



# BLM Authorized Officer Weekly Report

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**Project:** Tule Wind Energy Project

## Weekly Project Update

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**Reporting Period:** 10.31.16 through 11.6.16

## 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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-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. Preconstruction activities authorized under the LNTP-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>.

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 LNTP-2, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 10.31.16 through 11.6.16.

## 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. No issues or concerns about compliance with the mitigation measures were reported by ECMs. Daily observations were documented on daily site inspection forms and applicable mitigation

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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)

measures were reviewed. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

### Archaeological Resources

ECMs verified that ESA buffers are in place for a total of 28 cultural resource sites in accordance with MM CUL-1a. The ESAs will be maintained by the archaeological consulting firm, ASM to ensure the continual protection of environmental resources.

### Biological Resources

Tule Wind, LLC has contracted with a consulting firm, ICF, 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*

Crews were observed using hand tools (loppers) to remove cacti on the access road from McCain Valley Road to Structure G5 under the supervision of a Biological Monitor/Habitat Restoration Specialist in accordance with MM Bio-1c. Cacti were 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 in accordance with MM Bio-1a.

### *ESA Staking*

ECMs verified that ESA buffers are in place for a total of 6 sensitive plant communities and 75 jurisdictional water features in accordance with MM Bio-5a and MM Bio-2a.

### Survey Staking

ECMs observed survey crews staking road center lines, installing t-posts at turbine locations along the A, B, C, and J Strings, and setting a survey control point east of Structure G4 to ensure the limits of work areas are delineated in the field according to the design plans and MM Bio-1a. Flagging was installed to assist with delineating and defining the work limits.

### 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 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 road grading limits from Ribbonwood to McCain Valley Road and along the G Line,
- Cacti salvage between G7 and G12, and
- Cultural and Biological 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 hauled salvage cacti on foot from work areas between McCain Valley Road and turbine G5 to the access road for transport to the laydown area at turbine E2 in accordance with LNTP-2 authorized activities and the Habitat Restoration Plan (MM-BIO-1D).



**Photo 2:** Westwood survey crews staked the center line of the road on the C String ensuring the limits of the work area are delineated in the field according to the development plans (MM BIO-1A).



**Photo 3:** Salvaged cacti were observed transported to the laydown area at turbine E2 in a trailer along BLM access roads in accordance with the conditions of the LNTP-2.



**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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