



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 2.6.17 through 2.12.17

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.

On February 10, 2017, the BLM issued NTP 5 to Tule Wind, LLC authorizing the balance of plant construction activities including foundation drilling and blasting, installation of seal slabs, installation of turbine foundations, installation of MET Towers, foundation backfill and crane pad installation, turbine erection, installation of underground collection system, boring of specific locations for the collection line, drilling and setting of overhead lines system, structure erection, wire pulling, and restoration of temporarily impacted area.

All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, NTP-4, and NTP-5. 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.

¹ <http://tulewindeccmp.com/#NTP>

On January 20, 2017, the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. The Notice was issued in response to compliance issues/concerns associated with ground disturbing activities on the project site. On January 31, 2017, Tule Wind, LLC submitted a revised written assessment of the factors that caused the compliance issues/concerns to occur and corrective actions to prevent further issues/concerns. The BLM issued a Notice to Proceed to lift the Temporary Suspension of Construction Activities on February 1, 2017. The BLM determined that the corrective actions identified by Tule Wind, LLC in the letter dated January 31, 2017 provide adequate assurances that similar issues/concerns would not likely result in the future. The full text of this NTP can be viewed on the ECCMP website under the heading “Construction Information Updates”.

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, 4, 5, and the February 1, 2017 NTP; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 2.6.17 through 2.12.17.

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, NTPs 3, 4, 5, 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, ECMs observed the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road and the D, G, and H strings. In addition, crews planted salvaged cacti at the E-String laydown yard.

Crews continued grubbing and grading along the B and C strings, at turbine pads E2, C1-3, G5-6, and along the access roads and laydown yards near these structure sites. ECMs also observed crews mulching previously removed vegetation and road widening activities along McCain Valley Road. Drilling along the H and G strings occurred in anticipation of the start of blasting activities.

Cultural Resources

Cultural monitors were present to monitor the installation and maintenance of erosion and sediment control devices as well as the clearing and grubbing of turbine pads and access roads in accordance with mitigation measure (MM) CUL-1d. Cultural monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Biological Resources

Biological monitors/Habitat Restoration Specialists were present to monitor the installation and maintenance of erosion and sediment control devices, the planting of salvaged cacti, and the clearing and grubbing of turbine pads and access roads in accordance with MM BIO-1c. ECMs observed completed monitor signature logs at grubbing activities in accordance with the February 1, 2017 NTP.

ECMs confirmed that biological monitors have been performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Resource Monitoring – Non Compliance

On February 10, 2017, ECMs inspected an approximately 35-foot by 110-foot area along the access road, within the limits of disturbance between the H2 turbine and temporary staging area, on lands administered by the BLM. A bulldozer had smoothed the access road to fill-in a large hole created by boulder removal. Construction activities were approved for work without full-time cultural or biological monitoring at turbine sites H1 and H2, but not at the location where the hole was filled.

Upon inspection of the disturbed area, no impacts to biological or cultural resources were observed. The lead resource specialists and monitors determined that the root cause of the issue was a miscommunication between the operator that graded the access road and the drill and blast crew that was working at turbine sites H1 and H2. Tule Wind, LLC reiterated to their construction crews that whenever there is a change in activities that the entire crew gets together and discusses the Monitor Sign-off Form to ensure that there is a complete and consistent understanding about when monitors are/are not required.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a with the exception of the noncompliance events described below. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period. When ECMs observed incorrect, downed, or ambiguous stakes, they informed Tule Wind, LLC and the areas were re-staked.

In accordance with the February 1, 2017 NTP, bulldozers drove along the outside edge of the disturbance limits ahead of grubbing activities to help make the limit stakes more easily visible for the masticator operators. ECMs observed spotters walking ahead of the bulldozers to assist operators in viewing the disturbance limit stakes. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators and monitors.

Limits of Disturbance – Noncompliance Events

On February 9, 2017, ECMs observed a noncompliance event where an equipment operator caused disturbance beyond the limits of disturbance during grading activities along McCain Valley Road, on lands administered by the BLM. The operator inadvertently pushed soil outside the

limits of disturbance at a location where the limits of disturbance jut out towards the center line of the road. One of the limits of disturbance stakes was missing and the operator could not see the stake that was missing. Soil that was in front of the blade was pushed past the limits of disturbance and then pushed back into the limits of disturbance. As a result of this occurrence, contractors will review the grading plans ahead of time to identify areas of concern prior to grading activities due to irregular (non-linear) staking. The contractor will then have personnel identify these irregular disturbance limit boundaries in the field with GPS. Additional staking will be added or steel posts, with PVC extensions, will be installed where needed to give the operators greater visibility of limit of disturbance markers. In these irregular areas, the grading operators will walk the boundary prior to grading to make sure that they clearly understand the limits of disturbance.

Two additional issues regarding ground disturbance occurring outside of the staked limits of disturbance were identified on Wednesday, February 8 and Thursday, February 9, 2017. Each of these observations were made by cultural monitors monitoring ground disturbing activities on land administered by the County of San Diego, in accordance with Section 106 of the National Historic Preservation Act. In each case corrective actions were implemented to avoid similar issues from reoccurring. The corrective actions include installation of rope or caution tape at the limit of disturbance prior to any work associated with the overhead transmission and collector lines, ensuring that limit of disturbance stakes are placed a distance that can be easily discerned by equipment operators, and to completely finish staking the limits of disturbance in an area prior to moving to another area on-site.

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

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Some devices were found to be ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

During this reporting period, ECMs also observed the installation of sediment control devices and the application of hydromulch around and over the salvaged topsoil stockpiles in accordance with Section 7.8 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, maintaining traffic speeds at or below the 15 mile per hour speed limit, cleaning track-out along the paved entrance to McCain Valley Road, 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; MM Bio-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, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Fire Prevention/Protection Plan Section II R – Problem Area

On February 10, 2017, a third party ECM observed a construction crew member refueling a skid steer without shutting the equipment engine off prior to fueling. ECMs discussed this problem area and the need to remind all construction crews about shutting off equipment before fueling at the daily compliance meeting.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. In addition, ECMs observed crews removing stained soil in accordance with the HMMP.

Additional portable restroom facilities were installed and secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance along the southern portion of McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Erosion and sediment control device installation and repairs along McCain Valley Road and the E and F lines,
- Planting salvaged cacti at the temporary staging area at structure E12,
- Mulching along McCain Valley Road,
- Clearing and Grubbing along McCain Valley Road near the A and B lines and pad C8,
- Widening and spreading gravel along McCain Valley Road,
- Blasting at pad H1 and drilling along the H line access road,
- Continuing geotechnical drilling and excavations along the D, F, and G lines,

- And grading and moving rocks along the G-Line, McCain Valley Road, and at the Substation.

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"> • 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
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"> • Foundation drilling and blasting • Installation of seal slabs • Installation of turbine foundations • Installation of MET towers 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • Foundation backfill and crane pad installation • Turbine erection • Installation of underground collection system • Boring of specific locations for the collection line • Drilling and setting of overhead line systems • Structure erection • Wire pulling • Restoration of temporarily impacted areas 	

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	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	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
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Pending	Under BLM Review

Representative Photos



Photo 1: On February 9, 2017, ECMs observed a noncompliance event where an equipment operator caused disturbance beyond the limits of disturbance by first pushing soil outside the limit and then back-dragging the soil back into the limits of disturbance.



Photo 2: Contractor personnel added steel posts and PVC extensions where needed to give equipment operators greater visibility of limit of disturbance markers in response to the noncompliance event on February 9, 2017 (described in the caption of Photo 1).



Photo 3: Resource monitors and equipment operators cut pre-grubbing lines in thick vegetation along the yellow tape disturbance limits with monitors acting as spotters ahead of the equipment in accordance with the February 1, 2017 NTP.



Photo 4: Crews observed installing erosion and sediment control devices around salvaged topsoil stockpiles in accordance with the Habitat Restoration Plan and Section 7.8 of the SWPPP.

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