



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 07.31.17 through 08.06.17

### **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 07.31.17 through 08.06.17.

### **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 erosion and sediment control devices along the B line and the maintenance of spoils piles near turbine pad E12. In addition, drilling and grading activities continued at turbine pad sites and collector pole sites including pad grading and rock breaking along the G line and in laydown yard 10; turbine pad excavation at turbine site G2; drilling along

McCain Valley Road, the E line, and at collector pole sites 31, 50, 51, and 57; and blasting at turbine pad G1. Construction crews continued turbine and collector pole assembly, installation, and foundation pouring at poles 11, 12, and 54. Vegetation removal and grubbing continued along the collector line and trenching was performed along the access roads to the B and C lines. Construction crews continued work at culvert locations between the A and B lines and boulders were moved outside the limits of disturbance along McCain Valley Road north of the J line in accordance with the protocols established as part of Variance Request 006. Additional road grading occurred along the access road to the H line.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities for construction activities including 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 disturbing activities as well as clearing and grubbing activities in accordance with MM-BIO-1c. Biological monitors were observed conducting sweeps ahead of grubbing, grading, excavation, and trenching activities. ECMs observed effective nesting bird deterrents installed along the G line to prevent birds from nesting in active work areas.

### 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. On 8/1/17 an ECM observed that the MSOS for work at collector pole 57 was not signed off properly by the biological monitor. The designated biologist was notified and responded to the ECM that he would head over to collector pole 57 to properly fill out the MSOS. Biological sweeps had been conducted at collector pole 57 earlier in the day.

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

During this reporting period, ECMs observed construction crews moving rocks outside the limits of disturbance north of J line with appropriate resource monitors onsite to perform preconstruction inspections of the work area and to monitor the work as it occurred. The work was performed and recorded per the protocols established by Variance Request 006.

On Monday, 7/31/17 ECMs observed several rocks and pieces of rock outside the limits of disturbance along the border of the G2 and G3 turbine pad sites likely as a result of blasting activities. ICF and Blattner were notified and biologists removed rocks small enough to be moved by hand on the same day. All rocks too large to move by hand were left in place. No impacts to sensitive resources were observed during an inspection of the affected area.

On Saturday, 8/5/17 grubbing and top soil salvage activities occurred at the proposed pull site east of Transmission Structure #4 and within the established site boundary for CA-SDI-20,112.

This site was previously documented as a prehistoric artifact scatter and the fieldwork efforts for its potential listing on the National Register of Historic Places (NRHP) had been completed, but the BLM had yet to concur with the findings report submitted by ASM on July 31, 2017. Follow-up with regards to this non-compliance event is anticipated to occur in the upcoming reporting period.

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

During this reporting period, ECMs observed construction crews conducting ongoing repairs to silt fence and straw wattle. Several areas were identified with deficient silt fencing or sediment covered wattles requiring maintenance or replacement. Each of these issues was brought to the attention of the designated biologist and are being tracked by ECMs and construction crew maintenance repair teams. Silt fences at laydown yards #1 and #6 previously reported as requiring repairs were observed to be fixed.

On Friday 8/4/17, concrete washout was observed outside the designated containment area and silt fence along the C line. The designated biologist was notified of the issue and clean up occurred the same day.

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

ECMs observed water trucks applying water in active areas of construction and along access roads at least three times a day in accordance MM-AQ-1 and the Dust Control Plan.

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

During this reporting period, three lightning stand-downs occurred when lightning was tracked within five miles of the project site, in accordance with MM-HZA-1b.

ECMs observed fire equipment and water trucks on the project site during construction activities including vehicles equipped with fire suppression equipment within 25 feet of active work sites, in accordance with MM-FF-1.

On 7/31/17 an ECM observed work occurring without fire tools close by. The issue was resolved the same day.

On Tuesday, 8/1/17, a mower and mini excavator were observed parked on vegetation. ICF and Blattner were notified and the mower was moved on the same day. ECMs observed that the mini excavator was subsequently moved on Friday, 8/4/17.

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

On Tuesday 8/2/17, ECMs confirmed with the designated biologist that the stained boulder at laydown yard #10 was cleaned by Blattner Construction crews prior to being crushed and removed from the site in accordance with MM-HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

ECMs observed traffic flaggers on McCain Valley Road to notify motorists of temporary road delays during ongoing turbine component delivery activities in accordance with MM-TRA-1.

### **Construction Activities Schedule:**

- Survey and staking culvert work limits and pull pad along transmission and collector lines,
- Removal and replacement of culverts at E1,
- Subgrade A3 road,
- Rock management at sites G11 and E7-E10,
- Rock hauling and building crane pads at sites E7-E13,
- Establishing pull locations along the transmission and collector lines,
- Rock crushing at G5,
- Setting transformers at E4-E9 and E11-E13,
- Foundation building activities at sites B5, A3, C5, and C9,
- Drilling and blasting at sites G1-G2, A1, C8, E1, and along McCain Valley Road,
- Component delivery and staging,
- Clear brush and grub along the collection line,
- Substation work, and
- Set collector poles 63 and 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:** On August 4, 2017, ECMs recorded concrete washout that had flowed outside the established washout containment and silt fence along C line. The designated biologist was notified.



**Photo 2:** On August 4, ECMs confirmed that the concrete washout outside the containment area along C line had been cleaned up in accordance with the SWPPP.



**Photo 3:** ECMs observed K-rails placed along McCain Valley Road to protect an established ESA during component delivery and additional road work in accordance with the approved Variance Request 010.



**Photo 4:** During this reporting period, ECMs and applicable monitors were present to perform preconstruction inspections and required monitoring of the rock relocation outside of work limits north of J line in accordance with the approved Variance Request 006.

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