



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: 10.23.17 through 10.29.17

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 10.23.17 through 10.29.17.

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 electrical crews pulling wire between towers 50-66, setting junction cable boxes at the entrance to the E-line, backfilling at the E-4 junction box, and the completion of wiring at turbine pad E-11.

Construction crews continued with road maintenance activities including ditch digging and excavating to prepare for riprap installation by the main entrance of McCain Valley Road. Haul trucks moved material used for riprap from turbine pad G-5 to the south G-line access road, grading slopes on the G-line, curb grading/sub grading on Rough Acres Ranch Road, blading along the entrance to the J-line access road, and hauling dirt along Rough Acres Ranch Road.

Soil management activities included shoulder reclamation and slope contouring along the G-line access road from turbine pad G-11 to G-1. Additionally, road shoulder repair and culvert maintenance occurred along McCain Valley Road near the D-line entrance.

Top out crews continued with the installation of nacelle and rotors at turbine pads G-4 and E-11, assembly crews continued at turbine pads C-1, C-2, C-9, E-12, and blade component installation occurred at turbine pads G-2 and G-3.

A red flag warning was issued on Sunday, 10/22/2017, which limited overall project work and cancelled all rock management, drilling, wire pulling, and other work in close proximity to vegetation. The red flag warning remained in effect through the following day Monday, 10/23/17. The fire chief issued a hot work permit for BMP work and small rock maintenance but continued to suspend rock drilling, wiring, and work close to vegetation.

A wind hold on Tuesday, 10/24/17 grounded top out turbine builds at turbine pads G-5 and turbine pad E-12.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including grading, trenching, drilling, and soil loading in accordance with MM CUL-1d and the approved Tribal Participation Plan.

Biological Resources

Biological monitors were present to monitor ground-disturbing activities in accordance with MM BIO-1c.

On Saturday, 10/28/17, ECMs observed a pile of brush and wooden spool tops staged next to an area of open space adjacent to the entrance of the C-line and between turbine pads C-5 and C-6. ECMs asked the designated biologist to be present during the removal of the aforementioned items in order to minimize potential impacts to wildlife. The designated biologist concurred and remained on site during the removal of items.

ECMs observed piles of trash throughout the project site. Trash collection was addressed later in the day by the site foremen and the area was cleaned up in accordance with MM-BIO-7d.

During night turbine installations, ECMs observed light plants positioned in towards construction and down, to minimize lighting in adjacent native habitats and the nighttime sky in accordance with MM BIO-7c, APM BIO-15, and MM VIS-3b.

On 10/24/17, ECMs observed turbine pad and road shoulder reclamation along the G-line per the Habitat Restoration Plan, in accordance with MM BIO-1d.

ECMs observed a junction box by turbine pad G-15 fenced in to prevent wildlife entrapment in accordance with MM BIO-7a.

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)

On 10/23/2017, crewmembers walked outside disturbance limits with tag lines to keep a blade on a safe travel path. The area was swept prior to the event by Dudek, ICF, and ASM monitors and a foreseen impacts form was signed. The area was surveyed once again after rotor assembly and no impacts to sensitive cultural or biological resources were observed.

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

During this reporting period, ECMs observed construction crews replacing straw wattles along McCain Valley Road. Functional BMPs were also observed throughout the project site including erosion control blankets, rock aggregate, and silt fencing in accordance with MM HYD-1 and the project specific SWPPP.

On 10/23/2017, ECMs observed maintenance and repair crews with hand tools digging and installing straw wattles outside the entrance to the E-line access road in accordance with the project site specific SWPPP. Rock check dams on McCain Valley Road between the C and E lines were observed to be flattened by tracked vehicle traffic. This potential issue was brought to the attention of the designated biologist. ECMs will continue to monitor construction in the area for future repairs.

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 Monday, 10/23/17 at approximately 4:40 pm, ECMs discovered stained soil beneath a front loader on the south G-line access road. No construction crews were available and the stained soil

remained uncleaned. ECMs contacted the designated biologist via text message, and the designated biologist stated that she would address it first thing in the morning.

On the following day, ECMs observed the stained soil beneath the front loader to be cleaned up in accordance with MM HAZ-1a. The crew foreman informed the ECM that once the equipment was fixed, it would be moved off site and the remainder of the stained soil beneath was cleaned on 10/25/2017.

ECMs also observed well-maintained hazardous waste containment areas in accordance with MM HAZ-1c.

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. Project personnel were observed complying with the nighttime speed limit of 10 mph in accordance with MM BIO-7b and APM BIO-12.

Construction Activities Schedule:

- Haul trucks along McCain Valley Road,
- Shoulder reclamation along the G-line access road,
- Slope contouring between G-11 and G-14,
- Blading on the entrance to the J-line access road,
- Assembling rotors at C-1, C-2, and E-12,
- Culvert maintenance just north of D-2/D-4 access road,
- Component delivery on Rough Acre Ranch Road,
- Conducting site maintenance on the E-line,
- Excavation/setting up of junction box cables,
- Turbine/blade component assembly at G-2 and G-3, and
- Backfilling at E-4 junction box.

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 a fenced in junction box by turbine pad G-15 to prevent wildlife entrapment, in accordance with MM BIO-7a.



Photo 2: ECMs observed completed riprap installation and fiber mats on the south G-line access road in, accordance with the site specific SWPPP.



Photo 3: ECMs observed storage area for onsite waste containment to be well maintained in accordance with MM HAZ-1c.



Photo 4: ECMs observed completed turbine pad and soil reclamation along the G-line, per the Habitat Restoration Plan, MM BIO-1D.

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