Response to Comment Letter I32

Howard Cook
February 10, 2014

I32-1

The County of San Diego (County) acknowledges receipt of these comments. This comment is introductory in nature. Specific comments are addressed in detail below.

Dear Robert,

Attached are my 12 page comments on the Solect PEIR. A portion of this was covered at the meeting in Boulevard Last Feb. 6.

Also attached is the referenced Exhibit A in the comments. This is the Eco substation change order of 10/11/2013.

Please call me if you have any questions or if I can assist you in any way.

Regards,

Howard W Cook - 810-768-4640
This comment is introductory in nature and does not raise a significant environmental issue for which a response is required.

The County acknowledges the commenter’s preference for the No Project Alternative. The County disagrees with the commenter’s assertion that the No Project Alternative is the only alternative possible at this time. Each of the commenter’s points is addressed below.

The size of the Proposed Project, involving the disturbance of approximately 1,200 acres, contributes to the nature and scale of the impacts of the Proposed Project on the environment. Based on the environmental analysis, it has been determined that the Proposed Project would have significant, unmitigable impacts related to aesthetics, air quality, and land use (DPEIR, pp. S.0-9 to S.0-13). All feasible mitigation measures to reduce these impacts to below a level of significance were considered, as well as a range of alternatives (DPEIR, pp. S.0-9, S.0-73). The environmentally superior alternative, Alternative 7, would eliminate the significant, unmitigable impacts to air quality and land use; impacts to aesthetics would be reduced, but not to a level less than significant (DPEIR, pp. 4.0-41, 4.0-45). The Proposed Project size contributes to this significant aesthetic impact, as the creation of a utility-scale solar farm in the proposed and alternate locations alters the visual character of the landscape. The Proposed
Project’s size does not render the No Project Alternative the only available alternative.

The County disagrees with the commenter’s assertion that the Proposed Project has “severe environmental impacts,” and that such impacts make the No Project Alternative the only alternative possible. The DPEIR found that the Proposed Project would have potentially significant effects related to various areas analyzed in the DPEIR. However, mitigation is proposed that will reduce all of these environmental impacts to below significance, with the exception of certain impacts related to aesthetics, air quality, and land use (DPEIR, pp. S.0-9 to S.0-71). All feasible mitigation measures to impacts to aesthetics, air quality, and land use have been applied in an effort to reduce these impacts to less than significant. As noted above, the environmentally superior alternative, Alternative 7, would eliminate the significant, unmitigable impacts to air quality and land use; impacts to aesthetics would be reduced, but not to a level less than significant (DPEIR, pp. 4.0-41, 4.0-45). The County decision makers will determine whether to approve the Proposed Project or adopt an alternative.

The County disagrees with the commenter’s characterization of the CPV tracker technology as experimental. See the response to comment C2-47.

The County disagrees with the commenter that the Proposed Project would have major impacts to water or
aquifers, even in the current drought conditions in the state. The DPEIR analyzed the Proposed Project’s potential effects on groundwater and concluded that there would be no significant impact to groundwater, which would provide the water supply for the Proposed Project (DPEIR, pp. 3.1.5-48 to 3.1.5-56). See common response WR1 and WR2.

The County disagrees with the commenter’s assertion that the DPEIR was rushed. A Notice of Preparation was published for the Proposed Project on December 6, 2012. CEQA provides directory time limits for the completion of environmental impact reports (EIRs; see 14 CCR 15108), and the County worked diligently with the cooperation of the applicants to prepare the DPEIR, issuing the DPEIR on January 2, 2014. The DPEIR was available from January 2 to March 3, 2014, for public review and comment.

The County disagrees that the DPEIR is “broad brush” in nature. The DPEIR was prepared on a project-level for the Rugged and Tierra del Sol solar farms and a programmatic level for the LanEast and LanWest solar farms, in accordance with CEQA. CEQA provides for programmatic analysis where a series of actions can be characterized as one large project and are related (14 CCR 15168(a); see also 14 CCR 15165). LanEast and LanWest are related to the Rugged solar farm and Tierra del Sol solar farm by geography, as logical parts in a
The county should not approve an enormous 7500 CPV, 3500-acre commercial solar farm using commercially unproven units. The certain very large environmental costs to the people and the East County environment would make this a huge wager.

The Soltec CPV modules also have not been commercially installed and proven in the San Diego Mountains and the over 3500 foot environment that exists here. The 2014 Soltec website under “Products and Services” says “Soltec solar energy solutions, are the optimal choice for power generation in high DNI regions” it goes on to write under Soltec CPV Operations and Maintenance – “The modules must be cleaned periodically” also it continues “Module cleaning frequency depends very much on the amount of dust and humidity at the location where the system is installed”. The projects are all located at or on the immediate East high side of the “Isolated Divide”. This area is frequently hot and dry and it is also frequently snowy, splitting rain, in the clouds, cold. It also is a very dusty high wind area (Gusts of 60 and 70 mph are common). The Soltec barren project area and the projected multiple others scraped earth wind and solar projects will exacerbate the wind driven dust problem.

The area is also exposed to summer rain monsoons, summer smoke from across the border fires, seasonal oak and cotton wood pollens. This will cause frequent necessary washing, frequent flat nonoperational high wind modes. This in turn, will cause high operational water use and more glare as the units are frequently moving to a washing or flat operational mode. See the next section.

**WATER USAGE PROJECTIONS, IMPACTS ON AQUIFERS AND ANALYSIS**

A. Water Usage and Impacts Summary

The writer and contributors to this report reviewed the Soltec PEIR conclusions section in 3.1.5 as well as the underlying reports found in the Appendices and the Administrative sections. We also consulted with independent geologists and other specialists associated with our independent team. In addition, we investigated actual water usage figures reported in the more than half completed two substation and tie line projects (ISO&IEC’s Tule and Eco projects).

We found some grossly underestimated and misleading projected water use estimates for both the major Construction and Operating phases. Greater water usage estimates led us to examine the effect on the upstream and the downstream water aquifers and we again found misleading conclusions and superficial analysis. These are also detailed in the following sections:

B. Soltec PEIR Incomplete and Incorrect construction water usage estimates.

02/10/2014

The County disagrees with the commenter’s assertion that the CPV tracker technology is commercially unproven. Please refer to the response to comment C2-47, which provides information on current tracker installations and additional information on the technology. The commenter’s concern that unique conditions in this part of the County would necessitate frequent panel washing and high operational water use and more glare is unsubstantiated. As stated in Chapter 1.0 of the DPEIR, it is anticipated that in-place tracker washing would occur every 6 to 8 weeks. In addition, to

The County acknowledges the commenter’s preference for an alternative that would place one dozen trackers away from traveled areas. Please refer to the response to comment I2-8 regarding the County’s consideration of alternative locations for the Proposed Project and its analysis of a reasonable range of alternatives in accordance with CEQA.

See the response to comment C2-47 (CPV tracker technology is not experimental). The commenter’s reference to the status of trackers at the Newberry Springs 1 Solar Project is not an environmental issue related to the Proposed Project and the DPEIR.

**I32-5**

The County disagrees with the commenter’s assertion that the CPV tracker technology is commercially unproven. Please refer to the response to comment C2-47, which provides information on current tracker installations and additional information on the technology. The commenter’s concern that unique conditions in this part of the County would necessitate frequent panel washing and high operational water use and more glare is unsubstantiated. As stated in Chapter 1.0 of the DPEIR, it is anticipated that in-place tracker washing would occur every 6 to 8 weeks. In addition, to
reduce fugitive dust and erosion, each of the solar sites would be treated with a permanent nontoxic soil binding on all cleared areas around trackers and on other cleared areas. Disintegrated granite (DG) or other aggregate base materials may also be placed on all graded internal access and fire roads or other graded pads to reduce the generation of fugitive dust during project operations. Seasonal and environmental factors (rain, smoke, and pollen) are not anticipated to require more frequent in-place tracker washing during project operations than identified in the DPEIR.

Additional glare would not result under the commenter’s hypothetical scenario, estimating “more glare as the units are frequently moving to a washing or a flat operational mode.” Tracker washing would take place during evening and nighttime hours, when all tracker assemblies are aligned in their overnight storage position (DPEIR, Section 1.2.1.1). Therefore, trackers would not have the potential to create glare during washing operations.

Please refer to common response WR1, which presents a revised water estimate. In addition to the responses provided in common response WR1, the County would like to clarify that the Proposed Project does not propose two rock crushers, as suggested by the commenter. As stated in the Final Program Environmental Impact Report (FPEIR) (see Chapter 1.2, Project Description,
for the Rugged Solar Farm), there is only one temporary batch plant and rock crushing facility proposed, and it is located on the Rugged solar farm site; see also Section 1.2.1.1 of the FPEIR for further clarification of the operational characteristics of the proposed batch plant and rock crushing facility.

Please also refer to response to comment I21-1 which is a duplicative of I32-7.

Please refer to common response WR1. As further discussed in common response WR1, the County has revised its estimate of construction water demand upward in the DPEIR.

The County disagrees with the approach used by the commenter to provide an alternate 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 unrealistic, as evidenced by the actual result cited by the commenter of 1.5 billion gallons (or about 4,600 acre-feet). This amount of water is roughly sufficient to serve the annual water needs of a city of about 13,000 to 25,000 people in a hot desert climate, based on data of per capita water use in Banning, Indio, Brawley, Blythe, Imperial, Coachella, El Centro, and Calexico (DWR 2014).
The commenter inaccurately characterizes all areas within the Proposed Project boundaries as requiring the same level and intensity of mass grading and construction activity as the ECO Substation Project. The ECO Substation Project included two stepped substation pads—each of which requires large flat areas—over an approximately 100-acre site whose preexisting elevation varies by about 150 feet from top to bottom (URS 2008). Besides needing to be flat and requiring extensive constructed slopes around and between the pads, seismic design and geotechnical requirements dictated that these areas be over-excavated and recovered by a thick layer of engineered, moisture-conditioned fill. The extent and magnitude of grading, over-excavation, hydration, recompaction, and fill slopes required for mass grading and foundation preparation on the ECO Substation Project is orders of magnitude higher than what would be required for the Proposed Project. Earthwork on the ECO Substation site was estimated in the Final EIR/Environmental Impact Statement (EIS) (CPUC and BLM 2011) to amount to 1.268 million cubic yards, whereas earthwork on the Rugged and Tierra del Sol solar farms is estimated to total 29,835 and 9,429 cubic yards, respectively.

These earthwork estimates are so much lower compared to the ECO Substation because the vast majority of the Proposed Project area will not require any site leveling. In most cases, tracker masts can be installed via
vibratory or conventional pile driving and do not require a totally flat site. Shallow grading and site preparation will be required for interior roads and building pads, but these areas will be comparatively minor such that the general site topography will remain the same. Even the proposed operations and maintenance (O&M) areas and on-site collector substations are not at all analogous or comparable because the concrete pads (e.g., about 7,500 square feet each for O&M buildings and collector substations) will require shallow pad foundations, will mostly be located in places that are already level, and are minor in comparison to the 100-acre ECO Substation site.

It should also be noted that in contrast to the ECO Substation Project, whose geotechnical work was preliminary in nature when the EIR/EIS was being prepared (from which initial estimates have been cited), final geotechnical reports have been completed for both the Rugged and Tierra del Sol solar farms, neither of which indicate the need for deep cuts or extensive fill slopes.

Please refer to common response WR1, which addresses the panel washing schedule and the proposed method of dust control. 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.
RESPONSE AND COMMENTS TO SOITEC SOLAR DEVELOPMENT DRAFT EIR REPORT
EA, 3900-12-010, GPA, Tierra Del Sol, 3900-12-010 MUP, 3900-12-005 REI, 1992-17094-03, AP, Rugged Solar, 3900-12-00 MUP, SCH No: 201211208

I32-10 Please refer to common responses WR1 and WR2. In addition, impacts to existing hydrology and drainage patterns were considered in Sections 31.5.3.1 and 3.1.5.4.1 of the DPEIR.

I32-11 The comment that Proposed Project construction will require over a billion gallons of water for construction is inaccurate and lacks any citation or reference. See the response to comment I32-8 above and common response WR1. Quantitative estimates for water use have not yet been developed for the LanEast and LanWest solar farms (DPEIR, p. 3.1.5-54). Given that the LanEast and LanWest solar farms are smaller in size than either Tierra del Sol or Rugged, water use would be expected to be less than for either of these projects. Project level analysis for both LanEast and LanWest will be required when a Major Use Permit application is submitted.

The County acknowledges the commenter’s concern with regard to current drought conditions and the water supply needs for the Proposed Project. The commenter states that the State Water Resources Control Board “will not be supplying State Water System water to any California water agency, including San Diego’s.” The Proposed Project would utilize groundwater from on-site wells for much of its construction needs and all of the Proposed Project’s operational needs (DPEIR, pp. 3.1.5-50, 3.15-52). Where additional construction water supply is needed, the Proposed Project would obtain...
water from one of several local sources that have sufficient supply, including recycled water from the Padre Dam Municipal Water District (PDMWD). (DPEIR, pp. 3.1.5-50, 3.15-52). Imported water anticipated to supplement the on-site wells during Proposed Project’s peak construction-related needs would be derived primarily from off-site groundwater wells, except the imports from the PDMWD. Although many of San Diego’s water agencies rely partially on imports from the State Water Project, recycled water from the PDMWD recycling facility does not depend on imports from the State Water System.

The County has analyzed the effects of the Proposed Project on groundwater and based on substantial evidence has concluded that the Proposed Project will not have a significant impact (DPEIR, pp. 3.1.5-48 to 3.15-58; see common response WR1). For water supplies to the Proposed Project from outside sources, the DPEIR analyzed whether there are sufficient water resources in the southeast County area to serve the Proposed Project’s needs (DPEIR, pp. 3.1.9-9 to 3.1.9-13, Appendices 3.1.5-5, 3.1.5-6). The groundwater investigations for the Proposed Project demonstrated that off-site water purveyors would provide water to the Proposed Project without causing significant impacts on groundwater in storage or well interference (DPEIR, pp. 3.1.5-54, 3.1.9-12, Appendices 3.1.5-5, 3.1.5-7, 3.1.5-8). To provide an updated estimate of water use for construction, the County
 RESPONSE TO COMMENTS TO SOITEC SOLAR DEVELOPMENT DRAFT EIR REPORT RE: Soitec Solar Development Program Impact Report, Leg No. D52012-2910-120005 ER, 3800-12-010, GPA, Tierra Del Sol, 3300-12-010 MUP, 3900-12-005 REG, 3921-77046.

Response to Comments

December 2014

Final PEIR

The County disagrees with the commenter’s assertion that it has allowed the “fast tracking” of the Proposed Project. See response to comment O16-2.
Please refer to DPEIR Sections 3.5.1.4 and 3.1.9.4.1, which present an analysis of cumulative effects related to groundwater resources and water supply, respectively. The analysis is based on the identification of cumulative projects discussed in DPEIR Section 1.7 and Table 1-12, as well as resource-specific geographic and temporal scope of analysis discussed in both resource sections.

The commenter provides a list of eight projects that should be considered and analyzed as part of cumulative effects. The Tule Wind, Rough Acres rock crushing facility and Energia Sierra Juarez projects were identified in Table 1-12 and were considered in the cumulative effects analysis. The County records do not indicate any applications or information regarding the other cumulative projects provided by the commenter and therefore, they are not considered reasonably foreseeable at this time.

Beyond providing anecdotal accounts of wells and water supply in the eastern slopes region of the Tecate Divide, this comment does not raise specific issues related to the Proposed Project or the adequacy of the environmental analysis in the DPEIR; therefore, no additional response is required. The DPEIR describes the local watersheds and hydrologic areas for the individual project sites. As groundwater is the primary source of water supply for land use in the Proposed Project area, the DPEIR discusses and
The groundwater analysis performed in the DPEIR complies with the County’s Groundwater Ordinance and CEQA Guidelines for Determining Significance for analyzes groundwater resources. The three hydrogeologic units within the Proposed Project area (recent alluvium, decomposed granite (DG) (weathered bedrock), and the underlying crystalline bedrock (Tonalite of La Posta)) are discussed at length in Chapter 3.1.5, Hydrology and Water Quality. The long-term availability of groundwater resources and groundwater sources is discussed in Section 3.1.5.3.4, Groundwater Resources.

Please refer to Section 3.1.9.3.1, Water (page 3.1.9-9), of the DPEIR, for a discussion of whether there are sufficient water resources within the southeast County area necessary to serve the Proposed Project. This section also discusses whether a formal Water Supply Assessment for the Proposed Project is required.

Regarding water availability at Jacumba Community Services District (JCSD) (as discussed in DPEIR, Section 3.1.9 and Appendix 3.1.5-8), any excess off-site water demand over and above that which can be provided by small local water districts would be obtained from the PDMWD. Appendix 3.1.5-8 (Groundwater Resources Investigation Report for JCSD) confirms that JCSD’s Well 6 can supply up to 80,000 gallons per day (gpd). The commenter provides no support for the assertion that JCSD has limited Well 6’s production to 40,000 gpd.
Response to Comments

December 2014

Final PEIR

Groundwater Resources (San Diego County 2007). As explained in common response WR1 and response to comment I32-8, the County disagrees with the commenter’s estimates of construction and operational water usage for the Proposed Project. The County further disagrees with the commenter’s assertion that the Proposed Project will have significant impacts on downstream aquifers and the people and wildlife that depend on them because the commenter overestimates the Proposed Project’s construction and operational water usage, and the hydrology reports prepared for the Proposed Project demonstrate no significant impact.

For a response to the Volker law firm letter, please refer to common response WR2 and the responses to comment letters O4 and O10.

I32-15

The comment that Proposed Project construction will require over a billion gallons of water for construction is inaccurate as indicated in the response to comment I32-8 and common response WR1. With regard to potential effects of groundwater production on plants and wildlife, please refer to the response to comment O10-23.

I32-16

As stated in the response to comment I38-78, McCain Valley, Tule Creek, and Walker Canyon do not provide suitable habitat for peninsular bighorn sheep due to the vegetation communities present, being situated outside of their range, and the intervening unsuitable habitats present between existing range and the sites.
Potential impacts to groundwater were considered and addressed in the DPEIR (see Section 3.1.5, Hydrology and Water Quality). The County does not agree that the Proposed Project will result in impacts to water available for Peninsular big-horned sheep. See common response WR1 and O10-23.

I32-17 The commenter is referred to the response to comment O10-49.

I32-18 The DPEIR does not state that nesting potential for golden eagles will be affected by the Proposed Project. The commenter is referred to common response BIO1.

I32-19 The commenter does not provide reasonable facts or evidence to support its claim that Tule Lake and Jacumba Lake could be partially or fully dewatered by groundwater pumping for the Proposed Project. Nevertheless, the groundwater investigation reports included as DPEIR Appendices 3.1.5-5 through 3.1.5-8 address the potential groundwater-dependent habitat impacts at each proposed source of groundwater. Furthermore, M-BI-PP-15 implements the recommendations of the groundwater reports by requiring a Groundwater Mitigation and Monitoring Program at each proposed source of groundwater. Tule Lake is a surface water reservoir dependent on periodic surface water in-flows and possibly shallow perched groundwater. The alluvial groundwater aquifer from which the production wells would be...
The drawing does not intersect the surface and thus cannot dewater Tule Lake.

The County acknowledges the commenter’s opposition to the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.

The County agrees that the Proposed Project may have substantial adverse effects related to aesthetics and biological resources. Proposed Project effects to the existing visual landscape along Old Highway 80 were discussed in Section 2.1.3. Impacts to plants and wildlife habitat resulting from construction activities were discussed in Section 2.3, Biological Resources, of the DPEIR.

The comment regarding potential impacts to the San Diego tourist economy due to the presence of CPV trackers near Interstate 8 is noted. The County appreciates this comment and will take it into consideration. While this comment is not specifically related to an environmental impact associated with the Proposed Project, the DPEIR discusses potential glare impacts to interstate motorists and recreationists (where applicable). Please refer to Section 2.1.3.3 (Light and Glare) of the DPEIR.

The comments regarding potential glare impacts resulting from operation of CPV trackers and actions taken by the County of San Bernardino Board of...
Supervisors in regard to solar development are noted. The County of San Diego appreciates this comment and will take it into consideration. The potential glare impacts of the Proposed Project are discussed in Section 2.1.3.3 of the DPEIR.

References


## Resource Agency Coordination

<table>
<thead>
<tr>
<th>Resource Agency</th>
<th>Name</th>
<th>Action Required</th>
<th>Date</th>
<th>Documentation (see attached if yes)</th>
</tr>
</thead>
</table>

No resource agency coordination will be required as a result of the requested refinement.
ATTACHMENT A: MINOR PROJECT REFINEMENT REQUEST SCREENING FORM
MINOR PROJECT REFINEMENT REQUEST SCREENING FORM

RESOURCE EVALUATION

The proposal Minor Project Refinement request was evaluated to verify that it will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The following table provides a brief summary of the potential impacts for each resource area analyzed in the Final EIR/EIS.

<table>
<thead>
<tr>
<th>EIR/EIS Section</th>
<th>Summary of Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Change</td>
<td>The impact AIR-1 discussed in Section D.11.3.3 of the Final EIR/EIS recognizes that “water for dust control and other purposes during construction would be transported by water trucks from off-site locations within San Diego County, potentially as far away as San Diego.” Combined with emissions associated with other construction activities (such as mass grading), Impact AIR-1 was classified as Class 1 significant and unquantifiable.</td>
</tr>
<tr>
<td>Air Quality and Climate Change</td>
<td>Section D.9.3.3 of the Final EIR/EIS states that “Construction of the ECO Substation would require up to 30 million gallons of water to be delivered to the site of the ECO Substation site. Water would be transported to the ECO Substation site at the rate of about 1,900 gallons per hour.” The following assumptions were made regarding water deliveries: 4,000 gallons per hour would be used to transport water to the ECO Substation site. In this same paragraph on page D.9-21, the Final EIR/EIS states that “Air quality and climate change would be affected by the ECO Substation site.” From reviewing the detailed discussion in this section of the Final EIR/EIS, it is apparent that the estimate of 30 million gallons of water was for construction of only one Project component—the ECO Substation during its period of peak demand (i.e., grading). This is evident by the specific references to transportation routes and construction duration of just eight months.</td>
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Using the assumptions in Section D.9.3.3 and those found in “Appendix B: Air Quality and Greenhouse Gas Emissions” (Appendix B), the total emissions associated with water deliveries to the ECO Substation during mass grading can be calculated as 1,135,480 miles, assuming that water would be supplied from the City of San Diego (approximately 14 miles round trip) at 45 trips per day for a total of 6,260 vehicle-trips per day for approximately 150 days (52 weeks minus 8 days per week). The table below summarizes the Project’s current water usage through the end of August 2015, which coincides with the period of mass grading for the ECO Substation. The table demonstrates that the total emissions through August 2015 remain less than the 1,355,480 miles contemplated in the Final EIR/EIS analysis. This is in part due to the fact that cleaner sources have been used, reducing the emissions required for the deliveries, and because haul trucks with capacities of 5,000 to 7,000 gallons have been used, reducing the number of trips required to make the deliveries. Based on these actuals, ECO/EIS predicts that the total emissions, and therefore the associated emissions, for the period of peak demand will remain consistent with that contemplated in the Final EIR/EIS.
**Response to Comments**

<table>
<thead>
<tr>
<th>EIR/EIS Section</th>
<th>Summary of Potential Impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source Name</strong></td>
<td><strong>Total Gallons as of 8/31/2013</strong></td>
</tr>
<tr>
<td>City of San Diego</td>
<td>31,767,494</td>
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<tr>
<td>Campa</td>
<td>4,792,587</td>
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<tr>
<td>SDGW*</td>
<td>8,255,636</td>
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<tr>
<td>LCN*</td>
<td>2,733,775</td>
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<tr>
<td><strong>TOTAL</strong></td>
<td>58,095,705</td>
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</tbody>
</table>

*Water-gate trades with a capacity of approximately 3,500 gallons are being used at these locations, tanker-trucks with capacities of 3,000 to 7,000 gallons are not being used.

Further, “Appendix H: Quality and Greenhouse Gas Revisions to Applicant’s Environmental Information” (Appendix H) states “Late phases that would require water deliveries would result in lower combined emissions than this period.” Thus, the analysis indicates that additional water would be required for the Project, but emissions resulting from this water transport were not calculated due to the fact that they would be lower than the peak transport period required for the ECO Substation component of the Project (which represents the worst-case scenario).

Because the analysis was based on a worst-case scenario (with grading of the substation and peak water deliveries occurring at the same time), even if the water remained at the peak level for the whole Project (18 months), which is not anticipated, the emissions would still be under the criteria air pollutant and GHG thresholds analyzed in the Final EIR/EIS.

SDG&E’s Amended Construction Water Supply Plan, which was submitted to the CPUC on September 13, 2013, includes an updated water estimate of 90 million gallons, which represents a 48 million-gallon increase over SDG&E’s prior water usage estimate of 42 million gallons. As described in the Plan, SDG&E is obtaining construction water from a variety of sources, some of which can be as close as four miles from the ECO Substation Site. SDG&E is continuously in discussions with the CPUC and the Project’s construction water sources required by MM IVO-1 and the Project’s Construction Water Supply Plan’s Utilization of the above sources will ensure that the Project’s performance is consistent with the requirements for local water sources required by MM IVO-1 and the Project’s Construction Water Supply Plan.

Utilization of these sources will reduce emissions as well as allow SDG&E the flexibility to use additional water above the 50 million-gallon estimate included in the September 13, 2013 Amended Construction Water Supply Plan, if necessary, to respond to differing site conditions and/or implementation of mitigation measures associated with dust control and fire prevention.

As long as milestones associated with water truck deliveries for the remainder of construction remains less than the 1.15 million mile assumed in the Final EIR/EIS to be expended during the grading period at the ECO Substation, the Project’s unloaders will remain consistent with the impacts previously contemplated by the Final EIR/EIS. As referenced in the table below, the potential to obtain an additional 48 million gallons of water (90 million gallons expected in the Plan minus 42 million gallons already consumed) needed to complete construction over the approximately 12 months that remain can be achieved at the estimated rate of more than 20 million gallons per day delivered to less than approximately 31 percent of the total mileage on approximately 400 thousand mile estimate for total additional mileage.
Response to Comments

Table: Summary of Potential Impacts

<table>
<thead>
<tr>
<th>Source Name</th>
<th>Estimate of Loads per Month</th>
<th>Average Gallons per Load*</th>
<th>Estimated Gallons for 12 months</th>
<th>Average Mileage per Load</th>
<th>Total Mileage</th>
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<td>City of San Diego</td>
<td>48</td>
<td>7,747</td>
<td>331,927</td>
<td>140</td>
<td>80,640</td>
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<tr>
<td>Camps</td>
<td>410</td>
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<td>32,000,000</td>
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<td>248,400</td>
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<td>JCSB</td>
<td>480</td>
<td>7,753</td>
<td>11,241,400</td>
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<td><strong>TOTAL</strong></td>
<td><strong>108</strong></td>
<td><strong>6,800</strong></td>
<td><strong>44,854,470</strong></td>
<td><strong>128</strong></td>
<td><strong>307,400</strong></td>
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</table>

*The gallonage load average is based on actual as of August 27, 2014.

As a result, the total emissions for the requested refinement will be consistent with what was analyzed in the Final EIR/EIS, and the requested refinement will not trigger an exceedance of the greenhouse gas emission threshold. Therefore, the requested refinement will not result in a new significant impact on a substantial portion of the environment, or a substantial increase in the severity of a previously identified impact to air quality, which was evaluated as significant in the Final EIR/EIS, or to climate change, which was evaluated as less than significant (Class III) in the Final EIR/EIS.

Water Resources

No Change: The Impacts HYD-4 discussion in Section D 12.3.3 of the Final EIR/EIS analysis whether the Project could deplete local water supply. The Impact HYD-4 analysis focuses on whether water use during construction would affect groundwater levels in the vicinity of the Project, not the amount of water necessary for construction. The Final EIR/EIS concludes that no impacts is significant but able to be mitigated to a less than significant level (Class II). The Final EIR/EIS further proposes the implementation of Mitigation Measures (MM HYD-3) to “…mitigate impacts to groundwater within the Project area by ensuring that groundwater availability would not be adversely affected” and “…” ensure that use of local groundwater during construction would not impact the production rates of groundwater wells within a 1-mile radius.” MM HYD-3 also requires SDG&E to provide the “…total gallons of water needed through construction…” along with evidence that the water is available from both purchased water sources and/or groundwater wells.

As demonstrated throughout the Impact HYD-4 analysis in the Final EIR/EIS, the Class II significance level for impacts to water resources are not dependent on the amount of water used, but rather whether construction would impact groundwater in the Project area and whether water demand could be met by local sources. Accordingly, any increase, even a substantial increase, in the amount of water used for construction would be consistent with the analysis in the Final EIR/EIS as long as groundwater in the area is not affected and sufficient water can be supplied.

SDG&E’s implementation of MM HYD-3 and the Project’s Amended Construction Water Supply Plan, including Section 7 Monitoring Plan requirements for the Camps Indian Reservation, will continue to demonstrate that SDG&E is able to meet construction water demands from a combination of sources and its use of construction water will not adversely impact groundwater in the area.

As a result, the requested refinement will not result in a new, significant impact.
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<thead>
<tr>
<th>EIR/EIS Section</th>
<th>Summary of Potential Impacts</th>
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<tr>
<td>Public Services and Utilities</td>
<td>The maximum total volumes of 50 million gallons from the City of San Diego, 15 million gallons from the Jacumba Community Service District, and 35 million gallons from the Los Olivos Water Company will remain consistent with the originally approved volumes that were reported in the Construction Water Supply Plan, which was approved by the CPUC on January 31, 2013. Confirmation letters from all three sources of construction water were provided in the September 2013 Amended Construction Water Supply Plan. No public services will be disrupted as a result of the proposed refinement in no additional construction activities from what was described in the Final EIR/EIS will be associated with the requested increase in construction water usage. The duration of construction will not be greater than what was originally anticipated, and no different types or additional volumes of waste as was analyzed for in the Final EIR/EIS will be generated. Because no public services, utilities, or water supplies will be interrupted as a result of the refined refinement, no additional refinement will not result in a new, significant impact or a substantial increase in the severity of a previously identified impacts to public services and utilities, which was evaluated as significant but able to be mitigated to less than significant (Class II) in the Final EIR/EIS.</td>
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<td>Transportation and Traffic</td>
<td>No Change: As discussed in the Air Quality and Climate Change evaluation of this Minor Project Request Screening Form, the emissions associated with water truck deliveries during construction will stay within the 1.15 million metric tons as done in the Final EIR/EIS as a result of the proposed refinement. No additional construction activities associated with the proposed refinement will be conducted in accordance with the Project’s Traffic Control Plans. Therefore, the refined refinement will not result in a new, significant impact nor a substantial increase in the severity of a previously identified impacts to transportation and traffic, which was evaluated as significant but able to be mitigated to less than significant (Class II) in the Final EIR/EIS.</td>
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