



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 09.04.17 through 09.10.17

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 09.04.17 through 09.10.17.

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 line and observed ongoing drilling for overhead collector poles #57, #59, #61, #62, and #66. Construction crews continued to conduct road maintenance activities along the J line access roads and Rough Acres Ranch Road. Rock and soil management activities continued at turbine sites G5 and G12 as well as

near collector pole #42. Crews were onsite to repair and maintain erosion and sediment control BMPs across the project site and culverts along the C and G lines. Trenching for riprap installation occurred at culverts along McCain Valley Road between the A and B lines and additional trenching activities were performed near collection poles #31 and #33. ECMs also observed crews performing wire-stringing activities between poles #1 through #12, including tie off and securing wire. During this reporting period, crews began wire stringing between poles #12 through #23.

Turbine installation continued at sites G13-G15.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including road maintenance, trenching, rock breaking, drilling, soil loading, and BMP maintenance, in accordance with mitigation measure CUL-1d and the approved Tribal Participation Plan. ECMs observed archaeological and Native American monitors present during wire stringing activities within the boundaries of a cultural resource ESA.

On 9/7/17, ECMs observed an ESA fence along Rough Acres Ranch Road in need of repair. The onsite archaeological monitor was notified and the fence was repaired the following day.

Biological Resources

Biological monitors were present to monitor and perform sweeps ahead of ground disturbing activities in accordance with MM-BIO-1c. ECMs verified that open excavations were covered in accordance with MM-BIO-7a to prevent wildlife entrapment.

On 9/5/17, ECMs observed uncontained food trash that had likely been left in construction related waste materials over the weekend in the 80-acre laydown yard. The trash was removed the same day in accordance with MM BIO-7d.

On 9/6/17, food trash was observed at collector pole #31 and ravens were observed eating from the trash. The ECM removed the food trash immediately and notified the onsite Designated Biologist of the issue. No additional food trash was reported by the ECMs during this 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)

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)

ECMs observed construction crews cleaning straw wattles and repairing additional BMPs along McCain Valley Road and across the entire project site. Regular inspections of the BMPs onsite continued during this reporting period and following rain events. All BMPs requiring maintenance or repair are tracked in a punch list provided to construction crews and maintenance activities are ongoing throughout the project site.

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

ECMs observed water trucks applying water in active areas of construction, wire stringing, and drilling 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.

Lighting stand-downs were observed on 9/6/17, 9/7/17, and 9/9/17.

Hazardous Materials Management Plan (MM HAZ-1A)

On 9/5/17, ECMs observed stained soil at laydown yard 9 and notified the onsite Designated Biologist. The soil was cleaned on the same day.

On 9/7/17, ECMs discussed the ongoing issue of recurring minor leaks from the operating cranes onsite. Construction crews will continue to check for stained soil under the cranes and all observed stained soil will be cleaned up immediately per the SWPPP and 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, and
- 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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		access road • equipment staging and laydown yard/staging areas • foundation excavation and blasting (as-needed)	
4	11.18.16	Construction activities for four 10,000-gallon fire tanks including • 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: • 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.	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	Approved	07.27.17

Variance Request No.	Submitted	Description	Status	Approval Date
		line structure.		
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: Full-time archaeological and Native American monitors were present during trenching activities at overhead collection pole 31 in accordance with MM CUL-1d.



Photo 2: Flaggers were present during turbine component hauling on McCain Valley Road in accordance with MM TRA-1.



Photo 3: Archaeological and Native American monitors were present during BMP maintenance at turbine G2 in accordance with MM CUL-1d.



Photo 4: ECMs observed holes at collector pole 57 properly covered to prevent wildlife from becoming entrapped in accordance with MM BIO-7a.

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