



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 12.26.16 through 1.1.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3 and 4, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 12.26.16 through 1.1.17.

¹ <http://tulewindeccmp.com/#NTP>

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 and NTPs 3 and 4 as they pertain to current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

Construction Activities

Minimal construction activities occurred during this period including installation, maintenance, and repair of erosion and sediment control devices. All other construction activities were suspended during the holiday break between December 20 and January 3, 2017.

Cultural Resources

ECMs checked all of the cultural ESAs following the holiday weekend and recent rain events. No impacts to cultural resources were observed and the ESAs were in good condition.

Biological Resources

Biological monitors were present to conduct biological sweeps and spot check the installation, maintenance, and repair of erosion and sediment control devices.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs observed the proper installation, reinforcement, and repair of erosion and sediment control devices including straw wattles, silt fencing, and sandbags. Erosion and sediment control devices were being installed, reinforced, and repaired per the specifications provided in the grading plans and in accordance with the SWPPP.

On Tuesday, December 27, 2016 ECMs verified that a site-wide SWPPP inspection occurred following the holiday weekend and recent rain events in accordance with Section 8.0 of the SWPPP. The majority of the erosion and sediment control devices were observed to be in good condition without sediment discharge. During this reporting period, additional erosion and sediment control devices were installed and existing devices were reinforced or maintained along McCain Valley Road to prevent project runoff in accordance with MM HYD-1.

Stormwater Pollution Prevention Plan - Communication

On Friday, December 16 and Tuesday, December 27, 2016 the BLM's third-party ECM notified Tule Wind LLC of the sediment track-out at the paved portion of McCain Valley Road. Tule Wind LLC was already aware of the issue and has since been working with the BLM and San Diego County to determine and implement an appropriate solution. Tule Wind LLC anticipates using a street sweeper/vacuum to cleanup track-out on the paved portion of McCain Valley Road at least once per week starting the week of January 2, 2017, in accordance with Section 7.6 of the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes and maintaining traffic speeds at or below the 15 mile per hour speed limit in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Hazardous Materials Management Plan and Waste Management Plan (MM-HAZ-1a; MM-HAZ-1c)

On Tuesday, December 27, 2016 a portable sanitation facility, which was previously secured using a tie-down strap, was discovered overturned with the strap missing on McCain Valley Road near the B String. ECMs observed no fluid discharge from the overturned facility and determined that no cleanup was required. The facility was righted and secured upright with rope to prevent the potential for leaks or spills in accordance with ROW Grant Stipulation 78 and the Hazardous Materials Management Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MMBio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment and vehicles parked in areas with no vegetation. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Construction Activities Schedule:

- Continue staking disturbance limits along F and D strings;
- Continue erosion and sediment control device installation and SWPPP inspections;
- Continue grading, clearing, and grubbing activities along the G and H lines and connector roads;
- And continue grading the O&M building pad.

Potential Delays to the Online Date of the Project

- None.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 <ul style="list-style-type: none"> • turbine borings • met tower borings • soil test pit exactions • visual examination • completion of Multichannel Analysis of Surface Waves (MASW) and seismic refraction testing at up to 15 percent of the turbine locations • thermal resistivity sample collection at approximately six locations • electrical resistivity testing at approximately six locations 	Yes
2	10.12.16	Preconstruction activities as follows <ul style="list-style-type: none"> • disturbance limit staking and limited vegetation clearing • staking of ESAs • removal of weeds in accordance with the HRP • cacti salvage • pickup truck and ATV use of BLM access routes authorized under the Eastern San Diego County Resource Management Plan (2008) 	Yes
3	11.18.16	Clearing and grading activities as follows <ul style="list-style-type: none"> • vegetation clearing (site clearing and grubbing) • grading work and blasting (as-needed) associated with the access road • equipment staging and laydown yard/staging areas • foundation excavation and blasting (as-needed) 	Yes
4	11.18.16	Construction activities for four 10,000-gallon fire tanks including <ul style="list-style-type: none"> • site surveying • vegetation clearing and grading • footing excavation • turnout construction • forming the tanks • installation of reinforced steel • pouring footing, slab, and walls • backfill and final grading 	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	11.2.12
2	5.16.13	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	5.20.13
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Previously installed erosion control devices along McCain Valley Road reinforced with an additional sand bag and straw wattle following the site-wide SWPPP inspection in accordance with the SWPPP and MM HYD-1.



Photo 2: Crews installing additional straw wattles along McCain Valley Road in accordance with the SWPPP and MM HYD-1.



Photo 3: Portable sanitation facility, along McCain Valley Road, secured with rope in accordance with ROW Grant Stipulation 78 and the Hazardous Materials Management Plan.



Photo 4: Crews installing additional sand bags at areas subject to overland flow during rain events along McCain Valley Road in accordance with the SWPPP and MM HYD-1.

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