

Comment Letter I44  
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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: Comments on the Southern California Edison's San Joaquin Cross Valley Loop 220KV Transmission Line Project and the Draft Environmental Impact Report (DEIR) [CPUC A.08-05-039 and SCH #: 2008081090].

Dear Mr. Uchida:

Thank you for the opportunity to comment on this Project. It is understood and agreed upon that a Cross Valley Loop Transmission Line is necessary to increase transmission capacity in the region, while continuing to provide safe and reliable electric service; and that any impacts of the Project be minimized, both on the environment and on human lives. Consequently, we must all strive to identify the Project alternative, including the Proposed Project, that best meets these criteria.

Although the DEIR identifies Alternative 2 as the Environmentally Superior Alternative, in reality under CEQA the true Environmentally Superior Alternative is Alternative 3, based on the following facts:

1. It meets all of the Project objectives identified by SCE and is feasible;
2. It meets project need with the least environmental impact of all available options. [It can be slightly modified to avoid or mitigate any impact to northern claypan vernal pool habitat, or to jurisdictional waters of the United States and waters of the State, including drainages and seasonal wetlands.];
3. It is the option with the least impact on human lives, wildlife, and plant life, including:
  - A. Loss of high-value, productive agricultural land. [Permanent loss of 16.7 acres of Farmland versus 31.1 acres for the Proposed Project, 30.7 acres for Alternative 6, and 23.9 acres for Alternative 2.];
  - B. Loss of Prime Farmland. [Permanent loss of 6.6 acres of Prime Farmland versus 16.1 acres for the Proposed Project, 9.5 acres for Alternative 2, and 6.7 acres for Alternative 6.];
  - C. Scenic views and scenic highways;
  - D. Avoidance of major impacts on the City of Farmersville, its people, and the Farmersville General Plan;
  - E. Displacement of existing housing;
  - F. Displacement of people;
  - G. Demographics -- Future population and housing;
  - H. Construction or expansion of recreational facilities;
  - I. Affects fewer citrus and walnut orchards;
  - J. Irrigation and domestic well abandonment and relocation;
  - K. Infringement upon a major floodplain;
  - L. Electric shock from induced currents;
  - M. Noise impacts from operation of transmission lines and corona discharge effects, or humm;

- N. EMF impacts;
- O. Use of existing SCE ROW. [Uses 14.6 miles of existing SCE ROW versus only 10.8 miles for Alternative 2, 8.1 miles for Alternative 6, and 1.1 miles for the Proposed Project.]; and
- P. Overall cumulative impacts.

Consequently, for all of these reasons, **Alternative 3** is the **Environmentally Superior Alternative** under CEQA, hands down, and should be declared the "Project of Choice" by the CPUC. Of course, the slight realignment modification to avoid the vernal pool habitat would be necessary.

I respectfully urge the CPUC to take action to select **Alternative 3** so that SCE can stay on schedule with the Project and continue to provide safe and reliable electric service to the region.

Thank you for the opportunity to comment.

Respectfully yours,

