



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 09.11.17 through 09.17.17

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 09.11.17 through 09.17.17.

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

During this reporting period ECMs observed ongoing turbine component delivery and component offload on the E and G-lines. Turbine assembly continued on the G-line and at turbine site J-1. Transmission and collector pole activities included drilling at collector pole 60, structure assembly at collector pole 57 and 61, and box pad excavation/installation at overhead

collector pole 64. Additionally, crews conducted wire-pulling operations from the E to C-line, and pulled rope/cable between overhead collector poles 1-10, 12-28 and along the main access road south of the B-line. Erosion control maintenance crews continued with repairs along McCain Valley Road between the G and H-line, while rip rap installation occurred along the G and H-line, at turbine pad E-9, and between turbine pad D-2 and D-4.

Collector pole installation on the north side of the project area halted on 9/14/17 due to high winds. Collector pole assembly resumed the following day.

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.

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, trash was discovered by ECMs at overhead collector pole 57 on two separate occasions. The designated biologist was informed on both occasions and construction crews were observed shortly thereafter picking up and properly disposing of the trash, in accordance with MM-BIO-7d.

On 9/14/17, ECMs discovered toilet paper scattered in laydown yard 3 after high winds had blown the doors open on the portable toilet. After the designated biologist was notified of the location, the toilet paper was promptly removed from the surrounding vegetation, in accordance with 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.

Limits of Disturbance (MM BIO-1A)

All work during this reporting period was observed within the staked limits of disturbance.

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

During this reporting period, ECMs observed construction crews conducting repairs to silt fences and straw wattle erosion control devices due to a recent rain event. The designated biologist provided the construction repair crew a list of deficient sites in need of repair that were noted by the ECMs. Follow up inspections by ECMs will be conducted upon completion of repairs.

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, and fire crews conducting regular spot checks in accordance with MM-FF-1.

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

During this reporting period, ECMs observed a standalone containment bin with stained soil outside laydown yard 9. ECMs notified the designated biologist and the bin was removed by the end of the day per MM-HAZ-1a.

On 9/11/17, ECMs observed stained soil beneath a forklift at turbine pad G-12. The issue was resolved on 9/13/17 with the removal of the equipment and the proper removal of the stained soil in accordance with MM-HAZ-1a and the site 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:

- Set base and mid crane on G-4, H-1 and H-2,
- Move crane from G-5 to E-13,
- Rip rap culverts on C-line, and McCain Valley Road,
- Erosion control BMP maintenance across the project site,
- Pulling cable on A and B-line,
- Wire pulling through overhead collector poles,
- Shape slopes and ditches on Rough Acres Ranch Road,
- Continue offload components on B, C and G-line,
- Framing interior of O&M building,
- Drilling at collector pole 60, and 67-69,
- Pad blading on F and G-line,
- Receiving and stocking pad along collector and transmission lines, and
- Wiring generators on G-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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		Plan (2008)	
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 sensitive	Approved	02.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		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: ECMs observed construction crews excavating adjacent to culverts for the installation of rip rap in accordance with the site specific SWPPP and MM HYD-1.



Photo 2: ECMs observed cultural monitors during drilling operations in accordance with MM CUL-1d.



Photo 3: ECMs observe turbine assembly from a safe distance. Construction crews use cones to implement safety stand-off distances and safe working practices detailed in MM HAZ-1b and MM TRA-1.



Photo 4: ECMs observed native desert plants within an ESA boundary, which will be used for revegetation installation in accordance to the Habitat Restoration Plan and MM BIO-1D.

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