

Native American Consultation Letters

Contents – Appendix 9C

This section provides letters of consultation from the BLM sent to 49 representatives of 22 tribal governments potentially affected by the Proposed Project or project alternatives.

- Sample letters of consultation from the BLM regarding the proposed project
- Materials sent as attachments to the letters of consultation regarding the proposed project
- Mailing list for the above.

Responses of the 5 tribes listed below appear subsequently.

- Campo Band of Kumeyaay Indians
- Ewiiapaayp Band of Kumeyaay Indians
- Pala Band of Mission Indians
- Santa Ysabel Band of Diegueno Indians
- Viejas Band of Kumeyaay Indians



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 South 4th Street
El Centro, CA 92243
www.ca.blm.gov/elcentro



In Reply Refer To:

CR CA-610-05-26/EIS CA-670-2006-31/CA-47658 (CA667)P

July 5, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Jerome Salgado, Sr., Chairman
Cahuilla Band of Mission Indians
P.O. Box 391760
Anza, CA 92539-1760

Dear Chairman Salgado,

The Bureau of Land Management (BLM) is currently reviewing a Rights-of-Way application for San Diego Gas and Electric Company's (SDG&E) Sunrise Powerlink Transmission Line Project (SRPL). The SRPL project proposes new electric transmission line construction between Imperial Valley and San Diego, including a new substation and other system upgrades and modifications. The purpose of this letter is to inform you of the proposed project, provide a brief description, and based upon your interests, extend to the Cahuilla Band of Mission Indians an invitation to initiate government-to-government consultation pursuant to the *Executive Memorandum of April 29, 1994* and other applicable laws and regulations.

As proposed by SDG&E, the project includes:

Transmission Lines

- A new 500 kV transmission line would begin at the existing Imperial Valley Substation and terminate at a new 500/230 kV substation referred to as the Central East Substation (located southwest of Borrego Springs).
- A new double circuit 230 kV transmission line would begin at the new Central East Substation and terminate at the existing Sycamore Canyon Substation (located at the northern edge of Miramar Naval Air Station).
- A new single circuit 230 kV transmission line would begin at the Sycamore Canyon Substation and terminate at the existing Penasquitos Substation (located just east of Interstate 5, about 5 miles south of Del Mar).

Substations

- The proposed Central East Substation would be located on a private fee-owned property in an undeveloped rural area, west of San Felipe and San Felipe Road in northern San Diego County. An alternative substation site, the Central South Substation, is also being considered.
- The existing Imperial Valley Substation would be modified to accommodate the termination of one new 500 kV transmission line.
- The existing Sycamore Canyon Substation would be modified to accommodate the termination of three new 230 kV transmission lines; two lines from the proposed Central East Substation and one line to the Penasquitos Substation.

- The existing Penasquitos Substation would be modified to accommodate the termination of one new 230 kV transmission line.

Other System Upgrades

- A reconductor of the existing Sycamore Canyon to the existing Elliot 69 kV transmission line would be required.
- The San Luis Rey Substation would be modified with the addition of a third 230/69 kV transformer, and a 230 kV, 69 MVAR shunt capacitor would be added.
- The South Bay Substation would be modified with the addition of a 69 kV, 50 MVAR shunt capacitor.
- A repeater site would be required to accommodate microwave communication between the Central East Substation and the SDG&E grid.

A map for the general project area is provided as an attachment. You may also view these maps and obtain additional information on this proposed project by viewing the Sunrise Powerlink web site at the following address: <http://www.sdge.com/sunrisepowerlink/info/map.htm>.

A Proponent's Environmental Assessment (PEA) is currently being prepared for the project. Later, an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of this project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the PEA and Environmental Impact Report in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). BLM is the federal lead agency for the preparation of the Environmental Impact Statement in compliance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1). A joint CPUC/BLM EIR/EIS is being prepared; the EIR/EIS will evaluate the proposed project and alternatives to the proposed project.

BLM will be the lead agency for consultation with the U.S. Fish and Wildlife Service for Section 7 of the Endangered Species Act, as well as consultation with the California State Historic Preservation Office and other interested parties for Section 106 of the National Historic Preservation Act.

Cultural resources are among the important resources being identified and evaluated during the planning and the preparation of the EIS/EIR for the proposed project as well as the Section 106 consultation process. At this time, we would appreciate receiving any information that you would be willing to share with us on any unique, special, ethnographic, or archaeological resources or areas in or near the proposed project. Also, if you are aware of any other Tribes, individuals or tribally-affiliated organizations that should be contacted regarding this project, please let us know. A list of Tribal governments and other tribal contacts receiving a copy of this letter is enclosed for your reference. SDG&E has contracted with Greystone Environmental and Gallegos and Associates to evaluate the proposed transmission line corridors for cultural resources. Gallegos and Associates have already begun the process of survey for cultural resources for the proposed alternatives. Gallegos and Associates may be contacting you regarding knowledge of cultural resources that might be affected by this project.

BLM would value the participation of the tribe in identifying any issues or concerns that the tribe may have regarding this proposed project. BLM would be glad to meet with the tribe to brief you and to assist in identifying any issues or concerns. Please let us know if you need more information regarding this project, whether the Cahuilla Band of Mission Indians would like to initiate formal government-to-

government consultation for this project, or if you want to identify any issues or concerns that need to be addressed during the NHPA or NEPA review processes. We would also appreciate notice if the Cahuilla Band of Mission Indians believes that the project lies outside its area of interest and does not wish to consult or be contacted about this project in the future. You may informally contact us by phone, letter or email to let us know of your interest or preference for involvement in this proposed project. The BLM contact representatives for this project are:

Tom Zale, Resources Staff Chief
Phone: 760-337-4420
Email: tzale@ca.blm.gov

Lynda Kastoll, Project Manager
Phone: 760-337-4421
Email: lkastoll@ca.blm.gov

Rolla Queen, Heritage and Cultural Resources Program
Phone: 951-697-5386
Email: rqueen@ca.blm.gov

If you have written information or comments you would like to share, please send them to:

Vicki Wood, Field Manager
El Centro Field Office
1661 South 4th Street
El Centro, CA 92243

We look forward to our consultations with you on this project.

Sincerely,



for Vicki Wood
Field Manager

Attachments

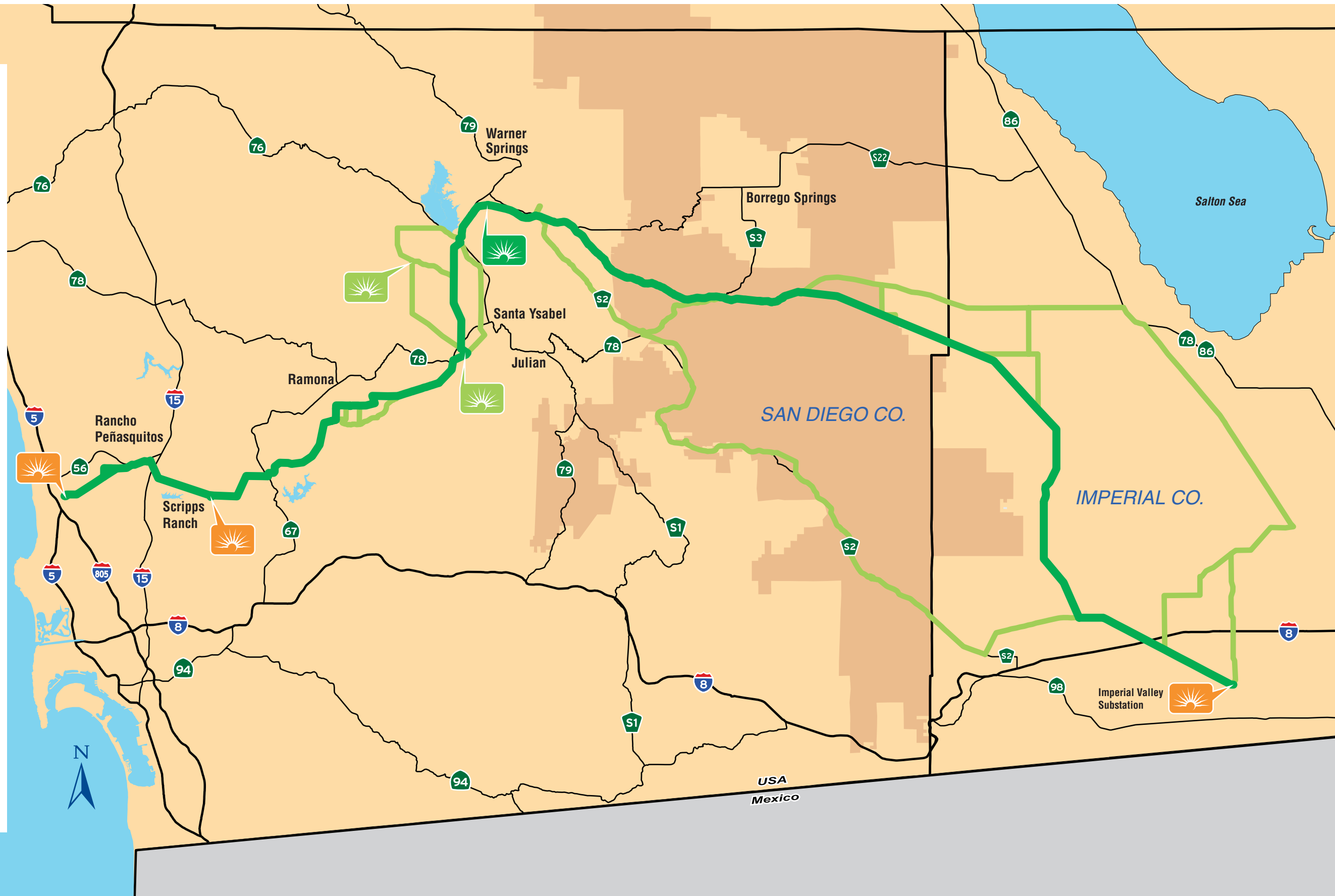
Proposed Routes for Sunrise Powerlink

This map illustrates the preferred and alternate routes for the Sunrise Powerlink.

SDG&E will complete a full environmental assessment of these potential routes prior to submitting them to the California Public Utilities Commission for review and consideration later this year.

LEGEND

-  Preferred Route
-  Alternate Routes
-  Existing Substations
-  Preferred Substation
-  Alternate Substations
-  State Parks
-  Roads





United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 South 4th Street
El Centro, CA 92243
www.ca.blm.gov/elcentro



In Reply Refer To:

CR CA-610-05-26/EIS CA-670-2006-31/CA-47658 (CA667)P

July 13, 2006

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Rhonda Welch-Scalco, Chairperson
Barona Band of Diegueno Indians
1095 Barona Road
Lakeside, CA 92040

Dear Chairperson Welch-Scalco,

On July 5, 2006, the Bureau of Land Management (BLM) mailed a letter and map inviting the Barona Band of Diegueno Indians to initiate government-to-government consultation pursuant to the *Executive Memorandum of April 29, 1994* and other applicable laws and regulations for San Diego Gas & Electric Company's proposed Sunrise Powerlink Project. The map attached to that letter was preliminary and is now outdated; a revised map is attached. This updated map more accurately reflects the current status of the alternative routes.

We would also like to apologize for incorrectly identifying the tribe's name in the body of the July 5th letter. Our contact database does have the correct information for the Barona Band of Diegueno Indians. A programming error in automatic generation of the mailing for this project was responsible for the error.

We apologize for any confusion caused by distribution of the earlier map. As stated in the July 5, 2006 letter, BLM would value the participation of the tribe in identifying any issues or concerns that the tribe may have regarding this proposed project. BLM would be glad to meet with the tribe to brief you and to assist in identifying any issues or concerns. If you need more information regarding this proposed project, or if you have written information or comments you would like to share, please send them to me or to the other parties defined in the July 5, 2006 letter.

We look forward to our consultations with you on this project.

Sincerely,

for Vicki Wood
Field Manager

Attachments



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 South 4th Street
El Centro, CA 92243
www.ca.blm.gov/elcentro



In Reply Refer To:

CR CA-610-05-26/EIS CA-670-2006-31/CA-47658
1430/8100 (CA610.21)P

February 28, 2007

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Rhonda Welch-Scalco, Chairperson
Barona Band of Diegueno Indians
1095 Barona Road
Lakeside, CA 92040

Dear Chairperson Welch-Scalco,

This letter follows our previous letter dated July 5, and a follow-up letter dated July 13, 2006 that included a revised map, concerning a Rights-of-Way application for San Diego Gas and Electric Company's (SDG&E) Sunrise Powerlink Transmission Line Project (SRPL). The SRPL project proposes to construct and operate a new 150-mile electric transmission line between Imperial Valley and San Diego, including a new substation and other system upgrades and modifications. In our previous letters, the Bureau of Land Management (BLM) provided a brief description of the proposed project and invited the Barona Band of Diegueno Indians to initiate government-to-government consultation pursuant to the *Executive Memorandum of April 29, 1994* and other applicable laws and regulations. At this time, we would like to provide a brief update on the status of the BLM's environmental review of the SRPL and to re-extend our invitation to participate in government-to-government consultation for this project.

Environmental Impact Statement/Environmental Impact Report

An Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is currently being prepared to evaluate the impacts of the proposed SRPL Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the Environmental Impact Report in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCK] Title 14, Section 15000 et. seq.). BLM is the federal lead agency for the preparation of the Environmental Impact Statement in compliance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1). A joint CPUC/BLM EIR/EIS is being prepared; the EIR/EIS will evaluate the proposed project and alternatives to the proposed project. The Draft EIS/EIR is currently scheduled to be released for public review on July 13, 2007.

Alternatives Proposed for Analysis

In addition to the project route, transmission elements, substation, and system modifications and upgrades proposed by SDG&E for the SRPL (as described and mapped in our previous letters), the BLM and CPUC have identified 30 route and system alternatives that may reduce or avoid impacts of the project as

proposed. On January 22, 2007, as part of the EIR/EIS scoping process, you were provided with a *Notice of Second Round of Scoping Meetings to the Proposed Sunrise Powerlink Project*, in which these alternatives were described and mapped. Between February 5 and 9, 2007, eight public meetings were held for the CPUC and BLM to hear public comments on the proposed alternatives to the proposed project. After consideration of oral and written public comments received by February 24, 2007, final decisions on alternatives to be analyzed in the EIR/EIS will be made by the CPUC and BLM.

Maps for the general project area and the alternatives were provided in the notice of public scoping meetings. You may also view these maps and obtain additional information on this proposed project by viewing the Sunrise Powerlink web site at the following address:

<http://www.cpuc.ca.gov/Environment/info/asp/sunrise/sunrise.htm>

Status of Cultural Resources Studies

Cultural resources are among the important resources being identified and evaluated during the planning and the preparation of the EIS/EIR for the proposed project as well as the Section 106 consultation process. SDG&E has contracted with Greystone/Arcadis and Gallegos and Associates to evaluate the proposed transmission line corridors and substations for cultural resources. The CPUC has contracted with Aspen Environmental Group, and their subcontractors SWCA and Applied EarthWorks, to conduct cultural resources studies for the alternatives and to analyze the results of all cultural resources studies for presentation in the EIR/EIS, on behalf of the CPUC and BLM.

To date, records searches have been conducted for the proposed project, and are underway for the alternatives. These searches at the South Coastal Information Center, Museum of Man, Begole Archaeological Research Center (Anza-Borrego Desert State Park), BLM, and South Eastern Information Center have provided information about known resources on national, state, and local registries, as well as other previously recorded archaeological sites along the proposed project and alternatives corridors. As reported in a preliminary summary on October 20, 2006, Gallegos and Associates, along with three Native American participants, had surveyed approximately 57 percent of the proposed project, generally along 300 foot corridors. Those surveys resulted in identification of 344 cultural resource sites, along with 115 other isolated artifacts. While these sites are all within the surveyed corridors, it is anticipated that many of these sites would not be directly impacted by construction of the proposed project. SWCA and Applied EarthWorks will be initiating surveys of the alternatives corridors in late February, 2007.

BLM is the lead federal agency for consultation with the California State Historic Preservation Office and other interested parties for Section 106 of the National Historic Preservation Act, as well as consultation with the U.S. Fish and Wildlife Service for Section 7 of the Endangered Species Act. During the course of the archaeological surveys of the proposed project, Gallegos and Associates contacted the Native American Heritage Commission to request a search of the Sacred Lands Inventory and to secure a list of tribes and individuals who might have an interest in the project. Forty-two individuals representing Native American interests were contacted for information pertaining to sacred lands or other cultural resources of concern. While Gallegos and Associates will continue such informal consultation, all formal government-to-government consultation for the project is being conducted by the BLM.

Government to Government Consultation

Now that alternatives to the proposed project have been identified, we would like to re-extend our invitation to the Barona Band of Diegueno Indians to initiate or continue government-to-government consultation for this project. At this time, we would appreciate receiving any information that you would be willing to share with us on any issue or concern related to this proposed project, or any unique, special,

ethnographic, or archaeological resources or areas in or near the proposed project or project alternatives. Also, if you are aware of any other Tribes, individuals or tribally-affiliated organizations that should be contacted regarding this project, please let us know. A list of Tribal governments and other tribal contacts receiving a copy of this letter is enclosed for your reference.

Again, BLM would value the participation of the Barona Band of Diegueno Indians in identifying any issues or concerns that the tribe may have regarding this proposed project. BLM would be glad to meet with the tribe to brief you and to assist in identifying any issues or concerns. Please let us know if you need more information regarding this project, whether the Barona Band of Diegueno Indians would like to initiate formal government-to-government consultation for this project, or if you want to identify any issues or concerns that need to be addressed during the NHPA or NEPA review processes. We would also appreciate notice if the Barona Band of Diegueno Indians believes that the project lies outside its area of interest and does not wish to consult or be contacted about this project in the future. You may informally contact us by phone, letter or email to let us know of your interest or preference for involvement in this proposed project. The BLM contact representatives for this project are:

Tom Zale, Resources Staff Chief
Phone: 760-337-4420
Email: tzale@ca.blm.gov

Lynda Kastoll, Project Manager
Phone: 760-337-4421
Email: lkastoll@ca.blm.gov

Rolla Queen, Heritage and Cultural Resources Program
Phone: 951-697-5386
Email: rqueen@ca.blm.gov

If you have written information or comments you would like to share, please send them to:

Vicki Wood, Field Manager
El Centro Field Office
1661 South 4th Street
El Centro, CA 92243

We look forward to our consultations with you on this project.

Sincerely,



Vicki Wood
Field Manager

Attachments



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 South 4th Street
El Centro, CA 92243
www.ca.blm.gov/elcentro



In Reply Refer To:

CR CA-610-05-26/EIS CA-670-2006-31/CA-47658 (CA667)P

SEP 05 2007

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mark Macarro, Chairman
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Dear Chairman Macarro,

This letter follows our previous letters dated July 5 and July 13, 2006 as well as our letter of February 28, 2007, concerning a right-of-way application for San Diego Gas and Electric Company's (SDG&E) Sunrise Powerlink Transmission Line Project (SRPL) that the Bureau of Land Management (BLM) is currently reviewing. The SRPL project proposes new electric transmission line construction between Imperial Valley and San Diego, including a new substation and other system upgrades and modifications. The purpose of this letter is to provide a brief description of some recently-added aspects of the proposed project, including possible future transmission system expansion, provide a brief update on the status of the BLM's environmental review of the SRPL, and based upon your interests, invite the Pechanga Band of Mission Indians to initiate or continue government-to-government consultation pursuant to the *Executive Memorandum of April 29, 1994* and other applicable laws and regulations.

As proposed by SDG&E, and as previously described, the project includes the following components:

Transmission Lines

- A new 500 kV transmission line would begin at the existing Imperial Valley Substation and terminate at a new 500/230 kV substation referred to as the Central East Substation (located southwest of Borrego Springs).
- A new double circuit 230 kV transmission line would begin at the new Central East Substation and terminate at the existing Sycamore Canyon Substation (located at the northern edge of Miramar Naval Air Station).
- A new single circuit 230 kV transmission line would begin at the Sycamore Canyon Substation and terminate at the existing Penasquitos Substation (located just east of Interstate 5, about 5 miles south of Del Mar).

Substations

- The proposed Central East Substation would be located on a private fee-owned property in an undeveloped rural area, west of San Felipe and San Felipe Road in northern San Diego County. An alternative substation site, the Central South Substation, is also being considered.
- The existing Imperial Valley Substation would be modified to accommodate the termination of one new 500 kV transmission line.
- The existing Sycamore Canyon Substation would be modified to accommodate the termination of three new 230 kV transmission lines; two lines from the proposed Central East Substation and one line to the Penasquitos Substation.
- The existing Penasquitos Substation would be modified to accommodate the termination of one new 230 kV transmission line.

Other System Upgrades

- A reconductor of the existing Sycamore Canyon to the existing Elliot 69 kV transmission line would be required.
- The San Luis Rey Substation would be modified with the addition of a third 230/69 kV transformer, and a 230 kV, 69 MVAR shunt capacitor would be added.
- The South Bay Substation would be modified with the addition of a 69 kV, 50 MVAR shunt capacitor.
- A repeater site would be required to accommodate microwave communication between the Central East Substation and the SDG&E grid.

Environmental Impact Statement/Environmental Impact Report

An Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is currently being prepared to evaluate the impacts of the proposed SRPL Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the Environmental Impact Report in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). BLM is the federal lead agency for the preparation of the Environmental Impact Statement in compliance with the requirements of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1). A joint CPUC/BLM EIR/EIS is being prepared; the EIR/EIS will evaluate the proposed project and alternatives to the proposed project. The Draft EIS/EIR is currently scheduled to be released for public review in late 2007 or early 2008.

Future Transmission System Expansion

SDG&E has stated that a system goal for SRPL is to bring a single 500 kV line as close to the SDG&E load center as is reasonably practicable, then use 230 kV lines to distribute the power to major 230 kV load-serving substations within the San Diego load center. As a result, the design and layout of the proposed Central East Substation would accommodate up to six 230 kV circuits

(i.e., four additional 230 kV future circuits in addition to the two 230 kV circuits proposed). The most likely connection points from Central East Substation for the additional circuits would include Sycamore Canyon, Peñasquitos (with or without tying into Sycamore Canyon), Escondido, Mission and Los Coches Substation (assuming a 230 kV bus is added to this substation). The attached maps show possible existing corridors for the future transmission system expansion.

In addition, there is the potential for a 500 kV “Full Loop” transmission line that would extend from the proposed Central East Substation to a new substation in SCE’s territory between the Serrano and Valley Substations. This alternative would combine SRPL with the proposed Lake Elsinore Advance Pumped Storage (LEAPS) transmission line project, an alternative that will be fully evaluated in the EIR/EIS. The attached maps show the possible route of the 500 kV Full Loop transmission line.

Alternatives Proposed for Analysis

In addition to the project route, transmission elements, substation, and system modifications and upgrades proposed by SDG&E for the SRPL, the BLM and CPUC have identified 30 route and system alternatives that may reduce or avoid impacts of the project as proposed and are going to be fully analyzed in the EIR/EIS. Information on these alternatives was mailed as part of a public scoping period in early 2007. You may view maps for the general project area and the alternatives and obtain additional information on this proposed project by viewing the Sunrise Powerlink web site at the following address:

<http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/sunrise.htm>.

Status of Cultural Resources Studies

Cultural resources are among the important resources being identified and evaluated during the planning and the preparation of the EIS/EIR for the proposed project as well as the Section 106 consultation process. SDG&E has contracted with Greystone/Arcadis and Gallegos and Associates to evaluate the proposed transmission line corridors and substations for cultural resources. The CPUC has contracted with Aspen Environmental Group and their subcontractors SWCA Environmental Consultants (SWCA) and Applied EarthWorks (AE), to conduct cultural resources studies for the alternatives and to analyze the results of all cultural resources studies for presentation in the EIR/EIS, on behalf of the CPUC and BLM.

To date, records searches have been conducted for the proposed project and alternatives, future transmission expansion corridors, and non-wires alternatives. These searches at the South Coastal Information Center, Museum of Man, Begole Archaeological Research Center (Anza-Borrego Desert State Park), BLM, South Eastern Information Center, Eastern Information Center, South Central Coastal Information Center (SCCIC), and Cleveland National Forest (CNF) have provided information about known resources on national, state, and local registries, as well as other previously recorded archaeological sites along the proposed project and alternatives corridors. As reported in a summary on August 3, 2007, Gallegos and Associates, along with three Native American participants, had surveyed approximately 91 percent of the

proposed project, generally along 300 foot corridors. Those surveys resulted in identification of 331 cultural resource sites, along with 145 other isolated artifacts, and updates for 33 previously recorded sites. While these sites are all within the surveyed corridors, it is anticipated that many of these sites would not be directly impacted by construction of the proposed project. As of August 21, 2007, SWCA and AE have conducted cultural resources survey for approximately 49 percent of additional alternative alignments (excluding the non-wires alternatives). A total of 86 cultural resource sites and 46 isolates were newly identified during cultural resource surveys by the SWCA/AE team. Additional previously recorded sites were encountered and updated by survey crews.

Consultation

BLM is the lead agency for consultation with the California State Historic Preservation Office and other interested parties for Section 106 of the National Historic Preservation Act, as well as consultation with the U.S. Fish and Wildlife Service for Section 7 of the Endangered Species Act. During the course of the archaeological surveys of the proposed project, Gallegos and Associates contacted the Native American Heritage Commission to request a search of the Sacred Lands Inventory and to secure a list of tribes and individuals who might have an interest in the project. Forty-two individuals representing Native American interests were contacted for information pertaining to sacred lands or other cultural resources of concern. While Gallegos and Associates and SWCA will continue such informal consultation, all formal government-to-government consultation for the project is being conducted by the BLM.

Again, BLM would value the participation of the tribe in identifying any issues or concerns that the tribe may have regarding this proposed project. We would appreciate receiving any information that you would be willing to share with us on any unique, special, ethnographic, or archaeological resources or areas in or near the proposed project, future transmission system expansion, or project alternatives. BLM would be glad to meet with the tribe to brief you and to assist in identifying any issues or concerns. Please let us know if you need more information regarding this project, whether the Pechanga Band of Mission Indians would like to initiate or continue government-to-government consultation for this project, or if you want to identify any issues or concerns that need to be addressed during the NHPA or NEPA review processes. We would also appreciate notice if the Pechanga Band of Mission Indians believes that the project lies outside its area of interest and does not wish to consult or be contacted about this project in the future. You may informally contact us by phone, letter or email to let us know of your interest or preference for involvement in this proposed project. The BLM contact representatives for this project are:

Tom Zale, Resources Staff Chief
Phone: 760-337-4420
Email: tzale@ca.blm.gov

Lynda Kastoll, Project Manager
Phone: 760-337-4421
Email: lkastoll@ca.blm.gov

Rolla Queen, Heritage and Cultural Resources Program
Phone: 951-697-5386
Email: rqueen@ca.blm.gov

If you have written information or comments you would like to share, please send them to:

Vicki Wood
Field Manager
El Centro Field Office
1661 South 4th Street
El Centro, CA 92243

We look forward to our consultations with you on this project.

Sincerely,

A handwritten signature in black ink that reads "Alan Stein". The signature is written in a cursive style with a loop at the end of the last name.

for Vicki Wood
Field Manager

Attachments

SDG&E SUNRISE POWERLINK PROJECT
Tribal Government Official Contacts

Mr. Jerome Salgado, Sr., Chairman
Cahuilla Band of Mission Indians
P.O. Box 391760
Anza, CA 92539-1760

H. Paul Cuero, Jr., Chairman
Campo Band of Kumeyaay Indians
36190 Church Road, Suite 1
Campo, CA 91906

Harlan Pinto, Sr., Chairman
Ewiiapaayp Band of Kumeyaay Indians
P.O. Box 2250
Alpine, CA 91903-2250

Ms. Gwendolyn Parada, Chairperson
La Posta Band of Kumeyaay Indians
P.O. Box 1120
Boulevard, CA 91905

Ms. Catherine Saubel, Chairwoman
Los Coyotes Band of Cahuilla and
Cupeno Indians
P.O. Box 189
Warner Springs, CA 92086

Mr. Leroy Elliott, Chairman
Manzanita Band of Kumeyaay Indians
P.O. Box 1302
Boulevard, CA 91905

Robert Smith, Chairman
Pala Band of Mission Indians
35008 Pala Temecula Road
Pala, CA 92059

Ms. Tracey Nelson, Chairman
La Jolla Band of Luiseno Indians
22000 Highway 76
Pauma Valley, CA 92061

Mr. Christobal Devers, Sr., Chairman
Pauma/Yuima Band of Mission Indians
P.O. Box 369
Pauma Valley, CA 92061

Mr. Mark Macarro, Chairman
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Mr. Allen Lawson, Jr., Chairman
San Pasqual Band of Diegueno Indians
P.O. Box 365
Valley Center, CA 92082

Mr. Raymond Torres, Chairman
Torres-Martinez Desert Cahuilla Indians
P.O. Box 1160
Thermal, CA 92274

Mr. Anthony Pico, Chairman
Viejas Band of Kumeyaay Indians
P.O. Box 908
Alpine, CA 91903-0908

Mr. John Currier, Chairman
Rincon Luiseno Band of Indians
P.O. Box 68
Valley Center, CA 92082

Mr. Johnny Hernandez, Chairman
Santa Ysabel Band of Diegueno Indians
P.O. Box 130
Santa Ysabel, CA 92070

Ms. Carmen Lucas
Kwaaymii Laguna Band of Mission
Indians
P.O. Box 775
Pine Valley, CA 91962

Ms. Rhonda Welch-Scalco, Chairperson
Barona Band of Diegueno Indians
1095 Barona Road
Lakeside, CA 92040

Ms. Rebecca Osuna, Chairperson
Inaja-Cosmit Band of Mission Indians
309 S. Maple Street
Escondido, CA 92025

SDG&E SUNRISE POWERLINK PROJECT
Tribal Government Official Contacts

Mr. Leon Acebedo, Chairperson
Jamul Indian Village
P.O. Box 612
Jamul, CA 91935

Ms. Carmen Mojado, Co-Chairperson
San Luis Rey Band of Mission Indians
P.O. Box 1
Pala, CA 92059

Mr. Mark Romero, Chairman
Mesa Grande Band of Mission Indians
P.O. Box 270
Santa Ysabel, CA 92070

Mr. Manuel Hamilton, Chairman
Ramona Band of Mission Indians
P.O. Box 391372
Anza, CA 92539

SDG&E SUNRISE POWERLINK PROJECT
Tribal Government Contacts – Copy List

Mr. Keith Adkins, Environmental
Manager
Manzanita Band of Kumeyaay Indians
P.O. Box 1302
Boulevard, CA 91905

Mr. Steve Banegas, Spokesman
Kumeyaay Cultural Repatriation
Committee
Barona Band of Diegueno Indians
1095 Barona Lake Road
Lakeside, CA 92040

Ms. Ruth Calac, President
Rincon Heritage Commission
Rincon Band of Mission Indians
P.O. Box 68
Valley Center, CA 92082

Mr. Ron Christman
Kumeyaay Cultural Historic Committee
Viejas Band of Kumeyaay Indians
56 Viejas Grade Road
Alpine, CA 92001

Mr. Ron Christman
Santa Ysabel Band of Diegueno Indians
P.O. Box 130
Santa Ysabel, CA 92070

Mr. Henry Contreras
San Luis Rey Band of Mission Indians
1763 Chapulin Lande
Fallbrook, CA 92028

Mr. Sam Dunlap
Pechanga Band of Mission Indians
P.O. Box 1391
Temecula, CA 92593

Mr. Michael Garcia, EPA Director
Ewiiapaayp Tribal Office
Ewiiapaayp Band of Kumeyaay Indians
P.O. Box 2250
Alpine, CA 91903

Ms. Shasta Guughen, Assistant Director
Cupa Cultural Center
Pala Band of Mission Indians
35008 Pala Temecula Road
Pala, CA 92059

Mr. Rodney Kephart, Environmental
Coordinator
Santa Ysabel band of Diegueno Indians
P.O. Box 130
Santa ysabel, CA 92070

Mr. Anthony Largo, Environmental
Director
Ramona Band of Mission Indians
P.O. Box 391372
Anza, CA 92539

Mr. Clint Linton
Santa Ysabel Band of Diegueno Indians
P.O. Box 507
Santa Ysabel, CA 92070

Ms. Devon Lomayesva, Esq., Tribal
Attorney
Santa Ysabel Band of Diegueno Indians
P.O. Box 130
Santa Ysabel, CA 92070

Mr. Paul Macarro
Cultural Resources Center
Pechanga Band of Mission Indians
P.O. Box 1477
Temecula, CA 92593

Mr. Anthony Madrigal, Jr., Director
Environmental Affairs
Cahuilla Band of Mission Indians
P.O. Box 391760
Anza, CA 92539-1760

SDG&E SUNRISE POWERLINK PROJECT
Tribal Government Contacts – Copy List

Mr. Will Micklin
Ewiiapaayp Tribal Office
Ewiiapaayp Band of Kumeyaay Indians
P.O. Box 2250
Alpine, CA 91903

Mr. Mark Mojado
San Luis Rey Band of Mission Indians
1889 Sunset Drive
Vista, CA 92081

Ms. Kristie Orosco, Environmental
Director
Rincon Luiseno Band of Indians
P.O. Box 365
Valley Center, CA 92082

Mr. William Pink
Cultural Resources Program
Pechanga Band of Mission Indians
626 E. Old 2nd Street
San Jacinto, CA 92583

Mr. Jimmy QuisQuis
San Pasqual Band of Diegueno Indians
P.O. Box 365
Valley Center, CA 92082

Mr. Alberto Ramirez, Environmental
Coordinator
Torres-Martinez Desert Cahuilla Indians
P.O. Box 1160
Thermal, CA 92274

Mr. Gary Resvoloso
Torres-Martinez Desert Cahuilla Indians
P.O. Box 1160
Thermal, CA 92274

Mr. Russell Romo, Chairman
San Luis Rey Band of Mission Indians
12064 Old Pomerado Road
Poway, CA 92064

Mr. Rob Roy, Environmental Director
La Jolla Band of Mission Indians
22000 Highway 76
Pauma Valley, CA 92061

Mr. Rob Shaffer, Tribal Administrator
Rincon Luiseno Band of Indians
P.O. Box 68
Valley Center, CA 92082

Mr. Dave Toler, Councilman
San Pasqual Band of Diegueno Indians
P.O. Box 365
Valley Center, CA 92082

Mr. Daniel Tucker, Spokesman
Sycuan Band of Mission Indians
5459 Sycuan Road
El Cajon, CA 92021

Responses from Native American Consultation

February 12, 2007

Billie Blanchard, CPUC/Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Dear Ms. Blanchard and Ms. Kastoll,

We are writing to you to express our opposition to the proposed Sunrise Powerlink Project as a whole, but especially the West of Forest Alternative in the Southwest Powerlink Alternatives (Figure 8 map).

The negative environmental impact of the West of Forest alternate route would be enormous. It goes right through the Sycuan Peak Ecological Preserve, within ½ mile of the Crestridge Ecological Preserve, through designated open space, and private properties. Native plants and animals would be affected by this route including threatened and endangered ones. People and animals live in, near, and travel throughout these areas.

The risk of fire is great in the West of Forest route. Some of the terrain is very steep and rocky as well as extremely windy. The sheer speed that a fire can travel up and down the steep mountainsides puts this area at increased risk. Firefighting would be impacted as well. Firefighters consider areas under and near power lines as "undefensible" and do not fight fires near them. Furthermore, fires would not be fought by air due to the dangers of the high towers. In addition, residents in the surrounding areas are listed as losing the only staffed fire department near them, leaving the closest fire station over 8 miles away! The destruction of hundreds of homes from the Cedar fire already proves that this is not a good area for huge power lines! Homeowners in and near this alternate route are at risk of losing their homeowner's insurance due to the hampering of fighting fire efforts created by these lines.

The health risk is great. The electromagnetic fields created will be huge. While research is inconclusive for healthy individuals living near power lines, studies have shown individuals with ill health are adversely affected. Current laws say all power lines like these must be at least 230 feet from all schools and hospitals because of the health concern. These health concerns exist in homes that are located near power lines as well.

Property values would dramatically decrease not only for the property owner's directly affected by the power lines, but also for anyone that has a view of these lines. The varied terrain on this route allows for people to see these power poles for miles. Increased costs or cancellation of homeowner's insurance would be a major financial burden.

If the Sunrise Powerlink Project must be built we recommend using the I-8 corridor. This route has already been impacted by the freeway and has existing Right-of-Ways

running along side it. Furthermore, it is the easiest way to put underground lines in any areas that might need it and will have the least impact on private land owners.

Finally, we believe that SDG&E has not proven that we need these additional power lines. Use of the Non-Wire alternates in the proposed project including the options that already exist make more sense. Reliable wind and solar options that are currently being used successfully elsewhere and the use of the existing Encina and South Bay power plants could address San Diego's need for more power. It would allow San Diego to act responsibly toward getting power that is environmentally friendly as opposed to allowing Sempra Energy to continue to rely on and produce dirty power in Mexico where there are few regulations. Pollutants from the power plants in Mexico can drift back into California, Arizona, and beyond.

Don't let a private business come in and use 1.4 Billion dollars of taxpayer money (or more), take over and destroy private and government lands forever, as well as risk the health of thousands all because of money. This project makes no sense. Please do the right thing and say NO to the Sunrise Powerlink Project.

Respectfully,

Kris Gerdesford



Ewiiapaayp Tribal Office

Ewiiapaayp Band of Kumeyaay Indians

4054 Willows Road · Alpine, CA 91901
P.O. Box 2250 · Alpine, CA 91903
TEL: (619)445-6315
FAX: (619)445-9126
E-mail: wmicklin@leaningrock.net

October 27, 2006

Mr. Kevin O'Beirne
San Diego Gas & Electric Company
8830 Century Park Court – CP32D
San Diego, CA. 92123

Re: Sunrise Powerlink Route Alternative

Dear Mr. O'Beirne:

On behalf of the Ewiiapaayp Band of Kumeyaay Indians (previously known as the Cuyapaipe Band of Mission Indians, and hereinafter the "Ewiiapaayp Tribe"), I express to you our support for the alternate route for the Sunrise Powerlink that is near Interstate 8 in San Diego County, as depicted by the yellow or red alternate routes in the map below:



SOURCE: San Diego Gas & Electric

UNION-TRIBUNE

The Ewiiapaayp Tribe is in the planning stages in development of a wind energy project on its Ewiiapaayp Indian Reservation that would produce between 37.5 MW and 50 MW of electricity beginning in 2010, which would require interconnection to the Sunrise Powerlink.

We also understand the Campo Band of Kumeyaay Indians and the Manzanita Band of Mission Indians, our immediate neighbors to the southeast, are also considering similar wind energy projects that would produce similar amounts of electricity for interconnection to the Sunrise Powerlink.

The preferred route for the Sunrise Powerlink, depicted as the black route in the map above, would require a long and expensive interconnection for the presumptive 112.5 MW to 150 MW that could be produced by the wind energy projects of our Tribe and our neighbor tribes. This clean, renewable, sustainable electricity would help fill the “green” energy targets for SDG&E and the State of California.

The Sunrise Powerlink is also the only option for interconnection because the Southwest Powerlink, a 230 kV transmission line whose route is east/west just south of Interstate 8, is fully subscribed and its upgrade is technically unfeasible and uneconomic (according to SDG&E engineers who evaluated this transmission line for the Kumeyaay Windpower Project that currently operates on the Campo Indian Reservation).

Please consider the benefit of the two alternate routes for the Sunrise Powerlink preferred by the Ewiiapaayp Tribe, and the benefit of the interconnection of the tribal wind energy projects planned in the area of these alternate routes.

Should you have any questions, please contact the Ewiiapaayp Tribe’s Executive Director & COO, Mr. William Micklin, at the tribal office (619) 445-6315, on his mobile phone (619) 368-4382, or by email at wmicklin@leaningrock.net. Thank you.

Sincerely,



Harlan Pinto, Sr.
Chairman

Cc: Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit

From: William Micklin [mailto:wmicklin@leaningrock.net]
Sent: Friday, October 27, 2006 08:15 PM
To: sunrise@aspeneg.com
Subject: Sunrise Powerlink Proposed Routes

On behalf of the Ewiiapaayp Band of Kumeyaay Indians, I wish to convey this Tribe's support for the Sunrise Powerlink. I also wish to convey this Tribe's strong interest in the route for the proposed Sunrise Powerlink being located near the Tribe's Ewiiapaayp Indian Reservation near Mt. Laguna, 12 miles north of Interstate 8 and the existing Southwest Powerlink. The Tribe plans a wind energy project that would produce between 37.5 and 50 MW of electricity that would need an interconnection to the Sunrise Powerlink. We understand the Campo Band of Kumeyaay Indians and the Manzanita Band of Mission Indians, our immediate neighbors to the southeast, also are planning wind energy projects that would produce similar amounts of electricity. The interconnection to the Sunrise Powerlink is essential to our projects. Please consider our request when deciding the route for the Sunrise Powerlink. Please contact me with any questions you may have.

Will Micklin, Executive Director & COO
Ewiiapaayp Band of Kumeyaay Indians
PO Box 2250
Alpine, CA 91903
TEL: (619) 445-6315
MOBILE: (619) 368-4382
FAX: (619) 445-9126
E-MAIL: wmicklin@leaningrock.net

Thank you.

Willie Micklin, Executive Director & COO
Ewiiapaayp Band of Kumeyaay Indians

CONFIDENTIAL COMMUNICATION: E-mails from this Tribe normally contain confidential and privileged material, and are for the sole use of the intended recipient. This E-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521 and is legally privileged. This information is confidential information and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you believe that you received this e-mail in error, please do not read this e-mail or any attached items. Please delete the e-mail and all attachments, including any copies thereof, and inform the sender that you have deleted the e-mail, all attachments and any copies thereof.

Thank you.

Devon Reed Lomayesva, Esq.
Office of the Tribal Attorney
Santa Ysabel Band of Diegueno Indians
PO Box 170
Santa Ysabel, CA 92070
760.765.1093, ext. 102 ~ 760.765.1312 fax
drlomayesva@verizon.net

February 9, 2007

Via Personal Delivery & E-mail to sunrise@aspeneg.com

Billie Blanchard/Lynda Kastoll, CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Dear Ms. Blanchard and Ms. Kastoll:

On behalf of the Santa Ysabel Band of Diegueno Indians ("Tribe"), I submit this letter and request for expedient government to government consultation regarding the proposed SDG&E Sunrise Powerlink Project (Project"). In our review of the proposed project route(s), the Tribe has serious concerns about the likelihood of significant impacts to our Tribal and ancestral lands and surrounding community should any of the proposed routes be approved. These impacts include, but are not limited to the following:

- Significant impacts to sacred lands and cultural resources
- Significant impacts to biological resources, such as animals and plant life essential to the traditional and cultural values and way of life of the Santa Ysabel Tribe
- Aesthetic impacts to the Tribe's economic development projects and Santa Ysabel Reservation residents
- Direct impact on Wireless Telecommunications that runs through and within the Santa Ysabel Reservation through Electro Magnetic Frequency emitted by power lines
- Environmental water shifts, subsurface where cement pad and anchors are to be placed
- Increased danger of fire (based on downed power lines) or through static electricity discharge from tower and cable or lightning caused by tower vein
- Danger and harmful effects to Tribal members and surrounding community due Electro Magnetic Frequency emitted by power lines

Based on the above stated concerns, the Tribe must oppose the proposed Project. The Tribe requests that you contact me as soon as possible to schedule a consultation to discuss the above stated concerns related to the proposed Project and the alternatives being presented in the current scoping sessions. Please contact me at 760-765-1093, ext. 102 or via email at drlomayesva@verizon.net.

Sincerely,


Devon Reed Lomayesva, Tribal Attorney

From: William Micklin [mailto:wmicklin@leaningrock.net]
Sent: Friday, March 2, 2007 05:10 AM
To: sunrise@aspeneg.com
Subject: Written Comment to SDG&E SRPL PEA

March 1, 2007

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: Request for Amendment of the SDG&E Sunrise Powerlink PEA

On behalf of the Ewiiapaayp Band of Kumeyaay Indians (formerly known as the Cuyapaipe Community of Digueno Mission Indians of the Cuyapaipe Indian Reservation, California, or the Cuyapaipe Band of Mission Indians), please accept this letter as the Tribe's additional comments on the scope and content of the SDG&E's Environmental Assessment (PEA) for the Sunrise Powerlink (SRPL). The Tribe's concern is with the segment of the application that deals directly with the routing of the transmission line and associated environmental issues.

The Tribe wishes to once again and emphatically express its concern with SDG&E's evaluation of project alternative routes that were considered and, the Tribe believes erroneously, eliminated. Please refer to SDG&E Alternatives Eliminated from Full Evaluation in the PEA and exhibited as Figure 8 (SDG&E Alternatives Considered and Eliminated).

The Tribe supports alternative route 'B', as its preference, or 'C.' SDG&E considered and eliminated alternative route B and C during its pre-filing study period. The PEA and its Appendix B, Routing & Siting Study, define the rationale for SDG&E's elimination of these alternatives in more detail, as summarized below:

Routing and Siting Alternatives Considered and Eliminated by SDG&E:

- Alternative Routes B, C, D: The 500 kV line would leave Imperial Substation parallel to existing 500 kV Southwest Powerlink (SWPL) into San Diego County, then turn north following existing roads or transmission corridors through portions of Cleveland National Forest and Cuyamaca Rancho State Park. Eliminated by SDG&E due to reliability concerns of locating a new 500 kV line near SWPL, effect on residential properties and sensitive species, and because of the Cleveland National Forest approval process for amending Forest Plan.

SDG&E's process developed the Proposed Project and alternatives and then analyzed in the PEA the set of alternatives, with an analysis completed using the following criteria to determine which ones would be carried forward for full evaluation:

- Does the alternative feasibly meet most of the basic Project Objectives?
- Does the alternative result in an overall net reduction of potential environmental effects rather than a shift of impacts from one area to another?
- Is the alternative feasible from a technical, legal or regulatory perspective?

It is important to note that the CPUC Criteria List states that the PEA must include all reasonable alternatives, “even if these alternatives substantially impede the attainment of the Project Objectives, and are more costly.” These are included in this chapter as Alternatives Evaluated and Carried Forward and those Eliminated from Full Evaluation.

The Tribe believes the facts support its position that alternate routes B or C satisfy all three criteria.

In Chapter 3 of the PEA, SDG&E states SRPL’s objectives are as follows:

1. Ensure SDG&E’s transmission system satisfies minimum reliability criteria.
2. Provide a transmission facilities with a voltage level and transfer capability that (a) allows for prudent system expandability and (b) supports regional expansion of the electric grid.
3. Provide transmission capability for Imperial Valley renewable resources for SDG&E customers to assist in meeting or exceeding California’s 20% renewable energy source mandate by 2010 and the Governor’s proposed goal of 33% by 2020.

In PEA Section 2.2, Project Purpose and Need, SDG&E states “the Sunrise Project is needed to ensure continued reliable service within the San Diego area, to facilitate achievement of California’s renewable resource goals, and to reduce the costs that consumers will otherwise have to pay to meet their day-to-day energy requirements.” SDG&E states the SPRL will (1) Maintain Reliability, and (2) Promote Renewable Energy .

However, Imperial County is a potential source only for a solar power resource, and solar is, indisputably, the most expensive source of renewable energy. Further, the solar energy resource produces energy that peaks during certain hours during daylight, produces no energy after the sun has set, and may produce less energy than expected during periods of inclement weather or cloudy skies.

SDG&E fails to include in its analysis the high value wind power resource available along alternative route B and C on and near the lands of the Bureau of Land Management, the Campo Indian Reservation, the Manzanita Indian Reservation, and the Ewiiapaayp Indian Reservation. This wind power resource area is of the highest quality with class 3 to class 5 winds and wind resource capacities of between 25% and 39%. The operating Kumeyaay Wind Power facility on the Campo Indian Reservation produces 40 MW and has excess capacity to produce additional energy. The Ewiiapaayp Indian

Reservation is developing a similar wind energy project that will produce between 75MW and 100MW. The BLM has contracted with a private wind power developer to study wind energy production on 17,000 acres of BLM east of the Ewiiapaayp Indian Reservation and north of the Campo Indian Reservation.

Wind resource power produces less expensive wind energy than does a solar power resource. More important, however, is that renewable energy is produced most effectively, most efficiently, most reliably, and most economically by the combination of both solar resource and wind resource power. Each balances the load of the other by producing peak-period power during the non-peak period power of the other. If SDG&E is to meet its targets for renewable energy, the rich wind resource power available along alternate routes B and C must be tapped.

The EAP, adopted by the Commission and the CEC in May 2003, accelerated the completion date for increasing the share of renewable energy in energy sales from 20% of sales by 2017 to 20% by 2010. On June 1, 2005 the Governor signed Executive Order S-3-05 accelerating the renewable energy goals to 33% of energy sales by 2020. These are aggressive goals, and if they are to be met, SDG&E must use the alternate routes of B and/or C for the SRPL.

The Tribe believes SDG&E CANNOT satisfy the renewable energy demands OR its minimum reliability criteria with solar resource power from Imperial County alone. If SDG&E is to meet its stated minimum reliability criteria, then criterion number 3 should be amended to read as follows:

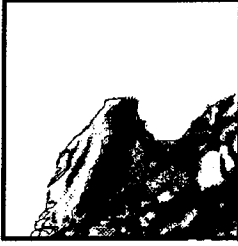
3. Provide transmission capability for Imperial Valley and Laguna Mountain renewable resources for SDG&E customers to assist in meeting or exceeding California's 20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020.

Only then can SDG&E satisfy the SPRL goals to (1) Maintain Reliability, and (2) Promote Renewable Energy.

Pursuant to the above-stated reasons, the Tribe believes SDG&E must, at a minimum, amend its SRPL PEA to analyze the wind resource power available to produce renewable wind energy along alternate routes B and C. The Tribe is confident the re-analysis in an amended PEA will show routes B and C should be the preferred route for the SRPL.

Sincerely,

Willie Micklin, Executive Director & COO
Ewiiapaayp Band of Kumeyaay Indians



Ewiiapaayp Tribal Office

Ewiiapaayp Band of Kumeyaay Indians

4054 Willows Road · Alpine, CA 91901

P.O. Box 2250 · Alpine, CA 91903

TEL: (619)445-6315

FAX: (619)445-9126

E-mail: wmicklin@leaningrock.net

VIA EMAIL, FACSIMILE and USPS
(866) 711-3106, sunrise@aspeneq.com

March 8, 2007

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: Request for Amendment of the SDG&E Sunrise Powerlink PEA

On behalf of the Ewiiapaayp Band of Kumeyaay Indians (formerly known as the Cuyapaipe Community of Digueno Mission Indians of the Cuyapaipe Indian Reservation, California, or the Cuyapaipe Band of Mission Indians), please accept this letter as the Tribe's additional comments on the scope and content of the SDG&E's Environmental Assessment (PEA) for the Sunrise Powerlink (SRPL). The Tribe's concern is with the segment of the application that deals directly with the routing of the transmission line and associated environmental issues.

The Tribe wishes to, once again and emphatically, express its concern with SDG&E's evaluation of project alternative routes that were considered and, the Tribe believes erroneously, eliminated. Please refer to "SDG&E Alternatives Eliminated from Full Evaluation in the PEA" and exhibited as Figure 8 (SDG&E Alternatives Considered and Eliminated).

The Tribe supports alternative route "B", as its preference, or alternative route "C." SDG&E considered and eliminated alternative routes B and C during its pre-filing study period. The PEA and its Appendix B, Routing & Siting Study, define the rationale for SDG&E's elimination of these alternatives in more detail, as summarized below:

Routing and Siting Alternatives Considered and Eliminated by SDG&E:

- Alternative Routes B, C, D: The 500 kV line would leave Imperial Substation parallel to existing 500 kV Southwest Powerlink (SWPL) into San Diego County, then turn north following existing roads or transmission corridors through portions of Cleveland National Forest and Cuyamaca Rancho State Park. Eliminated by SDG&E due to reliability concerns of locating a new 500 kV line near SWPL, effect on residential properties and sensitive species, and because of the Cleveland National Forest approval process for amending Forest Plan.

SDG&E's process developed the Proposed Project and alternatives and then analyzed in the PEA the set of alternatives, with an analysis completed using the following criteria to determine which ones would be carried forward for full evaluation:

- Does the alternative feasibly meet most of the basic Project Objectives?
- Does the alternative result in an overall net reduction of potential environmental effects rather than a shift of impacts from one area to another?
- Is the alternative feasible from a technical, legal or regulatory perspective?

It is important to note that the CPUC Criteria List states that the PEA must include all reasonable alternatives, "even if these alternatives substantially impede the attainment of the Project Objectives, and are more costly." These are included in this chapter as "Alternatives Evaluated and Carried Forward and those Eliminated from Full Evaluation."

The Tribe believes the facts and SDG&E's PEA evaluation criteria support the position that alternate routes B and C satisfy all three PEA criteria.

In Chapter 3 of the PEA, SDG&E states SRPL's objectives are as follows:

1. Ensure SDG&E's transmission system satisfies minimum reliability criteria.
2. Provide a transmission facilities with a voltage level and transfer capability that (a) allows for prudent system expandability and (b) supports regional expansion of the electric grid.
3. Provide transmission capability for Imperial Valley renewable resources for SDG&E customers to assist in meeting or exceeding California's 20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020.

In PEA Section 2.2, Project Purpose and Need, SDG&E states:

"[T]he Sunrise Project is needed to ensure continued reliable service within the San Diego area, to facilitate achievement of California's renewable resource goals, and to reduce the costs that consumers ... will otherwise have to pay to meet their day-to-day energy requirements."

SDG&E states the SPRL will (1) Maintain Reliability, and (2) Promote Renewable Energy¹.

¹ SDG&E states that "[c]onsistent with Senate Bill (SB) 1078 and the State's Energy Action Plan (EAP), Sunrise will provide California consumers more economical access to the Imperial Valley, an area that is rich in renewable resource potential. Further, it will encourage the development of such resources thereby diversifying the State's resource mix and reducing its reliance on fossil-fueled generation. Similarly, Sunrise will also provide access for renewable wind resources development in the eastern portions of San Diego County. California has also established a goal of procuring 20% of its electricity requirements from renewable resources by the year 2010 and is considering a goal of 33% by the year 2020.² The CPUC is also reviewing a number of transmission projects that will help meet the goals articulated in the EAP.³ Central to the achievement of these goals is the ability to access renewable resources located in remote

However, Imperial Valley is a potential source only for a solar power resource (biomass projects produce energy indirectly through the burning of gas produced by the biomass fuel from agricultural products or solid waste; and biomass fuel is not considered renewable energy component). Solar energy is, indisputably, the most expensive of the renewable energies.

With current wind research and development efforts, the California Energy Commission² estimates that newer technologies can reduce the cost of wind energy to 3.5 cents per kilowatt-hour.

The U.S. Department of Energy³ projects solar energy system costs for electricity produced from photovoltaic systems will be reduced to \$0.18/kilowatt-hour (kWh).

But there are also drawbacks to renewable solar energy development according to the California Energy Commission⁴, as follows:

“For example, solar thermal energy involving the collection of solar rays through collectors (often times huge mirrors) need large tracts of land as a collection site. This impacts the natural habitat, meaning the plants and animals that live there. The environment is also impacted when the buildings, roads, transmission lines and transformers are built. The fluid most often used with solar thermal electric generation is very toxic and spills can happen. Solar or PV cells use the same technologies as the production of silicon chips for computers. The manufacturing process uses toxic chemicals. Toxic chemicals are also used in making batteries to store solar electricity through the night and on cloudy days.. Manufacturing this equipment has environmental impacts. Also, even if we wanted to switch to solar energy right away, we still have a big problem. All the solar production facilities in the entire world only make enough solar cells to produce about 350 megawatts, about enough for a city of 300,000 people. that's a drop in the bucket compared to our needs. California alone needs about 55,000 megawatts of electricity on a sunny, hot summer day. And the cost of producing that much electricity would be about four times more expensive than a regular natural gas-fired power plant.”

SDG&E fails to include in its analysis the high value wind power resource available along alternative route B and C that is on and near the lands of the Bureau of Land Management, the Campo Indian Reservation, the Manzanita Indian Reservation, and the Ewiiapaayp Indian Reservation. This wind power resource area is of the highest quality with class 3 to class 5 winds and wind resource capacities of between 25% and 35%. The operating Kumeyaay Wind

areas at a cost that does not compromise the efficacy of the goals. The Sunrise Project is timed to meet the anticipated upsurge in congestion. SDG&E's studies indicate that the Sunrise Project will reduce the costs of accessing renewable energy ...”

² California Energy Commission Overview of Wind Energy In California Webpage (<http://www.energy.ca.gov/wind/overview.html>).

³ Energy Efficiency and Renewable Energy, Solar Energy Technologies Program Webpage (http://www1.eere.energy.gov/solar/mission_vision_goals.html).

⁴ Energy Quest Homepage (<http://www.energyquest.ca.gov/story/chapter17.html>).

Power facility on the Campo Indian Reservation produces 40 MW and has excess capacity to produce additional energy. The Ewiiapaayp Indian Reservation is developing a similar wind energy project that will produce between 75MW and 100MW. The BLM has contracted with a private wind power developer to study wind energy production on 17,000 acres of BLM east of the Ewiiapaayp Indian Reservation and north of the Campo Indian Reservation, which has the potential to produce MWs of renewable energy that is an order of magnitude more than what is being produced today and may be produced tomorrow on these three Indian Reservations. However, this potentially vast treasure of renewable wind energy will not be available to SDG&E customers should SDG&E fail to consider alternate routes B or C.

Wind resource energy and solar resource energy are not incompatible. In fact, these renewable energies are produced most effectively, most efficiently, most reliably, and most economically by the combination of both wind resource energy and solar resource energy. Each balances the load of the other by producing peak-period power during the non-peak period power of the other. If SDG&E is to meet its targets for renewable energy, the rich wind resource power available along alternate routes B and C must be tapped.

The EAP, adopted by the Commission and the CEC in May 2003, accelerated the completion date for increasing the share of renewable energy in energy sales from 20% of sales by 2017 to 20% by 2010. On June 1, 2005 the Governor signed Executive Order S-3-05 accelerating the renewable energy goals to 33% of energy sales by 2020. These are aggressive goals, and if they are to be met, SDG&E must use the alternate routes of B and/or C for the SRPL.


The Tribe believes SDG&E CANNOT satisfy the renewable energy demands or its minimum reliability criteria with solar resource power from Imperial Valley alone. If SDG&E is to meet its stated minimum criteria, then criterion number 3 should be amended to read as follows:

3. Provide transmission capability for Imperial Valley and East San Diego County renewable resources for SDG&E customers to assist in meeting or exceeding California's 20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020.

Only then can SDG&E satisfy the SPRL goals to (1) Maintain Reliability, and (2) Promote Renewable Energy.

Pursuant to the above-stated reasons, the Tribe believes SDG&E must, at a minimum, amend its SRPL PEA to analyze the wind resource power available to produce renewable wind energy along alternate routes B and C. The Tribe is confident the re-analysis in an amended PEA will show routes B and C should be the preferred route for the SRPL.

Sincerely,



Harlan Pinto, Sr.
Chairman **↑ FOR**

VIEJAS

TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Bobby L. Barrett, Chairman
Raymond J. Cuero Hyde, Vice Chairman
Diana L. Aguilar, Tribal Secretary
John A. Christman, Tribal Treasurer
Alan L. Barrett, Councilman
Greybuck S. Espinoza, Councilman
Virginia M. Christman, Councilwoman

Phone: 6194453810
Fax: 6194455337
viejas.com

March 13, 2007

Ms. Vicki Wood, Field Manager
El Centro Field Office
Bureau of Land Management (BLM)
1661 South 4th Street
El Centro, CA 92243

RECEIVED
BUREAU OF LAND MANAGEMENT
2007 MAR 19 PM 3: 37
EL CENTRO FIELD OFFICE
EL CENTRO, CA.

RE: Request to Initiate Formal Government-to-Government Consultation

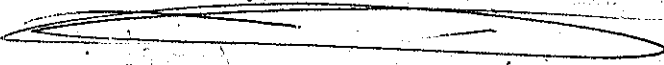
Dear Ms. Wood:

The Viejas Band of Kumeyaay Indians, (appearing in the U.S. Federal Register at Vol. 70, No. 226, p. 71194 as the Viejas (Baron Long) Group of the Capitan Grande Band of Mission Indians of the Viejas Reservation, California) is a self-governing federally recognized Indian Tribe exercising sovereign authority over the lands of the Viejas Indian Reservation; and joint patent administration of the Capitan Grande Indian Reservation.

The Viejas Band has reviewed the February 28, 2007 regarding the Right-of-Way application for San Diego Gas and Electric Company's (SDG&E) Sunrise Powerlink Transmission Line Project (SRPL). The Viejas Band has reviewed the copy of the Notice of Second Round of Scoping Meetings on Alternatives to the Proposed Sunrise Powerlink Project enclosed with the above referenced letter. In addition, the Viejas Band has also received several letters requesting permission to conduct cultural resources record searches from SWCA Environmental Consultants.

The Viejas Band formally request the Bureau of Land Management (BLM) initiate formal Government-to-Government Consultation. In order to identify and clarify issues and concerns, the Viejas Band requests the following information listed in Attachment A prior to meeting with BLM representatives. Thank you.

Sincerely,


Bobby L. Barrett, Chairman
Viejas Tribal Council

Attachment A

- 1 Maps with greater detail than those included in the Notice of Second Round of Scoping Meetings (Figures 1-10)
- 2 Aerial photographs of the alternative routes and their relationships to the Viejas and Capitan Grande Indian Reservations as well as fee lands owned by the Viejas Band along Interstate 8 and Alpine Blvd.
- 3 The consultant conducting the Public Meeting on Alternatives in Alpine, California on February 7, 2007, stated that all private property owners within 300 feet of the alternative routes were notified of potential impacts to their properties. The Viejas Band has not received the private property owner notification for fee lands recorded at the San Diego County Assessor's Office. Please provide copies of the notices for each property held in fee by the Viejas Band that may be impacted by the Interstate 8 alternative.
- 4 Maps indicating the one mile cultural resources record search area for any alternative routes adjacent to the Viejas and Capitan Grande Indian Reservations.

Janov Law Offices, P.C.
901 Rio Grande Boulevard NW, Suite F-144
Albuquerque, New Mexico 87104

Telephone: (505) 842-8302

Telefax: (505) 842-8309

March 23, 2007

VIA E-MAIL (sunrise@aspeneg.com)
AND FIRST CLASS MAIL

Billie Blanchard, CPUC / Linda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: Sunrise Powerlink

Dear Ms. Blanchard and Ms. Kastoll:

We submit the scoping comments that follow on behalf of our client, the Executive Committee of Campo Band of Kumeyaay Indians ("Executive Committee"). The Executive Committee appreciates the opportunity to provide these comments in connection with the preparation of the Sunrise Powerlink EIS/EIR. The Executive Committee also thanks you and your colleagues for meeting with us on February 7, 2007, to discuss the planned environmental review of the proposed project and your consideration of possible alternatives to San Diego Gas & Electric Company's ("SDG&E") proposed route for the Sunrise Powerlink ("SRPL").

The Executive Committee commends the decision to conduct additional scoping to explore alternatives to SDG&E's proposed route for the SRPL. The Executive Committee opposes the proposed route through Anza-Borrego Desert State Park because of the impact the proposed project would have on the unique and important cultural and environmental resources located in and provided by the Park.

Alternatively, the Executive Committee endorses the decision to consider the so-called Interstate 8 Alternative. As we understand it, this alternative would join I-8 in the Boulevard area and follow I-8 to the west for approximately thirty-two miles. This alternative would cross the Campo Reservation along I-8 for more than three miles. As presented at our February 7 meeting, you propose that under this alternative the route would run along the north side of I-8 where it enters the Campo Reservation on the east, would eventually cross to the south side of I-8, and would cross again back to the north side of the Interstate before the route exits the Reservation on the west.

Billie Blanchard, CPUC
Linda Kastoll, BLM
March 23, 2007
Page 2

The Executive Committee urges you to change this proposed alternative in a couple of ways. First, if this alternative were chosen, we would prefer that this route be located entirely on the north side of I-8 across the Campo Reservation. The majority of the commercial and residential development in the I-8 corridor on the Reservation is located on the south side of the Interstate, and the impact of the alternative route on this development would be mitigated most effectively by siting the route on the north side. Due to the location of the Kumeyaay Wind Energy Project on the north side of I-8, however, the Executive Committee understands that this may not be possible. The key issue in this respect is whether, given the distance from the southernmost wind turbine to the highway corridor, a sufficient right-of-way exists for the route on the north side of I-8 in this particular location. The Campo Band would be happy to work with you to examine this issue further.

Second, the Executive Committee believes that, if this alternative were chosen, it should provide for the construction of a new substation on the Campo Reservation for the purpose of interconnecting future wind generators in the area into the SDG&E grid. An additional means of interconnection is necessary for the development of additional wind energy resources in the East County area because the Southwest Powerlink is fully subscribed. In addition to the Campo Band, we understand that the Ewiiapaay Band of Kumeyaay Indians and the Manzanita Band of Mission Indians are considering additional wind energy projects in the area.

As you go forward in analyzing the potential environmental impacts of the Interstate 8 alternative, the Executive Committee asks that you pay particular attention to the impacts of this proposed route on the cultural and environmental resources of the Campo Reservation. In addition, we ask that you closely examine the socioeconomic impacts and the potential fire risks of siting the route along I-8 through the Reservation.

The Executive Committee thanks you for considering these comments. Please direct any questions you may have to Melissa Estes, the director of the Campo Band's Environmental Protection Agency, at (619) 478-9369.

Sincerely,

JANOV LAW OFFICES, P.C.

By:



Samuel D. Gollis

cc: H. Paul Cuero, Jr., Chairman, Campo Band
Ralph Goff, Vice-Chairman, Campo Band
Melissa Estes, Director, Campo EPA



Ewiiapaayp Tribal Office

Ewiiapaayp Band of Kumeyaay Indians

4054 Willows Road
Alpine, CA 91901
TEL: (619)445-6315
FAX: (619)445-9126
E-mail: wmicklin@leaningrock.net

VIA EMAIL, FACSIMILE and USPS
(866) 711-3106, sunrise@aspeneg.com

June 8, 2007

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: Response to CPUC/BLM Notice Regarding an Additional EIR/EIS Alternative to the
Proposed Sunrise Powerlink Project – May 2007

On behalf of the **Ewiiapaayp Band of Kumeyaay Indians** (formerly known as the *Cuyapaipe Community of Digueno Mission Indians of the Cuyapaipe Indian Reservation, California*, or the *Cuyapaipe Band of Mission Indians*), please accept this letter as the Tribe's comments on the "CPUC/BLM Notice Regarding an Additional EIR/EIS Alternative to the Proposed Sunrise Powerlink Project" dated May 2007. As expressed in our previous letters, the Tribe's concern is with the routing of the transmission line and associated environmental issues.

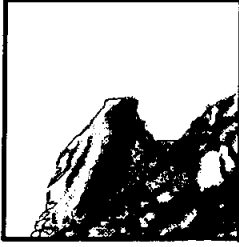
Pursuant to the additional EIR/EIS alternative, the Tribe herewith expresses its support for the BCD Alternative, in conjunction with the Interstate 8 Alternative.

The Tribe believes the facts and SDG&E's PEA evaluation criteria support the position that the BCD Alternative satisfies all PEA criteria (see Chapter 3 of the SRPL PEA), and is confident a re-analysis in an amended PEA will show these routes should be the preferred route for the SRPL.

Please contact the Tribe's CEO, Mr. Willie Micklin, should you have any questions. Thank you.

Sincerely,

Robert Pinto, Sr.
Chairman



Ewiiapaayp Tribal Office

Ewiiapaayp Band of Kumeyaay Indians

4054 Willows Road
Alpine, CA 91901
TEL: (619)445-6315
FAX: (619)445-9126
E-mail: wmicklin@leaningrock.net

VIA FACSIMILE and USPS
(949) 458-9058

June 8, 2007

Stephen O'Neil, Ethnographer/Applied Anthropologist
SWCA Environmental Consultants
Orange County Office
23392 Madero, Suite L
Mission Viejo, CA 92691

Re: Concerns Regarding Sunrise Powerlink Alternatives

Please refer to your letter dated June 6, 2007. The **Ewiiapaayp Band of Kumeyaay Indians** (formerly known as the *Cuyapaipe Community of Digueno Mission Indians of the Cuyapaipe Indian Reservation, California*, or the *Cuyapaipe Band of Mission Indians*), requests a meeting with you to review detailed maps of the alternative alignments pursuant to the CPUC/BLM EIR/EIS for the Proposed Sunrise Powerlink Project. As expressed in our letters to the CPUC and BLM, the Tribe's concern is with the routing of the transmission line and associated environmental issues.

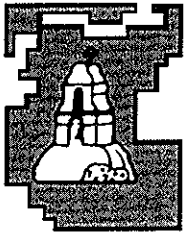
Pursuant to the additional EIR/EIS alternative, the Tribe previously expressed its support for the BCD Alternative, in conjunction with the Interstate 8 Alternative.

Please contact the Tribe's CEO, Mr. Willie Micklin, to schedule a meeting date. Thank you.

Sincerely,

Robert Pinto, Sr.
Chairman

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002



PALA BAND OF MISSION INDIANS

Tribal Historic Preservation Office

35008 Pala Temecula Rd. PMB 445

Pala, CA 92059

Ph: (760) 891-3591
Fax: (760) 742-4543

September 19, 2007

Vicki Wood, Field Manager
USDI-BLM, El Centro Field Office
1661 South 4th St.
El Centro, California 92243

RECEIVED
BUREAU OF LAND MANAGEMENT
2007 SEP 24 AM 11:18
EL CENTRO FIELD OFFICE
EL CENTRO, CA.

Re: Consultation, Project Designated CR CA-610-05-26/EIS CA-670-2006-31/CA-47658 (CA667)P; Proposed Electrical Transmission Lines

Ms. Wood,

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project as above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

We have consulted our maps and have determined that the bulk of the project area as described is neither within the boundaries of the recognized Pala Indian Reservation, nor is it within the territory that the Tribe considers its Traditional Use Area. However, portions of it labeled on your enclosed map by Aspen Environmental Group as the "Santa Margarita Ecological Reserve", the "Pechanga Reservation", and "Rainbow" are within proximity to the Pala Reservation and cultural resource information generated there would likely be useful in better understanding our regional cultural sequence(s). Therefore, we request, as a courtesy, that we be kept in the information loop with regard to these areas as the project progresses and we would appreciate being maintained on the receiving list for project updates, reports of investigations and/or any documentation that might be generated regarding previously reported or newly discovered cultural resource sites within the areas designated.

Further, if the project boundaries are modified to extend beyond the currently proposed limits, we do request updated information and the opportunity to respond to your changes.

Finally, we recommend that Approved Cultural Monitors be present on site during all survey and all ground disturbing activities, should they become necessary. If you do not have access to an Approved Cultural Resource Monitor, contact us and we will work with you to identify appropriately trained individuals.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have general questions regarding cultural resource management, please do not hesitate to call at the contacts indicated. Finally, if you have questions or need additional information about the particular project, contact Joseph M. Nixon at 1 (760) 891 3592 or at e.mail jnixon@palatribe.com.

Cordially,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Joseph M. Nixon, Ph. D., RPA
Tribal Historic Preservation Office
Pala Band of Mission Indians

Cc: Leroy Miranda

C:\JMN\thpo\consultations\proximity\2007\blm_sunrise_9_19_07.doc