



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: 4.17.17 through 4.23.17

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 4.17.17 through 4.23.17.

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 installation of culverts, road grading, and installation of wattles and erosion control devices along McCain Valley Road. Erosion and sediment control devices were also installed along the F and G lines. Construction crews continued road work along the B, D, and E strings, pad grading and construction along the B-D strings, and topsoil salvage along the A and B strings. ECMs

observed herbicide applied along the E string. Drilling occurred along C, D, and E strings, as well as overhead structures 3 and 18. Turbine foundations were excavated along strings F, G, and J, and poured along the E string. Vegetation removal occurred along the C string and at overhead structures 29 and 45. In addition, rock breaking occurred on the A and J string access roads, and grubbing occurred at overhead structure 30.

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.

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. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

Nesting Bird Surveys and No-disturbance Buffers (MM BIO-7j)

Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

On April 19, 2017, ECMs notified biological monitors and the onsite Designated Biologist (DB) when a water truck was observed idling inside an established nesting bird buffer near permanent water tank 3, despite the “No Parking/Idling/Loitering” signs in place on the access road. The operator moved the truck on his own accord and was reminded of the importance to not enter any ESA.

On April 19, 2017, ECMs notified the DB that there was no buffer installed at the active nest ID #16. The following day, ECMs confirmed that the appropriate no-disturbance buffer had been delineated and marked in the field around nest #16 in accordance with MM BIO-7j.

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.

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 across the project site as well as erosion control blankets at the culverts along McCain Valley Road.

On April 19, 2017, ECMs observed several topsoil salvage stockpiles that appeared to have not been properly stabilized in accordance with and Section 7.8 of the SWPPP, however it was unclear whether or not the stockpiles were inactive. ECMs notified the DB and Qualified SWPPP Practitioner (QSP) of the potential issue and confirmed that the inactive stockpiles were stabilized the following day. In order to facilitate the tracking of topsoil salvage, stockpile inactivity, and stabilization across the project site, contractors and the DB discussed developing a system to mark and track salvage and stabilization dates with marked stakes. The marked stockpiles would allow personnel to more easily identify which stockpiles are inactive and should be stabilized in accordance with Section 7.8 of the SWPPP.

On April 21, 2017, ECMs recorded a silt fence that had fallen down and concrete wash runoff surrounding the concrete washout basin at turbine site E11. The DB was notified of the incident and ECMs confirmed that the silt fence had been repaired in accordance with Section 7.10 of the SWPPP and the concrete wash surrounding the basin had been cleaned.

During this reporting period, ECMs observed two incidents where trash was left uncovered in waste bins. Both incidents were reported to the DB and the trash was covered shortly thereafter in accordance with the SWPPP.

Habitat Restoration Plan Implementation

During this reporting period, herbicide was applied by a Qualified Applicator License holder under the supervision of a Habitat Restoration Specialist in accordance with Section 6.1.2 of the Habitat Restoration Plan.

On April 21, 2017, ECMs observed erosion control wattles removed from the stabilized slope at turbine site G14. The construction crew identified the slope as having been mistakenly stabilized before salvaged topsoil had been applied across the slope. The crew removed the wattles and replaced the topsoil. The slope will be re-stabilized and the wattles replaced in accordance with Section 5.2.2.3 of the Habitat Restoration Plan. The DB suggested creating a system to mark all areas where salvaged topsoil has been applied with ESA signs so it is clear to personnel which areas have had topsoil replaced in accordance with the Habitat Restoration Plan.

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.

On April 19, 2017, ECMs recorded a truck exceeding the speed limit along McCain Valley Road. The ECM notified Tule Wind LCC of the issue. Tule Wind LLC are continuing to remind construction contractors about the requirement to follow the site speed limits.

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.

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.

On April 22, 2017, ECMs observed stained soil at turbine site G14. The construction crew removed the stained soil immediately following notification of the issue, 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 along the Connector Road and Rough Acres Ranch Road,
- Topsoil salvage along the A Line,
- Culvert installation along the E Line,
- Road work and mowing along the C Line access roads,
- Clearing/grubbing and rock management along the J Line,
- Widening, grading, and rock installation along McCain Valley Road,
- Erosion and sediment control device installation along McCain Valley Road,
- Building pad sites and foundation excavation along the C, E, G, and H lines,
- Drilling at the substation, along the G Line, and at turbine pad sites E1 and C1,
- And trenching at the O&M building

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 • Drilling and setting of overhead line systems 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • 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.	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.	Approved	04.14.17
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review

Representative Photos



Photo 1: On April 21, 2017, ECMs recorded a downed silt fence and concrete wash runoff surrounding the concrete washout basin at turbine site E11. The DB was notified of the incident.



Photo 2: On April 22, ECMs confirmed that the silt fence surrounding the concrete washout basin had been repaired in accordance with Section 7.10 of the SWPPP and the concrete wash outside the basin containment had been cleaned.



Photo 3: Erosion control devices were installed at culverts along McCain Valley Road in accordance with the project SWPPP.



Photo 4: During this reporting period, herbicide was applied along the E String by a QAL holder and under the supervision of a Habitat Restoration Specialist, in accordance with Section 6.1.2 of the Habitat Restoration Plan.

INTENTIONALLY LEFT BLANK