



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 4.24.17 through 4.30.17

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 4.24.17 through 4.30.17.

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 road grading, base spreading, and installation of culverts and erosion control measures along McCain Valley Road as well as grading along access roads near turbine sites C2-C5, B3, and along the J line. In addition, turbine pad and foundation work continued including

pad grading and contouring at E1, A2, C4, B1, B3, and B4; pad site excavation at E1, B1 and B5; foundation pouring at G14 and D4; and cage and conduit work at G14. Construction crews continued grading activities including rock breaking at turbine sites B1-B4 and along the J line access road, cut and fill work along the B and C lines, top soil salvage along the C line and at turbine pad A2, and backfilling activities along the G line. Drilling for overhead collection poles 4, 12, 16, and 23 took place as well as vegetation removal and chipping along the J line and overhead collection line.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and erosion control device installation 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.

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)

ECMs observed construction crews laying biodegradable and weed-free straw erosion control materials in culverts along MVR in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

In order to facilitate the tracking of topsoil salvage and stabilization across the project site, construction contractors are developing a system to mark and track salvage and stabilization dates with marked stakes. During this reporting period, ECMs followed up with the Designated Biologist in order to confirm that the contractor would start marking topsoil stockpiles with dates as originally discussed on Friday 4/21/17.

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

On April 24, 2017, ECMs observed a dozer working at Turbine site E1 and inquired about the absence of a water tender. Shortly after, a water tender was called and arrived to the construction area to apply water and control dust, in accordance with MM-AQ-1.

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.

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

During this reporting period, ECMs observed stained soil under equipment staged at overhead collection pole 53. The contractor properly contained the stained soil, and placed a containment bin under the machine for the remainder of the day. The contractor mentioned the equipment was recently serviced and believed that it had simply been overfilled.

On April 25th, 2017 a broken down truck at turbine site C1 was observed with stained soil beneath it and an inactive bobcat at site G6 was observed without containment beneath it. A containment bin was placed under the bobcat at site G6, in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan (MM HAZ-1a), and the Designated Biologist and contractor superintendent were notified of the leak at site C1. The following day, ECMs observed that the stained soil sites at site C1 had been properly cleaned in accordance with MM-HAZ-1a, and the bobcat was removed from site G6 for repair.

On April 25th, 2017 ECMs observed multiple stained soil sites at turbine pad site G15. The stained soil was flagged and the designated biologist and contractor superintendent were contacted. On April 27th, ECMs confirmed that all stained soil sites were properly contained, cleaned, and removed from the site 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 Rough Acres Ranch Road as well as the B and C lines,
- Erosion and sediment control device installation and repairs along the E and F lines,

- Widening, grading, rock installation, and hydro seeding along McCain Valley Road,
- Road work along Rough Acres Ranch Road as well as the B, C, and G line access roads,
- Culvert installation on the B Line,
- Building pad sites and foundation excavation along the B and C lines,
- Foundation drilling and backfill along the G Line,
- Drilling and excavation at the substation,
- Setting poles along the transmission line,
- Excavation at the O&M building,
- And Drilling and blasting along the C, E, and G lines.

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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • footing excavation • turnout construction • forming the tanks • installation of reinforced steel • pouring footing, slab, and walls • backfill and final grading 	
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 • Restoration of temporarily impacted areas 	Yes

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	Approved	Resubmitted on 03.24.17.

Variance Request No.	Submitted	Description	Status	Approval Date
		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 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.	Approved	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.	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.	Approved	Approved on 04.24.17
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: ECM's observed rock breaking at J string access road, with yellow tape shown delineating work limits in accordance with the February 1, 2017 NTP.



Photo 2: ECM's observed flagged, stained soil sites at turbine pad G15.



Photo 3: ECMs confirmed that stained soil was removed from the site G15, in accordance with MM HAZ-1A.



Photo 4: ECMs observed road grading on the access road between pad sites C2 and C5 with an accompanying water truck in order to minimize fugitive dust as per MM AQ-1. Yellow tape is shown marking limits of disturbance in accordance with the February 2, 2017 NTP.

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