



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: 4.10.17 through 4.16.17

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 4.10.17 through 4.16.17.

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

ECMs observed the continuation of road grading and widening activities along McCain Valley Road as well as grading and contouring activities at pad sites along the B through G strings. Drilling occurred along the E and D strings, grubbing occurred at laydown yard 6 and overhead structure 28, and a culvert was installed on Road AD. In addition, construction crews salvaged topsoil along

strings B through E, backfill preparation activities occurred along the G String, and vegetation removal continued along the collection line.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and erosion and vegetation removal in accordance with mitigation measure (MM) CUL-1d and the approved Tribal Participation Plan.

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 active bird nests in accordance with MM BIO-7j.

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 part of the conditions that allowed the temporary suspension of construction activities to be lifted.

On April 12th, 2017, the ICF designated biologist signed a MSOS mistakenly granting a construction crew permission to work within a drive through nesting bird buffer without a biological monitor present. The mistake was identified when a Dudek 3rd party compliance monitor noticed a vehicle within the buffer and reminded the Blattner construction team that they cannot park a vehicle within a drive through buffer. When the construction crew showed the signed MSOS to the ECM, the ICF designated biologist was contacted and identified the error. A biological monitor was immediately sent to monitor the active bird nest in accordance with MM BIO-7j. ECMs are continuing to work with the construction crews and biological monitors to ensure the required MSOS documents are filled out accurately and that appropriate monitors are present in accordance with the approved mitigation measures.

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)

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, fire suppression equipment on site within required distances, 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, as well as proper equipment and signage, were present in accordance with the hot work permit and 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.

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 the E Line,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading along the C, D, and E line access roads,
- Grading, rock management, and topsoil salvage at pad sites along the B, C, E, and G lines,
- Culvert installation,
- Building pad sites and foundation excavation along the E, G, and H lines,
- Drilling at the substation and D-Line,

- Weed abatement along the E-Line,
- 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.	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 04.14.17
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
		near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.		
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Pending	Under BLM Review

Representative Photos



Photo 1: Nesting black throated sparrow ESA at tank 3, within which a Blattner crew was accidentally given permission to work by the ICF designated biologist when signing MSOS documents for the activity. Following identification of the issue, a biological monitor was assigned to the activity in accordance with MM BIO-7j and no impacts to the active nest were observed.



Photo 2: A water truck, fire safety coordinator, and identification signage are located where hot work was occurring in accordance with MM FF-1.



Photo 3: Shovel and a 5-gallon water pack located along McCain Valley Road within 25 feet of an active work area in accordance with MM FF-1.



Photo 4: ECMs observed ESA signage for the nesting raptor buffer zone (300'). All construction crews in the vicinity were observed working and parking equipment outside the buffer in accordance with MM-BIO-7J.

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