



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 05.29.17 through 06.04.17

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 05.29.17 through 06.04.17.

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 ongoing road maintenance, ripping, pre-trenching, trenching, rock breaking, drilling, and compacting along the G-line. Additional road maintenance, blading, grading, drilling, and pouring concrete occurred along McCain Valley Road. Grading, rock breaking,

drilling, concrete foundation pouring, slurry pouring, backfilling, and turbine construction occurred along the E-line. Grading and backfilling also occurred along the H-line. Herbicide was applied along the J & H-line access roads under the guidance of the restoration ecologist, application of road palliative occurred between the A & C lines, continued drilling occurred along the collector line, and conduit installation occurred North of Highway 80.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, rock breaking, conduit trenching, and drilling, in accordance with mitigation measure MM-CUL-1D and the approved Tribal Participation Plan.

On Tuesday, 05/30/2017, Archaeological monitors completed excavation of 50 shovel test pits and continued phase II data recovery efforts at archaeological site CA-SDI-17,817 in accordance with the approved Treatment Plan dated 05/08/2017. Native American monitors were present to monitor and assist with the excavation of shovel test pits and phase II data recovery efforts.

Biological Resources

Biological monitors were present to monitor initial ground disturbance, road maintenance, and vegetation clearing activities in accordance with MM-BIO-1C. Biological monitors performed nesting bird and general wildlife clearance surveys ahead of construction activities. Biological monitors established no-disturbance buffers around observed active bird nests in accordance with MM-BIO-7J.

On 06/01/2017, ECM observed inactive sediment stockpiles lacking straw wattles at collector pole sites 40 and 41. The designated biologist was contacted and informed the ECM that Mountain Power is awaiting a new shipment of BMPs that will be installed upon arrival.

On 06/02/2017 a qualified biologist swept the G-line and closely monitored a bird buffer nest at turbine pad G8 in accordance with MM-BIO-1C and BIO7J, while a bulldozer performed ripping activities.

During the reporting period, ravens were observed feeding on garbage from the bed of a pick-up truck in the O&M laydown yard and on a dead rabbit carcass along McCain Valley Road. The designated biologist was contacted and promptly removed the trash from the bed of the pick-up truck and addressed the issue of trash management with the on-site foreman. The rabbit carcass was removed from the road to prevent attracting scavengers.

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)

On 06/01/2017, ECMs observed a damaged ESA fence on the access road to the H-Line. No environmental resources were affected. The lead archaeologist was notified about the damaged

fence. ECMs will follow up with project leads to ensure that the ESA is properly delineated. It is unknown if the ESA fence was damaged as a result of construction and/or public activity.

Stormwater Pollution Prevention Plan (SWPPP) (MM-HYD-1)

During this reporting period, ECMs observed multiple best management practices for storm water being replaced across the project site. ECMs are continuing to notify the designated biologists of additional locations where BMPs require repair in accordance with MM-HYD-1 and the project specific SWPPP.

On 06/01/2017, ECMs observed multiple damaged silt fences throughout the batch plant laydown yard, along the D-line, and at turbine pad B1. Concrete debris was also observed surrounding concrete washouts in the Batch Plant Laydown yard as well as two concrete washouts missing rock aggregate in laydown yard #6 in accordance with figure WM-8 of the grading plans. The designated biologist was notified and ECMs will be conducting follow up inspections.

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

ECMs observed drilling, excavations and rock breaking with water trucks present in order to control fugitive dust in accordance with MM-AQ-1 and MM-FF-1.

During this reporting period, dust was observed from multiple construction vehicles on McCain Valley Road. The dust originated due to dry road conditions and not speeding. The designated biologist was notified and requested more water to be applied on McCain Valley Road in accordance with MM-AQ-1. The additional water application helped to reduce dust to acceptable levels.

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 activities in accordance with MM-FF-1.

In response to the fire that originated along Rough Acres Ranch Road reported on 05/24/17 (during the previous reporting period), rock breaking activities are being considered as “hot work”. In accordance with MM-FF-1 and the Fire Prevention/Protection Plan, all hot work requires a “hot work permit” that is issued and coordinated by the on-site Fire Safety Coordinator.

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

ECMs observed fire safety trucks and water trucks throughout the work site with each crew in accordance with MM-HAZ-1.

On 05/31/2017 ECMs observed an excavator with a malfunctioning hydraulic line leak fluid during rock breaking activities along a connector road. The leak was contained and all stained soil and

absorbent materials used to clean the leak were collected in large drums to be properly disposed of in accordance with the Hazmat Management Plan per MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

As discussed during the previous reporting period, ECMs observed several traffic signs knocked over along McCain Valley Road and at the entrances to the B and H lines. On 06/01/2017, ECMs observed construction crews replacing and re-installing signs accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Grading and rock management along Ribbonwood side of Rough Acres Road,
- Building of turbine pad E9, E10,J3 and G5,,
- Topsoil salvage from Rough Acres Ranch Road to G-line, along McCain Valley road and at J3,
- Foundation work along A,B,C and D lines,
- Drilling and blasting at pad sites along the D and E line,
- Drilling collector pole #45 and #54,
- Pouring footings at substation,
- Framing at substation,
- Pre-ripping and rock breaking along G and H lines,
- 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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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 • 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 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
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 observed construction crews replace and re-install traffic signs along McCain Valley Road per MM-TRA-1.



Photo 2: Construction crews are observed using absorbent materials to address a hydraulic leak per the Hazardous Materials Management Plan and MM-HAZ-1A.



Photo 3: Erosion blankets and biodegradable straw wattles are installed along culverts in accordance with MM-HYD-4 and site specific SWPPP.



Photo 4: Phase II data recovery efforts continued during this reporting period in accordance with the approved Treatment Plan dated May 8, 2017.

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