



## BLM Authorized Officer Weekly Report

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**Project:** Tule Wind Energy Project

### Weekly Project Update

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**Reporting Period:** 07.17.17 through 07.23.17

### 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 07.17.17 through 07.23.17.

### 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

Construction crews continued excavation of a vault at the intersection of old Highway 80 and McCain Valley Road and continued with trenching activities between the J and G-line and turbine sites E-11 and E-13. Rock management activities including rock breaking and rock removal occurred at turbine site G-3, G-5, G-12, C-5, C-9, and laydown yard #10.

Vegetation removal activities including clearing, grubbing, and tree trimming occurred at overhead collector pole sites #31, #36, #42, #49, #62, #63, along McCain Valley Road east of the substation, and adjacent to the Lark Canyon Campground. ECMs observed clearing/grubbing at turbine pad B-5, between collector pole #41 and #42, at pull sites #2, #25, and between towers #62 and #63. Hydro mulch and soil stabilizer were applied in non-active areas of construction at turbine site E-7 through E-10. Construction crews drilled for overhead collector poles #20, #34, #36, #37, transmission towers T-2, T-10, T-34, and T-36.

Road maintenance including grading occurred at turbine site C-9, pull site #25, and overhead collector pole #31. Sub-grading occurred along Rough Acres Ranch Road and turbine sites F-3, D-4, and C-5. Top soil was salvaged from turbine site C-5 and along collector roads. ECMs observed cut and fill operations at turbine site C-5, compacting at turbine site F-3, and tower pad contouring at turbine sites F-3, F-9, C-8, and C-5.

Additionally, a culvert was removed near the Lark Canyon Campground and a culvert was re-installed along the G-15 access road.

### Cultural Resources

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

### Biological Resources

Biological and habitat restoration monitors were on-site during this reporting period to monitor ground disturbance and vegetation clearing activities in accordance with MM-BIO-1c. ECMs observed ICF biologists conducting nesting bird surveys near active areas of construction.

During this reporting period, ECMs observed food waste in a cardboard box on a trenching machine with no cover. The cardboard box was being used as a temporary trash receptacle. An ECM notified the designated biologist that all food related waste and garbage need to be removed from the construction site on a daily basis per MM-BIO-7d. The ECM verified that the cardboard box was properly disposed of at the end of the day. On 7/22 an ECM observed trash in the 80-acre laydown yard. The issue was reported and promptly resolved. On 7/19 an ECM also reported a full, uncovered trash container which was promptly resolved.

On 07.19.17, ECMs observed vegetation piles near turbine site T-3 and turbine site G-5. ECMs coordinated with the designated biologist and the safety coordinator to clear all brush and dead and decaying vegetation prior to beginning construction and/or maintenance work per the Fire Construction Plan. On 7/21/17, construction crews began mulching and chipping the vegetation pile. ECMs are anticipated to follow-up on this issue during the next reporting period.

### 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)

ECMs observed all construction activities throughout the reporting period within the staked limits of disturbance. 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 observed straw wattles covered by soil along the access road to turbine sites G-8 and F-1 and straw wattles downslope of the E-line access road not replaced after culvert re-installation. Third party ECMs continue to track and monitor minor BMP installation and maintenance across the project site with the designated biologist, Tule Wind LLC, and the construction contractor. Each of these issues are anticipated to be addressed during the next reporting period.

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

ECMs observed water trucks applying water to active areas of construction during rock breaking, grubbing, road maintenance, and grading to minimize dust in accordance with MM-AQ-1.

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

Water trucks 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.

ECMs observed the aforementioned vegetation pile at turbine sites T-3 and G-5. Construction crews began mulching in accordance with the Fire Construction Plan Section F.

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

During this reporting period, ECMs conducted a follow up from a previously stained soil site at laydown yard #9. Absorbent pads were applied beneath the vehicle to prevent the occurrence of future spills. All stained soil was properly cleaned in accordance with MM-HAZ-1a.

#### 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 and site #11 transmission line,
- Rock management at G-2 and G-1,
- Build turbine site G-1, G-2, B5 and C-5,
- Top soil strip site B-5,
- Remove and replace culverts for trencher on G-line,
- Build crane pads at H-line and J-line,
- Erosion control maintenance,
- Install silt fence at site C-9 and B-5,
- Brush and grub sites 49-53,
- Set transformers at J-line,
- Drilling collection pole #62, #63, #36, #31 and #57,
- Pouring concrete at collection pole #64.

## 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.	Approved	07.27.17
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 application of hydromulch and soil stabilizer at turbine site E-7 through E-10 in accordance with the site project specific SWPPP.



**Photo 3:** ECMs observed a water truck present during vegetation removal and grubbing at collector pole #31 in accordance with MM-AQ-1. Native American and archaeological monitors present but not pictured.



**Photo 4:** ECMs observed spill absorbent pads applied to a reel truck in laydown yard #9 as a spill prevention measure during clean-up activities in accordance with MM-HAZ-1 and the site HMMP.



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