



# BLM Authorized Officer Weekly Report

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**Project:** Tule Wind Energy Project

## Weekly Project Update

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**Reporting Period:** 11.06.17 through 11.12.17

## 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 11.06.17 through 11.12.17.

## 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

During this reporting period, ongoing road maintenance activities included grading and shaping of road shoulders, boulder replacement, and re-contouring along Rough Acres Ranch Road, as well as along the E, G, H, and J lines. Crews conducted horizontal drilling along the G-line main access road and along McCain Valley Road for culvert placement. Erosion control maintenance

and repair crews worked along the G-line, as well as along McCain Valley Road. Excavation for transmission pole installation occurred at tower T-12, with wire clipping operations along the overhead collection line. Turbine preparation work continued, as turbine components were assembled at turbine pads E-1 through E-3, E-6, and F-2.

Additionally, turbine installation crews were observed transporting a crane from the G-string to the E-string.

### Cultural Resources

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

### Biological Resources

Biological monitors were present to monitor ground disturbing activities including grading, excavation, drilling, and turbine assembly, in accordance with MM-BIO-1c.

ECMs observed night work conducted on 11/6/2017 through 11/10/2017. All light plants were positioned appropriately to minimize lighting in adjacent native habitat and the nighttime skyline, in accordance with MM-BIO-7C, APM-BIO-15 and MM-VIS-3B.

On 11/6/2017, ECMs observed the main laydown yard to be littered with trash, which was blown to turbine pads G-2 and G-5 as a result of strong winds. ECMs also discovered two small, uncovered trashcans. The ECM notified nearby construction crews and the areas were cleaned and the trash appropriately disposed of shortly thereafter in accordance with MM-BIO-7d.

On 11/11/2017, ECMs observed trash, including desiccant beads scattered on site. Scattered plywood was also observed on the A and B-string pads. ECMs communicated the situation to the designated project biologist, who contacted the construction contractor to have the trash and debris removed in accordance with MM BIO-7d and MM BIO-7e.

### 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 work during this reporting period was observed within the staked limits of disturbance.

On 11/11/17, the protocols of variance request 006 were implemented in order to extend four culverts. No impacts to special status flora or fauna were observed. Full time biological, cultural, and archeological monitoring were present in accordance with MM BIO-1c and MM CUL-1d.

On 11/6/2017, ECMs observed that the perimeter of turbine pads D-2 and E-9 needed to be re-staked to properly delineate the limits of disturbance per MM BIO-1a.

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

During this reporting period, ECMs observed crews performing erosion control maintenance at BMPs along McCain Valley Road, in accordance with the site specific SWPPP and MM HYD-1.

On 11/6/2017, ECMs observed a concrete washout basin near turbine pad F-2 in poor condition. ECMs notified the designated biologist to replace the washout basin in accordance to project site specific SWPPP.

### 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.

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

On 11/6/17, an ECM observed a vehicle exceeding the construction speed limit. On 11/11/2017, ECMs observed traffic control flaggers and signage in place along McCain Valley Road for culvert work in accordance with MM TRA-1.

### **Construction Activities Schedule:**

- Cut ditches/ place rip rap at G6, G15, and McCain Valley Road,
- Set turbine bases and mid-section, build rotors at A2, A3 on C-6 to C-9,
- Top out build on turbines at E1, F1, F2,
- Tower wiring on turbines F1-F3, G1,
- Pre-walk turbine pad E11-E13,
- Topsoil restoration on G and J-lines,
- Re-contour turbine site/string roads on G1-G5, J1-J3,
- Wire install-collection at wire 66-sub,
- Prep subgrade along G, H, and J-lines,
- Gravel rings on G-line, and
- SWPPP CMP clean-out on McCain Valley Road

## 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> </ul>	Yes

## Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> <li>• Drilling and setting of overhead line systems</li> <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

Variance Request No.	Submitted	Description	Status	Approval Date
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
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 trash littered in the main laydown yard. ECMs notified construction crews and trash was cleaned and properly disposed of shortly thereafter in accordance with MM-BIO-7d.



**Photo 2:** ECMs observed a wash out basin near turbine pad F-2 in poor condition. ECMs coordinated with the designated biologist to repair the wash out basin, in accordance with the project site specific SWPPP.



**Photo 3:** Installation of straw wattles and fiber blankets continued along McCain Valley Road, in accordance with the project site specific SWPPP and MM HYD-1.



**Photo 4:** ECMs observed an archaeological monitor inspecting culverts per the protocols of Variance Request 006 and in accordance with MM CUL-1d.

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