



IMPERIAL IRRIGATION DISTRICT

OPERATING HEADQUARTERS • P. O. BOX 937 • IMPERIAL, CALIFORNIA 92251

June 14, 2007

Billie C. Blanchard, California Public Utilities Commission
and Lynda Kastoll, Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

RE: Modified Route D Alternative in SDG&E Sunrise Application No. 06-08-010

Dear Ms. Blanchard and Ms. Kastoll:

The Imperial Irrigation District (IID) is filing these comments to support the consideration and hopefully acceptance of the modified Route D Alternative being reviewed in the Environmental Impact Analysis/Environmental Impact Report (EIR/EIS) for the Sunrise Powerlink Project. As you are aware, IID is concerned about the Eastern route proposed by SDG&E and has previously requested the Bureau of Land Management (BLM), Department of Defense and the California Public Utilities Commission (CPUC) to consider and select a route which will not have such a negative impact upon valuable farmland in IID service territory and upon valued pristine land.

Both the Route D alternative as well as the existing "Western route" would be better for Imperial Valley farmers because both avoid active farmlands to a greater extent than do the other routes through the Imperial County. In the future IID will be upgrading a large part of the transmission system to accommodate our system growth as well as to facilitate the export of renewable power from the Imperial and Coachella Valleys and the Route D alternative will not interfere with that transmission upgrade schedule or associated use of existing rights of way.

The Route D alternative appears to be a better overall route for the environment because it is shorter and thus would disturb less pristine land and biological flora and fauna. It is the most consistent alternative with existing land use plans because for the portions that do parallel the SWPL, it uses land in a designated utility corridor in the BLM's California Desert Conservation Act Plan, as well as the Imperial County Land Use Plan.

IID has not had a full opportunity to study the impacts of this route but believes that any reliability concerns for this route can be mitigated. IID offers assistance in studying and formulating any remedial action schemes necessary to ensure the continued reliability of both the SDG&E and IID service territories.

Thank you for this opportunity to explain IID's interests in the new modified Alternative D. If you have any questions or if I can assist in the review of this route please do not hesitate to contact me at (760) 482-3352.

Sincerely,

Frank Barbera
Regulatory Affairs