



## **BLM Authorized Officer Weekly Report**

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**Project:** Tule Wind Energy Project

### **Weekly Project Update**

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**Reporting Period:** 01.15.18 through 01.21.18

### **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.

On December 22, 2017, the BLM issued NTP-6, authorizing Tule Wind LLC to proceed with full commercial operations of 52 turbines, located on public land administered by the BLM and all associated project facilities. Associated project facilities include, but are not limited to, a substation, access roads, underground and overhead collection system, operations and maintenance building, and three permanent meteorological towers. A copy of NTP-6 along with the associated terms and conditions are posted on the ECMP website (<http://www.tulewindeccmp.com/>).

The following weekly report covers construction activities for the reporting period of 01.15.18 through 01.21.18.

### **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, 6, 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, road maintenance activities including reclaiming shoulders and rock lined ditch installation occurred along McCain Valley Road. Spreading and compaction of base and gravel was observed along the D, E, and F-line access roads. Haul trucks transported top soil, riprap, and base gravel along the A, B, and G-lines.

Re-contouring was observed at turbine pads A-2, A-3, C-6, the C-line and D-line access roads, and along McCain Valley Road. Topsoil was spread on the B and C-lines and the F-line access road. Ditch digging and excavation for energy dissipaters occurred along McCain Valley Road as well as on the B, C, E, and F-lines. Riprap rock aggregate was hauled from Laydown Yard #10 and used to reinforce culverts throughout the project site.

In addition, gate post installation continued at access road entrances along McCain Valley Road. Construction crews reclaimed Laydown yard #6 and hydro seeding occurred throughout the project site.

Throughout this reporting period, General Electric (GE) personnel were observed continuing to conduct commissioning and up-tower work at turbine sites project wide.

### Cultural Resources

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

### Biological Resources

Biological monitors were present to monitor ground-disturbing activities in accordance with MM-BIO-1c.

During this reporting period, ECMs observed ongoing habitat restoration. ECMs observed crews transplanting cacti from the on-site nursery located near Laydown Yard #5 to turbine pads on the G-line, in accordance with the Habitat Restoration Plan.

Hydro seeding was observed during the first half of this reporting period along the road shoulders of turbine sites E-11 through E-13, the G-line access road, and the J-line access road in accordance with the Habitat Restoration Plan.

During this reporting period, all project personnel were observed with the project specific WEAP training sticker on their hard hats, in accordance with MM BIO-1b.

#### 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)

Construction crews continued to construct drainage swales along McCain Valley Road, south of the E-line access road.

On 01/17/2018, an ECM discovered a pile of silt fencing that was no longer functional staged along turbine pads A-1 through A-3. ECMs worked with the designated biologist to identify and dispose of the silt fencing, in accordance with MM-BIO-7d. As a follow up from the previous reporting period, fiber rolls observed at turbine pad E-10 remain displaced and are in need of reinforcement. This item will continue to be tracked with the designated biologist.

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

During this reporting period, all work occurred within the project limits of disturbance in accordance with MM BIO-1a. Variance Request 006 was implemented once during this reporting period, please see below. Variance Request 006 was approved by the BLM to allow up to 10 acres of additional impacts, where activities occur along the edge of the limits of disturbance have the potential to cross the limits of disturbance.

On 01/16/2018, the protocols for Variance Request 006 were implemented to allow construction crews to dig energy dissipaters along McCain Valley Road that extended slightly beyond the limits of disturbance. Biological and cultural monitors were present full time to monitor this activity in accordance to the protocols of Variance Request 006. No impacts to sensitive cultural or biological resources were observed.

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

ECMs observed water trucks applying water in active areas of construction and accompanying haul trucks moving topsoil 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 present on the project site during all construction activities, including vehicles equipped with fire suppression equipment in accordance with MM FF-1.

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

During this reporting period, all project related vehicles were observed to be travelling at the posted daytime speed limit of 15 miles per hour in accordance with MM BIO-7b.

Traffic flaggers were observed notifying vehicles of temporary road closures during rock lined ditch installation along McCain Valley road, maintaining a safe travel corridor for both project personnel and the public, in accordance with MM-TRA-1.

#### **Construction Activities Schedule:**

- Asphalt paving on Ribbonwood Road,
- Rock restoration on the A-line,
- Placing rock aggregate along the C-line,
- Topsoil restoration along the A-line, B-line, and McCain Valley Road,
- Hydro seeding the collection and transmission pole sites,
- Reclaiming road shoulders along McCain Valley Road, the A,B and C-line,
- Cutting ditches and placing rip rap along McCain Valley Road,
- Gravel ring installation on the B and C-lines,
- SWPPP maintenance as needed, and
- Haul trucks moving soil along A-line, B-line, and C-line.

## 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>	
6	12/22/17	Commercial Operations: <ul style="list-style-type: none"> <li>• Full commercial operations of 52 turbines and all associated project facilities.</li> </ul>	Yes

## 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	Approved	06.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		vehicle (OHV) staging areas.		
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:** A water tender is observed applying water along a blade and roller near turbine pad D-2 in an effort to minimize dust in accordance with the Dust Control Plan and MM AQ-1.



**Photo 2:** Silt fencing is observed piled up at turbine pads A-1 through A-3. The ECM worked with the designated biologist to remove and dispose of the silt fencing.



**Photo 3:** Hydro seeding observed along the G-line access road with a habitat restoration specialist present, in accordance with MM BIO-1c.



**Photo 4:** Construction crewmembers are observed installing a rock lined ditch along McCain Valley Road with traffic control being implemented in accordance with MM TRA-1.



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