

September 30, 2020

**VIA U.S. MAIL AND E-MAIL [ [Ivanpah-Control@aspeneg.com](mailto:Ivanpah-Control@aspeneg.com) ]**

John Forsythe  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 640  
San Francisco, California 94104

Re: SCE Ivanpah-Control Project – Scoping Comments for Preparation of  
Environmental Impact Report.

Dear Mr. Forsythe:

This firm represents Meadowbrook Dairy (“Meadowbrook”), one of the largest agricultural producers in the Indian Wells Valley, located north of Ridgecrest in Kern County. Meadowbrook owns land that is adjacent to the existing SCE power transmission lines and the proposed SCE Ivanpah-Control Project (“Project”). A full list of Meadowbrook’s property will be sent at a later date (“Property”). On behalf of Meadowbrook we appreciate the opportunity to provide the following comments and issues that the Environmental Impact Report (“EIR”) must address as it relates to the potential impacts the Project will have on Meadowbrook’s property and agricultural operations.

The Project towers and power lines that will traverse Meadowbrook’s property are part of Segment 1 located between the Inyo-Kern Substation and the Coso Substation. SCE has existing easements across the eastern edge of Meadowbrook’s property, where several of the existing towers abut Meadowbrook’s alfalfa fields. SCE has indicated to Meadowbrook that the Project will require a new 100 foot wide easement (“new easement”) centered west of its existing easements. SCE has provided Meadowbrook with its Segment 1 Right-Of-Way exhibits that depict the general location of the new easement through the Property. Based on these

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exhibits, the new easement will put the Project, towers and transmission lines, further into and across Meadowbrook's Property. The Placement of the Project towers and transmission lines further into Meadowbrook's Property could result in construction and long-term impacts to agricultural land, health and safety, and air quality that must be analyzed in the EIR.

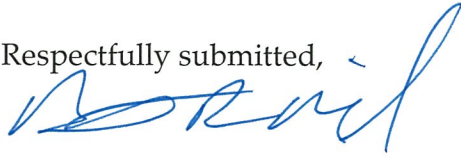
The EIR needs to identify and discuss the following:

1. Project Description and location: The location of the proposed towers and whether they will be within any of Meadowbrook's fields on the Property. Once the location of the towers is identified, discuss whether there will be any temporary or permanent removal of crops from production as result of the tower placement. In addition, the fields are irrigated with center-pivots, so if a tower is placed within a field the center-pivot irrigation may be impacted. If the towers and transmission lines will be outside of the fields the EIR should state that.
2. If the placement of the Project towers and transmission lines will be within an agricultural field, the EIR must identify, discuss and mitigate for the loss of agricultural land and crop production.
3. Regardless of the placement of the towers, it appears that the Project transmission lines will cross active agricultural fields. The EIR must address the impacts to the farming operations and safety requirements associated with agricultural personnel and equipment working in and under these new transmission lines including any impact to the farming operation that could result in impacts to crop yield.
4. The construction of the towers and transmission lines will impact crop production and impact the operations of the US Navy. Crops and the operations on the Navy Base would be negatively impacted by dust and construction activities in the form of dust, vehicle movement and aerial activities (use of cranes and helicopters). The EIR must identify, discuss and mitigate construction related impacts including air quality, water quality and loss of crop production if the permanent crop has to be removed.

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Please add the undersigned to the distribution list for this Project. We are available to discuss these comments.

Respectfully submitted,



Brent R. McManigal, of  
GRESHAM SAVAGE  
NOLAN & TILDEN,  
A Professional Corporation

BRM:jmk

cc: Meadowbrook Dairy