



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 12.11.17 through 12.17.17

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 12.11.17 through 12.17.17.

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, riprap placement occurred along McCain Valley Road and soil reclamation was observed along McCain Valley Road, Collector Pole pull sites 12, 38, and 41, the C-line, north and south of the E-line, and along the G-line. ECMs observed bulldozers

spreading topsoil at turbine pads B-1, B-4, C-1, C-3, C-5, C-7, D-1, D-4, G-6, and along the E-line access road.

Ditch repair was observed along the E and G-lines and re-contouring of soils occurred at turbine pads B-2, B-3, D-3, and the Collector Pole line located at the E-1 access road entrance. Construction crews were observed reclaiming driveways and spreading and compacting windrows at Overhead Collection Poles 5, 13-18, on the C-line access road, along McCain Valley Road at the E-1 access road, and on the B-line access road. Bulldozers with a blade attachment and excavators were used to reclaim shoulders and work space on access roads near turbine pads C-5, C-8, D-4, and the E-string access road near Laydown Yard 6.

Additionally, crane demobilization occurred on the A-line and work interior to the wind turbine generators continued. During this reporting period, Collector Pole lines D, E, F, and G were closed due to energization.

Cultural Resources

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

Biological Resources

Biological monitors were present to monitor ground-disturbing activities including grading, excavation, and turbine assembly, in accordance with MM-BIO-1c.

On 12/11/2017, an ECM observed a construction crewmember planting cacti at the pull site near Overhead Collection Pole 64 in accordance with Section 5.2.4.1 of the Habitat Restoration Plan. A Habitat Restoration Specialist was present spot-checking this activity. Replanting of cholla cacti also occurred along McCain Valley Road near the Lark Canyon Campground and along the G-line access road.

Monitor Sign-off (February 1, 2017 NTP)

On 12/14/2017, an ECM noticed that road maintenance was being conducted by construction crews along the main access road from turbine sites E-7 to E-10 without a completed MSOS. The ECM stopped the work and contacted the lead biologist and archaeologist to confirm that a biological sweep of the area had been conducted and that archaeological monitors were not required. The lead biological monitor confirmed that the area had been swept by a biological monitor earlier in the day. The lead archaeological monitor confirmed that an archaeologist was not required during road maintenance activities, as they did not include ground disturbance in native soil. A biological monitor and archaeological monitor were dispatched to the area where road maintenance activities were occurring to complete the MSOS.

Limits of Disturbance (MM BIO-1A)

On 12/11/2017, an ECM observed a construction crew using a backhoe to excavate a culvert dissipater on the J-line access road. The culvert dissipater was anticipated to extend beyond the limits of disturbance. The protocols of Variance Request 006 were implemented to account for

this anticipated disturbance outside of the staked limits of disturbance. Biological, archaeological, and third party ECMs were present to observe the activity and record the amount of disturbance outside of the approved disturbance limits. At the completion of this activity, an area measuring approximately 110 square feet was disturbed beyond the limits of disturbance. No sensitive resources were affected.

On 12/15/2017, construction crews were using a bulldozer with a blade attachment to reclaim shoulders along the B-line access road. During the reclamation efforts, the protocols of Variance Request 006 were implemented to account for disturbance outside of the staked limits of disturbance. Biological, archaeological, and third party ECMs were present to observe the activity and record the amount of disturbance outside of the approved disturbance limits. An area measuring approximately 1,255 square feet was recorded as being disturbed beyond the limits of disturbance. No sensitive resources were affected.

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

During this reporting period, ECMs observed construction crews performing erosion control maintenance at BMPs along McCain Valley Road and at turbine pad G-12, in accordance with the site specific SWPPP and MM HYD-1.

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.

On 12/12/2017, an ECM observed excessive dust during rock management activities at Laydown Yard 10. The ECM notified the lead biologist and requested that a water tender assist to minimize dust. The lead biologist notified the construction contractor and a water tender was mobilized to assist with the rock management activity shortly thereafter.

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.

Traffic Control Plan Implementation (MM TRA-1)

ECMs observed vehicles following the construction speed limit of 15 miles per hour (mph) during daytime construction activities.

On 12/14/17, an ECM observed a construction related pick-up truck travelling at speeds in excess of the 15 mph limit along McCain Valley Road. The lead biological monitor was contacted about this issue. During this reporting period, announcements were made at the morning tailboard meeting to ensure that construction crews were aware of and adhere to the project speed limits.

Construction Activities Schedule:

- Placement of riprap along McCain Valley Road,
- Ditch repair along and G-lines,
- Spreading of topsoil at turbine pads B-1, B-4, C-1, C-3, C-5, C-7, D-1, D-4, G-6 ,
- Re-contouring of soils at turbine pads B-2, B-3, D-3,
- Reclaiming shoulders at turbine pads C-5, C-8, D-4, and the E-string access road near Yard 6,
- Crane disassembly on the A-line,
- Lines D, E, F, and G closed due to energization,
- Skid steer spreading gravel around at turbine pad C-5 and D-4 ,
- Soil compaction on G-line access road,
- Rock placement/erosion control near the substation, and
- Soil management and transporting at Laydown yards 2 and 4.

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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<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) 	
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
6	Pending	Commercial Operations: <ul style="list-style-type: none"> • Full commercial operations of 52 turbines and all associated project facilities. 	N/A

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: An ECM observed a water truck applying water during earthwork activities to control and minimize dust in accordance with MM AQ-1 and the Dust Control Plan.



Photo 2: An ECM observed reclamation work taking place interior to the grading limits in accordance with MM BIO-1a.



Photo 3: An ECM observed biological monitors monitoring shoulder reclamation along the B-line access road in accordance with MM BIO-1c.



Photo 4: The protocols of Variance Request 006 were implemented to allow for disturbance beyond the staked limits of disturbance during road reclamation activities.

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