EAST COUNTY SUBSTATION PROJECT
MINOR PROJECT REFINEMENT
REQUEST FORM

Date Submitted:	09-20-13 (Originally Submitted) 10-01-13 (Resubmitted)	**Request #:**	8
Date Approval Required:	10-01-13	**Landowner:**	Not Applicable (N/A)
APN:	N/A		

Refinement from (check all that apply):

☐ Mitigation Measure	☐ APM	☑ Project Description	☐ Drawing	☐ Other

Identify source (mitigation measure, project description, etc.):

Pages B-3 and B-37 of Section B Project Description of the Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and the Construction Water Supply Plan, which was approved by the California Public Utilities Commission on January 31, 2013, for the East County (ECO) Substation Project (Project) describe the water usage required during construction of the Project. The information in this Minor Project Refinement (MPR) request describes a change in the amount of construction water consumption that was previously estimated in the Final EIR/EIS and the Construction Water Supply Plan. A description of and justification for the requested refinement are provided on pages 1 and 2 of this MPR request.

Attachments (check all that apply):

☑ Refinement Screening Form (provided as Attachment A: Minor Project Refinement Request Screening Form)

Under Order 3 of the Decision Granting SDG&E Permit to Construct the East County Substation Project (D.12-04-022), the CPUC may approve minor project refinements under certain circumstances. In accordance with Order 3 of the Decision, respond "yes" or "no" to the following questions (a) through (d).

(a) Is the proposed refinement outside the geographic boundary of the EIR/EIS study area? No. The proposed refinement requests a change to the Project description than what was presented in the Final EIR/EIS, which provided an estimated volume of water to be used during construction, and will not result in any change in geographic location.

(b) Will the proposed refinement 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 EIR/EIS? No. No change in impacts to any resource area evaluated in the Final EIR/EIS is anticipated to result from the requested refinement. The following resource areas apply to the Project's construction water usage and are discussed in detail in Attachment A: Minor Project Refinement Request Screening Form: air quality, climate change, water resources, public services and utilities, and transportation and traffic.

(c) Does the proposed refinement conflict with any mitigation measure or applicable law or policy? No.

(d) Does the proposed refinement trigger an additional permit requirement? No. Construction water usage was contemplated in Section B. Project Description of the Final EIR/EIS. No additional permits will be required.

Describe refinement being requested (attach drawings and photos as needed):

SDG&E is requesting an increase in the total water usage that will be needed throughout construction of the Project. This MPR request proposes that the total construction water usage be increased to an estimated 90 million gallons. While the Final EIR/EIS included an estimate of 30 million gallons for total construction water use, SDG&E increased this estimate to 50 million gallons prior to the start of construction as part of its January 2013 Construction

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 (UG Alternative).

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

This MPR 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 recompaction of alluvial soil at the ECO Substation site was expected to reach a maximum depth of 10 feet. However, during mass-grading of the ECO Substation site, remedial removal and recompaction of alluvium in excess of 20 feet in depth across most of the site was necessary to reach the formational, hard pan soils under the 230/138 kilovolt (kV) and 500 kV pad areas. The deeper than expected alluvial removal also triggered the need to construct a buttress slope 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 recompaction 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 30 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 45 gallons per cubic yard. In total, SDG&E's construction contractor now estimates handling approximately 50 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 line, the SWPL Loop-in, and the 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 50 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

Title	Name	Approval Initials	Date	Conditions (see attached)	
Environmental Project Manager	Don Houston	DH	09/19/13	☐ Yes	☑ No
Environmental Compliance Lead	Kirstie Reynolds	KR	09/19/13	☐ Yes	☑ No
Substation Project Manager	Matt Huber	MH	09/19/13	☐ Yes	☑ No
Environmental Field Supervisor	Jeffry Coward	JC	09/19/13	☐ Yes	☑ No

Landowner Approval (if required)

Landowner Name	Signature or Other Consent
No landowner approvals are required as a result of the requested refinement.	

Resource Agency Coordination				
Resource Agency	**Name**	**Action Required**	**Date**	**Documentation (see attached if yes)**
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 proposed 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 impact for each resource area analyzed in the Final EIR/EIS.

EIR/EIS Section	Summary of Potential Impacts
Air Quality and Climate Change	*No Change.* The Impact AIR-1 discussion 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 unmitigable. Section D.9.3.3 of the Final EIR/EIS stated that "Construction of the ECO Substation would require up to 30 million gallons of water. If enough water cannot be located on site or purchased from nearby sources, water would be imported from the City of San Diego or the Sweetwater Authority." The following assumptions were made regarding water deliveries: 4,000-gallon water trucks would be used to delivery water, with a maximum of 43 truck trips per day over 8 months, resulting in "an additional 7,500 truck trips" to transport water to the ECO Substation Project site. In this same paragraph on page D.9-22, the Final EIR/EIS states that "All vehicles and equipment would enter the ECO Substation site from Old Highway 80." 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 evidenced by the specific references to transportation routes and construction duration of just eight months. Using the assumptions in Section D.9.3.3 and those found in "Appendix 8- Air Quality and Greenhouse Gas Revisions to Applicant's Environmental Information" (Appendix 8), the total mileage associated with water deliveries to the ECO Substation during mass grading can be calculated as 1,155,840 miles, assuming water would be supplied from the City of San Diego (approximately 140 miles round trip) at 43 trips per day for a total of 6,020 vehicle-miles traveled per day for approximately 192 days (32 weeks times 6 days per week). The table below summarizes the Project's current water usage through the end of August 2013, which coincides with the period of mass grading for the ECO Substation. The table demonstrates that the total mileage through August 2013 remains less than the 1,155,840 miles contemplated in the Final EIR/EIS analysis. This is in part due to the fact that closer sources have been used, reducing the mileage 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, SDG&E predicts that the total mileage, and therefore the associated emissions, for the period of peak demand will remain consistent with that contemplated in the Final EIR/EIS.

EIR/EIS Section	Summary of Potential Impacts

Source Name	Total Gallons as of 8/31/2013	Approximate # of Loads	Average Gallons Per Load	Average Miles per Load (roundtrip)	Total Miles as of 8/31/2013
City of San Diego	31,767,494	5,528	5,747	140	773,873
Campo	4,792,587	805	5,950	46	37,052
JCSD*	8,251,839	2,997	2,753	8	23,979
LOS*	243,575	131	1,859	30	3,931
TOTAL	**45,055,495**	**9,462**	**16,309**	**88.65710489**	**838,835**

*Water spray trucks with a capacity of approximately 3,500 gallons are being used at these locations; tanker trucks with capacities of 5,000 to 7,000 gallons are not being used.

Further, "Appendix 8- Air Quality and Greenhouse Gas Revisions to Applicant's Environmental Information" (Appendix 8) states "Later 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 (16-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 40-million-gallon increase in SDG&E's prior water usage estimate of 50 million gallons. As described in the Plan, SDG&E is obtaining construction water from a variety of sources, some as close as four miles from the ECO Substation Site. SDG&E is committed to reducing emissions for water hauling on the Project. Therefore, once mass grading at the ECO Substation is complete, SDG&E will utilize water from the two closest water sources—Campo Indian Reservation and Jacumba Community Services District—to the maximum extent feasible while remaining compliant with the protections for local water sources required by MM HYD-3 and the Project's Construction Water Supply Plan. Utilization of these closer sources will reduce emissions as well as allow SDG&E the flexibility to use additional water above the 90 million gallon estimate included in the September 30, 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 mileage associated with water truck deliveries for the remainder of construction remains less than the 1.15 million miles assumed in the Final EIR/EIS to be expended during mass grading at the ECO Substation, the Project's emissions will remain consistent with the impacts previously contemplated by the Final EIR/EIS. As demonstrated in the table below, the potential to obtain an additional 48 million gallons of water (90 million gallons requested in the Plan minus 42 million gallons already consumed) needed to complete construction over the approximately 12 months that remain can be accomplished while limiting mileage for water deliveries to less than approximately 35 percent of the total mileage (an approximate 400,000 thousand mile estimate for total additional mileage

<table>
<tr><th>EIR/EIS Section</th><th>Summary of Potential Impacts</th></tr>
<tr><td></td><td>to deliver 48 million gallons divided by 1.15 million miles assumed in the Final EIR/EIS) expended during the mass grading activities at the ECO Substation site. Note that actual trips, gallons per load, and the distribution of sources may vary from that provided below, which is for illustration purposes only.
<table>
<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></tr>
<tr><td>City of San Diego</td><td>48</td><td>5,747</td><td>3,310,272</td><td>140</td><td>80,640</td></tr>
<tr><td>Campo</td><td>450</td><td>5,950</td><td>32,130,000</td><td>46</td><td>248,400</td></tr>
<tr><td>JCSD</td><td>400</td><td>2,753</td><td>13,214,400</td><td>8</td><td>38,400</td></tr>
<tr><td>TOTAL</td><td>898</td><td>4,800</td><td>48,654,672</td><td>125</td><td>367,440</td></tr>
</table>
*The gallons per load averages are based on actuals as of August 27, 2013.

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 emissions threshold. Therefore, the requested refinement will not result in a new, significant impact or a substantial increase in the severity of a previously identified impact to air quality, which was evaluated as significant and unavoidable (Class I) in the Final EIR/EIS, or to climate change, which was evaluated as less than significant (Class III) in the Final EIR/EIS.</td></tr>
<tr><td>Water Resources</td><td>No Change. The Impact HYD-4 discussion in Section D.12.3.3 of the Final EIR/EIS analyzes whether the Project could deplete local water supplies. 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 this impact 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 Measure (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 area 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 Campo 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 nor a</td></tr>
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EIR/EIS Section	Summary of Potential Impacts
	substantial increase in the severity of a previously identified impact to water resources, which was evaluated as significant but able to be mitigated to less than significant (Class II) in the Final EIR/EIS.
Public Services and Utilities	*No Change.* The Impact PSU-3 discussion in Section D.14.3.3 of the Final EIR/EIS discusses the availability of water in amounts sufficient to meet the substantial demands necessary for construction so as not to adversely impact area sources of water. The Final EIR/EIS concludes that this impact is significant but able to be mitigated to a less than significant level (Class II). As demonstrated throughout the Impact PSU-3 analysis in the Final EIR/EIS, the Class II significance level for impacts to public services and utilities 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 area sources. As described in the Water Resources evaluation of this Minor Project Refinement Request Screening Form, 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 Campo 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. Therefore, the proposed refinement will not result in an additional impact to any public water supply. 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 Live Oak Springs Water Company will remain consistent with the originally confirmed 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 as 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 requested refinement, the requested refinement will not result in a new, significant impact nor a substantial increase in the severity of a previously identified impact 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.
Transportation and Traffic	*No Change.* As discussed in the Air Quality and Climate Change evaluation of this Minor Project Request Screening Form, the mileage associated with water truck deliveries during construction will not exceed the 1.15 million miles assumed in the Final EIR/EIS as a result of the proposed refinement. In addition, all construction activities associated with the requested refinement will be conducted in accordance with the Project's Traffic Control Plans. Therefore, the requested refinement will not result in a new, significant impact nor a substantial increase in the severity of a previously identified impact 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.