



BLM Authorized Officer Weekly Report

EI Centro Field Office
1661 S. 4th Street
EI 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: 1.30.17 through 2.5.17

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 1.30.17 through 2.5.17.

¹ <http://tulewindeccmp.com/#NTP>

Notice to Proceed, February 1, 2017

On Friday, 1.20.17 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 proposed corrective actions to prevent further issues/concerns. On February 1, 2017 the BLM issued a Notice to Proceed to lift the Temporary Suspension of Construction Activities. 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".

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 and 4, and the most recent 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. In addition, crews planted salvaged cacti at the E-String laydown yard.

Following the NTP issued on February 1, 2017, crews continued grubbing at turbine pads E1-4, C1-3, and along the access roads and laydown yards near these structure sites. ECMs also observed crews mulching previously removed vegetation along McCain Valley Road.

Cultural Resources

Cultural monitors 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 mitigation measure (MM) CUL-1d.

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.

Limits of Disturbance

All work observed occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

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.

On Friday, February 3, 2017 an ECM observed a bulldozer operator stopping the equipment and walking ahead to check stake locations prior to proceeding in areas where vegetation was thick. While the operator was following the terms and conditions of the NTP, the ECM reminded Tule Wind, LLC that a spotter is required to help locate stakes during initial clearing adjacent to the limits of disturbance. Tule Wind, LLC mentioned that there was a spotter present, but that the spotter got too far ahead of the bulldozer requiring the operator to get out of the equipment. Tule Wind, LLC indicated that they will continue to work with the equipment operators and spotters to provide spotters at a safe distance ahead of the equipment, but close enough to allow for adequate communication both via radios and by visual hand signals.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1) – Problem Area

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.

Since the reporting period starting on 12.19.16 (documented in the Weekly Report 14), SWPPP and third party compliance monitors have documented recurring failures of the installed erosion and sediment control devices due to the amount of precipitation that has occurred during rain events in December and January (approximately 12 inches). The recurring issues have been recorded as a “Problem Area” according to Section 5.2 of the ECCMP. To address this problem area, crews began installing rip-rap devices to replace failing straw wattles and damaged sand/gravel bags. Remaining straw wattles were replaced with mulch wattles during this reporting period. Crews continued digging catch basins and drainage channels to manage the unanticipated amount of sediment generated during the rain events so far this season. In addition, crews began hydromulching topsoil salvage piles to protect them from erosion in accordance with the SWPPP.

On February 1, 2017, a meeting was held by Tule Wind, LLC to discuss BMP installation and maintenance across the project site.

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.

During this reporting period, ECMs observed a water truck producing visible, dark emissions on three separate days. ECMs contacted Tule Wind, LLC about this issue and the truck was removed from the site on February 3, 2017.

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.

ECMs observed a crew welding an excavator bucket in the laydown yard along the H String. A Hot Work Permit had been obtained from the Fire Safety Coordinator who was present to monitor the work along with an additional Fire Watch monitor. A 3-A-40 BC fire extinguisher, 5-gallon backpack pump, and shovel were present within 25 feet of the work area and proper warning signage was placed to notify individuals entering the area of the work. The monitoring and safety equipment were all in accordance with Section W of the Fire Prevention/Protection Plan.

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.

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

On Friday, January 27, 2017 the portable sanitation facility at the H-String laydown area had toilet paper blow into nearby vegetation during a period of high winds (gusts over 40 mph). At the end of the previous reporting period (1.23.17 through 1.29.17), the resolution to this problem area was still in progress. On January 30, 2017 ECMs confirmed that biological monitors had cleaned up all remaining litter in accordance with MM BIO-7d.

Construction Activities Schedule:

- Erosion and sediment control device installation and repairs,
- Planting salvaged cacti at the temporary staging area at structure E12,

- Mulching along McCain Valley Road,
- Clearing and Grubbing along the B-Line,
- And grading and moving rocks along the C-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
5	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

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

Representative Photos



Photo 1: ECMs observed containment drip pans under parked equipment to prevent potential leaking equipment from staining soils in accordance with MM HAZ-1A and the Hazardous Materials Management Plan.



Photo 2: ECMs observed a water truck producing visible, dark emissions on several occasions during this reporting period. The truck was removed from the project site on February 3, 2017.



Photo 3: Hydromulch was applied to salvaged topsoil storage piles to prevent erosion in accordance with MM HYD-1 and the SWPPP.



Photo 4: Biological monitors were present to observe grubbing activities in accordance with MM BIO-1C. All observed activities occurred within the disturbance limits in accordance with MM BIO-1A. Yellow tape was strung between disturbance limit stakes to increase visibility of limits for masticator operators in accordance with the NTP issued on February 1, 2017.

INTENTIONALLY LEFT BLANK