



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 01.29.18 through 02.04.18

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 01.29.18 through 02.04.18.

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, digging water dissipaters, and installing rock lined ditches occurred along McCain Valley Road and the C and G lines. ECMs observed construction crews using a blade attached to a bulldozer to smooth out soils along McCain Valley Road as well as the construction of drainages and culverts along the access road to the F-line. Spreading and compaction of base and gravel was observed along the A, B, D, E, and F lines and low water crossings were constructed on the E, F, and G lines, at the entrance of the B-line, and along Rough Acres Ranch Road. Haul trucks transported top soil, riprap, and base gravel along the A, B, and G lines.

Re-contouring was observed along the C-line, Laydown yard #10, turbine pads E-1 and G-5, and along McCain Valley Road. Ditch digging and excavation for energy dissipaters occurred along McCain Valley Road as well as on the A-line. Riprap and rock aggregate was hauled from Laydown yard #11 and used to reinforce culverts throughout the project site. ECMs observed gravel rings being constructed around turbines on the A and B-lines.

Construction crews reclaimed Laydown yards #3 and #6. Hydro seeding and soil and rock management were observed throughout the project site. Construction crews continued the installation of gates at access road entrances.

Throughout this reporting period, General Electric (GE) personnel continued to conduct commissioning and up-tower work at turbine sites throughout the project site.

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.

Hydro seeding was observed along the Collector Pole line, access roads, and McCain Valley Road, in accordance with the Habitat Restoration Plan. Work occurred within a bird buffer during this reporting period. A full-time Biological monitor was present to ensure that no disturbance to nesting activities occurred, in accordance with MM BIO-7j. No impacts to nesting behavior were observed by the biological monitor.

On 01/30/2018, crews were observed transplanting cacti at Laydown yard #5, 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.

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

ECMs observed that the BMPs at turbine site E-10 had been reinforced since the last reporting period, in accordance with site specific SWPPP.

On 01/30/2018, a BMP crew was observed installing fiber rolls along a slope at Collector Pole site 38 as well as at turbine pads D-1, D-2, and D-3.

On 01/30/2018, a concrete roll-off bin leaked material onto the ground surface at turbine pad C-8. This issue was reported to the designated biologist, biological monitor, and the construction crew foreman. The spill was immediately cleaned up in accordance with MM HAZ-2b.

On 02/01/2018 and 02/02/2018, BMP crews were observed installing fiber rolls on the downslope edge of the E-1 line and at turbine pad C-3, respectively in accordance with the 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. Variance Request 006 was implemented once during this reporting period. 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 01/29/2018, the protocols for Variance Request 006 were implemented to allow construction crews to remove soil and install riprap around a culvert on McCain Valley Road, south of the A-line access road. Biological and cultural resource monitors were present to monitor this activity full time in accordance to the protocols of Variance Request 006. The additional impact area measured approximately 55 square feet. No impacts to sensitive cultural or biological resources were observed.

On 01/31/2018, an ECM asked a Biological monitor to re-stake a fallen ESA sign located just south of the A-line on McCain Valley Road. The Biological monitor agreed and the sign was re-staked.

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 01/29/2018, an ECM observed the Red Flag Warning in San Diego County and asked the Tule Wind Fire Safety Coordinator if there were any work restrictions or special precautions for the day. The Fire Safety Coordinator responded that no special restrictions would be implemented for the day, as the current work on site posed no fire risk.

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)

On 01/30/2018 and 1/31/2018, an ECM observed haul trucks travelling at speeds of approximately 25 and 35 miles per hour (mph) along McCain Valley Road. After contacting the designated biologist about the issue, the ECM received a response from the designated biologist stating that the crews had been reminded of the 15 mph project speed limit.

On 02/01/2018, an ECM observed haul trucks speeding along McCain Valley Road exceeding the 15 mph project speed limit. The Designated Biologist was notified of the issue and responded to the ECM that it would be addressed with construction crews.

Construction Activities Schedule:

- Cutting ditches and placing riprap along B and C-line and McCain Valley Road,
- Reclaiming Laydown yards #6 and #10,
- Haul trucks moving soil along A-line, B-line, and McCain Valley Road,
- Installation of rolling dips site wide,
- Installing low water crossings at turbine pads E-7 through E-10,
- Erosion control along the E-line,
- SWPPP maintenance as needed, and
- Hydro seeding along the A-line, G-line, and 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 • 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: Straw wattles and other BMPs at turbine site E-10 have been reinforced, in accordance with site specific SWPPP.



Photo 2: ECMs observed a concrete washout leaking from a temporary roll-off bin at turbine pad C-8. Construction personnel were immediately notified and the spill was appropriately cleaned in accordance with MM HAZ-2B.



Photo 3: An ECM observed crews spraying hydro seed along the edges of McCain Valley Road and turbine access roads. This activity was monitored in accordance with MM BIO-7j.



Photo 4: ECMs observed the construction of a low water crossing at the entrance of the B-line, within the approved limits of disturbance, in accordance with MM BIO-1a.

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