



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 08.14.17 through 08.20.17

### **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 08.14.17 through 08.20.17.

### **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 Rough Acres Ranch Road as well as the removal of concrete washout from a containment basin in laydown yard #3. In addition, grading and backfill activities continued at turbine pad sites, overhead pole sites, crane pads, and stringing sites along the collector line and A through D lines. Construction crews

continued turbine and collector pole assembly, install, drilling, and foundation work at pole sites 50, 51, and 57 as well as along the G line. Vegetation removal and grubbing continued at collector pole site 50 and stringing equipment installation activities occurred along both the transmission and collection lines. Construction crews installed electrical boxes along the C line, conduit at collector pole site 18, and a switch box at turbine pad site A1. Additional roadwork occurred along McCain Valley Road and the D through G lines. During this reporting period, turbine staging and delivery continued along the E line.

### Cultural Resources

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

Twice during this reporting period, ECMs observed different segments of ESA fencing requiring maintenance. Each issue was resolved following notification of archaeological monitors onsite.

Lead lines for stringing activities along the overhead lines were walked through ESAs to minimize disturbance to resources. Environmental monitors confirmed that all foot traffic through ESAs was minimized as feasible.

### 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, and excavation activities.

Outside of ESAs, spotters were observed walking ahead of equipment used to install stringing lead lines to ensure operators remained inside the marked limits of disturbance.

On 8/17/17, ECMs observed open excavations at switch box installation sites along the C line and collection line without ramps installed to prevent wildlife entrapment per MM-BIO-7a. Following notification of the issue, ramps were installed. Biological monitors and construction crews continue to work together to find solutions to cover open excavations to prevent entrapment.

### 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.

### 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 BMPs. Each identified issue was brought to the attention of the designated biologist and is tracked by ECMs and construction crew maintenance repair teams. Straw wattles previously recorded as requiring sediment removal along Rough Acres Ranch Road were observed to be maintained in accordance with the SWPPP.

ECMs notified the designated biologist of toilet paper that had blown out of a portable toilet due to high winds on 8/15/17. The litter was picked up and disposed of the same day in accordance with MM-BIO-7d and the SWPPP.

On 8/16/17, roll-off concrete washout basin at turbine pad G4 was observed to be leaking. The designated biologist was notified and containment was placed under the leak. On 8/18/17, ECMs recorded that the washout containment was no longer leaking on the ground, but that stained soil still needed to be addressed in accordance with the SWPPP.

On 8/17/17, construction crews moved solidified concrete wash from the washout basin planned for removal in laydown yard #3 to the existing washout basin in need of repair in laydown yard #6. ECMs plan to follow-up during the next reporting period regarding silt fence and liner repair at the active concrete washout basin in laydown yard #6.

#### 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)

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

On 8/16/17, ECMs observed that a pile of cut vegetation left inside a work area at turbine pad G5 and recorded in the previous reporting period had been removed as per section F of the Fire Prevention/Protection Plan.

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

ECMs observed an unsecured portable toilet along the G line on 8/14/17. Following notification of the designated biologist, the issue was resolved the next day and the toilet was observed secured in accordance with MM-HAZ-1a.

On 8/17/17, the designated biologist was notified of stained soil at the laydown yard #6. The following day, ECMs reported that the stained soil had been removed 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. During this reporting period, traffic was also redirected from under wire stringing activities in accordance with MM-TRA-1.

**Construction Activities Schedule:**

- Erosion control BMP maintenance across the site,
- Backfill at site G2,
- Road maintenance along the C line,
- Rock management at G11,
- Building crane pads at sites E1, C2, and C3,
- Establishing pull locations along the collector line,
- Rock crushing at G5,
- Setting transformers and component delivery along the E line,
- Excavation and installation of switch boxes,
- Drilling at poles 51 and 57,
- O&M building work, and
- Demobilizing at the substation.

## 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:** During this reporting period, ECMs observed spotters walking ahead of equipment installing stringing lead lines to ensure operators remained inside the marked limits of disturbance in accordance with MM BIO-1A.



**Photo 2:** ECMs observed cultural monitors present during drilling activities at collector line site C57 in accordance with MM CUL-1D. A water truck was also present and work remained within the staked disturbance limits in accordance with MM AQ-1 and MM BIO-1A, respectively.



**Photo 3:** Portable toilet along the G line was observed to be properly secured in accordance with the Hazardous Materials Management Plan.



**Photo 4:** During this reporting period, ECMs notified the designated biologist that the concrete washout containment at turbine pad G4 was leaking. Following notification, a containment bin was placed under the leak, but the stained soil remained onsite.



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