



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 06.05.17 through 06.11.17

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 06.05.17 through 06.11.17.

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 drilling for the overhead collector line along the H-line, at site E-10, and along Rough Acres Ranch Road. Construction crews continued grading activities along McCain Valley Road, Rough Acres Ranch Road, and at turbine sites E-5, E-9 and E-10. Road maintenance and widening continued at the G-line access road, McCain Valley Road between

the J and G-lines, and along McCain Valley Road near the J-line entrance. Subgrade work occurred along Rough Acres Ranch Road and rock management activities occurred at turbine sites E-9, E-6, and the G-line access road from turbine sites G-4 to G-6. Rock breaking continued along the connector road, Rough Acres Ranch Road, along G-line access road from turbine sites G-4 to G-6, and along the H-line.

Additionally, trenching occurred along the transmission line, G-Line access road, and from turbine sites G-4 to G-6. Concrete was poured for turbine foundations at turbine sites C-1, C-3, and E-1. ECMs observed construction crews conducting concrete washout maintenance and repair along the B, C, D, and E-lines.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities and surveys including road widening, grading, trenching, rock breaking, drilling, soil loading, cut and fill, and ripping in accordance with mitigation measure CUL-1d and the approved Tribal Participation Plan.

In accordance with the approved Treatment Plan dated May 8, 2017, archaeological and Native American monitors completed phase II data recovery efforts at archeological site CA-SDI-17,817 on 06/05/17,

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM-BIO-1c. ECMs observed construction crews removing litter, placing containment under equipment, and covering trash bins. Additionally, bird deterrents were installed on multiple rock piles along the G-line in order to deter birds from nesting within the limits of disturbance.

During this reporting period, ECMs recorded several occasions where food and construction debris were not properly contained, resulting in the attraction of ravens to feed on the trash. The designated biologist was notified of this issue and ECMs and biological monitors are continuing to work with site superintendents to remind work crews the importance of properly securing trash on-site.

On 06/08/17, ECMs observed a partially uncovered roll off bin in laydown yard 6 with ravens feeding on food trash. A nearby construction crew was notified and closed the tarp to properly secure the roll off bin.

On 06/07/17 and 06/10/17, ECMs observed ASM and ICF monitors walking along McCain Valley Road picking up trash and debris in accordance with MM-BIO-7D.

On 06/10/17, ECMs observed excess food waste and construction debris in the corner of the main 80-acre laydown yard. The designated biologist was notified, but the food waste and construction debris was not disposed of by the end of the day. This issue is anticipated to be addressed during the next reporting period.

ECMs observed qualified biologists conducting sweeps of for general wildlife and nesting bird activity prior to construction activities in accordance with MM-BIO-1C and 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 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. ECMs observed Westwood surveyors re-staking several areas where limit of disturbance stakes were knocked over and/or missing.

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

During this reporting period, ECMs observed construction crews making repairs to BMPs including straw wattles, silt fencing, and concrete washouts. There were several issues identified with deficient silt fencing in need of repair, and have been added to a list provided to the designated biologist and construction contractor.

During the previous reporting period, ECMs observed stockpiles at collector pole sites 40 and 41 without straw wattles. On 06/06/17, ECMs conducted a follow-up and observed the proper BMPs installed in accordance with MM-HYD-1.

On 06/06/17, ECMs observed concrete washouts located in the north concrete batch plant repaired in accordance with the site Storm Water Pollution Protection Plan (SWPPP).

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

ECMs observed water trucks applying water to active areas of construction at least three times per day in accordance MM-AQ-1. The construction contractor planned to add aggregate to the entrance/exit to McCain Valley Road to prevent track-out in accordance with MM-AQ-1.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM BIO-1F)

ECMs observed fire equipment and water trucks on the project site during construction activities, including vehicles with required fire suppression equipment, fire suppression equipment within 25 feet of active work sites, and vehicles parked in areas with no vegetation in accordance with MM-FF-1.

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

During this reporting period, ECMs observed a water truck that broke down along McCain Valley Road resulting in an area of stained soil. The designated biologist was notified and the stained soil was immediately cleaned up in accordance with MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

During the previous and current reporting periods, vehicles were observed speeding along the project access roads. The designated biologist and construction contractor has addressed the speeding issue multiple times at construction meetings and informed construction crews that monitors will be stationed along access road and speeding vehicles will be reported.

The construction contractor is anticipated to install two radar speed limit signs along McCain Valley Road to help address the speeding issue. In addition, on 06/08/17 construction crews were observed replacing and installing new traffic control signs including speed limit signs in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Sub grading along Ribbonwood side of Rough Acres Road,
- Rock management along the J line,
- Building of turbine pad sites along J line,
- Topsoil salvage along MVR,
- Installing straw wattles and erosion blankets along MVR,
- Foundation excavation at E 10,
- Drilling and blasting at pad sites along the G-line, McCain Valley Road, and Rough Acres Access Road,
- Drilling for collector pole 52 and 55,
- Digging of box pads at E1, E2, F1 and F2,
- Form beams and backfill/compact at substation,
- And off load generators at 80 acre laydown yard.

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 observed a water truck providing dust control during backfilling at turbine site E-3 in accordance with MM-AQ-1.



Photo 2: A construction crew is observed adding a speed limit sign along McCain Valley road in accordance with MM-TRA-1.



Photo 3: Straw wattles are installed downslope of soil stockpiles at collector pole site 40 in accordance with the project specific SWPPP.



Photo 4: Archaeological, Native American, and biological monitors are present during drilling activities at collector pole location #54 in accordance with MM-CUL-1d and MM BIO-1C.

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