



# BLM Authorized Officer Weekly Report

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**Project:** Tule Wind Energy Project

## Weekly Project Update

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**Reporting Period:** 10.24.16 through 10.30.16

## Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind, LLC, a subsidiary of Avangrid 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 FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This 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 October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. All preconstruction activities are required to occur within the limits of disturbance identified in the Tule Wind FEIS and in accordance with the POD. Preconstruction activities authorized under the LNTTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes. Detailed definitions of these activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section<sup>1</sup>.

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 LNTTP-2 for these activities for the reporting period of 10.24.16 through 10.30.16.

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<sup>1</sup> [http://tulewindeccmp.com/CACA\\_49698\\_Tule\\_LNTP%2010.12.16%20\[FINAL\].pdf](http://tulewindeccmp.com/CACA_49698_Tule_LNTP%2010.12.16%20[FINAL].pdf)

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

Preconstruction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 as they pertain to current activities. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed. All vehicles were observed using existing BLM access roads and crews walked to work sites from the existing access roads. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

### Archaeological Resources

Tule Wind, LLC has contracted with an archeological consulting firm, ASM, approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP, the Management Plan for Archaeological Resources, the Memorandum of Agreement, and the Tribal Participation Plan for the Tule Project. ECMs observed cultural resource monitors staking ESAs. ESA signage was being staked at the outer edge of the work limits in areas where cultural sites are within 100 feet, satisfying and often exceeding the recommended 50-foot buffer in most areas.

### Biological Resources

Tule Wind, LLC has contracted with a consulting firm, ICF, approved by the BLM to complete day-to-day biological monitoring of the construction activities in accordance with the ECCMP and MM Bio-1c. In conformance with conditions outlined in LNTP-2, biologists' resumes were submitted and approved by the BLM prior to initial preconstruction activities in October 2016.

### *Cacti Salvage*

ACS crews (subcontractor to ICF) were observed using hand tools to remove cacti on the access road from McCain Valley Road to Structure G5 under the supervision of a Biological Monitor/Habitat Restoration Specialist. The work area was accessed on foot and the edges of the temporary disturbance areas were marked to sub-meter accuracy with pin flags. Cacti were removed from the entire width of the temporary disturbance area along the road and transported and staged within the temporary impact laydown yard near Structure E2 where they will eventually be planted in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.

### *Buffers*

All cacti salvage activities were observed within the temporary disturbance work limits.

### *ESA Staking*

Biological Monitors installed ESA signs at the intersection of each Jurisdictional Drainage (JD) and the boundary of the temporary disturbance limits. The JDs are mapped as having a total width of about 2 feet. One sign was staked at the center of each intersection per concurrence with the BLM

### Survey Staking

ECMs observed Westwood survey crews staking road center lines and installing t-posts at turbine locations along the D, G, and E Strings. Flagging was installed in accordance with Avangrid's flagging color scheme to assist with delineating and defining the various colors of flagging to be used on-site.

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

ECMs observed appropriate dust control measures being implemented.

### 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 (as applicable to preconstruction activities) and LNTP-2 conditions.

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, motors shut off prior to and during fueling, and vehicles parked in areas with no vegetation. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5- gallon backpack pumps, and shovels.

### **Preconstruction Activities Schedule:**

- Staking access roads and turbines,
- Cacti salvage, and
- Biological and Cultural ESA staking.

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

- Tule Wind, LLC has submitted a request for Notice to Proceed (NTP) for clearing, grading, excavation, and staging. The NTP request is under review by the BLM.

## 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
2	10.12.16	Preconstruction activities as follows <ul style="list-style-type: none"> <li>• disturbance limit staking and limited vegetation clearing</li> <li>• staking of ESAs</li> <li>• removal of weeds in accordance with the HRP</li> <li>• cacti salvage</li> <li>• pickup truck and ATV use of BLM access routes authorized under the Eastern San Diego County Resource Management Plan (2008)</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
2	5.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	5.20.13

## Representative Photos



**Photo 1:** Crews using hand tools to salvage cacti on the access road from McCain Valley Road to turbine G5 in accordance with LNTP-2 authorized activities and the Habitat Restoration Plan (MM-BIO-1D).



**Photo 2:** Salvaged cacti was observed being staged within a temporary impact laydown yard near turbine E2 in accordance with Section 5.2.2.1 of the Habitat Restoration Plan (MM-BIO-1D).



**Photo 3:** ESA signs being placed along the work limits prior to ground disturbance in accordance with the project requirements.



**Photo 4:** ESA sign installed at the intersection of a Jurisdictional Drainage and the temporary disturbance boundary in accordance with MM-BIO-2A.

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