



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: 3.20.17 through 3.26.17

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 3.20.17 through 3.26.17.

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 of culverts, road grading, and aggregate installation along McCain Valley Road. Construction crews continued grading, rock breaking, and soil salvage along the E, F, G, and J strings. Drilling and blasting occurred along the G and E strings, miscellaneous geotechnical testing activities occurred along the A-String and at the H2 turbine pad, and turbine foundations

were excavated, assembled, and poured along the G-String. In addition, vegetation removal continued along the collection line, tower footings were drilled in the 80-acre parcel, and transmission line poles were set.

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 and establishing no-disturbance buffers around observed nesting birds in accordance with MM BIO-7j. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted. ECMs are continuing to work with the construction foremen to ensure the required documents are filled out completely and clearly.

Limits of Disturbance (MM BIO-1a)

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. 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.

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

During this reporting period, construction crews installed biodegradable and weed-free straw wattles. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized 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, 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 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 Fire Watch personnel and proper equipment were present in accordance with the hot work permit and MM FF-1.

Fire Prevention/Protection Plan Implementation – Problem Area

On Monday, March 20, 2017, ECMs observed a construction crew drilling at turbine pad E1 without a 5-gallon backpack pump as required by Section J of the Fire Prevention/Protection Plan (FPPP). The construction crew informed the ECM who discovered the issue that the backpack was on a truck that had temporarily left the work area. The foreman and ECM agreed that the work activity would be in compliance with the FPPP if a water truck was staged at the worksite until the truck with the 5-gallon backpack could return. The ECM reminded the crew of the FPPP requirements and the ECM remained at the work site with his 5-gallon backpack pump so the work could continue until a water truck arrived.

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. In addition, construction crews were onsite to install, maintain, or replace traffic and speed limit signs along McCain Valley Road.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along Rough Acres Road,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading along Rough Acres Road and the D, E, and F lines,
- Culvert installation along McCain Valley Road,
- Building pad sites and foundation excavation along the G-Line,

- Drilling at the substation,
- And concrete pouring and setting poles along the transmission line.

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	11.02.12
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	Resubmitted as part of variance request 006 on 03.24.17.
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	Resubmitted on 03.24.17.
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Pending	Under BLM Review

Representative Photos



Photo 1: Concrete washout containers were used during foundation pouring activities to ensure contaminated discharge was contained in accordance with MM BIO-5.



Photo 2: Fire prevention equipment was staged within 30 feet of chainsaw work along the collection line in accordance with the Fire Prevention/Protection Plan (MM FF-1).



Photo 3: Archaeological and Native American monitors were present during grading activities along McCain Valley Road in accordance with MM CUL-1D.



Photo 4: ECMs confirmed that no-disturbance buffers have been installed to minimize impacts to nesting birds in accordance with MM BIO-7J.

INTENTIONALLY LEFT BLANK