



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: 11.20.17 through 11.26.17

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 11.20.17 through 11.26.17.

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, construction crews performed erosion control activities including riprap installation along the E and F lines, along McCain Valley Road outside the entrance to the Lark Canyon off-highway vehicle (OHV) staging area, and at a culvert near pole 57. Trenching and backfilling were observed at the meteorological (MET) tower near the E-line access road.

Blading occurred along McCain Valley Road and turbine pad G-12. ECMs observed grading along Rough Acres Ranch Road and McCain Valley Road along with soil reclamation work along McCain Valley Road, the G-line south entrance, the H-line, and at Laydown Yard 12. Soil recontouring occurred at turbines E-10 through E-13, F-2, and F-3. ECMs observed haul trucks moving soil to the G-line from turbine pad E-13 and moving rocks from digging culverts along the west side of the substation. Bulldozers spread topsoil at turbine pads G-2 and E-8.

Turbine component assembly continued with the setting of base, mid, and top segments at turbine pads B-5 and C-3, installation of nacelle and rotors at turbine pads A-3, C-2, C-4, C-5, D-1 through D-3, and blade assembly at turbine pad C-2. Crane movement occurred between turbine pads D-2 and D-1. Turbine pad reclamation was observed at turbine pad E-11.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities for construction activities including grading in accordance with MM 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 and excavation in accordance with MM BIO-1c. ECMs observed construction crews complying with the 10 miles per hour night speed limit and 15 miles per hour daytime 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 11/20/2017, an ECM observed replanting of the native Cholla cactus plants along the G-line access road between turbine pads G-14 and G-15 in accordance with the Habitat Restoration Plan and MM BIO-1d. Ongoing habitat restoration of native Cholla cactus plants was observed the following day.

On 11/20/2017 during an all hands tailboard meeting, the designated biologist reiterated to crews that trash found on the project site is everyone's responsibility and noted areas where trash had been accumulating and collected by their monitors. The designated biologist also mentioned to the construction team to be aware of wildlife including rattlesnakes that could potentially be out because of the cool, yet sunny environment.

The Fire Marshall on site noted that NOAA issued a La Nina watch for Southern California and to expect dry and warm weather. The construction crews were reminded that the project site is a no smoking site and to make sure water trucks were nearby when conducting rock management activities in accordance with MM FF-1.

On 11/24/2017, an ECM noted that trash receptacles were covered at the south lay down yard to minimize wildlife attractants in accordance with MM BIO-7a.

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 11/21/2017, an ECM observed a turbine blade at turbine pad D-2 within an area that was purposefully extended beyond the previous limits of disturbance as part of Variance Request 009. Variance Request 009 was approved in May 2017 to include approximately 6.02 acres of temporary disturbance needed for turbine installation. The turbine blade remained within the disturbance limits approved as part of Variance Request 009.

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

During this reporting period, ECMs observed installation of straw wattles at turbine pads E-10, F-3, and along the slope across from the entrance to the 80-acre laydown yard per the site specific SWPPP. ECMs observed traffic flaggers notifying motorists of temporary closures while a skid steer placed riprap along McCain Valley Road, in accordance with the site specific SWPPP and project grading plans.

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.

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. This includes 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 compliance issues regarding the storage of hazardous chemicals or waste management. On 11/21/2017, during an all hands tailboard meeting, the designated biologist discussed the importance of cleaning stained soil promptly as it could negatively affect surrounding wildlife.

Traffic Control Plan Implementation (MM TRA-1)

During this reporting period, speed limit signs were clearly posted along McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Rock lining ditches and placing riprap along McCain Valley Road,
- Working on road shoulders and motor grader spreading gravel along Rough Acres Ranch Road,
- Road maintenance along McCain Valley Road,
- Road maintenance and shoulder work at E, J, and H-lines,
- Restoration/reconstruction of pre-disturbed areas at tower pads B-1, E-13, E-8, and E-5,
- Escorting of crane on McCain Valley Road near turbine pad D-1,
- Setting base and mid segments at turbine pad B-5,
- Setting top segment at turbine pad C-3,
- Road maintenance along easternmost segment of connector road,
- Assembling and lifting rotors at A-3 and C-3, and
- Trenching and backfilling at MET Tower in vicinity of E-line access 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 	

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 a biologist at turbine pad C-2 conducting spot checks of blade assembly, in accordance with MM BIO-1c.



Photo 2: ECMs observed traffic flaggers notifying motorists of temporary closures while a skid steer placed riprap along McCain Valley Road, in accordance with the site specific SWPPP.



Photo 3: ECMs observed ongoing habitat restoration using native Cholla cactus plants per the Habitat Restoration Plan, in accordance with MM BIO-1d.



Photo 4: Light plants at turbine pad B-5 were positioned appropriately to minimize lighting in adjacent native habitats and the nighttime sky in accordance with MM BIO-7c, APM BIO-15, and MM VIS-3b.

INTENTIONALLY LEFT BLANK