



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 4.3.17 through 4.9.17

### **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 Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP 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 ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (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 4.3.17 through 4.9.17.

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

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP 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 of culverts, road grading, and aggregate installation along McCain Valley Road. Construction crews continued grading, rock breaking, and soil salvage along the C-F strings and pad grading and construction along the F-G strings. Drilling occurred at tower sites 1, 3, 18, 20, and 23 and turbine foundations were excavated, assembled, and poured along the G and E

strings. In addition, vegetation removal continued along the collection line and wattle installation occurred along the connector road.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d.

### Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities and establishing no-disturbance buffers around observed nesting birds in accordance with MM BIO-7j. Monitors also documented and marked new discoveries of rare plant species for avoidance within the vicinity of work areas. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

During this reporting period the following special-status species were observed: one coastal patch nose snake, three coast horned lizards, and four black tailed jackrabbits.

### Nesting Bird Buffer (MM BIO-7j) – Problem Area

On April 4, 2017, ECMs notified the onsite Designated Biologist when construction crews were observed parking inside an established nesting bird buffer. The ECM identified the “No Parking/Idling/Loitering” signs with the construction crew foreman and asked that the vehicles be moved outside the buffer. The equipment operators immediately moved the equipment.

On April 6, 2017, ECMs observed construction equipment parked within the same nesting bird buffer and reminded the crew foreman of the buffer boundaries and restrictions in accordance with MM BIO-7j. The equipment was moved outside the buffer and no sign of disturbance was observed at the active nest site. On April, 8, the “No Parking/Idling/Loitering” signs were painted pink to increase visibility and remind construction crews of the buffer restrictions. Construction crews were further reminded to abide by all environmental signage and to contact the biological and/or archaeological contractor if there are any questions or concerns.

### Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted. ECMs are continuing to work with the construction foremen as well as the biological and archaeological monitors to ensure the required documents are filled out completely and clearly.

During this reporting period, there were three instances where the monitor sign-off sheet was incomplete or not correctly filled out. In each case, the monitor sign-off sheet was either removed from the area where construction activities were occurring or filled out incorrectly. In each case, the construction foreman was reminded to keep the monitor sign-off sheet at the

location where construction activities were occurring and environmental monitors were reminded to correctly complete the monitor sign-off sheet based upon the level of monitoring required. In all three instances the appropriate monitors were present to monitor construction activities.

#### Limits of Disturbance (MM BIO-1a)

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. Yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

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

Construction crews installed biodegradable and weed-free straw wattles. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

During the previous reporting period on March 28, 2017, ECMs observed a concrete washout at turbine pad G15 without a rock apron as required by design detail WM-8 included in the grading plan. In addition to the missing rock apron, ECMs noted that the washout boundary silt fence required repair. ECMs notified Tule Wind LLC of the issues and on April 7, 2017, ECMs confirmed that both issues at the G15 concrete washout had been resolved in accordance with the SWPPP and grading plan design detail WM-8.

#### 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.

On April 4, 2017, ECMs recorded a complaint from a construction foreman that other construction related trucks had been speeding past work sites. The ECM notified Tule Wind LLC of the issue and both Tule Wind LLC and the ECMs will continue to work with construction crews to make sure crew members are reminded of the project site speed limits in accordance with MM-AQ-1, MM-BIO-7B, and the Dust Control Plan.

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

ECMs observed best management practices on the project site during construction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1.

Hot work permits were issued for tower foundation work along the G-String and ECMs verified that Fire Watch personnel and proper equipment were present in accordance with the hot work permit and 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.

During the previous reporting period, ECMs observed stained soil at laydown yard 11 on March 31, 2017. On the same day, construction crews removed the stained soil and placed it in a secondary containment bin. When ECMs returned to check on cleanup efforts at the laydown yard during the current reporting period, additional stained soil and soiled materials used to clean equipment remained onsite without proper containment. Following notifications to Tule Wind LLC, onsite biological monitors, and the Qualified SWPPP Practitioner; ECMs confirmed that all stained soil and materials were properly contained, cleaned, and removed from the site by April 7, 2017.

Several other incidents of stained soil were reported along the G-String and one at the laydown yard 12 during this reporting period. Each of these incidents was resolved and ECMs were able to confirm that the stained soil was removed from the site by the following day, in accordance with the Hazardous Materials Management Plan (HMMP).

### 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 McCain Valley Road in accordance with MM TRA-1.

#### **Construction Activities Schedule:**

- Surveying and staking disturbance limits,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading at structure pad sites,
- Building pad sites and foundation excavation along the D, E, and F lines,
- Drilling at the substation and collection line,
- And concrete pouring and setting poles along the transmission 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> <li>• Drilling and setting of overhead line systems</li> </ul> | Yes                       |

## Notice to Proceed

| NTP No. | Date Issued | Project Component   | Conditions Included (Y/N) |
|---------|-------------|---|---------------------------|
|         |             | <ul style="list-style-type: none"> <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.   | N/A      | Resubmitted as part of variance request 006 on 03.24.17. |
| 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  | Resubmitted on 03.24.17.                                 |
| 7                    | 03.03.17  | Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.  | Pending  | Under BLM Review   |
| 8                    | 03.24.17  | Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.   | Pending  | Under BLM Review   |
| 9                    | 03.28.17  | Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.  | Pending  | Under BLM Review   |
| 10                   | 03.29.17  | Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.  | Pending  | Under BLM Review   |
| 11                   | 04.07.17  | Relocation of office trailers from San Diego County land to laydown yards 9 and 11.  | Pending  | Under BLM Review   |

## Representative Photos



**Photo 1:** ECMs confirmed that the silt fence surrounding the concrete washout at turbine pad G15 was repaired and a rock apron was installed in accordance with the grading plan design detail WM-8.



**Photo 2:** ECMs observed construction equipment parked within an active nesting bird buffer on April 4 and 6, 2017. During both incidents, construction crews were reminded of the buffer restrictions outlined in MM BIO-7J and the equipment was moved. Following the second incident, the "No Parking/Idling/Loitering" signs have been painted pink to increase visibility.



**Photo 3:** ECMs reported that stained soil contained during the previous reporting period remained onsite at laydown yard 11, within a secondary containment container not intended for storage or disposal of hazardous materials. Following the identification of additional stained soil and soiled cleaning materials at the laydown yard, construction crews cleaned and removed all stained soil and materials in accordance with MM HAZ-1A.



**Photo 4:** ECMs observed archaeological and Native American monitors present during road work along the F String in accordance with MM CUL-1D. Water was also applied regularly during activity along the road to minimize fugitive dust in accordance with MM AQ-1.

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