



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 1.9.17 through 1.15.17

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 1.9.17 through 1.15.17.

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

During this reporting period, grading and topsoil salvage activities occurred along McCain Valley Road and along the H string access roads. Clearing activities along the D through H string access roads continued in accordance with NTP-4. As a part of the clearing activities that occurred along the G and H string access roads, boulders were relocated from work areas to a temporary staging area. ECMs observed the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road and the G string during this reporting period. Rock blasting also occurred in the 80-acre laydown yard located on land within San Diego County and salvaged cacti were temporarily re-planted along the J string.

Cultural Resources

Cultural monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure CUL-1d.

Cultural Resources – Non Compliance

On Thursday, 1.12.17, the BLM's third party cultural monitor observed a blade ripping and grading the eastern portion of the connector road in a previously disturbed area without cultural monitors present. The area where the disturbance occurred is located on land administered by San Diego County. The third party cultural monitor notified the lead archaeologist who sent an archaeological and Native American monitor to cover the activity. While the disturbance occurred in a previously disturbed area, the area had not been cleared by the BLM. No resources were determined to be impacted as a result of this event.

Biological Resources

Biological monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure BIO-1c.

Previously salvaged cacti segments were planted along the J string during this reporting period and are anticipated to be re-planted post-construction in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.

ECMs observed topsoil salvage activities along the H string in accordance with Sections 5.2.2.2 and 5.2.2.3 of the Habitat Restoration Plan.

Limits of Disturbance – Non Compliance

At approximately 11:00 am, on Wednesday, 1.11.17 the BLM's third party cultural monitor notified BLM's third party compliance monitor of a potential compliance issue where a skid steer with a mulching attachment had operated past the staked limits of disturbance along F string on lands administered by the BLM. Vegetation was mulched past the limits of disturbance by approximately 20 feet impacting approximately 230 square feet of vegetation. The operator cleared up to what he thought was the staked disturbance limit, but did not recognize that one of the stakes was an "off-set" stake that was intentionally placed off the ROW.

The BLM's third party compliance cultural and compliance monitors surveyed the area outside the disturbance limits and found no impacts to biological or cultural resources. The BLM is working with Tule Wind LLC to document the non-compliance and to take measures to prevent similar issues from occurring. Staking crews will begin placing "off-set" stakes inside the limits of disturbance to reduce the potential for confusion.

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

ECMs observed the installation, reinforcement, and repair of erosion and sediment control devices including straw wattles, silt fencing, and sandbags. SWPPP inspections are performed daily during storm events and weekly during clear conditions. SWPPP inspection include photos and GPS coordinates of areas requiring additional or maintenance of existing erosion and sediment control devices.

Due to recent and on-going rain events, numerous erosion and sediment control devices were in need of maintenance and repair. In several cases the erosion and sediment control devices were laden with sediment and in other cases were ineffective as water was flowing beneath the device rather than through the device. Each of these issues were documented and reported to Tule Wind, LLC. Dedicated construction crews are in the process of repairing, maintaining, and installing erosion and sediment control devices.

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, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Traffic Control Plan Implementation (MM TRA-1)

Construction crews continued to install traffic control signage along McCain Valley Road in accordance with MM TRA-1 and the approved Traffic Control 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, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. 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.

Blasting Plan Implementation (MM NOI-1; MM HAZ-4b)

Rock blasting was performed in accordance with the approved Blasting Plan and MM NOI-1 and HAZ-4b.

Construction Activities Schedule:

- Continue staking disturbance limits;
- Continue erosion and sediment control device installation and repairs;
- Continue grading, clearing, and grubbing activities along the D through J lines and connector roads;
- Continue building turbine sites and substation pad;
- And continue planting salvaged cacti at the J line salvage area.

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
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Previously salvaged cacti are being temporarily planted along the J string. The cacti are anticipated to be re-planted post-construction in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.



Photo 2: On 1.11.17, approximately 230 square feet of vegetation was mulched outside of the limits of disturbance. This event is being classified as a "Non Compliance" in accordance with Section 5.2 of the ECCMP.



Photo 3: Stop sign installed along the H string access road AA in accordance with the approved Traffic Control Plan and MM TRA-1.



Photo 4: Crews installing additional straw wattles and maintaining existing erosion and sediment control devices along McCain Valley Road in accordance with the SWPPP and MM HYD-1. Cultural monitors were present to observe ground disturbance associated with the installation and maintenance of sediment control devices in accordance with MM CUL-1D.

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