288 T19S Depth to G.W.(Ft.) | DISTRICT Depth to G.W.(Ft.) |
| 1953 | | | 108.0 | | | |
| 1963 | | | 74.5 | | | |
| 1970 | 27.5 | 59.3 | 46.4 | 35.4 | 64.4 | 52.3 |
| 1971 | 30.7 | 59.0 | 47.5 | 39.3 | 64.6 | 54.1 |
| 1972 | 34.0 | 59.8 | 48.7 | 48.9 | 69.1 | 60.6 |
| 1973 | 39.6 | 61.8 | 52.2 | 40.8 | 61.1 | 53.3 |
| 1974 | 30.7 | 54.3 | 43.9 | 40.0 | 58.4 | 51.3 |
| 1975 | 34.0 | 53.2 | 44.6 | 40.8 | 59.9 | 51.9 |
| 1976 | 39.5 | 55.9 | 48.3 | 48.4 | 65.0 | 58.0 |
| 1977 | 45.1 | 59.8 | 53.2 | 66.4 | 79.1 | 73.5 |
| 1978 | 53.5 | 71.2 | 63.2 | 40.6 | 65.1 | 54.2 |
| 1979 | 36.3 | 58.2 | 48.3 | 46.2 | 61.4 | 55.2 |
| 1980 | 37.8 | 54.4 | 46.9 | 37.1 | 53.8 | 47.0 |
| 1981 | 35.0 | 50.2 | 43.7 | 45.5 | 60.3 | 53.6 |
| 1982 | 37.2 | 51.6 | 45.4 | 35.8 | 51.8 | 44.6 |
| 1983 | 28.2 | 45.1 | 37.4 | 27.2 | 39.1 | 33.8 |
| 1984 | 22.1 | 35.0 | 29.1 | 31.5 | 41.3 | 37.4 |
| 1985 | 27.6 | 36.5 | 32.4 | 38.8 | 47.5 | 43.7 |
| 1986 | 33.2 | 40.9 | 37.3 | 33.1 | 38.8 | 35.8 |
| 1987 | 32.0 | 37.5 | 34.9 | 44.1 | 49.0 | 46.6 |
| 1988 | 37.5 | 44.8 | 41.4 | 50.6 | 54.1 | 52.5 |
| 1989 | 45.6 | 52.2 | 49.2 | 56.8 | 60.9 | 59.0 |
| 1990 | 50.7 | 57.8 | 54.5 | 67.2 | 71.6 | 69.6 |
| 1991 | 61.0 | 68.9 | 65.2 | 65.8 | 74.5 | 70.4 |
| 1992 | 55.1 | 69.2 | 62.5 | 66.6 | 79.4 | 73.5 |
| 1993 | 56.3 | 73.7 | 65.5 | 53.1 | 73.9 | 63.6 |
| 1994 | 46.9 | 67.8 | 58.3 | 58.0 | 78.2 | 68.8 |
| 1995 | 48.8 | 72.8 | 61.5 | 41.3 | 69.1 | 56.0 |
| 1996 | 37.7 | 65.0 | 52.1 | 41.3 | 66.4 | 54.3 |
| 1997 | 34.9 | 61.5 | 48.9 | 37.1 | 63.0 | 50.0 |
| 1998 | 33.0 | 59.0 | 46.0 | 28.3 | 54.2 | 41.3 |
| 1999 | 25.0 | 50.4 | 38.6 | 30.9 | 53.3 | 42.1 |
| 2000 | 30.6 | 51.3 | 42.3 | 33.1 | 53.1 | 43.7 |
| 2001 | 30.7 | 50.9 | 41.2 | 40.1 | 59.3 | 50.3 |
| 2002 | 35.8 | 55.3 | 45.6 | 44.3 | 63.7 | 54.4 |
| 2003 | 40.2 | 59.3 | 50.1 | 48.4 | 68.5 | 58.9 |
| 2004 | 43.8 | 63.5 | 53.8 | 52.4 | 72.3 | 63.6 |
| 2005 | 48.0 | 68.9 | 58.8 | 51.0 | 73.3 | 62.8 |
| 2006 | 48.0 | 68.7 | 56.9 | 44.8 | 71.3 | 58.6 |
| 2007 | 50.0 | 73.4 | 61.9 | 57.1 | 79.9 | 68.5 |
| 2008 | 50.0 | 75.4 | 63.2 | 60.5 | 83.3 | 74.2 |
| 2009 | 51.4 | 78.9 | 65.9 | | | |



SCALE: N.T.S.



DISTRIBUTION SYSTEM
EXETER IRRIGATION DISTRICT