



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: 12.12.16 through 12.18.16

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.

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 12.12.16 through 12.18.16.

¹ <http://tulewindeccmp.com/#NTP>

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 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

Cacti salvage activities authorized under LNTP-2 were completed on November 30, 2016. The cacti are currently being stored on-site within a staked and flagged Environmentally Sensitive Area. The cacti are anticipated to be temporarily planted in the ground, in a secured on-site restoration yard until they can be re-planted post-construction.

On Saturday, December 12, 2016 four 10,000-gallon temporary water tanks were installed along McCain Valley Road in accordance with the Fire Prevention/Protection Plan and NTP-3. With the installation of the four 10,000-gallon temporary water tanks, clearing and grading activities on land administered by the BLM were authorized to proceed.

During this reporting period, grading and clearing activities continued along the J string and G string access roads as well as temporary staging areas in accordance with NTP-4. Topsoil was salvaged along the ROW in accordance with Section 5.2.2.3 of the Habitat Restoration Plan.

During the previous reporting period, three of the five temporary meteorological (met) towers were removed from the project site in accordance with the Meteorological Tower Decommissioning Plan. The met towers were initially installed under a ROW Grant issued by the BLM on September 15, 2004 (CACA-45248). One of the two remaining met towers was decommissioned and removed from the project site during this reporting period. The final met tower was decommissioned and is currently stowed onsite. The met tower components are anticipated to be removed from the project site once the access road associated with installation of the wind turbines has been completed.

Archaeological 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.

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.

Biological and Cultural Monitoring – Problem Area (BIO-1c and CUL-1d)

At approximately 8:25 am, on Friday, December 16, 2016 the BLM's third-party ECM observed a bulldozer with a blade attachment working on the road between structures G6 and G7 without biological or cultural monitors present. The ECM contacted the operator to ask if there were cultural or biological monitors present. The operator responded that he was touching up an existing, previously disturbed roadway and did not think that monitors were required. The ECM asked the operator to stop all activities until the appropriate monitors could mobilize to the site of disturbance. The operator complied with the ECM's request.

The ECM estimated that the bulldozer operated for approximately five minutes without monitors present. The ECM along with the third-party archaeological monitor inspected the area and found no impacts to sensitive biological or cultural resources. As the operator mentioned, the area where ground disturbing activities were occurring was previously disturbed and unbeknownst to the ECM, previously surveyed by a biological monitor. However, it is unknown whether or not the blade exceeded the depth that was previously disturbed.

The BLM and Tule Wind LLC are working together to document the potential problem area and to ensure that there is a common understanding as to when biological and cultural monitors are required when working in previously disturbed areas.

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

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

ECMs confirmed that SWPPP inspections of best management practices (BMP – including erosion and sediment control devices, proper grading, unblocked culverts, etc.) along McCain Valley Road, the J String, and the G String were conducted in accordance with Section 8.0 of the SWPPP.

Stormwater Pollution Prevention Plan - Communication

On Friday, December 16, 2016, the BLM's third-party ECM noted that the entrance/exit at the paved portion of McCain Valley Road was not stabilized in accordance with section 7.6 of the SWPPP. ECMs notified Tule Wind LLC of the track-out at the paved portion of McCain Valley Road. Tule Wind LLC was aware of the issue and will be working with the BLM and San Diego County to stabilize the entrance/exit with gravel to prevent track-out, while not impeding or restricting the public's use of the area.

Dust Control Plan Implementation (MM-AQ-1)

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.

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.

On Saturday, December 12, 2016 four 10,000-gallon temporary water tanks were installed along McCain Valley Road in accordance with the Fire Prevention/Protection Plan and NTP-3 (see Construction Activities section above).

Preconstruction Activities Schedule:

- Continue staking disturbance limits for F String and D String.

Construction Activities Schedule:

- Continue clearing and grubbing for G and H Line access and connector roads.

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

Representative Photos



Photo 1: Erosion and sediment control devices properly installed in accordance with the SWPPP.



Photo 2: Clearing and grading activities observed within the staked limits of disturbance in accordance with MM BIO-1A.



Photo 3: Temporary 10,000-gallon water tanks installed with proper erosion and sediment control devices in accordance with the Fire Prevention/Protection Plan, NTP-3, and the SWPPP.



Photo 4: ECMs noted that McCain Valley Road is not properly stabilized at the paved entrance/exit in accordance with the SWPPP. Tule Wind LLC is aware of the issue and is working to stabilize the entrance/exit without impeding public access.

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