

STONE CORRAL IRRIGATION DISTRICT

Comment Letter O5

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SCE San Joaquin Cross Valley Loop Transmission Project, (A.08-05-039)
(Alternate 2)

Attn: Mr. Jensen Uchida, Environmental Project Manager
San Joaquin Cross Valley Loop Transmission Project
c/o Environmental Science Associates

My name is William D. West, Manager of Stone Corral Irrigation District. I am submitting written comments on behalf of Stone Corral Irrigation District to give you the district's opinion on SCE's San Joaquin Cross Valley Loop Transmission Project (A. 08-05-039), proposed (Alternate 2).

First, let me thank you for giving the opportunity to submit comments on Edison's proposed transmission loop project. I will be making my comments regarding the (Alternate 2 project). Alternate 2 is proposed to run through my district after it crosses from the west to Road 156 entering the district with new Tubular Steel Pole structures (59-74) and increasing a 150' ROW traveling through the district to the east, crossing over the Friant-Kern Canal at Road 176 and Ave. 376 approximately 3,200 feet to the north, to parallel Road 176 until Avenue 376. The alignment would then proceed east, paralleling Avenue 376 and then southeast through a saddle along the base of Colvin Mountain until Road 194.

The district has (3) sub-laterals that run perpendicular through Edison's ROW that range from 10"-12" ID transite pipe, (1) 24" ID Cenviro main lateral pipe and (1) 54" ID flood control pipe which is 48" from top of pipe to ground surface. Edison's ROW would also run perpendicular over one of the districts flood control ditches that is 127 "feet" wide. Alternate 2 ROW would also require at least (1) grower turnout to be re-located and (1) continuous air-vacuum vent to also be re-located depending on the final constructed steel power pole ROW.

Alternate 2 not only permanently removes some prime agricultural land, it would also reduce the acreage in the district due to the fact that the landowners land is reduced. This affect would cause the district to increase its cost to all land to achieve the same operating expense in the district. The district has tried to reduce its operating cost every year to help its landowners. The district can't continue to reduce costs without harming the integrity of the district. This lose of acreage is small, but could increase an estimated

cost of \$ 7-10 per/acre for all the landowners.

Your project description on the installation of new tubular steel pole structures indicate they will be buried 20-60 feet deep and have an excavated diameter of six to ten feet. You had also specified that if the Foundations that extend into groundwater would require that mud slurry be placed in the hole after drilling to prevent the sidewalls from sloughing. The district has undefined aquifers throughout the entire district. Most of the wells have underground water stratus. The landowners that have wells are pumping on a very limited capacity because of very limited groundwater resources. Should any of the deep holes required for the steel poles have an underground water stratus, you could very well eliminate some underground water pumping capabilities for some landowners. This, in the view of my district is absolutely unacceptable to put its landowners at risk on damaging or even eliminating a precious water resource they rely on. Taken everything in consideration the district feels that Alternate 3 approach would be in the best interest of its landowners and everyone for the following reasons:

1. It uses more of the existing right-of-way, which meets the Garamendi Principles in SB2431
2. The route's primary negative is the Stone Corral Ecological Preserve which can easily be circumvented by moving the line a little to the west.
3. There is less damage to prime agricultural land-permanent crop, wells, drive rows, etc.
4. Alternates 1, 2 and 6 have more of a negative environmental impact to agriculture, communities and people.
5. The land use impacts to the City of Farmersville weren't adequately addressed in the DEIR.

Please accept this letter as the official disapproval of SCE San Joaquin Cross Valley Loop Transmission Project, (A.08-05-039)-Alternate 2.

Sincerely,

William D. West
Secretary/Manager