



BLM Authorized Officer Weekly Report

EI Centro Field Office
1661 S. 4th Street
EI Centro, California 92243
Website: www.tulewindECCMP.com

Project: Tule Wind Energy Project

Weekly Project Update

Prepared By: David Hochart, DUDEK, 605 Third Street, Encinitas, CA 92024

Reporting Period: 10.09.17 through 10.15.17

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 10.09.17 through 10.15.17.

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, ongoing road maintenance activities included ditch cutting along McCain Valley Road and slope and shoulder work along Rough Acres Ranch Road. Erosion control maintenance included rock check dam installation along the north end of McCain Valley Road, while straw wattle installation, riprap installation, and silt fence repairs occurred along

the south portion of McCain Valley Road, Ribbonwood Road, and along the D, G, H, and J-lines. Turbine prep work continued as turbine components were installed at turbine pads G-3 through G-9, and turbine pads D-1 and J-1. Wire/rope pulling occurred between collector poles 31 and 52, between 52 and 59, between collector 61 and 66, and between tower 40 and 66.

Additionally, trenching occurred at turbine pad E-11 and turbine pads G-14 and 15 were re-contoured.

Cultural Resources

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

Plywood sheets have been set along the collector alignment to protect cultural ESAs from ropes and wire during collector pole stringing operations.

Biological Resources

Biological monitors were present to monitor ground disturbing activities including grading, trenching for rip rap installation, and wire/rope pulling in accordance with MM-BIO-1c.

On 10/10/2017, ECMs observed work requiring the protocols of Variance Request 006 to be implemented at turbine pad G-12 for the removal of vegetation to accommodate turbine blade assembly. ASM cultural monitors, ICF biological monitors, and third party compliance monitors discussed the vegetation removal with an ICF Habitat Restoration specialist. The Habitat Restoration specialist suggested that cutting portions of the vegetation with a chainsaw, rather than the complete removal of the vegetation, would be less impactful to biological resources. Vegetation removal was pre-soaked by fire crews prior to removal and was conducted under the supervision of fire crews with a water truck on site. The total area of vegetation removed by chainsaw measured approximately 410 square feet.

On 10/10/2017 and 10/12/2017, ECMs discovered a potential beehive located at a portable toilet by the E-11 access road. ECMs will continue to monitor bee activity and notify the designated biologist if the bees become a nuisance.

ECMs observed night work conducted on 10/14/2017. All light plants were positioned appropriately to minimize lighting in adjacent native habitat and the nighttime skyline, in accordance with MM-BIO-7C, APM-BIO-15 and MM-VIS-3B.

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, turbine pads G-6, G-7 and G-8 required actions listed in the protocols of Variance Request 006 to allow foot traffic outside the limits of disturbance in order for crewmembers to guide tag lines for turbine blade installation. Before work began, the areas were cleared per the protocols of Variance Request 006 by ASM cultural monitors, ICF biological monitors, and third party compliance monitors. No impacts to cultural or biological resources were observed.

On 10/14/2017, ECMs inspected collector pole site #66 due to a water truck potentially driving past the staked limits of disturbance. The designated biologist and ECM checked their GPS and project maps along with the staked limits of disturbance and determined that the water truck was within the limits of disturbance. No sensitive biological or cultural resources were affected.

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

During this reporting period, ECMs observed erosion control maintenance crews digging trenches and installing riprap energy dissipaters and straw wattles, in accordance with the site specific SWPPP and MM HYD-1.

ECMs followed up on an issue previously identified where hydromulch needed to be reapplied along the south facing slopes at turbine pad E-5. The designated biologist stated the problem area will be added to the list of deficient erosion controls and addressed once all ground disturbing activities in the area have been completed.

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.

On 10/9/2017, a red flag warning was issued for the project site and halted any work conducted within 100 feet of vegetation. Terminal crews, substation crews, underground work, and erosion control maintenance crews using hand tools were permitted to continue with work. The red flag warning was in effect through 10:00 am the next day, 10/10/2017.

Traffic Control Plan Implementation (MM TRA-1)

ECMs observed traffic flaggers on McCain Valley Road to notify motorists of temporary road delays during road maintenance activities per MM TRA-1.

Construction Activities Schedule:

- Cut ditches/ place rip rap along McCain Valley Road,
- Turbine pad restoration on G-13 to G-15,
- Hydromulch pole sites,
- Set bases and mids on C-6 to C-9,
- Top out G-1, G-2, G-4, E-13,
- Top out night crew G-3, G-5,
- Tower wiring on J-2, J-3, F-2, F-3, G-11,
- Generator wiring on E-1, E-2, F-1, F-2,
- Drilling overhead collector 60, 68 and 69,
- Turbine pad restoration at G-11 to G-14,
- SWPPP maintenance at G-line,
- Pad contouring F-2, F-3, D-2, H-1 and H-2,
- Wire installation on collector pole 50-66, and
- O&M building interior framing.

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 erosion control maintenance and repair crews install fiber blankets along the G-line, in accordance with the site specific SWPPP and MM HYD-1.



Photo 2: ECMs observed fire crews presoaking vegetation prior to removal at turbine pad G-12 to accommodate turbine blade installation in accordance with MM FF-1. ASM cultural resource monitors, ICF biological monitors, and third party ECMs implemented the requirements of Variance Request 006 after discussing vegetation removal with a Habitat Restoration Specialist.



Photo 3: Archaeological, Native American, and Biological monitors observe construction crews cutting a drainage ditch along McCain Valley Road, in accordance with MM CUL-1D, MM BIO-1C, and the approved Tribal Participation Plan.



Photo 4: ECMs observed light plants appropriately positioned down and in towards construction activities, to minimize lighting in adjacent native habitat and illumination into the nighttime sky, in accordance with MM BIO-7C, APM BIO-15 and MM VIS-3B.

INTENTIONALLY LEFT BLANK