



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 01.01.18 through 01.07.18

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 01.01.18 through 01.07.18.

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, 6, 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, ECMs observed construction crews conducting turbine commissioning and up-tower work along the A, E, F, and G-lines.

Road work activities along Rough Acres Ranch Road included haul trucks importing gravel from turbine pad F-2, as well as crews spreading topsoil along ditches, compacting rocks, digging energy dissipaters, placing rip rap, removing tree stumps, digging low waterways to driveways, and reclaiming road shoulders.

Roadwork activities along McCain Valley Road included re-contouring soils, reclaiming windrows, and the delivery of base and gravel.

Haul trucks continued to move stockpiled fill and topsoil to areas where restoration activities were occurring. Equipment removal continued near the Connector Road.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities in accordance with mitigation measure 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 01/04/2018, ECMs observed ACS crews transplanting cacti from laydown yard #8 to the stringing site located at overhead collector pole 38. A Habitat Restoration Specialist was present to monitor this activity in accordance with the Habitat Restoration Plan.

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, all work occurred within the project limits of disturbance in accordance with MM BIO-1a.

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

On 01/02/2018, ECMs discovered silt fencing along the C-line in need of maintenance.

On 01/03/2018, an ECM asked the designated biologist about a plan for BMP maintenance after observing several BMPs were in need of repair and that silt fences had been removed. The Designated Biologist contacted the Qualified SWPPP Practitioner and was notified that silt fences were removed during ongoing restoration activities.

On 01/05/2018, ECMs observed crews finalizing flood control and culverts on the west side of McCain Valley Road along the southern section.

On 01/08/2018, ECMs confirmed with the designated biologist that Blattner maintenance and repair crews had been provided a punch-list with deficient BMPs from the site Qualified SWPPP Practitioner and that they are in the process of tending to those listed items in preparation for an anticipated rain event.

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)

During this reporting period, there were no observations of stained soil from the storage of hazardous chemicals or waste management.

Traffic Control Plan Implementation (MM-TRA-1)

During this reporting period, all vehicles observed driving through the construction site were observed to be travelling at the posted daytime 15 mph speed limit in accordance with MM BIO-7b.

Construction Activities Schedule:

- Reclaiming and re-contouring shoulders along McCain Valley Road,
- Haul trucks moving stockpiled fill,
- Loading and removal of equipment using flatbed trucks near the Connector Road,
- Equipment blading along the southern sections of McCain Valley Road,
- Material staging with a forklift in laydown yard 9,
- Spreading topsoil along Rough Acres Ranch Road,
- Transplanting of cacti from Laydown yard 8 to Collector Pole site 38,
- Commissioning and up-tower work at turbine locations along A, E, F, and G-lines,
- Excavator compacting rocks along Rough Acres Ranch Road, and
- Digging low water crossings along Rough Acres Ranch 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
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 	
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	Approved	06.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		vehicle (OHV) staging areas.		
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 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: Construction crewmembers were observed parking within the delineated work limits in accordance with MM BIO-1a (turbine pad G-6 is shown in photo).



Photo 2: ECMs observed ACS crews transplanting cacti segments at the stringing site near overhead collection pole 38. A Habitat Restoration Specialist was present in accordance with the Habitat Restoration Plan.



Photo 3: ECMs observed an excavator along McCain Valley Road pulling back berms with a water tender present in accordance with the Dust Control Plan and MM AQ-1.



Photo 4: ECMs observed equipment blading the southern sections of McCain Valley Road. This activity was spot checked by archaeological and Native American monitors in compliance with MM CUL-1d.

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