



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 5.8.17 through 5.14.17

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 5.8.17 through 5.14.17.

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 continued drilling for the overhead collector line, application of palliative along McCain Valley Road, as well as grading and rock removal along Rough Acres Road. Grading continued along the A, B, C, E, and H lines, and topsoil salvage occurred along the A, C, and G

lines. Furthermore, turbine tower foundations were excavated along the B, C, and E lines, and pad contouring occurred along the A, C, E, and G lines. Rock removal and relocation took place along the E and G lines, rebar was installed along the D line, and vegetation removal occurred along the E line. Construction crews also repaired the access roads and assembled tower structures along the G line. Additionally, drilling occurred for collector poles 43 through 46, 31, 41, 48, and 49, and concrete was poured for poles 10, 12, and 28.

Cultural Resources

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

Archaeologists and Native American monitors dug additional shovel test pits at archeological sites in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads, including McCain Valley Road. Where bone has been identified, but cannot be determined by archaeologists as human or faunal, Tule Wind LLC has and continues to work with representatives from the San Diego County Coroner's Office to examine the bone fragments uncovered to determine if they are human remains.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j.

ECMs also observed inactive trenches and excavations covered to prevent wildlife entrapment in accordance with MM BIO-7a. On 5/9/2017, an open excavation was observed at the G10 turbine pad site with no wildlife ramp in place. ECMs notified a nearby biological monitor and confirmed at the end of the day that construction crews had returned to install a wildlife ramp in the excavation in accordance with MM BIO-7a.

A bag containing food trash was observed open near the turbine site E8 on 5/9/2017. Construction crews removed the trash immediately following notification of the issue.

During this reporting period, ECMs observed multiple incidents of project related vehicles speeding in excess of the 15 mph limit required by MM BIO-7b. ECMs and biological monitors are working with Tule Wind LLC to remind construction crews of speed limit requirements to protect wildlife and minimize fugitive dust.

During this reporting period the following special-status species were observed: one coast horned lizard located outside the work area and one deceased coastal whiptail.

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 applying palliative to windrows along McCain Valley Road 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.

On 5/11/2017, a concrete washout basin and surrounding silt fence was observed in need of maintenance. The Designated Biologist (DB) and construction crews were notified of the issue. On 5/12/2017, it was observed that the washout basin had not yet been maintained and washout breached the surrounding silt fence. The spill stayed within the staked disturbance limits and construction crews pumped excess wash water out of the basin for disposal at the 80 acre laydown yard.

On 5/13/2017, a construction crew disposed of the stained soil in accordance with MM HYD-1 and the basin was repaired in accordance with the project specific SWPPP. No impacts to biological or cultural resources were observed. The washout pit is staged over 50 feet from the nearest jurisdictional drainage and construction of new basins has been completed to accommodate additional washout needs during ongoing concrete pouring activities.

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 within 25 feet of active work sites, 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 a biological monitor cleaning stained soil along the connector road, in accordance with MM HA-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:

- Continue staking disturbance limits on Connector Road,

- Rock management and Grading along Ribbonwood side of Rough Acres Road,
- Grading A line,
- Building of turbine sites along E and A lines,
- Building access roads along the B and C lines,
- Topsoil salvage at pad sites along E line,
- Installing straw wattles in McCain Valley Road culverts and along E, G, line,
- Foundation backfill at pad sites along H and J lines,
- Drilling and blasting at pad sites along A, E and G lines,
- Digging of box pads at sites along G line,
- Excavating conduit and concrete form setting at substation,
- Drilling, pole setting, and concrete pouring along the collection line,
- Trenching underground transmission line south of I-8,
- Weed abatement along E, C, and J lines,
- And H-Frame installation at the intersection of McCain Valley Road and Old Highway 80.

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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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 • 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	Approved	02.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		construction and engineering design.		
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.	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	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: Palliative was applied to windrows along McCain Valley Road in accordance with MM HYD-1.



Photo 2: Shovel Test Pit dug in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads.



Photo 3: Biological Monitor removing stained soil on the connector road in accordance with MM HAZ-1a.



Photo 4: The new concrete washout pits at Yard 6 were double-lined with thick poly sheeting to prevent soil contamination in accordance with MM HYD-1 and the project SWPPP.

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