



# BLM Authorized Officer Weekly Report

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**Project:** Tule Wind Energy Project

## Weekly Project Update

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**Reporting Period:** 5.15.17 through 5.21.17

## 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 5.15.17 through 5.21.17.

## 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 continued drilling and installation of straw wattles along McCain Valley Road and grading and weed management along Rough Acres Road as well as the A and B lines. Grading continued along the A, B, C, D, E, and J lines, and topsoil salvage occurred along the C,

G, and H lines. Turbine tower foundations were excavated along the E line, pad contouring occurred along the A line, and foundations were poured along the E, F, and G lines. Rock removal and relocation took place along the E and G lines, and concrete washout pits were dug at sites along the C line. Additionally, drilling occurred for collector poles 41, 43, 45, and 52, poles 37 and 38 were set, and trenching occurred at collector pole 25.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, trenching, and foundation excavations in accordance with mitigation measure (MM) CUL-1d and the approved Tribal Participation Plan.

Archaeologists and Native American monitors dug additional shovel test pits at archeological sites in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads, including McCain Valley Road. Where bone has been identified, but cannot be determined by archaeologists as human or faunal, Tule Wind LLC has and continues to work with representatives from the San Diego County Medical Examiner's office to examine the bone fragments and make a determination.

### Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j. During this reporting period, ECMs did not record any incidents of project vehicles speeding in excess of the 15 mph limit in accordance with MM BIO-7b.

During this reporting period, ECMs observed scrap plastic outside a nearby dumpster staged at Lot 6 and food trash left uncovered in a roll-off bin at yard 11. The onsite Designated Biologist (DB) and construction crews were notified of each issue and reminded of the requirement to remove or cover trash in accordance with BIO-7d. ECMs plan to follow-up on the resolution of these issues in the next reporting period.

On 5/16/2017 and 5/17/2017, ECMs observed open excavations at turbine sites G8, G11, and G12 without proper wildlife ramps. The onsite DB and additional biological monitors were notified of the issue both days. ECMs confirmed ramps had been installed in accordance with MM BIO-7a by the end of the day on 5/17/2017.

Two San Diego Black-tailed jackrabbits were recorded in a single observation outside of the work area during this reporting period. No action was taken and/or required as a result of the observation.

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

ECMs observed monitor sign-off sheets (MSOS) at construction activities 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.

During this reporting period, several road maintenance crews were observed not to be in possession of the applicable MSOS at all times because only one form was completed for the road maintenance crews, which would often work in multiple areas along large access roads and be managed by a roaming foreman. ECMs and biological monitors agreed that a photo or other copy of the completed log should remain with at least one operator in each crew per the February 1, 2017 NTP.

#### 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.

On 5/18/2017, an ECM noticed an ESA with damaged fencing between turbine sites H1 and H2. No impacts to sensitive cultural or biological resources were observed. The lead archaeological monitor was contacted to repair the ESA fencing. It is unknown if the damage to the ESA fencing was caused by construction activities or the public.

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

ECMs observed construction crews installing biodegradable straw wattles along McCain Valley Road in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

During this reporting period, ECMs observed silt fencing in need of repair, including at multiple concrete washout basins. The DB was notified of each location and ECMs will follow-up in the next reporting period to ensure BMPs are repaired in accordance with MM-HYD-1.

ECMs observed a concrete washout area on the access road to the B-line without an aggregate apron.

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

ECMs observed track-out build up on the pavement at McCain Valley Road. The onsite DB and construction contractor were notified of the issue. During this reporting period, the construction contractor installed additional aggregate at the entrance/exit to McCain Valley Road to prevent further track-out in accordance with MM AQ-1.

ECMs observed dust control best management practices being implemented including limiting vehicle idling times and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 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, fire suppression equipment within 25 feet of active work sites, 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.

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

On 5/16/2017, an ECM observed multiple pieces of inactive equipment at laydown yard 9 without containment. While no leaks were identified and there was no removal or changing of fluids taking place, the construction contractor was notified and the placement of containment was recommended.

During this reporting period, ECMs observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

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

During this reporting period, several traffic signs were observed knocked down on McCain Valley Road. ECMs provided each location to the onsite DB and will follow-up in the next reporting period to ensure signs are repaired in accordance with MM-TRA-1.

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

- Staking disturbance limits along the underground collection line, starting at G4 and working south to McCain Valley Road,
- Grading along Ribbonwood side of Rough Acres Road,
- Grading G line,
- Rock management along McCain Valley Road and Rough Acres Road,
- Building of turbine pad sites along E line,
- Building access roads along the A and E lines,
- Topsoil salvage at pad sites along G line and at the substation,
- Installing straw wattles in McCain Valley Road culverts,
- Foundation excavation along the A line,
- Foundation backfill at pad sites along the J line,
- Drilling and blasting at pad sites along the E line,
- Digging of box pads at sites along E line,
- Excavating conduit and concrete form setting at substation,
- Hydro-seeding along the B and C lines,

- Drilling, pole setting, and concrete pouring along the collection line,
- And trenching underground transmission line south of I-8.

### 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> </ul>	Yes

## Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> <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> <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.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
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.	Approved	04.18.17
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.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
		near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.		
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review
13	05.21.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Pending	Under BLM Review

## Representative Photos



**Photo 1:** ECMs confirmed that wildlife ramps were installed in the open excavation at turbine site G11 in accordance with MM BIO-7A.



**Photo 2:** Crew spraying herbicide within disturbance limits on A string. A qualified restoration monitor was present per MM BIO-3A.



**Photo 3:** Construction crew installing concrete washout basin at turbine pad C3 in accordance with the project SWPPP.



**Photo 4:** ECMs observed drilling along McCain Valley Road. Archaeological and Native American monitors were present to observe the ground disturbance in accordance with MM-CUL-1D.

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