



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 2.13.17 through 2.19.17

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.

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, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 2.13.17 through 2.19.17.

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

ECMs observed the installation and maintenance of erosion and sediment control devices along the F and E strings. In addition, crews continued planting salvaged cacti at the E-String laydown yard, working on the permanent water tanks along McCain Valley Road near the G and J strings, and grading pad sites along the G-String. Crews also continued grubbing and grading along the B and C strings, at the A-String laydown yard, and along McCain Valley Road. ECMs also observed crews

mulching previously removed vegetation, performing road widening activities, and adding rock along McCain Valley Road.

Drilling and blasting activities were performed along the H-String on Road AA during this reporting period. Crews also began grubbing and grading along the transmission alignment and performing geotechnical testing of soil and bedrock depth along the E, F, G and J strings.

Cultural Resources

Cultural monitors were present to monitor ground disturbing activities including grading, grubbing, and geotechnical testing 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 were present to monitor initial ground disturbance activities, the planting of salvaged cacti, and clearing and grubbing activities in accordance with MM BIO-1c. ECMs observed completed monitor signature logs at construction activities in accordance with the February 1, 2017 NTP. Biological monitors have been performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Noxious Weed and Non-Native Species Control Plan Implementation (MM BIO-3A)

During this reporting period, ECMs verified equipment wash certificates with contractors to confirm compliance with Section 5.2.1 of the Noxious Weed and Non-Native Species Control Plan.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a with the exception of the noncompliance event described below. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. Crews installed additional staking or steel posts with PVC extensions where needed to give the operators greater visibility of limit of disturbance markers. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators, spotters, and monitors in accordance with the NTP issued February 1, 2017.

Limits of Disturbance – Noncompliance Event

On February 14, 2017, the Dudek third party lead ECM along with a survey and engineering team verified a breach of the approved limits of disturbance along the C-String. During the event, a rubber tracked skid steer travelled approximately seven feet outside the staked limits of disturbance and travelled approximately 35 feet before re-entering the limits.

The lead ECM recorded that the skid steer was conducting clearing activities when it travelled along the staking tape that was bowed outside of the limits of disturbance by the wind. The skid steer operator followed the arc of the staking tape rather than travelling in a straight line between the stakes. The limit stakes were spaced approximately 100 feet apart from one another. The lead ECM and an archaeological monitor examined the disturbance area and determined that there were no impacts to sensitive biological or cultural resources. There were no environmentally sensitive areas (ESAs) in the vicinity of the unauthorized disturbance.

Per discussions between the BLM and Tule Wind, LLC, to avoid similar events from reoccurring, Tule Wind, LLC will be installing staking at a maximum of 25-foot increments. For the areas that have already been staked at 100-foot increments, new stakes would be placed inbetween the stakes placed at 100 feet. No work is authorized to occur in any area until the additional stakes are placed in the area.

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 observed the stockpiling of salvaged topsoil at the laydown yard near site G5. While topsoil salvage activities continue along the G-String, these stockpiles are still considered active. ECMs confirmed that following the completion of these salvage activities, installation of sediment control devices and the application of hydromulch around and over the salvaged topsoil stockpiles will occur 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, 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 construction and geotechnical testing 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.

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. ECMs also observed portable restroom facilities 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 and improvement activities along the southern portion of McCain Valley Road in accordance with MM TRA-1.

Waste Management (MM-BIO-7d) – Problem Area

On February 14, 2017, the portable sanitation facility at the F-String access road had toilet paper blow into nearby vegetation during a period of high winds. ECMs notified the designated biologist and the litter was removed upon notification.

Blasting Plan Implementation (BLM Stipulation 73)

On February 17, 2017, an ECM monitored the seismic and acoustic activity during the blasting activities occurring along the H-String to ensure compliance with the allowable thresholds in the Blasting Plan. The pre-blast warning and time signals were also observed in accordance with the Blasting Plan.

Construction Activities Schedule:

- Surveying and staking along strings to be filled and the G-Line,
- Erosion and sediment control device installation and repairs along McCain Valley Road and the E-Line,
- Mulching along McCain Valley Road,
- Widening along McCain Valley Road,
- Clearing and Grubbing along McCain Valley Road, the overhead line alignment, and the A, G, and E lines,
- Culvert installation at the J-Line bypass,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- And building pad sites along the G and H lines.

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 • 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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • 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	11.02.12
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	05.20.13
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.	Approved	02.14.17
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 14, 2017, the portable sanitation facility at the F-String access road had toilet paper blow into nearby vegetation during a period of high winds. ECMs notified the designated biologist and the litter was removed upon notification.



Photo 2: On February 9, 2017, a breach of the approved limits of disturbance along the C-String was observed.



Photo 3: Archaeological and Native American monitors observed the installation of silt fence near site E13 in accordance with MMs CUL-1D and HYD-1.



Photo 4: Crews observed verifying disturbance limit stake locations and installing yellow tape prior to the start of disturbance activities in accordance with the NTP issued February 1, 2017.

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