

September 14, 2006

Mr. J. Tyler Carlson, Regional Manager
Desert Southwest Region
Western Area Power Administration
P.O. Box 6457
Phoenix, Arizona 85005-6457

Dear Mr. Carlson:

The following comments are submitted regarding the Western Area Power Administration's (Western) notice of proposed allocation from the Parker-Davis Project. The notice was published at 71 Fed. Reg. 40503 (July 17, 2006). The comments are submitted on behalf of the following eight tribal and non-tribal entities:

San Luis Rey Indian Water Authority
Pala Band of Mission Indians
Rincon Band of Mission Indians
City of Escondido

La Jolla Band of Mission Indians
Pauma Band of Mission Indians
San Pasqual Band of Mission Indians
Vista Irrigation District.

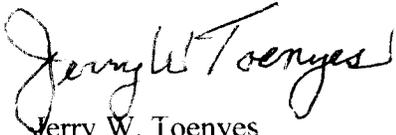
These entities are the beneficiaries of the San Luis Rey River Indian Water Rights Settlement Act, Public Law 100-675 (Title I), 102 Stat. 4000 (November 17, 1988), as amended (Settlement Act). They are referred to herein as the Settlement Parties. The Settlement Parties filed for an allocation of Parker-Davis Project power to facilitate the implementation of the Settlement Act. All of the Settlement Parties are located in northern San Diego County, California, within the marketing area for Parker-Davis Project power referred to in 70 Fed. Reg. 74805 (December 16, 2005).

Representatives of the Settlement Parties attended the public information forum hosted by Western in Ontario, California, on August 31, 2006. We appreciate the information made available at that forum and take this opportunity to respond to the proposed allocation.

The information presented at the public information forum revealed that Western went through a very thorough and methodical process to arrive at the proposed allocations. Giving first consideration for eligibility to applicants in the Parker-Davis Project marketing area who do not have a contract with Western for Federal power resources conforms to the general eligibility criteria published in 70 Fed. Reg. 74805. The procedure disclosed in 71 FR 40503 and at the information forums to allocate Parker/Davis power amongst those first priority entities was well reasoned, giving consideration for widespread use of the Federal resource, magnitude of the benefits, and load. Because proper procedures were followed and a logical rationale for the Parker/Davis allocation was presented in 71 FR 40503 and at the information forums, the Settlement Parties support the proposed allocation and request the allocation be finalized as proposed.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Jerry W. Toenyes". The signature is written in a cursive style with a large, prominent initial "J".

Jerry W. Toenyes
For the Settlement Parties