



October 4, 2010

Mr. Iain Fisher
CEQA Project Manager
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3296

Re: Tule Wind Project - Response to Data Request No. 13

Dear Mr. Fisher:

Pacific Wind Development, Inc., a wholly owned subsidiary of Iberdrola Renewables, Inc. (IBR) received your Data Request No. 13 regarding the Tule Wind Project. Enclosed is IBR's response.

If you have questions regarding this information, please contact me at 503-796-7781 or Patrick O'Neill at 858-712-8313.

Sincerely,

Jeffrey Durocher
Wind Permitting Manager

cc (via e-mail): Greg Thomsen, BLM (GThomsen@blm.gov)
Thomas Zale, BLM (Thomas_Zale@blm.gov)
Jeffery Childers, BLM (jchilders@blm.gov)
Rica Nitka, Dudek (rnitka@dudek.com)
Patrick O'Neill, HDR Engineering (Patrick.oneill@hdrinc.com)

Water

1. It has been recommended by the County of San Diego, that Iberdrola contact a nearby water district, such as the Padre Dam Municipal Water District, to obtain a service availability letter for the construction water supply needed for the Tule Wind Project. Please provide information on discussions with a nearby water district or a service availability letter by October 8, 2010.

Response

Project Construction Water Needs

The project will include the construction of up to 134 wind turbines and associated roads, transmission lines and support facilities. The following water requirements have been estimated for the project construction (all work is anticipated to be performed over five-day work weeks):

1. Road Construction – Up to 120,000 gallons per work day will be required over a 72-day construction period. With continuous water storage, 24-hours per day, seven days per week, it is estimated that well production of 59.5 gallons per minute (gpm) will be required to support this work.
2. Turbine Foundation Concrete Mixing – Depending on the turbine, each foundation will require 7,500 to 15,000 gallons of water per foundation. Assuming that two foundations are constructed each day in accordance with the 72-day work schedule; up to 30,000 gallons of water per day would be required. The maximum continuous pumping rate (24-hours per day, seven days per week), required to support concrete mixing for three turbine foundations per day is equivalent to 14.8 gpm.
3. Dust Control – During construction, 50,000 to 100,000 gallons per working day will be required for dust control on project roads. The maximum continuous pumping rate required for dust control would be 49.6 gpm for an estimated nine-month construction period.

To present a worst-case water demand during construction activities, it is assumed that the combination of road construction, turbine foundation concrete mixing and dust control activities occur at one time. Simultaneous activities will generate a peak water use of approximately 250,000 gallons per day (124 gpm). This peak water demand will drop quickly after the initial road building activity is completed. Once road construction is complete, the peak water demand level is estimated to be about 130,000 gallons of water per day. Water sources were identified to meet the peak water demand.

Identified Water Sources

Geo-Logic Associates completed groundwater testing was on two wells located within the project area. According to the *Estimate of Available Groundwater Memo*, September 7, 2010 prepared by Geo-Logic Associates, test data indicates that one well on Rough Acres

Ranch has an estimated well yield of 60 gpm with a minimum of 50 gpm. The second well located on Ewiiapaayp Reservation has a pumping rate of 80 gpm.

The two wells have a combined total pumping rate of 130 gpm, which would be sufficient to meet the peak water demand of 124 gpm during concurrent road construction, turbine foundation concrete mixing and dust control activities.

In addition to the two identified wells located on the project, four potential water supply sources are available for the project as listed below:

- Live Oak Springs – This entity operates a well that pumps about 40,000 gallons per day (25 to 30 gpm) and maintains a 100,000 gallon pond, and two large tanks for additional storage capacity. Live Oak Springs has signed a County of San Diego Will-Serve letter committing to 40,000 gpd for immediate use and 80,000 gpd with additional storage tanks (equivalent of 28 to 55 gpm).
- Jacumba Community Service District (CSD) – CSD's well produces 200 gpm. CSD has signed a County of San Diego Will-Serve letter committing to up to 40,000 gpd (equivalent of 28 gpm).
- State Correctional Facility- Two wells with an estimated well production of 45 and 65 gpm.
- City of El Centro- The City of El Centro has indicated that wastewater plant effluent water is available for purchase.

The additional water sources (not including the effluent water) would provide an additional 80,000 to 120,000 gpd or approximately 55 to 83 gpm of water during construction activities in the event that the identified water sources on the project site are not sufficient.

HDR contacted the water service providers listed below in an effort to identify all possible water sources that could be utilized during project construction activities. According to the water service providers that were contacted during research, potable water can not be sold to any entity located outside of the water service provider's service boundaries, per the San Diego County Water Authority and the California Regional Water Board requirements.

- Padre Dam Water District: The district will not provide potable water, although recycled water is available for sale. The Padre Dam Water District is currently committed (tentative) to sell recycled water to the SDG&E Sunrise Energy Project. SDG&E has completed a water study which could be utilized for the Tule project if SDG&E does not commit to use the water. This water is not suitable for concrete construction, but could be utilized for dust suppression and roadway construction. Padre Dam contact (Personal phone conversation with Courtney Mael, Padre Dam Engineer, September 30, 2010).
- Lake Morena Oak Shores Water Company: The Tule project is out of the company's service area; it cannot provide water.

- Otay Water District: The project is out of the district's service area; it cannot provide water.
- Pine Valley Mutual Water Company: The project is out of the company's service area; it cannot provide water.
- Sweetwater Water District: The project is out of the district's service area; it cannot provide water.
- Lakeside Water District: The project is out of the district's service area; it cannot provide water. The district has no recycled water available.
- Majestic Pines Community Service District: The Tule project is out of its service area; it cannot provide water. The district has no recycled water available.

Summary

As discussed above, the project's estimate of water demand (250,000 gallons/day) is a worst-case estimate that assumes road construction, turbine foundation concrete mixing and dust control activities occur simultaneously. This occurrence is unlikely, and actual instantaneous demand will be lower. The project has identified more than ample supply of groundwater (*Estimate of Available Groundwater Memo*, September 7, 2010 Geo-Logic Associates) to serve the worst-case water demand.

Furthermore, please note that under California law, Tule Wind, LLC cannot enter into a discretionary agreement with, or obtain a final "written verification" from, a municipal water district for this project at this point in time because doing so would commit the agency to a definite action prior to the completion of the Environmental Impact Report. See *Riverwatch v. Olivenhain Mun. Water Dist.*, 170 Cal.App.4th 1186 (2009) (responsible agency Olivenhain Municipal Water District violated CEQA by committing to supply recycled water to Gregory Canyon landfill prior to the completion of EIR for the project).