



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 11.27.17 through 12.03.17

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 11.27.17 through 12.03.17.

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

Road maintenance activities included grading along McCain Valley Road, Rough Acres Ranch Road, and the A and G-line access roads. Re-contouring of soils occurred at turbine pads E-2, E-3, and Laydown Yard 4. Reclaiming of road shoulders was observed on the access road between turbine pads E-1, E-4, E-7 through E-10, F-3, McCain Valley Road, and the access roads to

overhead collection poles 50-60, excluding pole 58. ECMs observed the spreading of topsoil at turbine pads E-2 through E-6, F-1 through F-3, and G-1. A motor grader was observed spreading gravel along Rough Acres Ranch Road, roads AB, AC, and AA, and along the H and J lines. ECMs also observed tower-wiring work at turbine pad C-5.

Erosion control maintenance and repair included reclaiming pull pads and access roads leading to overhead collector poles 40 through 44 and straw wattle installation along Rough Acres Ranch Road. In addition, trenching continued along portions of Rough Acres Ranch Road and soil decompaction occurred at turbine pad E-1. Compaction occurred at a utility box along McCain Valley Road north of the G-line access road along Lark Canyon.

ECMs observed crane breakdown at turbine pad B-3 and B-4 and rotor installation along the A-line.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including wiring, grading, and trenching in accordance with MM CUL-1d and the approved Tribal Participation Plan.

Biological Resources

Biological monitors were present to monitor ground disturbing activities including grading, trenching for riprap installation, and wire/rope pulling activities in accordance with MM BIO-1c.

On 11/30/2017, an ECM reminded the designated biologist that berms and other areas of stockpiled topsoil that have been inactive for over two weeks requires biological monitoring when it is being moved to reduce potential impacts to biological resources, in accordance with MM BIO-1c.

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)

All observed activities were being conducted within clearly delineated work limits in accordance with MM BIO-1a. During this reporting period, the protocols for Variance Request 006 were implemented on three occasions. For each of these occasions' biological, archaeological, and third party ECMs were present to observe the activity and record the amount of disturbance outside of the approved disturbance limits. Each of these occasions is summarized below:

On 11/27/2017, the protocols of Variance Request 006 were implemented to allow for excavations associated with a culvert along McCain Valley Road near overhead collector pole 58, outside of the staked limits of disturbance. The total impact outside the limits of disturbance was estimated to be 24 square feet. No sensitive resources were affected.

On 11/28/17, the protocols of Variance Request 006 were implemented to account for potential disturbance outside of the limits of disturbance during access road shoulder reclamation that occurred between turbine pads E-4 and F-3 and E-2 and E-4. Minimal disturbance occurred outside of the limits of disturbance when the excavator bucket extended beyond the disturbance limits during reclamation activities. No sensitive resources were affected.

On 11/30/2017, the protocols of Variance Request 006 were implemented to excavate a culvert along the F-line. The total impact outside of the limits of disturbance was estimated to be 280 square feet. No sensitive resources were affected.

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

During this reporting period, ECMs observed erosion control maintenance crews digging trenches and installing straw wattles along Rough Acres Ranch Road, in accordance with the project specific SWPPP and MM HYD-1.

On 11/29/2017, a State Water Resources Control Board (SWRCB) representative visited the project site to tour the area and discuss project drainage and BMPs. The SWRCB, representatives from Tule Wind LLC, and ECMs inspected slope grade and temporary straw wattle implementation on turbine pad H-1 as well as other locations adjacent to the staked limits of disturbance.

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

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

On 11/30/17, an ECM contacted the designated biologist regarding dust observed along the B-line. The designated biologist contacted the construction supervisor to mobilize additional water trucks in accordance with MM AQ-1.

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.

On 12/02/2017, an ECM attended a morning tailboard meeting where fire personnel were in attendance to discuss the anticipated high winds in relationship to project fire risks.

Hazardous Materials Management Plan (MM HAZ-1A)

On 11/27/2017, a bulldozer was observed re-contouring the workspace at turbine pad E-2. The bulldozer operated only for a short period of time before the operator noticed a potential leak. Upon inspection, the operator found a hose that appeared to have been cut. There was no fluid observed on the ground surface. The operator shut down the bulldozer and staged it over a drip pan until a mechanic could arrive to repair the bulldozer in accordance with MM HAZ-5a.

On 11/30/17, an ECM observed stained soil under a crane at turbine pad B-4. The ECM notified the foreman of the spill and the foreman indicated that the spill clean-up crew was on their way to clean up the spill in accordance with MM HAZ-5a. An ECM checked the spill the following day and observed that the affected areas had been appropriately cleaned.

On 12/02/2017, an ECM observed stained soil at turbine pads A-3, C-4, C-5, and C-6. The ECM contacted the designated biologist. These areas of stained soil were not cleaned up at the end of the day. An ECM is anticipated to follow-up on this issue on Monday, 12/04/17, during the following reporting period.

Traffic Control Plan Implementation (MM TRA-1)

Throughout this reporting period, ECMs observed traffic control signs being installed before construction work along McCain Valley Road in accordance with MM TRA-1.

On 11/27/2017, ECMs observed that flaggers were present to notify motorists of a temporary road blockage in accordance with MM TRA-1.

On 11/28/2017, an ECM notified the designated biologist that the haul trucks on the F-string appeared to be travelling at a speed in excess of the project speed limit of 15 miles per hour. The designated biologist was contacted and stated that he would address the issue. Shortly after this conversation, the haul trucks were observed travelling at or below the project speed limit of 15 miles per hour.

On 11/30/2017, an ECM observed a construction related truck and crane haul semi-truck exceeding the project speed limit. ECMs notified the designated biologist. All project related vehicles were later observed abiding by the project speed limit per MM BIO-7b.

Construction Activities Schedule:

- Grading along McCain Valley Road,
- Rotor installation along A-line,
- Road maintenance on McCain Valley Road,
- BMP installation along McCain Valley Road,
- Shoulder reclamation on access road between turbines E-4 and F-3,
- Re-contouring work space at turbine pad E-3,
- Crane disassembly at B-3 and B-4,
- Culvert excavation along McCain Valley Road at H-string,
- Reclaiming pull pads and driveways at overhead collector poles 42, 43, 44,
- Spreading of topsoil at E-2 and E-3, F-1 through F-3,
- Reclaiming slopes at turbine pad E-1,
- Installation of rock line dams along McCain Valley Road north of Lark Canyon Campground,
- Installation of rolling dips in roads on G and H lines, and
- Placing boulders at turbine pads G-1 and G-3.

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: Full-time biological and archaeological monitors were present during culvert excavation on McCain Valley Road in accordance with MM BIO-1c and MM CUL-1d.



Photo 2: Traffic control signs are installed along McCain Valley Road prior to construction activities taking place in accordance with MM TRA-1.



Photo 3: A water tender was observed working alongside construction equipment at overhead collection pole 43 in accordance with the Dust Control Plan and MM AQ-1.



Photo 4: A SWRCB representative and representatives from Tule Wind LLC are observed inspecting slope grade and temporary straw wattle installation at turbine pad H-1 per the project specific SWPPP.

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