



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 11.13.17 through 11.19.17

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 11.13.17 through 11.19.17.

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 Mountain Power crews clipping wire along the overhead collector line south of the Lark Canyon OHV staging area (collector pole 65-69).

Construction crews continued with road maintenance activities including ditch inspection, digging, and excavation to prepare for riprap installation by the main entrance of McCain Valley Road. ECMs observed a backhoe preparing a ditch to be lined with rock and fabric at turbine pad J-3. ECMs also observed grading along the E-line, G-line, and Rough Acres Ranch Road, turbine pad restoration with rock replacement at turbine pads G-5 and G-6, and gravel ring preparation and sub grading along the G, H, and J-lines.

Soil management activities included shoulder reclamation and spreading gravel occurred along Rough Acres Ranch Road. Soil reclamation piles were staged on turbine pad H-2 in preparation for turbine pad restoration. Additionally, road shoulder repair, BMP placement/restoration, and culvert maintenance occurred along McCain Valley Road. Bulldozers reclaimed soil at turbine pad G-1 and transmission tower T-12, re-contoured soils at turbine pad G-3, and spread topsoil at turbine pads G-2 and G-3.

Top out crews continued with the installation of nacelle and rotors at turbine pads B-2 through B-4, D-3, D-4, and D-6. Assembly crews continued at turbine pads along the E-line and blade component installation occurred at turbine pads A-1 through A-3, C-5 through C-7, C-9, E-5, E-8, and E-9.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including grading and soil loading in accordance with MM CUL-1d and the approved Tribal Participation Plan. ECMs observed boulder placement and habitat restoration along the G-line. This activity was spot checked by an archaeological and Native American monitor in accordance with MM CUL-1d.

Boards, matting, and sandbags that have been used to protect cultural resources are being removed by construction crews under the guidance of archaeological and Native American monitors in areas where work has been completed.

Biological Resources

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

On 11/13/2017, an ECM discovered alcohol bottles and a water bottle inside the first portable toilet along the entrance to McCain Valley Road. The ECM contacted the designated biologist, to notify him of the location. The designated biologist stated that he would get clean the trash in accordance with MM BIO-7d. By the following day, an ECM checked this same location and confirmed that it had been cleaned up.

On 11/14/2017, an ECM observed trash at turbine pads B-1 and B-2. The ECM met with a biological monitor and asked if he could pick up the trash and debris. The affected areas were cleaned up by 11/16/2017.

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 11/15/2017, an ECM observed cactus replanting in accordance with the Habitat Restoration Plan and MM BIO-1d. On the same day, an ECM observed trash at turbine pads E-2, E-3, E-5, E-6, and E-7 as well as along and across from the access road, and plywood debris on the embankment slope at turbine pad D-1. The designated biologist was notified of these locations and the ECM promised to conduct a follow up to make sure the project site was free of litter the following day, in compliance with MM BIO-7d. On 11/18/2017, ECMs confirmed that the areas where trash was identified had been cleaned.

On 11/17/2017, cigarette butts and trash were observed on the ground at turbine E-7. The designated biologist was notified of a lack of coverings on pipe openings, an uncovered excavation at an A-line junction box, a snake mortality, and an uncovered dumpster at a laydown yard. An uncovered excavation was also observed on 11/18/2017 on the G-line access road and was reported by the ECM to the designated biologist.

On 11/18/17 it was confirmed that open trenches had been covered and trash observed at turbine E-7 was being addressed.

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 11/14/2017, the construction contractor requested to conduct ground-disturbing activities at the intersection of Ribbonwood Road and Rough Acres Ranch Road and at turbine pad B-4 outside of the limits of disturbance. In each of these cases, the ECM, an archaeological monitor, and biological monitor implemented the procedures outlined in Variance Request 006 to approve this activity. . There were no impacts to sensitive cultural or biological resources.

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

During this reporting period, ECMs observed construction crews engaging in BMP maintenance and repair crews installing fiber rolls along the north G-line access road in accordance with project specific SWPPP. Functional BMPs were also observed throughout the project site including silt fencing and straw wattles in accordance with MM HYD-1 and the project specific SWPPP.

On 11/15/2017 an ECM observed a concrete washout at turbine D-2 in need of repair, and another concrete washout at turbine E-1 in need of repair was observed on 11/17/2017.

On 11/16/2017, an ECM discovered downed silt fences at turbine pads F-1 and F-3. This issue was brought to the attention of the designated biologist and was subsequently addressed on 11/17/2017. On the following day, an ECM observed a small silt fence needing repairs at turbine

pads G-1 and E-13. The designated biologist was notified and agreed to repair the silt fencing once the ongoing construction activities in the area was completed as it may re-impact the silt fence. 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 11/16/2017, an ECM discovered two areas of stained soil that needed to be cleaned up in accordance with MM HAZ-5a. The designated biologist was notified of the issue and was provided locations of the stained soil. These stained soil areas were cleaned up by the following day, 11/17/2017.

On 11/17/2017, an ECM observed construction crews clean-up two stained soil spots at turbine pad E-1. On the same day, an ECM observed a crane at turbine pad C-7 leaking and immediately notified the designated biologist of the leak. Stained soil was also observed on the B-line. The designated biologist contacted the construction contractor and a biological monitor to clean-up the stained soil in accordance with MM HAZ-1.

On 11/18/2017, an ECM observed leaking containment pans. No stained soil was observed. A small stain remained after cleanup at B-1; the designated biologist was notified.

Traffic Control Plan Implementation (MM TRA-1)

ECMs observed control personnel with signage put in place in accordance with MM TRA-1. Project personnel were observed complying with the nighttime speed limit of 10 mph and daytime speed limit of 15 mph in accordance with MM BIO-7b and APM BIO-12.

Construction Activities Schedule:

- Haul trucks along McCain Valley Road,
- Culvert and riprap replacement along McCain Valley Road,
- Installation of fiber rolls along the north G-line access road,
- Rotor building along E-line,
- Spreading gravel and blue topping along Rough Acres Ranch Road,
- Re-contouring site at G-3,
- Spreading topsoil at G-2 and G-3,
- Dozers grading site at E-12,
- Motor grader reclaiming site at G-1,
- Gravel ring prep and subgrading along J, H and G Lines, and
- Blade assembly at A-1 to A-3, C-5 to C-7, C-9, E-8, and E-9.

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 were present to observe construction crews clean and properly dispose of stained soil in accordance with MM HAZ-1.



Photo 2: ECMs observed rotor assembly along the E-line. Archaeological and Native American monitors spot checked the activity in accordance with MM CUL-1D.



Photo 3: ECMs observed cactus replanting per MM BIO-1d and the Habitat Restoration Plan.



Photo 4: ECM discovered alcohol bottles and water bottle trash inside the first portable toilet along the entrance to McCain Valley Road. The trash was cleaned-up by the following day in accordance with MM BIO-7D.

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