



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 6.12.17 through 6.18.17

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 Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP 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 ECMP, 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 6.12.17 through 6.18.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP 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

During this period, third party monitors observed rock management activities including, pre-ripping along McCain Valley Road (MVR), along the C, D, E and G lines, and turbine pad F2. Rock breaking occurred along the E, G, H and J lines, and along MVR. Construction crews trenched

along old highway 80 and turbine pad E12; excavated along old highway 80 and along the E line; removed rocks at the E and G lines; and drilled overhead collector poles 45, 52, and 54.

Road maintenance activities observed during the reporting period included road widening along MVR and laydown yard 9; blading and grading MVR between the G and H lines, along the E line, and at turbine pads on the D line. Sub grading occurred on turbine pad G11, the Met Tower access road, and along MVR. Backfilling occurred on the D, E and F line and overhead collector pole installation began on pole 41. Turbine pad construction continued on pads along the A, B, C and F lines. In addition, Stormwater Pollution Prevention Plan (SWPPP) best management practice (BMP) installation and maintenance of erosion control blankets, biodegradable straw wattles, silt fence, and hydro mulch occurred throughout the work site.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including road widening, grading, trenching, rock breaking, drilling, soil loading, cut and fill, and rock ripping in accordance with MM-CUL-1D.

On 06/15/17 during road widening along MVR, an excavator was removing a rock near the limits of disturbance and struck a rock that was buried approximately two feet beyond the limits of disturbance. The designated biologist, lead archaeologist, along with several Native American monitors supervised the careful removal of the rock. No impacts to sensitive cultural or biological resources were observed. The impacts are being considered as an unforeseen event in accordance with the protocols established by Variance Request 006.

On 06/16/17, two boulders that were being excavated and appeared to be within the limits of disturbance were discovered to protrude outside of the limits of disturbance beneath the ground surface. As the boulders were being excavated, they caused the ground above them, located outside the limits of disturbance to cave slightly. Dudek's ECM was present for the disturbance and notified the designated biologist and lead archaeologist of the incident. The remainder of the work area was surveyed by biological and cultural monitors to prepare for the potential of further disturbances outside the limits of disturbance. No sensitive resources were observed and/or impacted. The impacts are being considered as an unforeseen event in accordance with the protocols established by Variance Request 006.

On 06/17/17, ECMs observed the relocation and identification of sensitive cultural resources with San Diego County's forensic anthropologist. Native American and archaeological monitors were present in accordance with MM-CUL-2.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM-BIO-1C. ECMs observed construction crews placing containment under equipment, observed monitors spot-checking trenching activities in accordance with MM-BIO-1C, and the installation of two radar speed limit signs on MVR to enforce speed limits in accordance with MM-BIO-7B.

On 06/15/17, ECMs observed ravens in the 80-acre yard pulling trash from the back of construction vehicles. Food trash continues to be an issue in the lay down yard with the potential to attract wildlife to the project site. The designated biologist has been notified of this issue and ECMs and biological monitors are continuing to work with site superintendents to remind work crews the importance of properly disposing of their trash on site.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM BIO-1A)

Work occurred within the project limits of disturbance in accordance with MM-BIO-1A, apart from the two aforementioned instances where work occurred outside the limits of disturbance requiring the protocols established by Variance Request 006 to be implemented.

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

During this reporting period, ECMs observed construction crews making repairs to straw wattles, concrete washouts, and installing erosion control blankets. There were several issues identified with deficient silt fencing in need of repair, and have been added to a list provided to the designated biologist. Construction crews began reclamation of unused concrete washout stations.

On 06/13/17, ECMs observed concrete that was disposed in the open, located by one of the water tanks on the main access road to the A line. The problem area was communicated to the lead biologist. ECM's later observed the concrete to be properly discarded in accordance with the SWPPP.

On 06/15/17, ECMs observed that the concrete washout near turbine B2 had concrete/water mixture leaking outside of the silt fence and onto the soil. The lead biologist was notified of the issue and the issue was addressed by repairing the plastic lining in the washout basin and ensuring that the washout basin does not exceed its capacity.

On 06/15/17, ECMs observed a concrete truck driver that had underestimated the distance to the washout pit and released the washout onto the ground instead of the prescribed pit. The construction foreman was contacted and he stated that he would install rock aprons in accordance with the project grading plans. The washout that affected the ground surface was appropriately cleaned and disposed of.

Dust Control Plan Implementation (MM-AQ-1; AIR-3)

ECMs observed water trucks watering active areas of construction at least three times per day and on an as-needed basis for rock breaking activities, in accordance MM-AQ-1. Soil binders have also been applied to control sediment discharge and erosion in accordance with MM-AQ-1.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM BIO-1F)

ECMs observed fire equipment and water trucks on the project site during construction activities, including vehicles with required fire suppression equipment, fire suppression equipment within 25 feet of active work sites, and vehicles parked in areas with no vegetation in accordance with MM-FF-1.

Hazardous Materials Management Plan (MM-HAZ-1A)

No spills were reported during this period. ECMs observed containment bins staged under construction equipment in accordance with MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

Two speed radar signs were staged along McCain Valley Road to remind construction crews of the project specific speed limits in accordance with MM-BIO-7B and MM-TRA-1.

On 06/12/17, ECMs observed construction traffic flaggers along McCain Valley Road during road maintenance to notify motorists of temporary delays, in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Sub grading along Ribbonwood side of Rough Acres Road,
- Topsoil salvage in the vicinity of Lark Canyon,
- Backfill and compact substation,
- Pre-ripping along B and C line,
- Rock management, and pre-trench ripping along the B and C line,
- Building of turbine pad sites,
- Drilling and blasting at pad sites along the G line and McCain Valley Road, and
- Digging of box pads along the D, E and F 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • 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 	
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 • Structure erection • Wire pulling 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> 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.	N/A	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.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
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.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Approved	06.14.17
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during	Approved	05.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
		construction.		
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17
14	06.16.17	Includes additional pull ares for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Pending	Under BLM Review
15	06.16.17	Requests turbine B-5 to be approved as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed drip pan containment bins beneath construction equipment in accordance with MM-HAZ-1.



Photo 2: Two speed limit radar signs were staged along McCain Valley Road to remind construction vehicles of the project speed limit and prevent speeding in accordance with MM-BIO-7B.



Photo 3: ECMs observed excess concrete/water mixture outside of the silt fencing in multiple locations. The construction contractor was notified to install gravel aprons in accordance with the Grading Plans (please see Photo 4) and to not fill washout basins beyond capacity.



Photo 4: Gravel apron installed as a best management practice (BMP) to prevent concrete washout discharge in accordance with the Grading Plans.

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