



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 08.28.17 through 09.03.17

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 08.28.17 through 09.03.17.

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 the installation of sediment and erosion control devices along stringing sites near collector pole 38, excavation for riprap installation along the E and H-lines as well as trenching along the B, C and G-lines. In addition, turbine component delivery continued on the C and D-lines; backfill, grading and compacting continued at overhead collector poles sites and turbine

pad sites along the A, B, C, and G-lines. Construction crews continued drilling at overhead collector poles 31, 50, 57-59, and 61-63. Road maintenance continued along McCain Valley Road along the A, B, and C-lines, while rock breaking and rock management continued on the G-line and laydown yard #10. Additionally, crane pads were constructed at turbine site A-3, turbine assembly occurred at site G-15, and wire-pulling activities continued along the entrance of McCain Valley road and between transmission tower T1 and T2.

Cultural Resources

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

On 8/29/17, ECMs observed PLC Trenching using a backhoe to dig a trench by collector pole #31 with no archaeological or Native American monitors present. ECMs halted work until the area was inspected by an ASM archaeologist. No sensitive cultural or biological resources were impacted. An area of approximately 20 feet in length, three feet in depth, and two feet in width was excavated without an archaeological or Native American monitor present. Trenching activities resumed when a full-time archaeological monitor and Native American monitor were made available to observe this activity.

ASM agreed to have an archaeological monitor inspect the spoils pile when the spoils are used to backfill the trench. While an archaeological monitor is not typically required during backfilling activities, the purpose of having an archaeological monitor present is to ensure that there are no archaeological resources interior to the spoils pile that were not observed as part of the exterior inspection conducted by archaeological and Native American monitors.

This issue has been documented as a noncompliance in accordance with the ECMP.

Biological Resources

Biological monitors were present to monitor ground disturbing activities as well as clearing and grubbing activities in accordance with MM-BIO-1c. Biological monitors were observed conducting sweeps ahead of grubbing, grading, excavation and wire pulling activities. During this reporting period, an avian mortality was reported to the designated biologist in the vicinity of collector pole 55. The bird was a non-special status species. No further action was required.

On 9/1/17, ECMs discovered an uncovered junction box at turbine pad E-1 with no escape route for wildlife per MM-BIO-7a. After the designated biologist was notified, a cover was placed over the junction box the following day on 9/2/17.

On 9/2, ECMs observed ravens feeding on trash under a work utility trailer in laydown yard #10. Shortly after ECMs notified the designated biologist, the issue was cleaned and resolved per MM-BIO-7d.

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.

On 8/29/17, ECMs spot checked an excavation site near collector pole #31, which did not have a monitor sign off sheet present. Construction was halted while ECMs coordinated with site superintendents. A miscommunication during the morning tailboard meeting led to multiple construction activities listed in one space on the sign off sheet, implying one single crew as well as dissimilar labeling used by different crews. The issue was resolved with construction superintendents separating crews on separate sections of the monitor sign off sheet, in addition to agreeing on a naming convention for locations to prevent this incident from occurring in the future.

Limits of Disturbance (MM BIO-1A)

During this reporting period, a bulldozer was conducting road maintenance on McCain Valley Road, adjacent to overhead collector pole #31, when the spoils pile was pushed outside the limits of disturbance. ECMs responded and notified construction crews to leave the pile untouched. No sensitive cultural or biological resources were impacted. The area of disturbance was approximately one meter wide by 10 meters long. This event was documented as an “unforeseen” incident per the protocols established by Variance Request 006. The following day, ECMs observed cultural and biological monitors conducting sweeps of the spoils pile and verified all required signatures on the monitor sign off sheet before crews relocated spoils back within the disturbance limits.

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

During this reporting period, ECMs observed construction crews conducting ongoing repairs to silt fences and straw wattle erosion control devices. Multiple locations are in need of repairs, with each location communicated to the designated biologist. ECMs identified straw wattles submerged under soil on the D2-D4 access road, and inoperable silt fences on the A-line access road. ECMs continue to coordinate through the designated biologist for maintenance repair crews to repair deficient sections.

On 8/30/17, ECMs notified the designated biologist of a portable toilet at turbine pad E-1 not secured per the project specific SWPPP. The issue was resolved the following day on 8/31/17 and observed secured by ECMs.

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

ECMs observed water trucks applying water in active areas of construction and along access roads 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.

On 8/28/17, non-project related personnel were conducting maintenance at the Lower Lark Canyon Campground when a fire ignited. Tule Wind LLC fire crews quickly responded and contained the fire within two hours. There was no damage to sensitive resources and project infrastructure as a result.

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

ECMs continued to address stained soil issues beneath a concrete washout basin at turbine pad G-5 from the previous reporting period. This issue was resolved on 9/1/17 when the stained soil was properly cleaned and the washout basin repaired, in accordance with MM-HAZ-1a.

During this reporting period, five incidents of stained soil were reported by ECMs. Two stained soil sites inside laydown yard 9, one stained soil site outside of laydown yard 9, one stained soil site at turbine pad G-3, and one stained soil site at the entrance to G-line. ECMs notified the designated biologist of the locations. Each of the stained soil areas were promptly addressed by construction crews within the same day or following day in accordance with MM-HAZ-1a and the project specific SWPPP.

Traffic Control Plan Implementation (MM-TRA-1)

ECMs observed traffic flaggers on McCain Valley Road to notify motorists of temporary road delays during ongoing turbine component delivery activities in accordance with MM-TRA-1. During this reporting period, traffic was also redirected from under wire stringing activities in accordance with MM-TRA-1.

Construction Activities Schedule:

- Erosion control BMP maintenance across the site,
- Rock hauling from J2 to G11,
- Rock management at G11,
- Road maintenance and shape slopes on Rough Acre Ranch Road,
- Prep culverts for rip rap on A and C-line,
- Continue offload components on C and E-line,
- Framing interior of O&M building,
- Drilling at collector pole 61 to 66, then 57 to 59,
- Pouring concrete at collector pole 61,
- Frame and set hold downs at collector poles 1-12 and transmission towers 10-25,
- Pulling cable through E6 through E9, and
- Set generators on 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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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	Approved	02.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		sensitive environmental resources, and to accommodate construction and engineering design.		
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
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: During this reporting period, ECMs observed a public notice sign in Lower Lark Canyon Campground, providing notice of anticipated delays/closures in and around the wilderness and recreation area in accordance with MM-WR-1.



Photo 2: ECMs observed fire tools and water truck (not pictured) on site during drilling activities in accordance with MM-FF-1.



Photo 3: ECMs observed cultural and biological monitors present during excavation for rip rap installation on the C-line in accordance with MM-BIO-1a and MM-CUL-1d.



Photo 4: During this reporting period, ECMs notified the designated biologist of straw wattle submerged under soil on the D2-D4 access road. These BMPs are anticipated to be repaired during the next reporting period.

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