The County of San Diego agrees that revisions to the construction and operational water demand estimates are required. Please refer to common response WR1. County staff has not revised the estimate of operational water demands because the estimate has accounted for long-term dust control, panel washing, potable use, and the landscape buffer. The County disagrees with the alternative estimate of construction related-water use. Applying a water use factor derived from the ECO Substation Project to the entire Proposed Project area is inappropriate and is discussed in response to another comment letter you submitted under I32-8. However, certain construction work activities delineated in the comment are not addressed in construction or operational water demand estimates for the Proposed Project because they are not part of the Proposed Project. The cement plant and rock crusher for the Tule Wind gen-tie line and the Tule Wind gen-tie line to Boulevard Substation are not part of the Project. The commenter refers to the “Gen Tie Line between Rugged and Boulevard Substations.” The applicants have not proposed a gen-tie line between the Rugged solar farm and Boulevard Substation as part of the Project. Rather, the Rugged
A solar farm will connect to the Tule Wind gen-tie line, passing adjacent to the Rugged site. Water demand for these elements of the Tule Wind project, both the cement plant and rock crusher and the gen-tie line between the Tule Wind project and Boulevard Substation, has been fully evaluated in the Tule Wind Environmental Impact Report. While the Rugged project will connect to the Tule Wind gen-tie line, this line, and the associated Tule Wind cement plant, will be constructed and will operate independently of the Proposed Project. These components of the Tule Wind project are therefore not components of the Project and their impacts were not evaluated in the DPEIR.
RESPONSE AND COMMENTS TO SOTEC SOLAR DEVELOPMENT DRAFT EIR REPORT

- The Eco/Boulevard Project roughly totals 100 acres. The projected construction water usage based on actuals to date is 100 million gallons (100,000,000).
- Therefore, the total projected construction water use for the 3500 acre Sotec Project (without two cement batch plants) = 1,500,000,000 (one billion five hundred million) gallons.
- The water usage of two cement and rock crushing plants covering 25 acres on the Tule/Walker Creek watershed aquifers both operating an estimated 16 hours a day for two years must be in the multiple hundreds of millions of gallons of water. This estimate must also be added to the over a billion gallons total above.

The question of why the SDGE Eco/Boulevard project water use jumped by over three hundred percent after actual experience was discovered is instructive for the Sotec Project construction water estimates. Both Eco/Tule and Sotec projects used the same consultant/engineers (Dudek and Aecom) and the County Engineering/Hydrology teams. The SD&E change document says that errors in judging the depth and the dryness of the alluvial ground of the project were at fault. This does not speak well to the carefulness or the experience level of the consultant/county construction water estimating team on the Sotec Project PEIR. Another reason not to believe the construction water PEIR.

The huge increase in construction water usage estimates and the surrounding facts bring the PEIR estimates further in to question and cause us to insist that the Sotec PEIR team move the Water and Hydrology section of the PEIR from “Not Significant to the Environment” to the “Significant to the Environment” category.

D. Estimated operational water usage and analysis

The Sotec PEIR in table 1-7 projects a total of 5,698,267 gallons of operational water a year. We believe that the operational estimates are also grossly underestimated and therefore will cause further depletion and environmental damage to our aquifers and therefore to our local environment and to our water supplies.

We question the PEIR Table 1-7 estimates for nine tracker washings a year. We provide the following factors to show that the true CPV washing interval estimates should be closer to 52 times a year because of the following reasons:

- The absence of any other operational Sotec CPV farms means that all estimates are also “experimental” and judgmental by the Sotec Marketing team.
- The 2014 Sotec website under Sotec CPV Operations and Maintenance says “The modules must be cleaned periodically also it continues “Module cleaning frequency depends very much on the amount of dust and humidity”
The East County Substation Project Minor Project Refinement Request Form provided by the commenter is not relevant to the Proposed Project, including anticipated water demand. Please refer to common response WR1.
Water Supply Plan. This increase was found to be consistent with the language in the Final EIR/EIS in light of the selection of the ECO Partial Underground 138 KV Transmission Route Alternative (ECO Alternative).

Provide need for refinement (attach drawings and photos as needed):

This MPS request has been prepared as a result of the necessity to increase the Project’s overall construction water usage in order to continue to meet soil compaction standards and dust control requirements associated with the Project’s Mitigation Monitoring, Compliance, and Reporting Program. The conditions at the ECO Substation site, which is currently under construction, have differed from what was originally anticipated, resulting in a higher Project demand for construction water. Based on the geotechnical report, the contractor estimated that remedial removal and remcompaction of alluvial soil at the ECO Substation site was expected to reach a maximum depth of 10 ft. However, during mass grading of the ECO Substation site, remedial removal and remcompaction of alluvium to excess of 20 ft in depth across most of the site was necessary to reach the finalization, final pass soils under the 250/138 kilovolt (KV) and 500 KV pad areas. The deeper than expected alluvial removal also triggered the need to construct steeper slopes outside of the grading limits on the south side of 500 KV pad to accommodate proper compaction of the soils within the grading limits.

In addition, the moisture content of the in-situ soils were lower than anticipated, resulting in higher water usage for remcompaction and dust control. The anticipated amount of water to provide the optimum moisture content for compaction prior to the start of construction was estimated at 50 gallons per cubic yard, based on a typical project at this elevation with similar soils and climate, but the actual water required to achieve the optimum moisture content for compaction has been approximately 47 gallons per cubic yard. In total, SDG&E’s construction contractor was estimating handling approximately 30 percent more material than was originally planned in order to complete grading at the ECO Substation site. These differing site conditions will result in the use of approximately 50 to 55 million gallons of water during mass grading of the ECO Substation site alone.

Accordingly, an increase in the water needed to complete construction of the ECO Substation along with the other Project components is necessary. SDG&E’s construction contractor estimates that approximately 40 to 45 million additional gallons of water will be needed to complete construction of the ECO Substation following mass grading and for construction activities at the Boulevard Substation, the underground and overhead portions of the transmission lines, the SWPL Loop-in, and other associated Project components, such as the construction yards. At the end of August 2013, the Project had used approximately 42 million gallons of water. Therefore, approximately 40 million gallons of water, in addition to the 30 million gallons already approved through the January 2013 Construction Water Supply Plan, will be needed to complete construction of the Project.

Date refinement is expected to be implemented: 10-02-13

SDG&E Approvals

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<tr>
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<th>Name</th>
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<tr>
<td>Environmental Project Manager</td>
<td>Dan Houston</td>
<td>DH</td>
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<tr>
<td>Environmental Compliance Lead</td>
<td>Kristie Reynolds</td>
<td>KR</td>
<td>08/19/13</td>
<td>☑ Yes ☒ No</td>
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<tr>
<td>Substation Project Manager</td>
<td>Mike Haber</td>
<td>MI</td>
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<td>Environmental Field Supervisor</td>
<td>Jeffery Corvall</td>
<td>JC</td>
<td>08/19/13</td>
<td>☑ Yes ☒ No</td>
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Landowner Approval (if required)

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<tr>
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<th>Signature or Other Consent</th>
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No landowner approvals are required as a result of the requested refinement.
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