



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 07.10.17 through 07.16.17

### **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 07.10.17 through 07.16.17.

### **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

Environmental Compliance Monitors (ECMs) observed clearing and grubbing along the A-line and the east side of the substation. Rock management activities occurred at turbine sites G-3 and G-4, including rock breaking and rock removal from turbine site G-2. Construction crews pre-ripped and trenched along the G-line, while excavation and blasting preparation occurred

at turbine site G-3. Road maintenance activities including grading were observed along the G-2 and G-3 access road and turbine site C-9. Sub grading occurred at turbine site C-9 and the Rough Acres Ranch Road. Top soil was salvaged from turbine sites G-3 and C-9 and backfilling occurred at turbine sites A-1, A-2, B-1, B-3, and G-3. Construction crews drilled for overhead collector poles #21 and #34 and transmission poles T-2, T-8, and T-10. Concrete for foundations was poured at collector pole #52 and foundation work occurred at turbine site B-4.

Additionally, palliative was applied along McCain Valley Road, box pad installation occurred at turbine sites C-8 and B-3, installation of straw wattles occurred along the C-line, and culverts were removed along the G-line to provide access for trenching activities.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including road widening, grading, trenching, rock breaking, drilling, grubbing, and cut and fill, in accordance with mitigation measure CUL-1d and the approved Tribal Participation Plan.

### Biological Resources

Biological monitors were present to monitor ground disturbance and vegetation clearing activities in accordance with MM-BIO-1c. ECMs observed construction crews repairing and where needed, replacing silt fencing along the C and G-lines and straw wattles at turbine site E-5 in accordance with MM-HYD-1 and the Storm Water Pollution Prevention Plan (SWPPP).

During this reporting period, ECMs observed food waste not properly secured along the G-line. Cardboard boxes were used as temporary trash receptacles with no observed covering. The designated biologist was notified and the trash was properly disposed of in sealed containers.

In accordance with MM-BIO-7b, ECMs observed all project related vehicles adhering to the posted 15 mph speed limit in order to minimize dust.

On 7/14/17, ECMs observed construction crews spreading base along McCain Valley Road within a drive through nesting bird buffer with no biological monitor present. ECMs notified the designated biologist and work halted within the buffer. An avian biologist was called to observe the nest for the duration of construction activities in accordance with MM-BIO-7j and the Nesting Bird Management, Monitoring and Reporting Plan. The nest was not affected as a result of this activity.

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

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

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

All construction activities observed throughout the reporting period were within the staked limits of disturbance and grading boundary limits. This includes the revised limits of disturbance

approved as part of the variance request approval process. No sensitive species were observed or disturbed.

#### Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1)

During this reporting period, ECMs created a punch list with a description and photos of deficient and/or missing BMPs including damaged straw wattles, silt fencing, and aggregate at concrete washout basins that need to be repaired and/or replaced. The punch list was provided to Tule Wind LLC along with the construction contractor. Tule Wind LLC and the construction contractor are anticipated to address the items provided in the punch list within a week.

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

ECMs observed water trucks applying water to active areas of construction at least three times a day per MM-AQ-1.

#### Fire Prevention/Protection Plan Implementation (MM-FF-1; MM BIO-1F)

Water tenders were observed working closely with construction equipment conducting rock breaking, drilling and clearing/ grubbing activities in accordance with MM-FF-1 and MM-BIO-1f. Fire suppression tools were observed 25 feet of active work sites with a 5-gallon hand pump, fire extinguisher, and spade tip shovel.

During rock breaking activities at turbine site G-3, ECMs noticed that a water truck was not present. While not a requirement of the Fire Prevention/Protection Plan, extra caution is being taken to avoid the potential of starting a fire. The fire prevention specialist was contacted and indicated that a fire patrol was on foot nearby and that a water truck was being mobilized.

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

During the reporting period, ECMs observed construction crews fueling equipment with containment present in accordance with MM-HAZ-5a.

On 7/15/17, ECMs observed stained soil in laydown yard 39. The designated biologist was notified. ECMs are anticipated to follow-up on this issue during the next reporting period.

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

ECMs observed construction traffic flaggers along McCain Valley Road during road maintenance to notify motorists of temporary delays, in accordance with MM-TRA-1.

**Construction Activities Schedule:**

- Survey and staking underground collection,
- Rock management at G-2,
- Remove and replace culverts for trencher on G-line,
- Backfilling box pads at E-9, E-10 and F3,
- Drilling and blasting G-2 access road,
- Set collection poles 45, and 55,
- Drilling and pouring concrete at substation,
- Pre-ripping and trenching J-line,
- Topsoil strip B-5, C-5 and G-1,
- Place aggregate along McCain Valley Road, and
- Brush and grub along collector string 62 through 66.

## 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.	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 near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Approved	06.14.17
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17
14	06.16.17	Includes additional pull areas for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Pending	Under BLM Review
15	06.16.17	Requests turbine B-5 to be approved, as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Approved	07.12.17
16	07.07.17	Requests a change in the means for installing underground collector line under McCain Valley Road from boring to trenching.	Approved	07.12.17

## Representative Photos



**Photo 1:** ECMs observed traffic flaggers present and signage posted at the entrance of McCain Valley Road in accordance with MM-TRA-1.



**Photo 2:** ECMs observed water tenders present during grubbing and clearing activities, in accordance with MM-AQ-1.



**Photo 3:** ECMs observed archaeological and Native American monitors present during culvert replacement along the G-15 access road in accordance with MM-CUL-1d.



**Photo 4:** ECMs observed a covered dumpster in Laydown Yard 9 to prevent litter and avoid providing a source of food for wildlife in accordance with MM-BIO-7d/7e.



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