



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 2.27.17 through 3.5.17

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.

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 2.27.17 through 3.5.17.

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 McCain Valley Road and the C-String as well as the installation of culverts along McCain Valley Road and the H-String. Crews also continued grubbing and grading along the overhead alignment, McCain Valley Road, and the A, G, H, and J strings. ECMs also observed crews mulching previously

removed vegetation and performing road widening activities along McCain Valley Road. In addition, blasting occurred along the G and H strings, work continued on the fire tank pads along McCain Valley Road, and a rock pit was excavated at the G12 pad during this reporting period.

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 ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Cultural Resources – Noncompliance Event

On Tuesday, February 28, 2017, a third party archaeological monitor observed a D6 Bulldozer grading a pad for a drill rig north of the G6 turbine pad without archaeological or Native American monitors present. The third party monitor stopped the grading activity to ask where the required monitors were. The operator responded that he had thought the monitors were present and pointed out a biological monitor's truck that was parked approximately 20 meters away. A biological monitor was present, however there were no archaeological or Native American monitors at the location of the activity. The third party monitor notified the Lead Archaeological Monitor who dispatched an available archaeological monitor to the location.

Upon inspection of the monitor sign-off form associated with this activity, the construction crew foreman indicated that grading was not included on the monitor sign-off sheet as it was associated with the drilling activity. Archaeological monitors informed the crew foreman that because drilling and grading result in different levels of disturbance they require different levels of monitoring in accordance with MM CUL-1D. The drilling and grading activities should be listed separately on the monitor sign-off sheet.

The approximately 300 square meter area of unauthorized disturbance was inspected by an archaeological and Native American monitor and no impacts to cultural resources were identified. There were no ESAs in the vicinity of the disturbance.

Archaeological monitors continue to work with construction crews and Tule Wind, LLC to ensure monitor sign-off sheets are properly and completely filled out so that monitors and crews understand when monitors are required at construction activities in accordance with the February 1, 2017 NTP and MM CUL-1D.

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 in accordance with MM BIO-7j.

Limits of Disturbance

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

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. Most were in good condition, however, some areas where recent grading activities had occurred required additional BMP installations to prevent sediment from leaving the ROW. 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.

In accordance with Section 7.8 of the SWPPP, ECMs observed crews stabilizing topsoil stockpiles using hydromulch and wattles. 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.

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, the mulching of previously removed vegetation along McCain Valley Road, 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.

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.

On Monday, February 27, 2017, a third party ECM reported a portable restroom facility that had blown over along the D-String during a period of high winds. The portable restroom was staked down. The following day, the portable restroom was turned upright and re-staked to prevent the issue from reoccurring. Stained soil from the overturned portable restroom was removed in accordance with the Hazardous Materials Management Plan.

Waste Management Plan Implementation – Problem Area

On Saturday, March 4, 2017, a third party ECM observed a trash bin at the E-String laydown yard, containing food waste, which had been left uncovered overnight. The ECM had observed the uncovered trash containers at the laydown yard and reported the issue to the Designated Biologist and construction contractor the previous day. Since the original notification, only one of the three bins had been covered and one of the bins left uncovered still contained food waste and other trash. The ECM contacted the Designated Biologist about the incomplete resolution. The ECM verified that the trash bins were covered by the end of the day in accordance with Section 2.1.1.6 of the Waste Management Plan.

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,
- Silt fence installation and repairs along the A-Line,
- Stabilizing topsoil stockpiles along the J and H lines,
- Mulching along McCain Valley Road,
- Widening and grading along McCain Valley Road,
- Clearing and Grubbing along the C-line,
- Grading along the E and G lines,
- Culvert installation along McCain Valley Road,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- Building pad sites along the G-line,
- 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	Under BLM Review
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	Under BLM Review
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: ECMs and SWPPP monitors observed and reported locations along McCain Valley Road where recent grading activities changed the path of overland flow and additional BMPs are required to ensure sediment remains on the ROW. Tule Wind, LLC had BMP installation and maintenance crews onsite to resolve these issues during this reporting period.



Photo 2: The portable restroom which had blown over during a period of high winds on February 27, 2017 was turned upright and staked the following day to prevent the issue from reoccurring. The stained soil was removed in accordance with MM HAZ-1A.



Photo 3: Traffic control flaggers and signs were present to notify motorists of work areas while crews worked along McCain Valley Road in accordance with the Traffic Control Plan (MM TRA-1).



Photo 4: Archaeological and Native American monitors were present during road widening activities along McCain Valley Road in accordance with MM CUL-1D. Water was applied regularly to reduce dust in accordance with the Dust Control Plan and MM AQ-1 and disturbance limits were demarcated with yellow tape in accordance with the February 1, 2017 NTP.

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