



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 08.07.17 through 08.13.17

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 08.07.17 through 08.13.17.

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 turbine component delivery/offload at turbine pads G-6 and G-7 and observed ongoing drilling for overhead collector poles #50, #51, #53, #54, and #57. Construction crews continued to conduct road maintenance activities including installing culverts along the E-1 access road, grading and road widening along the C, E, and D-lines, along collector poles #10

and #12, and grading at transmission towers T17 and T25. Clearing and grubbing continued along the east side of McCain Valley Road near Upper Lark Canyon Campground, near the F-line along McCain Valley Road, at pull sites #4, #12, #17 and #25, at collector poles #1, #10, #12, #40, from collector pole #58 to #61, and at transmission towers #41 to #43. Rock management and rock breaking activities continued at turbine site G-2, G-5, laydown yard #7 and #10 while rock, rip rap, and fill dirt was hauled from the E-line. Backfilling occurred at turbine pad C-5 and C-9 and excavation occurred at collector pole #44.

Turbine pad and foundation work continued such as pouring concrete at turbine sites A-3, B-4, B-5, C-9 and G-2, box pad installation at collector poles #25 and #54, setting rebar at collector pole #50, conduit installation at collector pole #18, and building pull sites C-10 and C-12. Collector pole #34 was assembled and wire pulling occurred at transmission tower T49 and from T4 to T12.

Cultural Resources

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

On 8/12/17, ECMs observed archaeological and Native American monitors scanning areas ahead of transmission pulling activities from transmission pole T4 to T12.

As a follow up to the previous weekly report, ECMs observed ASM cultural monitors re-establishing the ESA for site SDI-20,112 on Monday, 8/7/17. The ESA fencing was previously attached to an existing barbed-wire fence. When the barbed-wire fence was removed, the ESA fencing was inadvertently removed. The removal of the ESA lead to unauthorized ground disturbing activities within the ESA. The ESA site boundary was re-surveyed confirming that no resources were damaged. The ESA fencing around the resource boundary for CA-SDI-20,112 will remain in place until a formal determination is made by the BLM.

Biological Resources

Biological monitors were present to monitor ground disturbing activities and grubbing/clearing activities in accordance with MM-BIO-1c. Biological monitors were observed conducting sweeps ahead of grubbing, grading, excavating and trenching activities.

On 8/9/17, ECMs observed that the trash in laydown yard #9 was removed and properly disposed of. This trash was identified during the previous reporting period.

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 8/9/17, construction halted temporarily at pull site #12 due to discrepancies between ICF biologist maps and in place limit of disturbance boundary stakes. The designated biologist was contacted and confirmed the limits of disturbance with the presence of a Westwood Survey crew. No work occurred outside of the approved limits of disturbance.

Storm Water Pollution Prevention Plan (SWPPP) (MM HYD-1)

During this reporting period, several areas were identified with deficient silt fencing. In addition, the plastic lining in the concrete washout basins in laydown yard #6 were in need of repair. The designated biologist and construction contractor were notified of the issues.

On Friday, 8/11/17, ECMs observed construction crews conducting ongoing repairs to silt fences and concrete washout basins in laydown yard # 6, concrete washout basin at turbine site C-9, and installing straw wattles at turbine site C-5. ECMs will continue to monitor and report potential issues to ensure that they are addressed in a timely manner.

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

ECMs observed water trucks applying water in active areas of construction at least three times a day in accordance MM-AQ-1 and the Dust Control Plan.

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

ECMs observed fire crews conducting spot checks site wide. ECMs observed fire equipment and water trucks on the project site during all construction activities including vehicles equipped with fire suppression equipment within 25 feet of active work sites, in accordance with MM-FF-1.

On 8/8/17, ECMs reported the presence of vegetation piles at E3 and G5 repeatedly throughout this reporting period. The vegetation pile at E3 was removed on 8/10/17. The vegetation pile at G5 was not resolved in this reporting period.

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

On Thursday, 8/10/17, ECMs observed stained soil at the entrance of turbine site D-2 and D-3 access road. At the time of discovery, no vehicles were present at the stained soil site. ICF biologists confirmed that a water truck was being maintained near that site earlier in the day. ECMs notified the designated biologist and Tule Wind LLC of the stained soil location. ECMs are anticipated to verify that the stained soil has been properly cleaned.

Traffic Control Plan Implementation (MM-TRA-1)

ECMs observed traffic flaggers on McCain Valley Road to notify motorists of temporary road delays in accordance with MM-TRA-1.

Construction Activities Schedule:

- Survey and staking turbine grade locations,
- Rock management at site G-11,
- Road maintenance on C, D, and E-lines,
- Rock crushing at site G-5,
- Component deliveries along Rough Acres Ranch Road,
- Excavating, installing conduit, ground grid at substation,
- Drilling collector pole #51, #57, and #61,
- Pulling cable from substation to Vault B,
- Build pull sites at overhead collector pole #41,
- Build crane pads at E-1, C-2, and C-3,
- Set transformers at C-3, C-5, C-9, B-1 to B-3, B-5, A-1 and A-2,
- Subgrade site A-3, and
- Offload components and generators at E-line.

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.	Approved	06.14.17
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.	Approved	06.21.17
14	06.16.17	Includes additional pull areas for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Approved	07.27.17
15	06.16.17	Requests turbine B-5 to be approved, as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Approved	07.12.17
16	07.07.17	Requests a change in the means for installing underground collector line under McCain Valley Road from boring to trenching.	Approved	07.12.17

Representative Photos



Photo 1: ECMs observed biological and cultural monitors conducting sweeps ahead of a skid steer during electrical line pulling for transmission pole 4, in accordance with MM-CUL-1d.



Photo 2: ECMs observed rock management at laydown yard #10, with water tender present in the background in accordance with MM-AQ-1 and MM-FF-1.



Photo 3: ECMs observed torn plastic liner, a damaged silt fence, and one side full of concrete residue at a concrete washout basin in laydown yard #6.



Photo 4: ECMs observed construction crews cleaning out the concrete washout basin and repairing the silt fence shortly after the construction superintendent was notified, in accordance with the site specific SWPPP.

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