



BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El Centro, California 92243
Website: www.tulewindECCMP.com

Project: Tule Wind Energy Project

Weekly Project Update

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

Reporting Period: 11.7.16 through 11.13.16

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. Detailed definitions of these 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 and LNTP-2, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 11.7.16 through 11.13.16.

Site Inspections, Mitigation Monitoring, and Compliance

Preconstruction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 as they pertain to current activities. No issues or concerns about compliance with the mitigation measures were reported by ECMs. Daily observations were documented on daily site inspection forms and applicable mitigation

¹ [http://tulewindeccmp.com/CACA_49698_Tule_LNTP%2010.12.16%20\[FINAL\].pdf](http://tulewindeccmp.com/CACA_49698_Tule_LNTP%2010.12.16%20[FINAL].pdf)

measures were reviewed. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

Archaeological Resources

Crews continued to install ESA fencing and work with survey crews to ensure ESAs are clearly and appropriately delineated along the project disturbance limits in accordance with MM CUL-1a. The ESAs will be maintained to ensure the continual protection of environmental resources.

Biological Resources

Tule Wind, LLC has contracted with a consulting firm, ICF, to complete day-to-day biological monitoring of the construction activities in accordance with the ECCMP and MM Bio-1c. In conformance with conditions outlined in LNTP-2, biologists' resumes were submitted and approved by the BLM prior to initial preconstruction activities in October 2016.

Cacti Salvage

Crews were observed using hand tools (loppers) to remove cacti on the access road from McCain Valley Road under the supervision of a Biological Monitor/Habitat Restoration Specialist in accordance with MM Bio-1c. Cacti salvaged from near Structures G10 and G11 were transported and staged temporarily at the laydown yard between Structures G11 and G12. After project roads are constructed, the cacti at this temporary staging area will be transported and planted at designated laydown yards near Structures E2 and E8 in accordance with Section 5.2.2.1 of the Habitat Restoration Plan. The cacti salvaged near the E String were staged in the laydown yard near Structure E2 where they will eventually be planted.

Buffers

All cacti salvage activities were observed within the temporary disturbance work limits in accordance with MM Bio-1a.

Survey Staking

ECMs observed survey crews staking the road centerline, grading limits, and turbine locations along the G String and McCain Valley Road to ensure the disturbance limits are delineated in the field according to the design plans and MM Bio-1a. Flagging was installed to assist with delineating and defining the work limits.

Dust Control Plan Implementation (MM-AQ-1)

ECMs observed appropriate dust control measures being implemented.

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

During all construction activities, Tule Wind, LLC is required to adhere to the guidelines and commitments within the Construction Fire Prevention/Protection Plan (as applicable to preconstruction activities) and LNTP-2 conditions.

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.

Preconstruction Activities Schedule:

- Staking disturbance limits along McCain Valley Road,
- Cacti salvage between G7 and G12, and
- ESA staking.

Potential Delays to the Online Date of the Project

- Tule Wind, LLC has submitted a request for Notice to Proceed (NTP) for clearing, grading, excavation, and staging. The NTP request is under review by the BLM.

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

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

Representative Photos



Photo 1: Vehicles parked in areas free of vegetation in accordance with the Construction Fire Prevention/Protection Plan (MM FF-1 and MM BIO-1F).



Photo 2: The temporary staging area for salvaged cacti at the laydown yard between Structures G11 and G12 is labeled as an ESA in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.



Photo 3: Survey crew staking the grading limits along the G String in accordance with MM BIO-1A.



Photo 4: Crews restricted OHV use to BLM roads while transporting salvaged cacti to staging areas in accordance with the LNTP-2.

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