



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 11.12.12 through 11.13.12

### **Summary**

The BLM is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (FEIS) for the Tule Wind Energy Project. A federal Right-of-Way (ROW) for the Tule Wind Energy Project was granted by the BLM to Tule Wind, LLC, a subsidiary of Iberdrola Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIS to mitigate or avoid significant impacts are implemented in the field. The ECCMP status report is intended to provide a description of construction activities, a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs), the compliance status of mitigation measures required by the ECCMP, and anticipated construction activities for the following week.

On September 17, 2012, the BLM issued a Notice to Proceed (NTP) #1 to Tule Wind, LLC authorizing geotechnical activities within the Tule Wind Energy Project site. The requirement for completion of design-level geotechnical investigations was analyzed as mitigation in the Final Environmental Impact Statement (FEIS), adopted as part of the Record of Decision (ROD) and further stipulated in the ROW Grant issued to Tule Wind, LLC. The requirement for design-level geotechnical activities was identified as Mitigation Measure (MM) Geo-3 in these documents.

All geotechnical testing will occur within the proposed limits of disturbance identified in the Tule Wind FEIS and more specifically at the geographic coordinates included in Appendix D to the Tule Wind Project Plan of Development (December 2011). Geotechnical activities authorized under NTP-1 include turbine borings, met tower borings, soil test pit exactions, visual examination, completion of Multichannel Analysis of Surface Waves (MASW) and seismic refraction testing. Detailed definitions of these activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section ([http://tulewindeccmp.com/NTP\\_1\\_Approval.pdf](http://tulewindeccmp.com/NTP_1_Approval.pdf)).

This status report is intended to provide a summary of site inspections conducted by the BLM's third party environmental compliance monitors (ECMs), and the compliance status of mitigation measures required per NTP #1 for these activities for the reporting period of 11.12.12 through 11.13.12.

## **Site Inspections, Mitigation Monitoring, and Compliance**

Areas of active geotechnical investigations were observed to verify implementation of the measures stipulated in the project's ECCMP as they pertain to current activities. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed. Pre-construction mitigation measures including but not limited to development and implementation of preconstruction plans have been completed as indicated in NTP #1. The following compliance activities were observed by third party ECMs on site during geotechnical activities:

### Worker Environmental Awareness Program (WEAP) Training (MM-Bio-1b)

Tule Wind, LLC initiated geotechnical activities on 11.12.12 following an Environmental Awareness Tailgate Training Program as conditioned in the NTP. All personnel on site were Worker Environmental Awareness Program (WEAP) trained.

### Archaeological Resources

Tule Wind, LLC has contracted with an archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. ECMs observed archeological monitors and Native American observers present during all ground disturbing activities. As conditioned in NTP #1, these monitors worked with biological monitors on site to ensure activities were completed within the approved work limits and conducted sweeps within the work limits prior to geotechnical activities (see photo 1). Monitors ensured that resources were avoided during geotechnical investigation by walking in front of geotechnical equipment, and flagging ESA's for avoidance per MM-CUL-1.

### Biological Resources

Tule Wind, LLC has contracted with a consulting firm approved by the BLM to complete day-to-day biological monitoring of the construction activities in accordance with the ECCMP and MM Bio-1c. Biologists' resumes were submitted to the BLM prior to geotechnical activities in conformance with NTP #1 conditions to ensure monitors had all appropriate qualifications. ECMs observed biological and archeological monitors identifying routes within the approved work limits for gaining access to the required work areas. Monitors were observed accompanying geotechnical drill rigs, back hoes, and other vehicles travelling overland on approved project access or on existing roads in order to avoid and minimize impacts to sensitive biological resources such as special-status plant and animal species. ECMs also observed monitors surveying geotechnical testing sites and surrounding areas for compliance with all environmental specifications. ECMs observed that topsoil was re-used to cover disturbed areas in order to facilitate re-growth of vegetation (see photo 2).

### Dust Control Plan Implementation (MM-AQ-1)

In accordance with the Dust Control Plan, traffic speeds on unpaved roads and the right-of-way were limited to 15 miles per hour. ECMs observed watering and stabilizing of active unpaved access roads, parking areas, and staging areas throughout the week to suppress fugitive dust (see photo 3). When dust occurred as a result of vehicle traffic, ECMs observed monitors reminding vehicle operators of the speed limits on unpaved access roads in accordance with the Dust Control Plan.

### Fire Prevention/Protection Plan (MM-FF-1; MMBio-1f)

During all construction activities, Tule Wind, LLC is required to adhere to the guidelines and commitments within the Construction Fire Prevention/Protection Plan, NTP-1 conditions of approval and Variance Approval 001.

As approved through Variance Approval #001, ECMs observed required fire equipment and personnel on the project site during geotechnical activities, including an all-wheel drive Type III engine, as well as a 2 -wheel drive Type II Water Tender for use during any backhoe work. The vehicles were also equipped with 1,200-foot hose extensions per NTP-1 conditions of approval (see photo 4).

Fire crews were observed applying appropriate fire suppression techniques and monitoring disturbed areas for one hour post-geotechnical activities in accordance with the Construction Fire Protection/Prevention Plan.

### **Geotechnical Schedule:**

Scheduled Activities for Next Week: None.

### Potential Delays to the Online Date of the Project

- None identified at this time.

### **Plan Review Submittal Items**

- None identified at this time.

## Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 <ul style="list-style-type: none"> <li>• turbine borings</li> <li>• met tower borings</li> <li>• soil test pit exactions</li> <li>• visual examination</li> <li>• completion of Multichannel Analysis of Surface Waves (MASW) and seismic refraction testing at up to 15 percent of the turbine locations</li> <li>• thermal resistivity sample collection at approximately six locations</li> <li>• electrical resistivity testing at approximately six locations</li> </ul>	Yes

## Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.2.12

## Photographs from the Week



**Photo 1:** ECMs observed biological monitors, archaeological monitors, Native America observers and fire personnel monitoring initial ground disturbing activities and ensuring crews stayed within the approved work limits.



**Photo 2:** Vegetation is not removed during geotechnical activities and topsoil is reused as backfill following geotechnical testing activities in accordance with the NTP condition.



**Photo 3:** ECMs observed water trucks pre-watering access roads to minimize dust caused by moving vehicles and heavy equipment.



**Photo 4:** ECMs observed Type III Fire Engines equipped with 1,200-foot hose extensions.

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