



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 01.22.18 through 01.28.18

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 01.22.18 through 01.28.18.

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, road maintenance activities including reclaiming shoulders, smoothing road surfaces, and installing rock lined ditches occurred along the A-line, C-line, F-line, and H-line access roads, and along McCain Valley Road. Spreading top soil and sub grading occurred along the A, B, and C-lines. Low water crossings were excavated along the A and B-lines and haul trucks transported top soil along the A, B, and C-line access roads. Soil and rock management were also observed throughout the reporting period at Laydown yards #1, #2, #3, #7, and #10.

Re-contouring activities including pulling back windrows, tracking slopes, and rock dam installation occurred between the A and B-lines, south of the A-line access road, south of the E-7 and E-10 line, H-line, and north of the G-line along McCain Valley Road. Ditch digging and excavation for energy dissipaters occurred along McCain Valley Road, while erosion control maintenance and repair crews installed straw wattles near turbine pad C-9. Construction crews continued dispersing riprap into drainage ditches along the access road near the B-line access road and McCain Valley Road intersection.

In addition, gate post installation continued at access road entrances along McCain Valley Road and hydro seeding continued at various locations throughout the project site during 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.

On 01/22/2018, a biological monitor was observed performing nesting bird surveys. Environmentally sensitive area (ESA) buffers were established for a red-tailed hawk and bushtit nest.

On 01/23/2018, culvert installation occurred along the B-line access road within an active bird nest buffer. A biological monitor was present to confirm no disturbance to nesting activities occurred in accordance with MM BIO-7j.

On 01/26/2018, an ECM followed up on an issue reported earlier in the month regarding plastic duct and cables that appeared to be no longer in use that were left at the MET tower along the G-line. An ECM contacted the designated biologist to remind them of the duct and cables. The designated biologist indicated that they would work with the construction contractor to address this issue. This issue will continue to be tracked by ECMs.

During this reporting period, hydro seeding was observed along the Collector Pole Line and the 80-acre parcel with both a biological monitor and Restoration Specialist present, in accordance with MM BIO-1c and 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.

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

Installation of rock lined drainage swales along McCain Valley Road, south of the A-line access road was observed in accordance with site specific SWPPP on 01/22/2018.

On 01/24/2018, construction crews were observed preparing for the installation of riprap for rock dams by installing matting on the E-7 and E-10 access roads, in accordance with site specific SWPPP.

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. During this reporting period, Variance Request 006 was implemented three times to allow for construction activities to proceed, as listed below. 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.

On 01/24/2018, the protocols of Variance Request 006 were implemented to allow for the digging of culvert dissipaters and installation of culverts along McCain Valley 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 01/25/2018, the protocols of Variance Request 006 were implemented in order to install a smart ditch along the north slope of turbine site E-10. The disturbance area outside of the approved limits of disturbance measured approximately 10 feet by 16 feet. Monitors confirmed that no sensitive cultural or biological resources were impacted.

On 01/26/2018, the protocols of Variance Request 006 were implemented for culvert work near Collection Tower 44 on the east side of McCain Valley Road. Biological and cultural monitors were present to monitor the activity. No impacts to sensitive biological or cultural 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, 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 present on the project site during all construction activities, including vehicles equipped with fire suppression equipment in accordance with MM FF-1.

Hazardous Materials Management Plan (MM HAZ-1A)

During this reporting period, there were no observed compliance issues in regards to the storage of hazardous chemicals or waste management.

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 mile per hour speed limit in accordance with MM BIO-7b.

Construction crew members were observed directing traffic during temporary road closures along McCain Valley Road. The temporary road closures were enacted to allow rock dam installation and restoration activities, 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 lane,
- Cutting ditches and placing riprap along McCain Valley Road and C and E lines,
- Reclaiming road shoulders along McCain Valley Road,
- Reclaiming Laydown yards #4 and #10,
- Topsoil restoration along McCain Valley Road and the A-line,
- Installation of low water crossings along the C-line,
- Gravel ring installation on the A and B-line,
- SWPPP maintenance as needed,
- Haul trucks moving coil along McCain Valley Road and A and B-lines, and
- Placing aggregate along A and B lines.

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: Hydro seeding along the Collector Pole Line in accordance to MM-BIO-1d and the Habitat Restoration Plan.



Photo 2: ECMs observed rock lined drainage swale installation along McCain Valley Road, near the A-line access road, per the site specific SWPPP and Grading Plans.



Photo 3: Shoulder reclamation along McCain Valley Road and the H-line. All work took place within the limits of disturbance, in accordance with MM BIO-1a.



Photo 4: Archaeological and biological monitors observed construction crew members excavate soil outside of the limits of disturbance to allow for riprap placement at turbine pad E-10 in accordance with the protocols of Variance Request 006.

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