



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 08.21.17 through 08.27.17

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 08.21.17 through 08.27.17.

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 along the E and F-lines and observed ongoing drilling for overhead collector poles #51, #53, and #57. Construction crews continued to conduct road maintenance activities including grading along the B and C-line access roads, along overhead collector #43, #50, #52, #64, and grading at turbine pads C-2 and C-3. Rock and

soil management activities continued at turbine sites A-1, B-5, at laydown yards #7 and #12, and along the G-line, while rock breaking continued at turbine sites G-3, G-5 and G-12. Hydro seeding occurred at turbine site C-1, backfilling occurred along the G-line, excavation trenching occurred at the entrance to the B-line, while reclamation of a concrete washout basin occurred at laydown yard #6.

Turbine pad and foundation work continued, such as pouring concrete at turbine site C-5, pad contouring at turbine site B-3, and building a crane pad at turbine site B-2.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing 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.

Biological Resources

Biological monitors were present to monitor ground disturbing activities and grubbing/clearing activities in accordance with MM-BIO-1c. ECMs observed ICF biological monitors conducting bird surveys on the A-line in accordance with MM BIO-7a.

On 8/21/17, ECMs observed a partially uncovered vault at turbine site G-4 with no escape route for wildlife, per MM-BIO-7a. ECMs notified the designated biologist of the location.

On 8/22/17, while conducting follow up inspections, ECMs verified the vault had been covered in accordance with MM-BIO-7a.

On 8/22/17, ECMs observed trash accumulating against a silt fence on the perimeter of laydown yard #9. ECM informed the designated biologist of the location and crews were notified to remove the trash. The issue had been promptly resolved by the end of the day in accordance with MM-BIO-7d.

On 8/22/17, ECMs discovered a roll of fencing in the vegetation, outside the perimeter of laydown yard #6. The designated biologist was notified and on 8/24/17, the fencing was removed in accordance with MM-BIO-1b.

On 8/24/17, ECMs observed a project related vehicle speeding on McCain Valley Road. ECMs followed the vehicle to match its speed. The vehicle approached the project speed radar sign and observed the sign flashing "Slow Down". ECMs spoke to the driver about abiding by the project speed limit per MM-BIO-1b. In addition, ECMs spoke with the construction superintendent about the situation and was told that the superintendent would speak to the driver as well. ECMs notified the designated biologist about the issue and provided a photo of the license plate to help prevent the issue from reoccurring.

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)

During this reporting period, all work occurred within the project limits of disturbance in accordance with MM BIO-1a.

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

During this reporting period, ECMs observed construction crews applying soil stabilizer on top soil piles at overhead collector pole #1 and hydro seeding slopes and soil piles at laydown yard #2 and turbine site C-1 in order to minimize soil loss from the construction area in accordance with MM-HYD-1 and the project specific SWPPP. Additionally, ECMs observed construction crews cleaning straw wattles and collecting trash along McCain Valley Road between the E and F-lines and near the B-line.

On 8/25/17, ECMs observed straw wattles submerged in soil at the entrance of turbine pad D-4 and the D-2 and D-4 access roads. ECMs will continue to monitor and report potential issues to ensure that they are addressed in a timely manner.

On 8/21/17, ECMs observed that the stained soil beneath the temporary roll off concrete washout containment at turbine pad G-4 remains to be cleaned since being recorded in the previous reporting period. The designated biologist was notified of the stained soil beneath the roll off dumpster and ECMs are anticipated to verify the stained soil has been properly cleaned during follow up inspections.

On 8/22/17, during concrete washout reclamation in laydown yard #6, ECMs observed construction crews backfilling the basin while remnants of the plastic liner and concrete waste remained in the pit. ECM notified the operator that the remaining plastic and concrete needed to be removed before backfilling. A biological monitor arrived and concurred with the ECM. The issue was resolved with the construction crew removing the remnants of plastic and concrete from the pit before backfilling resumed.

On 8/25/17, ECMs observed a temporary roll off dumpster used as a concrete washout at turbine pad G-5. The dumpster leaked washout onto the soil. As a corrective action, a containment bin was placed beneath the dumpster, but the stained soil remains to be cleaned. The designated biologist was notified of the stained soil beneath the roll off dumpster and ECMs are anticipated to verify the stained soil has been properly cleaned on a follow up inspection. 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 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.

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

On 8/21/17, ECMs discovered a fuel spill in laydown yard #6. ECMs arrived during the cleanup process and observed construction crews using a skid steer to remove stained soil. Stained soil was placed into three roll off bins to be removed from the site per MM-HAZ-5a and the Spill Prevention, Control, and Countermeasure plan. The stained soil removal was monitored by ECMs and biological monitors in accordance with MM-HAZ-1a.

On 8/21/17, ECMs observed stained soil near equipment in laydown yard #9. ECMs notified the designated biologist and during a follow up the next day, ECMs observed the stained soil to be properly cleaned and disposed of in accordance with MM-HAZ-1a.

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:

- Rock management at site G-11 and J-2,
- Rock crushing at G-11,
- Haul trucks on the E-line,
- Road maintenance at site A-1 - A-3 and G-1 - G-5,
- Prepping culverts on H-line,
- Pulling LV cable from E-7 to E-13,
- Component delivery on Rough Acre Ranch Road,
- Drilling collector pole #57, #58, and #61,
- Building crane pads at G-1 to G-3, and E-7 to E-10,
- Pouring concrete at collector pole #51,
- Excavation/installing conduit at substation,

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 straw wattles buried beneath soil at the entrance to turbine site D-2. The designated biologist was notified of the issue and ECMs will continue to monitor this issue.



Photo 2: ECMs observed top soil piles at laydown yard #2 stabilized with a soil binder to help minimize top soil erosion in accordance with section 7.3 of the site specific SWPPP.



Photo 3: ECMs observed concrete washout reclamation in laydown yard #6.



Photo 4: ECMs observed containment bins beneath roll off dumpsters being used as temporary washout basins to prevent washout from leaking onto the ground surface.

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