

Devon Reed Lomayesva, Esq.
Office of the Tribal Attorney
Santa Ysabel Band of Diegueno Indians
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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:

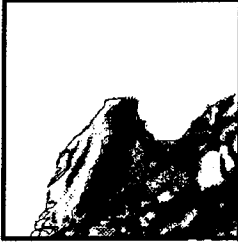
3. Provide transmission capability for Imperial Valley and Laguna Mountain renewable resources for SDG&E customers to assist in meeting or exceeding California's 20% renewable energy source mandate by 2010 and the Governor's proposed goal of 33% by 2020.

Only then can SDG&E satisfy the SRPL 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

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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

PO 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

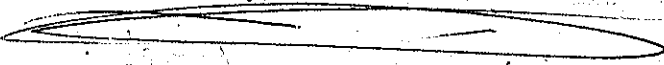
Dear Ms. Wood:

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@aspeneq.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 Ewiiapaayp Band of Kumeyaay Indians and the Manzanita Band of Mission Indians are considering additional wind energy projects in the area.

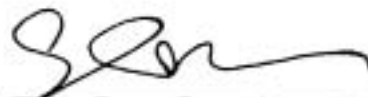
As you go forward in analyzing the potential environmental impacts of the Interstate 8 alternative, the Executive Committee asks that you pay particular attention to the impacts of this proposed route on the cultural and environmental resources of the Campo Reservation. In addition, we ask that you closely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