



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 3.13.17 through 3.19.17

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, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (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 3.13.17 through 3.19.17.

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 replacement of sediment control devices along the H and J strings. The installation of culverts also continued along the G-String and McCain Valley Road. Construction crews continued grubbing and grading along McCain Valley Road as well as the G and E strings. Pad preparation activities also included rock breaking and topsoil salvage. ECMs observed construction

crews performing road widening and rock installation activities along McCain Valley Road. In addition, drilling and blasting occurred along the G-String, work continued on the fire tanks along McCain Valley Road, the foundation assembly continued at Tower 4, and turbine foundations were excavated and poured along the G-String.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on and installing new ESA fencing where necessary, in accordance with APM-TULE-CUL-1. Unanticipated new discoveries were recorded in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities. ECMs also verified that wildlife ramps were installed in turbine foundation excavations in accordance with MM BIO-7a.

Monitor Sign-off

During this reporting period, ECMs recorded two incidents where a foreman left the active work site with the monitor signature log and signed job hazard analysis (JHA). While the monitoring log and JHA were observed to be completed in accordance with the February 1, 2017 NTP when the foreman returned to the work site, the documents are required to be available at the area where construction activities are occurring. ECMs are continuing to work with the construction foremen to ensure the required documents remain where the construction activities are occurring.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a except during the incidents described below. ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

During blasting activities on March 16, 2017, rock debris fell outside the disturbance limits near the turbine pad G15. The pieces of rock were recorded and left in place to avoid creating additional unauthorized disturbance.

Limits of Disturbance – Problem Areas

On March 13, 2017, two incidents occurred where work activities occurred outside of the approved limits of disturbance. Each of the incidents is described below:

- During grading activities, a blade hit a rock located below the ground surface along the access road north of turbine pad G8. When the blade hit the rock, it lost balance and travelled outside of the approved limits of disturbance while trying to regain balance. An approximately 40-foot by 10-foot area was disturbed outside of the approved limits of disturbance. Per ECM's conversations with the equipment operator, if the equipment had not travelled outside of the approved limits of disturbance to regain balance, the blade could have tipped over.
- A D8 bulldozer slipped down the slope of turbine pad G6 during grading activities. The bulldozer did not cross the limits of disturbance, but dirt extending approximately 100 square feet was pushed outside of the limits of disturbance.

In each case, archaeological and Native American monitors were present at the time of the incident and the area had been swept by a biological monitor. The areas of disturbance were inspected and it was determined that no damage to sensitive environmental resources occurred.

These incidents are being reported as Problem Areas in accordance with Section 5.2 of the ECCMP.

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

Per direction from the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board, Tule Wind, LLC has ceased the use of all plastic encased straw wattles. During this reporting period, Tule Wind, LLC had construction crews onsite to install biodegradable and weed-free straw wattles. Tule Wind, LLC is replacing the existing plastic encased straw wattles that have previously been installed. The removed plastic encased wattles are being hauled off site for disposal.

In accordance with Section 7.8 of the SWPPP, ECMs observed crews hydromulching topsoil stockpiles. Some of the windrowed stockpiles were temporarily covered with fabric to protect against erosion. The fabric is removed as crews are able to hydromulch and install wattles in accordance with the SWPPP.

During this reporting period, construction crews also continued installing silt fence along the G-String in accordance with 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, 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 activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing

activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1.

Hot work permits were issued for tower foundation work and ECMs verified that the Fire Safety Coordinator as well as Fire Watch personnel were present to monitor the hot work activities. Proper equipment was also present and warning signs were posted at the work site in accordance with the hot work permit and MM FF-1. Fire Watch personnel remained at the work site with required equipment for an hour after the work was completed.

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 McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along McCain Valley Road,
- Widening and grading along McCain Valley Road,
- Clearing, grubbing, and grading along Rough Acres Road and the A, C, E, F, and G lines,
- Culvert installation along McCain Valley Road,
- Building pad sites and foundation excavation along the G and J lines,
- Meteorological tower installation.

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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • 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	11.02.12
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	Pending resubmittal by Tule Wind, LLC.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Pending	Pending resubmittal by Tule Wind, LLC.
7	0.3.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review

Representative Photos



Photo 1: On March 13, 2017, disturbance beyond the staked limits of disturbance occurred when a piece of construction equipment hit a subsurface rock and lost control. The area of disturbance was inspected and it was determined that no damage to sensitive environmental resources occurred.



Photo 2: During blasting activities on March 16, 2017, rock debris fell approximately 10 feet outside the staked disturbance limits. The pieces of rock were left in place to avoid creating additional unauthorized disturbance.



Photo 3: ECMs observed construction crews installing biodegradable and weed-free straw wattles at the H1 turbine pad in accordance with the SWPPP and per direction from the BLM, CDFW, and State Water Board.



Photo 4: Required equipment and warning signs were present at the Transmission Line Pole 4 during hot work activities in accordance with the issued hot work permit and the Fire Prevention/Protection Plan (MM FF-1).

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