



## **BLM Authorized Officer Weekly Report**

**EI Centro Field Office**  
1661 S. 4th Street  
EI Centro, California 92243  
Website: [www.tulewindECCMP.com](http://www.tulewindECCMP.com)

---

**Project:** Tule Wind Energy Project

### **Weekly Project Update**

**Prepared By:** David Hochart, DUDEK, 605 Third Street, Encinitas, CA 92024

**Reporting Period:** 09.25.17 through 10.01.17

### **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 09.25.17 through 10.01.17.

### **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

Turbine component delivery and offload continued on the A-line and at turbine pad E-13. Ongoing turbine assembly occurred on the E, G, and H-lines. A junction box was excavated and installed at turbine pad C-5 and a junction box at turbine C-2 was backfilled. Collector line activities continued with drilling overhead collector poles #42 and #60. Wire pulling occurred

between collector poles 13-39, north of the F-line, and south of the C-line. Erosion control maintenance and repair included top soil reclamation along the G and J-line access roads, silt fence repair at turbine pad G-3, and straw wattle installation along the B-line and at collector pole #40. Additionally, trenching and rip rap installation continued along McCain Valley Road, south of the J and C-lines, and along portions of Rough Acres Ranch Road.

Road maintenance activities included blading on the H and J-line access roads. Road remediation occurred along the north G-line access road and along the D-line access road between turbine pad D-2 and D-3.

### Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including wire and cable pulling, grading, trenching, and drilling, in accordance with MM CUL-1d and the approved Tribal Participation Plan.

Plywood sheets have been set along the collector alignment to protect cultural ESAs from ropes and wire during collector pole stringing operations.

### Biological Resources

Biological monitors were present to monitor ground disturbing activities including grading, trenching for rip rap installation, and wire/rope pulling activities in accordance with MM BIO-1c. On 9/27/17, ECMs observed the lead biologist at a morning construction tailboard meeting discussing environmental issues with construction crews. The lead biologist spoke about addressing issues including but not limited to trash, stained soil, speeding, and deficient erosion control devices in a timely manner.

During this reporting period, ECMs observed dumpsters properly covered in accordance with MM BIO-1d and turbine component delivery vehicles adhering to the posted speed limits in accordance with MM BIO-7b.

### 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)

During this reporting period, there were two occasions where work occurred outside of the limits of disturbance. On 9/27/17, a construction crew requested to work outside the limits of disturbance with a forklift to pull turbine tag lines. The lead biologist contacted the lead archaeologist and ECM to implement the requirements of Variance Request 006 to complete this foreseen impact. The proposed area of impact was swept by biological and cultural monitors along with the ECM. The area of disturbance was measured and recorded in accordance with the protocols established by Variance Request 006.

On 9/30/17, during blade installation at turbine pad G-14, a turbine blade and tag line extended outside the limits of disturbance. Before work was allowed to resume, the area was cleared per the protocols established by Variance Request 006 by biological and cultural monitors along with the ECM. The tag lines came into contact with vegetation approximately 20 feet outside the limits of disturbance boundary. No impacts to cultural or biological resources were observed.

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

During this reporting period, ECMs observed erosion control maintenance crews digging trenches, installing riprap, and installing straw wattles, in accordance with the site specific SWPPP and MM HYD-1. ECMs observed containment beneath staged equipment that are stationary for long durations.

During the previous reporting period, silt fencing at turbine pad G-3 was in need of repair. During this reporting period, ECMs confirmed that the silt fence had been repaired.

On 9/26/17, ECMs discovered slopes on turbine pad E-5 requiring the reapplication of hydromulch in order to minimize soil loss from the construction area in accordance with MM-HYD-1 and the project specific SWPPP. ECMs contacted the designated biologist. Hydromulch is anticipated to be reapplied once all ground disturbing activities in the area has been completed.

On 9/27/17, ECMs discovered sediment overflow a deficient silt fence at turbine pad D-2. ECMs contacted the lead biologist. This issue is anticipated to be addressed during the next reporting period.

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

ECMs observed water trucks applying water in active areas of construction 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.

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

There were no reported incidents of stained soil during this reporting period.

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

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

### **Construction Activities Schedule:**

- Excavate/Riprap culverts on McCain Valley Road,
- SWPPP management on E and D-line,
- Offload turbine components on B and C lines,
- Set bases and mid sections on E-9, E-10, F-1 – F-4,
- Tower wiring on G-13,
- Top out G-13, G-14, J-2 and J-3,
- Drilling overhead collector 60, 68 and 69,
- Turbine pad contouring on C-4 through C-6, E-10 through E-13, and G-6 and G-9,
- Set generators on B-line,
- Wire generators on G-line,
- Wire installation on collector pole,
- O&M building interior framing,
- Haul trucks on McCain Valley Road and Rough Acres Ranch Road, and
- Hydromulch pole sites.

## 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 the installation of rip rap with cultural monitors present in accordance with MM CUL-1D.



**Photo 2:** ECMs observed turbine blade assembly at pad G-14. Blades extended approximately 65 feet outside the limits of disturbance. Before installation continued, the area was cleared per the protocols of Variance Request 006. The area was swept by biological and cultural monitors along with third party ECMs to ensure no biological or cultural resources were affected.



**Photo 3:** ECMs observed a repaired silt fence from a previous reporting period, in accordance with the project SWPPP and MM HYD-1.



**Photo 4:** ECMs observed cultural and biological monitors present for erosion control maintenance and repairs in accordance with MM BIO-1D and MM CUL-1D.



INTENTIONALLY LEFT BLANK