



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 5.22.17 through 5.28.17

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 5.22.17 through 5.28.17.

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 drilling, road widening/maintenance, erosion and sediment control best management practice (BMP) installation and replacement, and hydro seeding along McCain Valley Road. Additional roadwork occurred along Rough Acres Ranch Road and the access roads

along the A and E lines. Trenching activities occurred along the G line and near Interstate-80. Drilling and pole erection continued along the collector line. ECMs also observed rock management activities along the G line, connector road, and at laydown yard 10. In addition, construction crews performed pad building and backfill along the E line, concrete pouring along the D line, excavation along the A line, BMP installation along the G line, and boring at the substation.

Cultural Resources

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

Archaeologists and Native American monitors completed shovel test pits and began phase II data recovery efforts at archeological site CA-SDI-17,817 in accordance with the approved Treatment Plan dated May 8, 2017. The project archaeologist, Native American monitors and tribal leaders, and a representative from the San Diego County Medical Examiner's Office were onsite on Saturday, May 27, 2017 to determine the origin of bones discovered during the ongoing data recovery efforts.

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.

During the previous reporting period, ECMs observed scrap plastic outside a nearby dumpster staged at lot 6 and food trash left uncovered in a roll-off bin at laydown yard 11. On 05/22/17, ECMs confirmed that the plastic had been removed from lot 6 and the roll-off bin was covered at laydown yard 11 in accordance with MM BIO-7d.

On 05/23/17, ECMs observed trash at turbine pad site C3. A nearby biological monitor was notified of the issue and the trash was cleaned up and properly disposed of in accordance with MM BIO-7d, by the end of the day.

On 05/25/17, ECMs recorded that the open excavations at two collector poles were found to be improperly covered. The lead biological monitor was notified of the issue. The following day, ECMs confirmed that the excavation openings had been covered to prevent wildlife entrapment in accordance with MM BIO-7a.

During this reporting period, ECMs recorded several occasions where vehicles and/or construction equipment were observed speeding. The designated biologist was notified of this reoccurring issue. ECMs and biological monitors are continuing to work with Tule Wind LLC to remind construction crews of speed limit requirements to protect wildlife and minimize fugitive dust.

Construction crews were observed removing litter, installing bird deterrents to prevent nesting activity on/in equipment, placing secondary containment under equipment, and covering trash bins and open excavations in anticipation of site inactivity over the Memorial Day Holiday weekend.

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. 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)

During this reporting period, ECMs observed construction crews repairing BMPs throughout the project site. There were several issues identified with deficient BMPs including silt fencing and straw wattles in need of repair, concrete washout basins missing rock aprons, and sediment stockpiles at turbine sites G3 and G5 requiring stabilization during inactivity (more than 14 days). Each of these issues were discussed with the designated biologist and were in the process of being addressed. ECMs are preparing a punch list to help identify and address BMP deficiencies.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9, MM AQ-1, and the Dust Control Plan. The construction contractor continued to maintain aggregate at the entrance/exit to McCain Valley Road to prevent further track-out 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 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.

On 05/24/2017, a fire began along Rough Acres Ranch Road during rock breaking activities. The protocols outlined in the Fire Prevention/Protection Plan were implemented. All on-site personnel were evacuated and there were no injuries or impacts to sensitive environmental resources. The origin of the fire is under investigation. The fire occurred on lands administered by the County of San Diego.

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

During this reporting period, ECMs observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

During the previous and current reporting period, several traffic signs were observed to be knocked down along McCain Valley Road. ECMs reminded the designated biologist of each location and will follow-up on the resolution during the next reporting period.

ECMs observed construction crews carpooling to/from the project site during this reporting period in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Grading along Ribbonwood side of Rough Acres Road,
- Grading, rock management, and pre-trench ripping along the G line,
- Building of turbine pad sites along E line,
- Topsoil salvage at pad sites along the A and G lines as well as Rough Acres Ranch Road,
- Installing straw wattles on the B line,
- Foundation work along the B-F lines and backfill along the E and J lines,
- Drilling and blasting at pad sites along the E line,
- Digging of box pads along the J line,
- Hydro-seeding along the B and C lines,
- Pouring footings at O&M building,
- Framing at substation,
- And weed abatement along the C line, McCain Valley Road, and laydown yard 2.

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.	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.	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

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.	Approved	05.24.17
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.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs confirmed that the roll-off bin at laydown yard 11 was covered in accordance with MM BIO-7d.



Photo 2: The silt fencing surrounding a concrete washout basin is maintained in good condition. A rock apron is anticipated to be installed at the washout basin in accordance with figure WM-8 of the grading plans.



Photo 3: Excavations are covered to prevent wildlife from becoming entrapped in accordance with MM BIO-7A.



Photo 4: Archaeological and Native American monitors were present for excavations associated with overhead collector pole #25 in accordance with MM CUL-1D.

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