

From: [Fogg, Mindy](#)
To: [Real, Sami](#); [Gungle, Ashley](#)
Cc: [Bennett, Jim](#)
Subject: RE: 90M gallons of water & 1M miles trucking
Date: Thursday, November 21, 2013 8:51:19 AM

Okay.

From: Real, Sami
Sent: Wednesday, November 20, 2013 8:23 PM
To: Fogg, Mindy; Gungle, Ashley
Cc: Bennett, Jim
Subject: RE: 90M gallons of water & 1M miles trucking

We should call Pat and just loosely talk about this to see what he has to say. Let him know that the inquiry we received was not specifically for his project but does affect his project and that we are giving him a heads up. We should conclude the conversation by letting him know that we need to address this in the EIR.

After we talk to Pat, we should formulate an email using the information Jim and Justin provided to provide guidance on what information needs to be included. Let me know how I can help or if you need my assistance on anything. Thanks guys!

Sami Real, Chief of Project Planning
COUNTY OF SAN DIEGO | Planning & Development Services
T. 858.694-3722

From: Crumley, Justin
Sent: Wednesday, November 20, 2013 4:36 PM
To: Real, Sami; Jones, Megan
Cc: Bennett, Jim
Subject: RE: 90M gallons of water & 1M miles trucking

FYI - Additional information on the substation water use increase.

The minor project refinement request to the CPUC can be found at the following link:

http://www.cpuc.ca.gov/environment/info/dudek/ecosub/MPR_8_Request.pdf

And the CPUC approval of the minor modification can be found at the following link:

http://www.cpuc.ca.gov/environment/info/dudek/ecosub/MPR_8_Approval.pdf

Justin A. Crumley

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CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATION

From: Real, Sami
Sent: Wednesday, November 20, 2013 1:49 PM
To: Jones, Megan; Crumley, Justin
Cc: Anzures, Claudia F; Gretler, Darren M; Bennett, Jim; Beddow, Donna
Subject: RE: 90M gallons of water & 1M miles trucking

Here is information from Jim as requested in your email. It is a little on the long side, but it is all important.

I have attached the FEIR sections from the water and traffic sections. The original EIR for the ECO Substation indicated 30,000,000 gallons of use in the EIR. The EIR indicates up to 7,500 truck trips from the City of San Diego or Sweetwater Authority could be generated if the project needs all of its water from offsite sources. Her statement of 90,000,000 gallons was a figure the Union Tribune indicates in the article she cited. According to the U-T, sources for the project now include the City of San Diego (provided 8.8 million gallons so far and agreed to provide up to 50,000,000 gallons), Jacumba Community Services District (provided 8.8 million gallons thru September 2013 and agreed to provide up to 15 million gallons), and the Campo Indian Reservation (reportedly provided 7.2 million gallons thru September 2013). We have no jurisdiction over the three entities. It looks like they have tripled their water demand based on the article.

The EIR indicates that for mitigation groundwater investigations would be prepared that would evaluate short- and long-term impacts on the other wells in the project area and that the applicant would provide demonstration of compliance with all applicable laws and regulations prior to construction. In the case of getting water from the City of San Diego, no groundwater investigation would be needed. In the case of Campo, this is a sovereign nation and I'm not sure what would be required. There are NEPA considerations with tribes but we have no jurisdiction. For the Jacumba Community Services District, they are regulated by the California Department of Public Health (Sean Sterchi is the contact in our jurisdiction). This would be under their purview.

For groundwater projects in our jurisdiction, we would have required a full groundwater investigation to evaluate both cumulative and direct impacts from pumping groundwater prior to

allowing groundwater to be used. This would include evaluating well interference on nearby well users and groundwater dependent habitat. Depending on the amount of water to be utilized, we may also require a Groundwater Monitoring and Mitigation Plan (GMMP) in which it could include a cap on the maximum amount of water that could be extracted, and also water level thresholds in which pumping would be required to cease pumping to ensure impacts to other groundwater users and groundwater dependent habitat remain less than significant. We may also require biological monitoring to evaluate the health of nearby groundwater dependent habitat throughout the pumping for a project. If habitat were shown to degrade, mitigation for impacts to the habitat would be required.

This does have an impact on other projects we have in the area since there are several solar projects searching for short-term water to meet their construction demands. Soitec's Rugged Solar and Tierra Del Solar projects are looking at importing water from the City of San Diego, the Pine Valley Mutual Water Company, and from the Jacumba Community Services District. We received a groundwater investigation from Soitec this past month for Jacumba Community Services District and they are proposing groundwater from the same well that SDG&E is likely getting their water. They did not identify in their groundwater investigation that SDG&E is currently pumping that well and is going to take up to 15,000,000 gallons from the well for their project. I found this out by you bringing this to my attention today and I will make this a comment in my review of Soitec's groundwater investigation for Jacumba Community Services District. In conclusion, we are in a situation where we have multiple projects with overlapping timelines that are one by one going forward with finding imported water sources and as a result we are at risk of not accurately evaluating impacts to groundwater resources as this case today shows. We also are facing potentially significant groundwater impacts if projects are allowed to go forward without adequate investigation and mitigation monitoring in place. We will continue to struggle with this issue until the construction phase of the wave of solar/wind projects in the backcountry has worked itself through.

Please let me know if there is anything else you need at this time.

Sami Real, Chief of Project Planning
COUNTY OF SAN DIEGO | Planning & Development Services
T. 858.694-3722

From: Jones, Megan
Sent: Tuesday, November 19, 2013 5:34 PM
To: Real, Sami
Cc: Anzures, Claudia F; Gretler, Darren M
Subject: FW: 90M gallons of water & 1M miles trucking

Hi Sami

Can someone from your team look into the background behind the increase in water usage to see what the EIR/EIS approved by the CPUC said and pass that back to me and Claudia? We know that the County doesn't control groundwater usage on tribal lands, but we'd like your team's thoughts on if the cumulative water usage is beyond what was studied and approved.

Many thanks.

From: Donna Tisdale [<mailto:tisdale.donna@gmail.com>]
Sent: Sunday, November 17, 2013 5:10 PM
To: Fitzpatrick, Lisa
Cc: Jacob, Dianne; Wilson, Adam
Subject: 90M gallons of water & 1M miles trucking

Hello Lisa,

Please forward this message to the Commissioners for me.

SDG&E's 85-acre 500/230/138kV ECO / Boulevard Substation project and 14 miles of new line is under construction between Jacumba and Boulevard in East County.

A 300% increase in construction water is at issue along with promised fire mitigation going to other communities out of the project impact zone--while Boulevard and Jacumba Fire stations were mostly unstaffed.

The linked Union Tribune article covers some of the controversy surrounding SDG&E's vastly inadequate handling of estimating and procuring water for their new substation--that reportedly has the largest footprint of any substation in the nation.

They estimated 30M gallons of water that just got upped to 90M gallons--with no public input. The project EIR approved for up to 1.5 million miles of trucking.

As you know this is just one of many massive energy / infrastructure projects planned to industrialize our ruggedly beautiful area that is rich with biological and cultural resources.

The cumulative impacts to our groundwater and public health and safety will be raised again and again with each new project. Please carefully consider the long-term impact of your decisions on some of the County's most vulnerable residents and resources.

UT Article: <http://www.utsandiego.com/news/2013/Nov/14/tp-power-project-wasting-water/?#article-copy>

photo gallery showing massive size of project <http://www.utsandiego.com/news/2013/nov/13/sdge-substation-east-county-water-use/>

short video clip from article: <http://www.utsandiego.com/news/2013/nov/13/sdge-substation-east-county-water-use/>

CLOSED FOR FIRE SEASON? DEATH IN DE ANZA, CLOSED FIRE STATIONS INFLAME IRE IN RURAL RESIDENTS: <http://www.eastcountymagazine.org/node/14170>

Regards

Donna Tisdale, Chair
Boulevard Planning Group
619-766-4170