



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 01.07.18 through 01.14.18

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 01.08.18 through 01.14.18.

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, soil reclamation and contouring occurred on road shoulders along McCain Valley Road, near Collector Pole Site 52, near the G-line access road, along the E-line, and at turbine pad A-1. Construction crews placed boulders at Overhead Collection Pole 23 and along the E-line. Erosion control ditches were installed on the B-line access road, excavation for ditches and riprap installation occurred along McCain Valley Road, and erosion channels on the G-line were smoothed out with hand tools and a skid steer. Haul trucks delivered topsoil from laydown yard #7 to the C, D and E lines. Haul trucks continued to move stockpiled fill to areas along McCain Valley Road in order to cover rock-lined drainage ditches.

ECMs observed trucks spreading gravel between the A and B lines and along the E and F lines. Slopes were stabilized by track walking at turbine pads C-6 through C-9 and turbine pads E-8 through E-9. Road blading occurred along both the E and F-line access roads, while culvert maintenance and expansion occurred along McCain Valley Road.

General Electric (GE) and Avangrid personnel continued to conduct commissioning and up-tower work at turbine locations throughout the project site. Rosendin electrical crews were observed conducting electrical work around turbines in various spots throughout the site. Construction related equipment and laydown yard demobilization also continued throughout this reporting period.

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.

During this reporting period, ECMs observed construction crew members planting cacti at turbine pads G-1, G-4, and G-6 in accordance with the Habitat Restoration Plan.

On 01/10/2018, an ECM discovered previously used silt fencing, old fiber rolls, and broken drip pans littered along the C-line access road and McCain Valley Road. The ECM notified the designated biologist. The designated biologist responded by reassuring the ECM that the litter would be cleaned up. The following day, an ECM followed-up on the issue by asking the designated biologist if the displaced fiber rolls would be removed from the site. The designated biologist stated that a dumpster had been ordered for crews to remove the waste. On 01/12/18, ECMs observed that the silt fencing, and drip pans had been removed and that the fiber rolls were in the process of being removed.

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, an ECM contacted the designated biologist in regards to a forecasted rain event. The designated biologist indicated that the project Qualified SWPPP Practitioner (QSP) was conducting a pre-storm inspection and that BMP maintenance and repair crews were making the necessary pre-storm maintenance/repairs.

On 01/09/2018, ECMs observed a BMP crew reinforcing rock dams on the shoulders of McCain Valley Road to minimize runoff during a rain event, in accordance with site specific SWPPP.

On 01/10/2018, ECMs observed riprap installation along the edge of McCain Valley Road, per the site specific SWPPP and the grading plans. A temporary concrete washout was removed and backfilled at Laydown yard #3. The resulting washout debris was placed into a roll-off bin on a trailer to be disposed, in accordance with site specific SWPPP.

On 01/12/2018, BMP crews were observed reclaiming straw wattles and staging fiber rolls at Laydown Yard #6. In addition, an ECM observed unused portions of conduit and wire rolls at the MET Tower on the G-line. Since underground electrical work has been completed on the G-line, the ECM contacted the designated biologist to coordinate with the electrical contractor to determine if there were plans to use to conduit and electrical rolls. The conduit and electrical rolls remained in place at the end of this reporting period.

BMPs were identified that required maintenance as a result of the rain event that occurred on 01/09/18. In addition, disturbance limit staking and ESA signs that had fallen over or become damaged as a result of the rain event were discussed with the designated biologist and requested to be re-set or removed, if deemed unnecessary. Coordination continued throughout this reporting period with the designated biologist to identify and track BMP maintenance and other issues that arose as a result of the rain event.

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, apart from cases where the protocols of Variance Request 006 were implemented. Variance Request 006 was approved by the BLM to allow up to 10 acres of additional impacts where activities occur along the edge of the limits of disturbance have the potential to cross the limits of disturbance. Each of these cases is further described below:

On 01/09/2018, the protocols for Variance Request 006 were implemented to allow an excavator to contour road shoulder slopes along McCain Valley Road. A biological and cultural monitor were present full time to monitor this activity in accordance to the protocols of Variance Request 006. No impacts to sensitive biological or cultural resources were observed.

On 01/11/2018, the protocols of Variance Request 006 were implemented for culvert construction on McCain Valley Road, past the north G-line access road. Biological and cultural monitors were present to sweep the area for sensitive resources and monitor the activity. No impacts to sensitive biological or cultural resources were observed.

On 01/13/2018, the protocols for Variance Request 006 were implemented near turbine pads E-12 and E-13 to allow construction crews to clear and expand drainage culverts. A biological and cultural monitor were present full time to monitor this activity. No impacts to sensitive biological or cultural resources were observed.

Dust Control Plan Implementation (MM AQ-1; AIR-3)

ECMs observed water trucks applying water in active areas of construction and accompanying haul trucks moving topsoil, 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 present on the project site during all construction activities, including vehicles equipped with fire suppression equipment in accordance with MM FF-1.

On 01/10/2018, an ECM notified the Fire Safety Coordinator about a small brush fire located towards the northwest of the project site. The Fire Coordinator determined that the fire was a controlled burn located on tribal land adjacent to the project site and that there was no threat to the project.

Hazardous Materials Management Plan (MM HAZ-1A)

On 01/11/2018 and 01/12/2018, ECMs observed dumpsters being transported off the project site and noted that they were properly covered in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

During this reporting period, all project related vehicles were observed to be travelling at the posted daytime speed limit of 15 miles per hour in accordance with MM BIO-7b.

Flaggers were observed notifying vehicles of temporary road closures during rock lined ditch installation, maintaining a safe travel corridor for both project personnel and the general public in accordance with MM TRA-1.

Construction Activities Schedule:

- Asphalt paving on Ribbonwood Road,
- Haul trucks moving stockpiled fill to the A,B,C and D-line,
- Placing rock aggregate along the D, E and F-line,
- Topsoil restoration,
- Hydro seeding the G-line, and collection and transmission pole sites,
- Reclaiming the laydown yard/80 acre parcel,
- Place rip rap along McCain Valley Road,
- Installation of gravel rings on C-line,
- SWPPP BMP maintenance, and
- Reclaiming road shoulders 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
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 	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> • 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	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

Variance Request No.	Submitted	Description	Status	Approval Date
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 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: A water tender observed watering along McCain Valley Road in an effort to minimize dust, in accordance with the Dust Control Plan and MM AQ-1.



Photo 2: ECMs observed construction crew transplanting cacti from the onsite nursery, in accordance with the Habitat Restoration Plan.



Photo 3: ECMs observed a construction crew member conducting traffic control to support ditch installation along McCain Valley Road, in accordance with MM TRA-1.



Photo 4: Culvert excavation and rip rap installation occurred along McCain Valley Road requiring implementation of Variance Request 006. This activity was monitored by biological and cultural monitors in accordance with the protocols of Variance Request 006.

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