



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 2.20.17 through 2.26.17

### **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, LNTP-2, NTPs 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 2.20.17 through 2.26.17.

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

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

#### Construction Activities

ECMs observed the installation and maintenance of erosion and sediment control devices along the G-String and the installation of a culvert west of pads E11-E13. In addition, crews continued planting salvaged cacti at the E-String laydown yard and grading pad sites along the G-String. Crews also continued grubbing and grading along the G and H strings, the road between G14 and G15 included in Variance 001, the overhead alignment, and McCain Valley Road. ECMs also observed crews

mulching previously removed vegetation and performing road widening activities along McCain Valley Road. Drilling in anticipation of blasting activities was performed at pad G5 during this reporting period.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and geotechnical testing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

### Biological Resources

Biological monitors were present to monitor initial ground disturbance activities, the planting of salvaged cacti, and clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

### Biological Resources – Noncompliance Event

On Thursday, February 23, 2017, an excavator was used to remove vegetation along the access road north of turbine G9 without a biological monitor present. Archaeological and Native American monitors were present. The third party ECM stopped the vegetation removal activity after realizing that there was no biological monitor present. The monitor signature log was signed by the biologist after an initial work site sweep was completed, but the only activity listed on the log under the column “Construction Activity” was “subgrade on roads,” which does not require a full-time biological monitor if no vegetation clearing occurs.

The crew foreman indicated that the vegetation removal activity was communicated to the biologist, but the Designated Biologist and biological monitor who conducted the morning sweep of the area indicated that they were unaware of vegetation removal.

The area where the vegetation was removed was inspected by a biological monitor and it was determined that there was no impact to sensitive environmental resources. There were no ESAs in the vicinity of the disturbance and the activity was allowed to resume once a full-time biological monitor was present.

The construction foremen, monitors, and Tule Wind, LLC are working together to ensure the monitor signature logs accurately and completely identify the work activities occurring at each location in accordance with the February 1, 2017 NTP.

### Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. Crews installed additional staking or steel posts with PVC extensions where needed to give the operators greater visibility of limit of disturbance markers. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators, spotters, and monitors in accordance with the NTP issued February 1, 2017.

#### Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Most were in good condition, however, some devices were found to be damaged or ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

Per direction from the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board on Thursday, 2/23/17, Tule Wind, LLC has ceased the use of all plastic encased straw wattles. Tule Wind, LLC has ordered biodegradable weed free straw wattles that will be used to replace the existing plastic encased straw wattles that have been currently installed. The biodegradable straw wattles will be used to avoid wildlife from becoming entrapped in the plastic casing and to prevent plastic debris at the conclusion of construction activities.

During this reporting period, ECMs observed the stockpiling of salvaged topsoil along the G-String. While topsoil salvage activities continue along the G-String, these stockpiles are still considered active. In accordance with Section 7.8 of the SWPPP, ECMs observed topsoil stockpiles which had been stabilized using hydromulch and wattles as well as windrows of topsoil covered with fabric secured with sandbags. Some of the fabric protecting windrow stockpiles was observed to be pulling away from the topsoil on February 23, 2017. These issues were discussed with the contractor to ensure inactive topsoil stockpiles continue to be protected during construction activities according to the SWPPP.

#### Dust Control Plan Implementation (MM-AQ-1; AIR-3)

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

ECMs observed two incidents where construction vehicles were not following the posted 15 mph project site speed limit. ECMs spoke directly with the vehicle operators involved in the incidents and reported the issue to the Designated Biologist and Tule Wind, LLC in order to ensure that all on-site personnel abide by the project speed limit.

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

ECMs observed required fire equipment and best management practices on the project site during construction and geotechnical testing activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

### Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

### Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along the southern portion of McCain Valley Road in accordance with MM TRA-1.

### **Construction Activities Schedule:**

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along the C-Line,
- Stabilizing topsoil stockpiles along McCain Valley Road,
- Mulching along McCain Valley Road,
- Widening and installing gravel along McCain Valley Road,
- Clearing and Grubbing along the overhead line alignment and A-line,
- Grading along the E and G lines,
- Pipe installation at the H-line,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- Building pad sites along the G-line.

## Notice to Proceed

| NTP No. | Date Issued | Project Component  | Conditions Included (Y/N) |
|---------|-------------|--|---------------------------|
| 1       | 09.17.12    | 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                       |
| 3       | 11.18.16    | Clearing and grading activities as follows <ul style="list-style-type: none"> <li>• vegetation clearing (site clearing and grubbing)</li> <li>• grading work and blasting (as-needed) associated with the access road</li> <li>• equipment staging and laydown yard/staging areas</li> <li>• foundation excavation and blasting (as-needed)</li> </ul>   | Yes                       |
| 4       | 11.18.16    | Construction activities for four 10,000-gallon fire tanks including <ul style="list-style-type: none"> <li>• site surveying</li> <li>• vegetation clearing and grading</li> <li>• footing excavation</li> <li>• turnout construction</li> <li>• forming the tanks</li> <li>• installation of reinforced steel</li> <li>• pouring footing, slab, and walls</li> <li>• backfill and final grading</li> </ul>   | Yes                       |
| N/A     | 02.01.17    | Temporary Suspension of Construction Activities lifted for the project subject to the implementation of all safeguards and corrective actions identified by Tule Wind, LLC in the letter of January 31, 2017.  | Yes                       |
| 5       | 02.10.17    | Balance of plant construction activities including: <ul style="list-style-type: none"> <li>• Foundation drilling and blasting</li> <li>• Installation of seal slabs</li> <li>• Installation of turbine foundations</li> <li>• Installation of MET towers</li> <li>• Foundation backfill and crane pad installation</li> <li>• Turbine erection</li> <li>• Installation of underground collection system</li> <li>• Boring of specific locations for the collection line</li> </ul>                                 | Yes                       |

## Notice to Proceed

| NTP No. | Date Issued | Project Component  | Conditions Included (Y/N) |
|---------|-------------|--|---------------------------|
|         |             | <ul style="list-style-type: none"> <li>• Drilling and setting of overhead line systems</li> <li>• Structure erection</li> <li>• Wire pulling</li> <li>• Restoration of temporarily impacted areas</li> </ul> |                           |

## 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 | 11.02.12         |
| 2                    | 05.16.13  | 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 | 05.20.13         |
| 3                    | 12.20.16  | Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.   | Approved | 02.14.17         |
| 4                    | 01.09.17  | Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.   | Pending  | Under BLM Review |
| 5                    | 02.09.17  | The use of generators to provide power for up to four Conex storage trailers.  | Approved | 02.23.17         |
| 6                    | 02.24.17  | Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted. | Pending  | Under BLM Review |

## Representative Photos



**Photo 1:** Spotters walked ahead of bulldozer operators who cleared large vegetation along the taped disturbance limits ahead of grubbing activities to help increase visibility for masticator operators in accordance with the February 1, 2017 NTP.



**Photo 2:** During this reporting period, crews repaired a damaged silt fence on the McCain Valley cutoff road per direction provided by the QSP and ECMs in accordance with the SWPPP.



**Photo 3:** ECMs observed windrowed topsoil salvage stockpiles along McCain Valley Road covered in fabric secured with sand bags in accordance with the SWPPP.



**Photo 4:** Biological, archaeological, and Native American monitors were present during road widening activities along McCain Valley Road in accordance with MM CUL-1D and BIO-1C. Water was applied regularly to reduce dust in accordance with the Dust Control Plan and MM AQ-1.

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