



BLM Authorized Officer Weekly Report

EI Centro Field Office
1661 S. 4th Street
EI Centro, California 92243
Website: www.tulewindECCMP.com

Project: Tule Wind Energy Project

Weekly Project Update

Prepared By: David Hochart, DUDEK, 605 Third Street, Encinitas, CA 92024

Reporting Period: 10.30.17 through 11.05.17

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. The following weekly report covers construction activities for the reporting period of 10.30.17 through 11.05.17.

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, ECMs observed wire clipping along the overhead collector lines and wire stringing along overhead collector poles 15 and 55-66. Electrical wires were tightened, fastened, and connected to electrical junction boxes at turbine pads B-1 and C-1.

Road and erosion control maintenance activities included blading along the G-line access road and at turbine pad H-1, riprap placement in multiple locations along McCain Valley Road, and excavation of road shoulders along the G-line.

Turbine component preparation continued with blade and nacelle assembly at turbine pad E-9, tower and nacelle installation at turbine pads G-1, G-2, and F-3. Crane movement occurred between turbine pads along the B and C-lines and from the E-line to turbine pad F-3, while crews load tested the crane at turbine pad G-5.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities for construction activities including grading, drilling, and wire pulling, in accordance with mitigation measure CUL-1d and the approved Tribal Participation Plan.

Biological Resources

Biological monitors were present to monitor ground disturbing activities including conducting sweeps ahead of grading, excavation, and wire pulling in accordance with MM-BIO-1c. ECMs observed construction crews complying with the 10 mph night speed limit in accordance with MM BIO-7b.

During night work throughout this reporting period, light plants were properly placed and faced inward and down to minimize lighting in adjacent native habitat, in accordance with MM-BIO-7C. Backscatter to the nighttime sky was minimized in accordance with MM-VIS-3B.

On 10/30/17, ECMs observed wind-blown trash along the H-line and notified the designated biologist. On 11/02/17, the trash at the H-line had been removed in accordance with MM BIO-7d.

Trash was also observed at turbine pad C-6 and vegetation piles were observed beyond the disturbance limits at turbine C-6. The designated biologist was notified and the area was cleaned by 11/06/17. The disturbance caused by the vegetation piles were documented in accordance with the protocols established by variance request 006.

ECMs observed scattered plywood and plywood containers at turbine sites A-1, A-3, D-1, D-3, and D-4. ECMs contacted the designated biologist. The designated biologist later informed the ECM that the plywood had been collected and stacked in accordance with MM-BIO-7d.

On 11/04/17, ECMs discovered an uncovered roll off dumpster in the upper laydown yard. ECMs contacted the designated biologist who covered the dumpster before the end of the day.

On 11/04/17, ECMs observed damaged erosion control devices by turbine pad E-8, likely from off-highway vehicle use. ECMs continue to notify the designated biologist of habitat disturbances in order to minimize any negative impacts to potentially sensitive resources or species.

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)

On 10/31/17, an ECM observed construction crews assembling turbine blade components when a forklift drove outside the limits of disturbance in order to keep a blade level and off the ground surface. An area outside the limits of disturbance measuring approximately 6 feet by 8 feet was disturbed (approximately 48 square feet). ICF and Dudek monitors conducted a sweep of the disturbed area before and after the incident and observed no damage to sensitive cultural or biological resources. The protocols of variance request 006 for unforeseen impacts were implemented to document this event.

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

During this reporting period, ECMs observed erosion control devices including silt fencing and straw wattles at turbine pads C-4 and E-5 in need of maintenance/repair. ECMs are continuing to work with the designated biologist to identify these issues and ensure that they are maintained/repared in a timely manner in accordance with the site specific SWPPP.

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

ECMs observed water trucks applying water in active areas of construction and along access roads at least three times a day in accordance MM AQ-1 and the Dust Control Plan.

ECMs discovered an unattended crane idling more than five minutes. The site foreman was notified by the ECM that vehicles and construction equipment idling for more than five minutes that are not being used are required to be turned off in accordance with MM AQ-1. The site superintendent resolved the issue by turning the idling crane off.

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, containment bins were observed by ECMs under staged vehicles in accordance with MM HAZ-1a. Debris and substrate that were removed from culverts were also properly disposed of at laydown yards in accordance to MM HAZ-1c.

On 10/30/17, ECMs observed gas generators and gas cans placed on the ground surface without containment, per MM HAZ-1a. The designated biologist was notified about this issue. This issue was resolved when the construction contractor placed the gas generators and gas cans within containment bins.

On 11/04/17, ECMs discovered an open excavation at turbine pad G-15 without fencing. The ECM notified the designated biologist that the excavation would need to be backfilled or ramped in accordance with MM HAZ-1b. The designated biologist replied that the excavation was ramped and that it would be fenced shortly.

Traffic Control Plan Implementation (MM TRA-1)

During this reporting period, all members on site adhered to the 15 mph speed limit during the day and the 10 mph speed limit during the night in accordance with MM TRA-1.

Construction Activities Schedule:

- Wire stringing along collector lines 55-66,
- Wires connected to junction boxes at B-1 and C-1,
- Road maintenance along McCain Valley Road,
- Preparation for paving along Connector Road,
- Grader blading along the G-string access road,
- Dozing and excavating sides along the G-line,
- Road blading at turbine pad H-1,
- Preparing turbine components at turbine pad E-9,
- Nacelles attached at F-3 and G-2,
- Crane testing at turbine G-5, and
- Tower installation and prep work at turbines G-1, G-2, and G-5.

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 	

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

Variance Request No.	Submitted	Description	Status	Approval Date
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: ECMs observed Mountain Power tightening sag points along the overhead collector line at Tower 66. The activity was spot checked by archaeological monitors per MM CUL-1d.



Photo 2: ECMs observed a bulldozer spreading topsoil along the G-line as part of site reclamation according to the Habitat Restoration Plan, MM BIO-1d.



Photo 3: ECMs observed water trucks minimizing fugitive dust by applying water to access roads and other active work areas, in accordance with MM AQ-1.



Photo 4: ECMs observed wind-blown trash along the H-line. The designated biologist was contacted and the trash was cleaned shortly thereafter in accordance with MM BIO-7d.

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