

July 21, 2009

**Meling
Bros.**

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

17456 Ave. 344
Visalia, CA 93292

Dear Mr. Uchida:

I am a third generation citrus grower and one of the many family farms that will be affected by the Cross Valley Loop Transmission Project proposed by Southern California Edison. The recent draft environmental report preferred alternate route 2, which will cross one of the citrus properties my family owns. After reading the DEIR and considering its points, I have several concerns that I believe the report does not address or dismisses as unimportant.

First, the DEIR estimates the loss of acreage for route 2 at approximately 23 acres and the loss of acreage for SCE proposed route at approximately 30 acres. However, the report makes clear that the loss of acreage is based only on the footing size for each tower and not the 50-foot clearance area that SCE would require (4.2-13). Since the specifications for the tubular towers have a footing size of approximately 6-10 feet (3-14), the additional trees lost to gain a 50-foot clearance (2-40) increases the acres lost to much higher than 23 or 31 acres.

Second, the DEIR acknowledges that during construction there will be a loss of trees due to the excavation site of 100 x 100 feet at a minimum (3-14). During construction, the loss of acreage rises from the 20 acres to over 80 acres (4.2-17). The report further acknowledges that trees can be replanted in part of this area after construction but that production will not be regained for approximately 10 years (4.2-12). Under current economic conditions, such a loss of production for the timeline of construction and after could be devastating to many family farms. A reduction in profitability for any family farm during these uncertain times puts it at risk and increases the possibility of additional jobs lost for the community.

Next, the report seems to be unclear about the effects of construction and the final power line on irrigation systems. While it states that irrigation will be rerouted during construction, it fails to acknowledge that pumps as well as irrigation lines will need to be moved. Yet the DEIR makes clear on page 2-40, "no valves or controllers of any type would be permitted in the ROW." To move an existing pump is easier said than done. Water is a vital resource but also an elusive one in our area. The current drought has already weakened some wells and the prospect of moving a well that is currently producing enough volume is unreasonable. The chances that a new well would produce the same volume of water are slim-to-none, which would leave the property in danger of additional acres lost for production. The report alludes to this problem when it states on page 4.2-19, "Alternate route 2 could result in impacts to irrigation systems and/or ancillary farming systems that could result in the indirect conversion of Farmland to nonagricultural use." The mitigation measures simply state that irrigation will be re-routed into

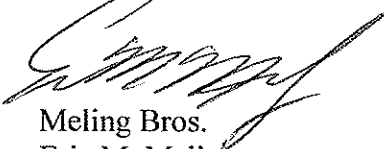
temporary systems during construction (4.2-16). There is no mention in the mitigation measures that valves, controllers, wells, and pumps are under the proposed ROW and need to be relocated. Once again, if a viable well is eliminated from use, the entire acreage is in danger of being lost. Existing wells that function well are too valuable to be lost.

The acreage lost to agriculture on alternate route 3 is much less than any of the other routes. The DEIR acknowledges that this route is the preferred one when it comes to agricultural resources. Much of the route crosses grassland that does not require pumps and irrigation systems like those needed for permanent crops. The likelihood is that wells and lines will need to be moved on all the routes except for route 3, which makes it better suited for SCE purposes. The only negative for route 3 is the vernal pools that are under the existing SCE line. It is my understanding that viable options have already been proposed to mitigate this issue by moving the line east of the vernal pools.

Finally, the report does not consider the importance of wind machines and their placement in a grove to protect it from frost. One wind machine is strategically placed to protect 10 acres. The power line would force the removal of some wind machines and thereby compromise the frost protection for those 10 acres of fruit. The loss of production and eventually trees will increase when wind machines must be relocated and cannot adequately protect all sections of the grove.

It is important to take into consideration the difficulties that the DEIR fails to adequately address. The water, wells, and pumps that will be lost unnecessarily are my greatest concern since water is so difficult to locate. The loss of agricultural land will surely increase from the estimate given in the DEIR. I would only support a route that would eliminate or severely limit the intrusion of the power line and its construction on permanent crops; thus, at this time, I would support route 3 as the best route. The risk to the existence of all family farms in our area is too great under the proposed DEIR report.

Thank you,



Meling Bros.
Eric M. Meling, partner
17456 Ave. 344
Visalia, CA 93292