



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 12.18.17 through 12.24.17

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.

On December 22, 2017, the BLM issued NTP-6, authorizing Tule Wind LLC to proceed with full commercial operations of 52 turbines, located on public land administered by the BLM and all associated project facilities. Associated project facilities include, but are not limited to, a substation, access roads, underground and overhead collection system, operations and maintenance building, and three permanent meteorological towers. A copy of NTP-6 along with the associated terms and conditions are posted on the ECMP website (<http://www.tulewindeccmp.com/>).

The following weekly report covers construction activities for the reporting period of 12.18.17 through 12.24.17.

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 Rough Acres Ranch Road, reclaiming shoulders and re-contouring activities occurred at collector pole sites 23, 32, 33, 37, turbine pads B-4 and E-1, along the A-line, B-line, J-line, and at overhead collector poles 24, 25, and 27. ECMs observed bulldozers spreading topsoil along the C-line and E-line access roads, at overhead collector pole sites 23, turbine pads C-4, D-3, D-4, laydown yard 4, and the D-1/D-4 access road. Gravel was spread at turbine pad E-11, along the E-line, and along road M on the E-line.

A compactor was observed working at turbine pad E-9 and a front loader was observed loading dump trucks with topsoil from laydown yards 2 and 4. Crews cut ditches and worked on rocks outside of the fence at the substation and along Rough Acres Ranch Road. Reclamation work occurred on the E-string, maintenance of erosion control devices occurred along McCain Valley Road, and hydro seed application occurred at tower H-1.

In addition, commissioning inspections occurred inside turbines throughout the project site.

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.

On 12/19/2017, construction crews excavated a trench along Rough Acres Ranch Road without an archaeologist or Native American monitor present. A portion of the trench that was excavated traverses an environmentally sensitive area (ESA). The ESA was delineated with t-posts and orange snow fencing. The construction crew who excavated the trench removed the ESA posts and fencing without authorization.

The construction contractor notified Tule Wind LLC's archaeological contractor, ASM of the trenching activity after a trench extending approximately 77 feet had been dug. When ASM's archaeological monitor observed that a trench had been dug without archaeological or Native American monitors present, the archaeological monitor requested that no additional construction activities occur along Rough Acres Ranch Road until the monitor could assess the situation.

The BLM's third party archaeological monitor, ASM's Senior Archaeologist, and ASM's archaeological monitor inspected the trench and associated spoils pile and did not observe any archaeological resources. No additional construction activities occurred along Rough Acres Ranch Road for the day as a result of this incident. ASM installed t-posts and rope around the trench to prevent unauthorized access. Subsequently, ASM archaeologists conducted sample screening of the spoils piles. No archaeological resources were identified in the sample screening effort.

This incident has been documented as a serious violation in accordance with Section 5.2 of the ECMP. The ECMP defines a serious violation as “an activity that is not in compliance with the project specifications and causes substantial harm to resources or poses a serious threat to sensitive resources or worker/public safety”. While no resources were affected as a result of this incident, it did pose a serious threat to sensitive resources.

Biological Resources

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

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.

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

During this reporting period, ECMs observed construction crews removing old silt fencing and straw wattles using a backhoe from the D-1/D-4 access road, installation of fiber rolls at overhead collector poles 40-41, and installation of new straw wattles on the slope of turbine pad E-10, 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.

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. Signs posting the 15 mph speed limit were also in place along McCain Valley Road and visible in accordance with MM-BIO-7b.

Construction Activities Schedule:

- Placement of riprap along Rough Acres Ranch Road,
- Ditch cutting along Rough Acres Ranch Road,
- Spreading of topsoil at C-line and E-line access roads, collector pole sites 23, C-4, D-3, and D-4, laydown yard 4, and the D-1/D-4 access road ,
- Manual work inside of turbines,
- Installation of fiber rolls at overhead collector poles 40-41,
- Reclaiming pull pads and driveways at overhead collector poles 24, 25, and 27,
- Re-contouring sites on A and B-lines,
- Skid steer spreading gravel at turbine pad E-11, along the E-line, and along road M on the E-line,
- Rock management outside of the fence at the substation along Rough Acres Ranch Road,
- Energizing Circuit 1, and
- Bulldozers building up a berm on McCain Valley Road.

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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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
6	12/22/17	Commercial Operations: <ul style="list-style-type: none"> • Full commercial operations of 52 turbines and all associated project facilities. 	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 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: A bulldozer is observed spreading topsoil at turbine pad C-2 in accordance with Section 5.2 of the Habitat Restoration Plan.



Photo 2: Reclamation/re-contouring activities occurred at overhead collector pole site 23. A water tender applied water in an effort to minimize dust in accordance with MM AQ-1.



Photo 3: A construction worker is observed installing straw wattles along the slope at turbine pad E-10, in accordance with site specific SWPPP.



Photo 4: Looking west along Rough Acres Ranch Road where ESA fencing was removed and trenching occurred without an archaeologist or Native American monitor present. This incident was documented as a serious violation by the BLM.

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