

2017 QUARTERLY COMPLIANCE REPORT

Quarter No. I

January 2017 - March 2017

Tule Wind Energy Project

Prepared for:

U.S. Department of the Interior

Bureau of Land Management

El Centro Field Office

1661 South 4th Street

El Centro, California 92243

www.TuleECCMP.com



Prepared by:

DUDEK

605 Third Street

Encinitas, California 92024

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
1 INTRODUCTION.....	1
2 NOTICE TO PROCEED	3
3 CONSTRUCTION OVERVIEW	5
4 MITIGATION MONITORING	7
5 PROJECT INCIDENTS AND CORRECTIVE ACTIONS.....	13
6 VARIANCE REQUESTS.....	19

APPENDICES

A	BLM Authorized Officer Weekly Reports January 2017 February 2017 March 2017
B	Bureau of Land Management Notice of Temporary Suspension
C	Bureau of Land Management Notice to Proceed

TABLES

1	Notice to Proceed.....	3
2	Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016	13
3	Variance Requests.....	19

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

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2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

1 INTRODUCTION

The following Quarterly Construction Status and Compliance Report (Report) provides a summary of construction activities and compliance monitoring during the period of January 1, 2017 through March 31, 2017 for the Tule Wind Energy Project (Tule Wind). This Report is being provided in accordance with Section 5.3 of the Tule Wind Environmental Compliance Monitoring Plan (ECMP).

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 ECMP to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP quarterly report provides a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); and the compliance status of mitigation measures required by the ECMP and Limited Notice to Proceed (LNTP) -2, and Notice to Proceed (NTP) 3, 4, and 5.

The following quarterly report covers construction activities for the reporting period of January 1, 2017 through March 31, 2017. For more details about the specific construction activities that occurred during the reporting period, please see Appendix A, BLM Authorized Officer Weekly Report.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

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2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

2 NOTICE TO PROCEED

Table 1, Notice to Proceed includes a summary of the construction activities the BLM has authorized Tule Wind LLC to perform along with the date authorization was provided.

Table 1
Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 - 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 - 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 - 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 - 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

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 1
Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
5	02.10.17	Balance of plant construction activities including: • 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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

3 CONSTRUCTION OVERVIEW

LNTP-2

On October 12, 2016, the BLM issued LNTP-2 to Tule Wind LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas (ESA), weed removal, cacti salvage, and truck and ATV use of BLM access routes.

During this reporting period the staking of ESAs, weed removal, and disturbance limit staking continued. Cacti salvage was completed on November 30, 2016. Salvaged cacti will continue to be monitored during this reporting period. At the conclusion of construction activities, the salvaged cacti will be replanted to best represent pre-disturbance distribution in accordance with section 5.2.2.1 of the Habitat Restoration Plan (HRP).

NTPs- 3 and 4

On November 18, 2016 the BLM issued NTPs 3 and 4 to Tule Wind LLC authorizing construction activities including:

- NTP-3: Four 10,000-gallon, concrete, open-topped water tanks in accordance with MM-FF-1 and ROW grant stipulation 106.
- NTP-4: Clearing and grading, vegetation clearing, grading work and blasting associated with the access roads, construction of equipment staging and laydown yard areas, and foundation excavation and blasting.

Construction activities associated with NTPs 3 and 4 continued during this reporting period. Construction activities included grading activities along McCain Valley Road, the turbine string access roads, and turbine pads, relocation and blasting of boulders, and turbine foundation excavations were monitored by ECMs

NTP-5

On February 10, 2017 the BLM issued NTP 5 permitting balance of plant construction activities. During this reporting period, Tule Wind LLC began foundation drilling and blasting, rebar installation at turbine pad sites, turbine foundation backfill, and excavation of footings for the overhead transmission poles.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

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2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

4 MITIGATION MONITORING

A summary of the mitigation measures implemented in association with LTNP-2 and NTPs 3 and 4 are summarized below along with minor issues that were identified and addressed by Tule Wind LLC:

Biological Resource Monitoring (MM-BIO-1C)

Tule Wind LLC has contracted with a biological consulting firm, ICF, approved by the BLM to complete day-to-day biological and habitat restoration monitoring in accordance with the ECMP and MM-BIO-1C.

Biological and habitat restoration monitors were on-site during this reporting period during brush removal, topsoil removal, clearing and grading activities, and excavations. Biological and habitat restoration monitors inspected initial removal of soil and areas of excavation for signs of potential biological resources. Biological monitors conducted daily biological sweeps and roving monitoring prior to construction activities proceeding.

Nesting bird season began on February 1, 2017. In accordance with MM-BIO-7J and the Nesting Bird Management, Monitoring, and Reporting Plan, ICF biological monitors conducted nesting bird surveys and implemented appropriate avoidance measures including the establishment of ESAs for identified nesting birds. Nesting birds and their associated ESAs were monitored throughout this reporting period.

Archaeological Resource Monitoring (MM-CUL-1D)

Tule Wind LLC has contracted with an archaeological consulting firm, ASM, approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECMP, the Management Plan for Archaeological Resources, the Memorandum of Agreement, and the Tribal Participation Plan for the Tule Wind Project. Archaeological monitors along with Native American monitors staked ESA and installed ESA signage and were present to monitor ground disturbing activities associated with clearing and grading and turbine pad and transmission tower excavations.

Apart from the issues discussed in Table 2, archaeological and Native American monitors were present during all ground disturbing activities. In addition, archaeological and Native American monitors checked cultural ESAs on at least a weekly basis to ensure that the ESAs were maintained in good condition in accordance with APM-TULE-CUL-1. Archaeological and Native American monitors also recorded unanticipated discoveries in accordance with MM-CUL-1e.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Dust Control Plan Implementation (MM-AQ-1)

ECMs observed dust control best management practices being implemented including limited vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and applying water to active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan (prepared in accordance with MM-AQ-1).

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM-BIO-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment including 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels, and vehicles parked in areas with no vegetation. Fire patrols occurred on a regular basis one hour after the end of daily construction.

As a part of the clearing activities that occurred along McCain Valley Road, previously cut vegetation was chipped for fuels management in accordance with the Fire Prevention/Protection Plan.

On February 10, 2017, a third party ECM observed a construction crew member refueling a skid steer without shutting the equipment engine off prior to fueling. ECMs discussed this issue with the construction crew and reminded all construction crews about shutting off equipment before fueling at the daily compliance meeting. No similar issues occurred during this reporting period.

Hazardous Materials Management Plan; Waste Management Plan; and Spill Prevention, Control, and Countermeasure Plan Implementation (MM-HAZ-1a; MM-HAZ-1c; MM-HAZ-5a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the secondary containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a.

On January 6, January 27, and February 27, 2017 portable sanitation facilities, which were previously secured, were discovered overturned. ECMs observed fluid discharge from each of the overturned facilities. The stained soil was contained and removed from the site in accordance with Section 8.3 of the Hazardous Materials Management Plan. The facilities were righted and secured. During this reporting period, Tule Wind LLC began securing portable sanitation facilities with wire to more securely affix the facilities to the ground surface and prevent theft or vandalism.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Limits of Disturbance (MM-BIO-1A)

ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period in accordance with MM-BIO-1A.

In accordance with the February 1, 2017 NTP to lift the Temporary Suspension of Construction Activities (please see Section 5, below), bulldozers drove along the outside edge of the disturbance limits ahead of grubbing activities to help make the limit of disturbance stakes more easily visible for the masticator operators. ECMs observed spotters walking ahead of the bulldozers to assist operators in viewing the disturbance limit stakes.

On Friday, February 3, 2017 an ECM observed a bulldozer operator stopping the equipment and walking ahead to check stake locations prior to proceeding in areas where vegetation was thick. While the operator was following the terms and conditions of the NTP, the ECM reminded Tule Wind LLC that a spotter is required to help locate stakes during initial clearing adjacent to the limits of disturbance. Tule Wind LLC mentioned that there was a spotter present, but that the spotter got too far ahead of the bulldozer requiring the operator to get out of the equipment. Tule Wind LLC indicated that they will continue to work with the equipment operators and spotters to provide spotters at a safe distance ahead of the equipment, but close enough to allow for adequate communication both via radios and by visual hand signals.

On March 13, 2017, two incidents occurred where work activities occurred outside of the approved limits of disturbance. Each of the incidents is described below:

- During grading activities, a blade hit a rock located below the ground surface along the access road north of turbine pad G8. When the blade hit the rock, it lost balance and travelled outside of the approved limits of disturbance while trying to regain balance. An approximately 40-foot by 10-foot area was disturbed outside of the approved limits of disturbance. Per ECM's conversations with the equipment operator, if the equipment had not travelled outside of the approved limits of disturbance to regain balance, the blade could have tipped over.
- A D8 bulldozer slipped down the slope of turbine pad G6 during grading activities. The bulldozer did not cross the limits of disturbance, but dirt extending approximately 100 square feet was pushed outside of the limits of disturbance.

In each case, archaeological and Native American monitors were present at the time of the incident and the area had been swept by a biological monitor. The areas of disturbance were inspected and it was determined that no damage to sensitive environmental resources occurred.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Stormwater Pollution Prevention Plan (SWPPP) (MM-HYD-1)

Erosion and sediment control devices including straw wattles and silt fencing were observed to be properly installed by ECMs. Erosion and sediment control devices were continually installed during this reporting period per the specifications included in the grading plan and in accordance with the SWPPP.

Due to the above average rainfall, numerous erosion and sediment control devices were damaged or in need of maintenance and repair. In several cases, the erosion and sediment control devices were laden with sediment and in other cases were ineffective as water was flowing beneath the devices rather than through the device. Each of these issues were documented and reported to Tule Wind LLC. Tule Wind LLC has assigned a dedicated crew to address repair, maintenance, and installation of erosion and sediment control devices.

On February 1, 2017, Tule Wind LLC hosted a meeting to discuss BMP installation and maintenance across the project site. The purpose of this meeting was to discuss BMP installation and maintenance with the Qualified SWPPP Practitioner/Developer and ways that the BMPs can be improved to further prevent off-site stormwater discharge and reduce exceedances in terms of pH and turbidity.

During the week of March 6th the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board instructed Tule Wind LLC to discontinue the use of all plastic encased straw wattles. Tule Wind LLC has ordered biodegradable weed free straw wattles that are being used to replace the existing plastic encased straw wattles that have already been installed. The removed plastic encased wattles are being hauled off site for disposal. The biodegradable straw wattles will be used to avoid wildlife from becoming entrapped in the plastic casing and to prevent plastic debris at the conclusion of construction activities.

Traffic Control Plan (MM-TRA-1)

Construction crews continued to install traffic control signage along McCain Valley Road in accordance with MM-TRA-1 and the approved Traffic Control Plan. Traffic flaggers were appropriately used during times when there were obstructions in the road or road closures due to construction activities.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Blasting Plan Implementation (MM-NOI-1; MM-HAZ-4b)

Rock blasting was performed in accordance with the approved Blasting Plan and MM-NOI-1 and HAZ-4b. The pre-blast warning and time signals were also observed to be properly implemented in accordance with the Blasting Plan

On February 17, 2017, an ECM monitored the seismic and acoustic activity during the blasting activities occurring along the H-String to ensure compliance with the allowable thresholds in the Blasting Plan.

Waste Management

On Friday, January 27, 2017 the portable sanitation facility at the H-String laydown area had toilet paper blow into nearby vegetation during a period of high winds (gusts over 40 mph). ECMs notified the designated biologist and environmental lead. Biological monitors picked up all litter and performed a sweep around the general area to ensure that all pieces of litter were collected and properly disposed of in accordance with MM-BIO-7d.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

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2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

5 PROJECT INCIDENTS AND CORRECTIVE ACTIONS

In accordance with Section 5.2 of the ECMP, compliance levels are assigned to each separate activity monitored. The compliance levels include acceptable, problem area, noncompliance, and serious violation. During this reporting period, nine noncompliance events were identified along with two serious violations. Please note that these noncompliance events and serious violations are in addition to the issue discussed in Section 4, above. Due to the minimal potential for negative impacts to environmental resources as a result of the issues discussed in Section 4, these issues were recorded and tracked until adequately addressed under an acceptable compliance level in the daily and weekly compliance reports. Each of the noncompliance events, serious violations, and corrective actions are summarized in Table 2.

On Friday, January 20, 2017 the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. The Notice of Temporary Suspension of Construction Activities was issued as a safeguard to ensure that the violations in connection with ground disturbing activities ceases. No construction activities were permitted apart from the maintenance and installation of erosion and sediment control devices, cacti planting, and examining the project site to determine ways to address the compliance issues described in the Notice of Temporary Suspension of Construction Activities letter. In order to lift the order and resume construction activities, Tule Wind LLC was required to file a written request. A copy of the Notice of Temporary Suspension of Construction Activities has been included as Appendix B.

On February 1, 2017 the BLM issued a Notice to Proceed to lift the Temporary Suspension of Construction Activities. The BLM determined that the corrective actions identified by Tule Wind LLC in a letter dated January 31, 2017 provide adequate assurances that similar issues/concerns would not likely result in the future. The full text of the NTP authorizing the resumption of construction activities has been included as Appendix C.

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
<i>October 2016</i>			
There were no problem areas, noncompliance, or serious violations that occurred in October 2016.			
<i>November 2016</i>			
There were no problem areas, noncompliance, or serious violations that occurred in November 2016.			
<i>December 2016</i>			
01	12.08.16	At approximately 1:30 pm, on 12.08.16 a biological monitor notified BLM's third-party ECM of a potential problem area. BLM's third-party ECM	Tule Wind LLC, the construction contractor, and ICF's restoration specialist restored the area of disturbance and notified construction

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		evaluated the problem area and observed a boulder that was pushed past the staked disturbance limits on the west side of the access road that leads to the 80-acre parcel, on lands administered by the BLM. The boulder was pushed approximately 15 feet past the staked limits of disturbance causing approximately 150 square feet of disturbance. BLM's third-party ECM and archaeological monitor inspected the area of disturbance and found no impacts to sensitive biological or cultural resources. In accordance with Section 5.2 of the ECMP, this event is being classified as a "Problem Area" or "an activity that the compliance monitors determine is unintentional and an isolated departure from the project specifications, with no damage to resources".	personnel that construction activities must remain within the approved limits of disturbance. The Clearing and Grading Superintendent was assigned to regularly check in with the construction team to discuss areas which are problematic for large boulders.
02	12.16.17	At approximately 8:25 am, on Friday, December 16, 2016 the BLM's third-party ECM observed a bulldozer with a blade attachment working on the road between structures G6 and G7 without biological or cultural monitors present. The ECM contacted the operator to ask if there were cultural or biological monitors present. The operator responded that he was touching up an existing, previously disturbed roadway and did not think that monitors were required. The ECM asked the operator to stop all activities until the appropriate monitors could mobilize to the site of disturbance. The operator complied with the ECM's request. The ECM estimated that the bulldozer operated for approximately five minutes without monitors present. The ECM along with the third-party archaeological monitor inspected the area and found no impacts to sensitive biological or cultural resources. As the operator mentioned, the area where ground disturbing activities were occurring was previously disturbed and unbeknownst to the ECM, previously surveyed by a biological monitor. However, it is unknown whether or not the blade exceeded the depth that was previously disturbed.	As a result of this problem area, Tule Wind LLC and the BLM drafted additional language to help clarify MM-CUL-1D and MM-BIO-1C. In particular, when biological and cultural monitors are anticipated to be on-site and what activities require biological and/or cultural monitoring. The updated monitoring protocols were adopted by the BLM and Tule Wind LLC on December 29, 2016.
<i>January 2017</i>			
03	1.11.17	At approximately 11:00 am, on Wednesday, 1.11.17 the BLM's third party cultural monitor notified BLM's third party compliance monitor of a potential compliance issue where a skid steer with a mulching attachment had operated past the	Tule Wind LLC shut down the site to discuss this instance and to assess the number of offset stakes placed on site with the goal of providing assurances that this has not happened elsewhere on the site. Because all

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		staked limits of disturbance along F string on lands administered by the BLM. Vegetation was mulched past the limits of disturbance by approximately 20 feet impacting approximately 230 square feet of vegetation. The operator cleared up to what he thought was the staked disturbance limit, but did not recognize that one of the stakes was an "offset" stake that was intentionally placed off the ROW. The BLM's third party compliance cultural and compliance monitors surveyed the area outside the disturbance limits and found no impacts to biological or cultural resources.	stakes have GPS locations recorded in the field, the contractor quickly assessed that a total of 45 offset stakes had been placed throughout the project. A new protocol was put in place requiring removing offset stakes and clarifying the limits of disturbance when a rock or other immobile object blocked appropriate stake placement. Specifically, these new protocols consist of staking on either side of the object at the clearing limits.
04	1.12.17	On Thursday, 1.12.17, the BLM's third party cultural monitor observed a blade ripping and grading the eastern portion of the connector road in a previously disturbed area without cultural monitors present. The area where the disturbance occurred is located on land administered by San Diego County. The third party cultural monitor notified the lead archaeologist who sent an archaeological and Native American monitor to cover the activity. While the disturbance occurred in a previously disturbed area, the area had not been cleared by the BLM. No resources were determined to be impacted as a result of this event.	Tule Wind LLC discussed this issue with the BLM and the management lead for the cultural monitoring team. The monitor was removed from the site the next day and retrained. Additionally, monitoring crews were increased to include three "floater" roving monitors per day to avoid situational dilemmas of a monitor choosing what activity to monitor and the on-site contractor noted that no activities would occur without a monitor going forward.
05	1.16.17	On Monday, 1.16.17, the BLM's third party cultural monitor observed a blade grading the G string access road between structures G7 and G6 in a previously disturbed area without cultural monitors present. The third party cultural monitor notified the lead archaeologist who sent an archaeological and Native American monitor to cover the activity. No resources were determined to be impacted as a result of this event. A serious violation was issued by the BLM for this incident due to a monitor not being present in an area that required monitoring per MM-CUL-1D. Tule Wind LLC is in the process of preparing a corrective actions memorandum to provide BLM with a process that will be implemented moving forward to minimize the potential for a similar incident to not occur in the future.	Tule Wind LLC shut down the site and the construction team began to brainstorm options to alleviate any confusion related to the need for monitors for previously disturbed areas.
06	1.18.17	On Wednesday, 1.18.17 the BLM's third party ECM observed a compliance issue where vegetation had been grubbed within the proposed disturbance limits of Variance Request 003, which had not yet	Tule Wind LLC shut down the site to assess this incident. At the time, the only remaining variance staking in the field was on the G-line associated with the last area in Variance

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		been approved. Upon inspection, the ECM and Designated Biologist observed that the grubbing had occurred within the staked limits; however the stakes were placed at the limits designated in Variance 003, which is pending BLM review and approval. The area impacted outside of the currently approved disturbance limits was approximately 11,700 square feet. The BLM's third party cultural and environmental compliance monitors surveyed the area outside the currently approved disturbance limits and found no impacts to biological or cultural resources. A serious violation was issued by the BLM for this incident due to work occurring outside of the approved work limits per MM-BIO-1A.	Request 003. To avoid risk of grading in these areas, the stakes were pulled from the field and res-established with the approval of Variance Request 003. To avoid confusion with future variances, any design layout changes will be provided to monitors in the form of shapefiles of cultural and biological monitoring teams to conduct appropriate surveys using handheld GPS equipment.
N/A	1.20.17	Notice of Temporary Suspension of Construction Activities.	N/A
<i>February 2017</i>			
N/A	2.1.17	Notice to Proceed to lift the Temporary Suspension of Construction Activities	N/A
07	2.8.17 and 2.9.17	On Wednesday, February 8 and Thursday, February 9, 2017 two issues arose when there was ground disturbance occurred beyond the approved limits of disturbance. Each of these observations were made by cultural monitors monitoring ground disturbing activities on land administered by the County of San Diego, in accordance with Section 106 of the National Historic Preservation Act.	The corrective actions include installation of rope or caution tape at the limit of disturbance prior to any work associated with the overhead transmission and collector lines, ensuring that limit of disturbance stakes are placed a distance that can be easily discerned by equipment operators, and to completely finish staking the limits of disturbance in an area prior to moving to another area on-site.
08	2.9.17	On February 9, 2017, ECMs observed a noncompliance event where an equipment operator caused disturbance beyond the limits of disturbance during grading activities along McCain Valley Road, on lands administered by the BLM. The operator inadvertently pushed soil outside the limits of disturbance at a location where the limits of disturbance jut out towards the center line of the road. One of the limits of disturbance stakes was missing and the operator could not see the stake that was missing. Soil that was in front of the blade was pushed past the limits of disturbance and then pushed back into the limits of disturbance.	As a result of this occurrence, contractors will review the grading plans ahead of time to identify areas of concern prior to grading activities due to irregular (non-linear) staking. The contractor will then have personnel identify these irregular disturbance limit boundaries in the field with GPS. Additional staking will be added or steel posts, with PVC extensions, will be installed where needed to give the operators greater visibility of limit of disturbance markers. In these irregular areas, the grading operators will walk the boundary prior to grading to make sure that they clearly understand the limits of disturbance.
09	2.10.17	On February 10, 2017 ECMs observed a noncompliance event where the construction	Tule Wind LLC has reiterated the message to their construction crews that whenever a

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		contractor graded a portion of the H-String without archaeological and Native American monitors present. The construction contractor was experiencing issues transporting a drill rig needed for rock blasting activities along the H-String. In order to transport the drill rig, the construction contractor proceeded to grade an approximately 15-meter by 40-meter area of the access road without the appropriate archaeological and Native American monitors present. The area of disturbance was inspected by an archaeologist and Native American monitor and it was determined that no sensitive resources were affected.	situation changes that the entire crew gets together and discusses both the job hazard analysis (JHA) and the monitor sign-off sheet. Additionally, the monitor sign-off sheet was updated to include an area for more specific information on what site is being considered for what activity.
10	2.14.17	On February 14, 2017, the third party lead ECM along with a survey and engineering team verified a breach of the approved limits of disturbance along the C-String. During the event, a rubber tracked skid steer travelled approximately seven feet outside the staked limits of disturbance and travelled approximately 35 feet before re-entering the limits. The lead ECM recorded that the skid steer was conducting clearing activities when it travelled along the staking tape that was bowed outside of the limits of disturbance by the wind. The skid steer operator followed the arc of the staking tape rather than travelling in a straight line between the stakes. The limit stakes were spaced approximately 100 feet apart from one another. The lead ECM and an archaeological monitor examined the disturbance area and determined that there were no impacts to sensitive biological or cultural resources. There were no environmentally sensitive areas (ESAs) in the vicinity of the unauthorized disturbance.	Per discussions between the BLM and Tule Wind LLC, to avoid similar events from reoccurring, Tule Wind LLC will be installing staking at a maximum of 25-foot increments. For the areas that have already been staked at 100-foot increments, new stakes would be placed in between the stakes placed at 100 feet. No work is authorized to occur in any area until the additional stakes are placed in the area.
011	2.23.17	On Thursday, February 23, 2017, an excavator was used to remove vegetation along the access road north of turbine G9 without a biological monitor present. Archaeological and Native American monitors were present. The third party ECM stopped the vegetation removal activity after realizing that there was no biological monitor present. The monitor signature log was signed by the biologist after an initial work site sweep was completed, but the only activity listed on the log under the column "Construction Activity" was	The construction foremen, monitors, and Tule Wind LLC are working together to ensure the monitor signature logs accurately and completely identify the work activities occurring at each location in accordance with the February 1, 2017 NTP. This noncompliance was discussed as a topic at the 6:00 am foreman meeting and monitors and foremen discussed how to properly review construction activity for monitor sign-off.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		“subgrade on roads,” which does not require a full-time biological monitor if no vegetation clearing occurs. The crew foreman indicated that the vegetation removal activity was communicated to the biologist, but the Designated Biologist and biological monitor who conducted the morning sweep of the area indicated that they were unaware of vegetation removal. The area where the vegetation was removed was inspected by a biological monitor and it was determined that there was no impact to sensitive environmental resources. There were no ESAs in the vicinity of the disturbance and the activity was allowed to resume once a full-time biological monitor was present.	
012	2.28.17	On Tuesday, February 28, 2017, a third party archaeological monitor observed a D6 Bulldozer grading a pad for a drill rig north of the G6 turbine pad without archaeological or Native American monitors present. The third party monitor stopped the grading activity to ask where the required monitors were. The operator responded that he had thought the monitors were present and pointed out a biological monitor’s truck that was parked approximately 20 meters away. A biological monitor was present; however there were no archaeological or Native American monitors at the location of the activity. The third party monitor notified the Lead Archaeological Monitor who dispatched an available archaeological monitor to the location. Upon inspection of the monitor sign-off form associated with this activity, the construction crew foreman indicated that grading was not included on the monitor sign-off sheet as it was associated with the drilling activity. Archaeological monitors informed the crew foreman that because drilling and grading result in different levels of disturbance they require different levels of monitoring in accordance with MM CUL-1D. The drilling and grading activities should be listed separately on the monitor sign-off sheet. The approximately 300 square meter area of unauthorized disturbance was inspected by an archaeological and Native American monitor and no impacts to cultural resources were identified. There were no ESAs in the vicinity of the	The monitors and the foreman discussed when it was appropriate to start a new activity line on the monitoring log and obtain new signatures. The team also discussed the way the monitors could have been more helpful in discussing what monitoring was needed and why so that a new operator had a full understanding of when the monitor sign-off log would need to be updated with a new line. Additionally, cross training of the cultural and biological leads was suggested as a way to reinforce what monitoring was needed. For example, the full-time biological monitor who was monitoring for Big Horn Sheep 20 yards away may have noticed that the cultural monitor left and said something to the dozer operator.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 2
Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q4 2016

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
		disturbance.	

6 VARIANCE REQUESTS

In accordance with Section 6, Deviations (Variances) and Amendments of the ECMP, during construction, unforeseen or unavoidable site conditions could result in the need for changes from the approved mitigation measures and construction procedures. In addition, the need for extra workspace, or changes to previously approved construction work areas may arise. During this reporting period, seven variance requests were submitted and two variance requests were approved including variance requests 3 and 5. Please note that two variance requests were previously submitted and approved by the BLM in 2012 and 2013 as part of the geotechnical work activities. Each of the variance requests are summarized in Table 3, Variance Requests.

Table 3
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

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Table 3
Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
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.	Pending	Resubmitted on 03.24.17.
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project

Representative Photos



Photo 1: Clearing and grading activities observed within the staked limits of disturbance in accordance with MM BIO-1A. Water trucks in use for dust control in accordance with MM-AQ-1.



Photo 2: Crews installing additional straw wattles along McCain Valley Road in accordance with the SWPPP and MM HYD-1.



Photo 3: On 1.18.17, approximately 11,700 square feet of vegetation was mulched outside of the currently approved limits of disturbance. BLM issued a "Noncompliance" in accordance with Section 5.2 of the ECMP.



Photo 4: ECMs observed containment drip pans under parked equipment to prevent potential leaking equipment from staining soils in accordance with MM HAZ-1A and the Hazardous Materials Management Plan.

2017 Quarterly Compliance Report (Q1) for the Tule Wind Energy Project



Photo 5: Biological monitors were present to observe grubbing activities in accordance with MM BIO-1C. All observed activities occurred within the disturbance limits in accordance with MM BIO-1A. Yellow tape was strung between disturbance limit stakes to increase visibility of limits for masticator operators in accordance with the NTP issued on February 1, 2017.



Photo 6: Traffic control flaggers and signs were present to notify motorists of work areas while crews worked along McCain Valley Road in accordance with the Traffic Control Plan (MM-TRA-1).



Photo 7: Archaeological and Native American monitors were present during grading activities along McCain Valley Road in accordance with MM-CUL-1D.



Photo 8: Fire safety coordinator and required signs were present during Hot Work at turbine pad G12 in accordance with the issued Hot Work Permit and MM-FF-1.

APPENDIX A

BLM Authorized Officer Weekly Reports

January 2017



BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 1.2.17 through 1.8.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3 and 4, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 1.2.17 through 1.8.17.

¹ <http://tulewindeccmp.com/#NTP>

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 and NTPs 3 and 4 as they pertain to current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

Construction Activities

During this reporting period, grading activities occurred along McCain Valley Road and H string access roads, and clearing activities along the G and E string access roads continued in accordance with NTP-4. As a part of the clearing activities that occurred along the G string access roads, boulders were relocated from work areas to a temporary staging area. Survey crews continued to stake the project disturbance limits in accordance with LNTP-2. ECMs also observed the installation, maintenance, and repair of erosion and sediment control devices during this reporting period.

Cultural Resources

Cultural monitors were present to monitor clearing and grading activities along with the installation of erosion and sediment control devices in accordance with mitigation measure CUL-1d.

ECMs checked the cultural ESAs following the recent rain events. No impacts to cultural resources were observed and the ESAs were in good condition.

Biological Resources

Biological monitors were present to monitor clearing and grading activities along with the installation of erosion and sediment control devices in accordance with mitigation measure BIO-1c.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs observed the installation, reinforcement, and repair of erosion and sediment control devices including straw wattles, silt fencing, and sandbags. Traffic along McCain Valley Road has begun to damage sandbags that have been placed as temporary check dams. In addition, multiple straw wattles along McCain Valley Road were damaged due to recent rain events. The damaged sandbags and straw wattles were reported to Tule Wind, LLC. Dedicated construction crews are in the process of repairing, maintaining, and installing erosion and sediment control devices.

Stormwater Pollution Prevention Plan - Communication

As reported in Weekly Report #15 for the period of 12.26.16 through 1.1.17, concerns were documented regarding sediment track-out at the paved portion of McCain Valley Road. In

response to this concern, Tule Wind LLC procured a street sweeper to remove track-out on a daily basis in accordance with Section 7.6 of the SWPPP.

Third-party compliance monitors will continue to monitor for track-out and to ensure that the street sweeper is effective in addressing this concern.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Hazardous Materials Management Plan and Waste Management Plan (MM-HAZ-1a; MM-HAZ-1c)

On Friday, January 6, 2017 a portable sanitation facility, which was previously secured using rope, was discovered overturned on the west side of McCain Valley Road. ECMs observed fluid discharge from the overturned facility. The stained soil was contained and removed from the site in accordance with Section 8.3 of the Hazardous Materials Management Plan. The facility was righted and secured. Tule Wind LLC is working to determine a permanent solution to securing the portable sanitation facilities onsite.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MMBio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment and vehicles parked in areas with no vegetation. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Construction Activities Schedule:

- Continue staking disturbance limits;
- Continue erosion and sediment control device installation and repairs;
- Continue grading, clearing, and grubbing activities along the G and H lines and connector roads;
- Begin building turbine sites and substation pad;
- And build fence at the temporary parking/laydown area.

Potential Delays to the Online Date of the Project

- None.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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

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	11.2.12
2	5.16.13	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	5.20.13
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Clearing and grading activities observed within the staked limits of disturbance in accordance with MM BIO-1A. Water trucks in use for dust control in accordance with MM-AQ-1.



Photo 2: Cultural monitor observing clearing activities in accordance with MM CUL-1D.



Photo 3: Spill from overturned portable sanitation facility cleaned and stained soil removed in accordance with Section 8.3 of the Hazardous Materials Management Plan. Tule Wind LLC is working to determine a permanent solution to securing the portable sanitation facilities onsite.



Photo 4: Crews installing additional straw wattles along McCain Valley Road in accordance with the SWPPP and MM HYD-1.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 1.9.17 through 1.15.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3 and 4, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 1.9.17 through 1.15.17.

¹ <http://tulewindeccmp.com/#NTP>

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 and NTPs 3 and 4 as they pertain to current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

Construction Activities

During this reporting period, grading and topsoil salvage activities occurred along McCain Valley Road and along the H string access roads. Clearing activities along the D through H string access roads continued in accordance with NTP-4. As a part of the clearing activities that occurred along the G and H string access roads, boulders were relocated from work areas to a temporary staging area. ECMs observed the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road and the G string during this reporting period. Rock blasting also occurred in the 80-acre laydown yard located on land within San Diego County and salvaged cacti were temporarily re-planted along the J string.

Cultural Resources

Cultural monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure CUL-1d.

Cultural Resources – Non Compliance

On Thursday, 1.12.17, the BLM's third party cultural monitor observed a blade ripping and grading the eastern portion of the connector road in a previously disturbed area without cultural monitors present. The area where the disturbance occurred is located on land administered by San Diego County. The third party cultural monitor notified the lead archaeologist who sent an archaeological and Native American monitor to cover the activity. While the disturbance occurred in a previously disturbed area, the area had not been cleared by the BLM. No resources were determined to be impacted as a result of this event.

Biological Resources

Biological monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure BIO-1c.

Previously salvaged cacti segments were planted along the J string during this reporting period and are anticipated to be re-planted post-construction in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.

ECMs observed topsoil salvage activities along the H string in accordance with Sections 5.2.2.2 and 5.2.2.3 of the Habitat Restoration Plan.

Limits of Disturbance – Non Compliance

At approximately 11:00 am, on Wednesday, 1.11.17 the BLM's third party cultural monitor notified BLM's third party compliance monitor of a potential compliance issue where a skid steer with a mulching attachment had operated past the staked limits of disturbance along F string on lands administered by the BLM. Vegetation was mulched past the limits of disturbance by approximately 20 feet impacting approximately 230 square feet of vegetation. The operator cleared up to what he thought was the staked disturbance limit, but did not recognize that one of the stakes was an "off-set" stake that was intentionally placed off the ROW.

The BLM's third party compliance cultural and compliance monitors surveyed the area outside the disturbance limits and found no impacts to biological or cultural resources. The BLM is working with Tule Wind LLC to document the non-compliance and to take measures to prevent similar issues from occurring. Staking crews will begin placing "off-set" stakes inside the limits of disturbance to reduce the potential for confusion.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs observed the installation, reinforcement, and repair of erosion and sediment control devices including straw wattles, silt fencing, and sandbags. SWPPP inspections are performed daily during storm events and weekly during clear conditions. SWPPP inspection include photos and GPS coordinates of areas requiring additional or maintenance of existing erosion and sediment control devices.

Due to recent and on-going rain events, numerous erosion and sediment control devices were in need of maintenance and repair. In several cases the erosion and sediment control devices were laden with sediment and in other cases were ineffective as water was flowing beneath the device rather than through the device. Each of these issues were documented and reported to Tule Wind, LLC. Dedicated construction crews are in the process of repairing, maintaining, and installing erosion and sediment control devices.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Traffic Control Plan Implementation (MM TRA-1)

Construction crews continued to install traffic control signage along McCain Valley Road in accordance with MM TRA-1 and the approved Traffic Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MMBio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire

extinguishers, 5-gallon backpack pumps, and shovels. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Blasting Plan Implementation (MM NOI-1; MM HAZ-4b)

Rock blasting was performed in accordance with the approved Blasting Plan and MM NOI-1 and HAZ-4b.

Construction Activities Schedule:

- Continue staking disturbance limits;
- Continue erosion and sediment control device installation and repairs;
- Continue grading, clearing, and grubbing activities along the D through J lines and connector roads;
- Continue building turbine sites and substation pad;
- And continue planting salvaged cacti at the J line salvage area.

Potential Delays to the Online Date of the Project

- None.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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

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	11.2.12
2	5.16.13	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	5.20.13
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Previously salvaged cacti are being temporarily planted along the J string. The cacti are anticipated to be re-planted post-construction in accordance with Section 5.2.2.1 of the Habitat Restoration Plan.



Photo 2: On 1.11.17, approximately 230 square feet of vegetation was mulched outside of the limits of disturbance. This event is being classified as a "Non Compliance" in accordance with Section 5.2 of the ECCMP.



Photo 3: Stop sign installed along the H string access road AA in accordance with the approved Traffic Control Plan and MM TRA-1.



Photo 4: Crews installing additional straw wattles and maintaining existing erosion and sediment control devices along McCain Valley Road in accordance with the SWPPP and MM HYD-1. Cultural monitors were present to observe ground disturbance associated with the installation and maintenance of sediment control devices in accordance with MM CUL-1D.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 1.16.17 through 1.22.17

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.

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On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

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¹ <http://tulewindeccmp.com/#NTP>

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 and NTPs 3 and 4 as they pertain to current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following compliance activities were observed by third party ECMs on site during preconstruction activities:

Construction Activities

During this reporting period, grading and topsoil salvage activities occurred at the temporary staging area along the E string, at the G12 and G5 turbine pads, and at a temporary water tank pad site along McCain Valley Road. Clearing activities along the D through F string access roads continued in accordance with NTP-4. As a part of the clearing activities that occurred along the connector and the G string access roads, boulders were relocated from work areas to a temporary staging area on the H string access road AA. Survey crews also continued staking the limits of disturbance along the south end of the G string.

ECMs observed the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road; the G, H, and J strings; and at the turbine pad E6 during this reporting period. An additional temporary fire tank was installed along McCain Valley Road and the concrete pads for several of the permanent water tanks along McCain Valley Road were poured.

Cultural Resources

Cultural monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure CUL-1d. Monitors also accompanied survey crews while staking disturbance limits to ensure cultural resources are avoided in accordance with MM CUL-1b.

Cultural Resources – Non Compliance

On Monday, 1.16.17, the BLM's third party cultural monitor observed a blade grading the G string access road between structures G7 and G6 in a previously disturbed area without cultural monitors present. The third party cultural monitor notified the lead archaeologist who sent an archaeological and Native American monitor to cover the activity. No resources were determined to be impacted as a result of this event. A non-compliance was issued by the BLM for this incident due to a monitor not being present in an area that required monitoring per MM-CUL-1D. Tule Wind LLC is in the process of preparing a corrective actions memorandum to provide BLM with a process that will be implemented moving forward to minimize the potential for a similar incident to not occur in the future.

Biological Resources

Biological monitors were present to monitor clearing, grading, and topsoil salvage activities along with the installation of erosion and sediment control devices in accordance with mitigation measure BIO-1c.

Limits of Disturbance – Non Compliance

On Wednesday, 1.18.17 the BLM's third party ECM observed a compliance issue where vegetation had been grubbed within the proposed disturbance limits of Variance Request 003, which had not yet been approved. Upon inspection, the ECM and Designated Biologist observed that the grubbing had occurred within the staked limits; however the stakes were placed at the limits designated in Variance 003, which is pending BLM review and approval. The area impacted outside of the currently approved disturbance limits was approximately 11,700 square feet. The BLM's third party cultural and environmental compliance monitors surveyed the area outside the currently approved disturbance limits and found no impacts to biological or cultural resources.

A non-compliance was issued by the BLM for this incident due to work occurring outside of the approved work limits per MM-BIO-1A. Tule Wind LLC is in the process of preparing a corrective actions memorandum to provide BLM with a process that will be implemented moving forward to minimize the potential for a similar incident to not occur in the future.

The BLM is working with Tule Wind LLC to document the non-compliance and to take measures to prevent similar issues from occurring.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs observed the installation, reinforcement, and repair of erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts. During recent rain events that occurred during this reporting period, numerous erosion and sediment control devices were in need of maintenance repair. In several cases the erosion and sediment control devices were laden with sediment and in other cases were ineffective as water was flowing beneath the device rather than through the device. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews on-site on a daily basis repairing, maintaining, and installing erosion and sediment control devices in accordance with MM-HYD-1 and the project specific SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

ECMs checked track-out at the paved portion of McCain Valley Road and observed minimal track-out in accordance with MM AQ-1.

Traffic Control Plan Implementation (MM TRA-1)

ECMs observed the concrete trucks pouring pads along McCain Valley Road using hazard lights to identify the temporary road blockage in accordance with MM TRA-1.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

As a part of the clearing activities that occurred along McCain Valley Road, previously cut vegetation was chipped for fuels management in accordance with the Fire Prevention/Protection Plan.

Hazardous Materials Management Plan (MM-HAZ-1a)

ECMs confirmed that all new portable restroom facilities have been secured with wire in accordance with ROW Grant Stipulation 78 and the Hazardous Materials Management Plan. It is anticipated that the new securing protocol will reduce the possibility of additional portable facilities tipping over as reported in previous weekly reports, most recently Weekly Report 16 from the reporting period of January 2 through January 8, 2017.

Notice of Temporary Suspension of Construction Activities

On Friday, 1.20.17 the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. Since construction began on the Tule Wind project on December 6, 2016 there have been six confirmed violations of terms and conditions of the ROW grant. As a safeguard to ensure that the violations in connection with ground disturbing activities ceases, no construction activities are permitted apart from the maintenance and installation of erosion and sediment control devices, cacti planting, and examining the project site to determine ways to address the compliance issues described in the Notice of Temporary Suspension of Construction Activities letter. Tule Wind, LLC may file a written request for permission to resume construction activities with supporting facts and reasons as to why the BLM should lift the order.

A copy of the Notice of Temporary Suspension of Construction Activities letter has been posted onto the Tule Wind ECCMP website under the Construction Information Updates section.

Construction Activities Schedule:

Due to the Notice of Temporary Suspension of Construction Activities, limited construction activities have been allowed to continue including:

- Erosion and sediment control device installation and repairs
- And planting salvaged cacti at the temporary staging area at structure E12.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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

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	11.2.12
2	5.16.13	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	5.20.13
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: On 1.18.17, approximately 11,700 square feet of vegetation was mulched outside of the currently approved limits of disturbance. BLM issued a “Non Compliance” in accordance with Section 5.2 of the ECCMP.



Photo 2: On 1.16.17, a BLM third party cultural monitor observed a blade operating in a previously disturbed area along the G string access road between structures G7 and G6 without a cultural monitor present. BLM issued a “Non Compliance” in accordance with Section 5.2 of the ECCMP.



Photo 3: Cultural monitors were observed monitoring vegetation removal and grading activities along McCain Valley Road in accordance with MM CUL-1D.



Photo 4: Water trucks were observed working alongside grubbing machines in accordance with the approved Fire Prevention/Protection Plan (MMs FF-1 and BIO-1F).

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 1.23.17 through 1.29.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3 and 4, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 1.23.17 through 1.29.17.

¹ <http://tulewindeccmp.com/#NTP>

Notice of Temporary Suspension of Construction Activities

On Friday, 1.20.17 the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. Since construction began on the Tule Wind project on December 6, 2016 there have been six incidents where non-compliances were documented with the terms and conditions of the ROW grant. As a safeguard to ensure that the violations in connection with ground disturbing activities ceases, no construction activities are currently permitted apart from the maintenance and installation of erosion and sediment control devices, cacti planting, and examining the project site to determine ways to address the compliance issues described in the Notice of Temporary Suspension of Construction Activities letter. Tule Wind, LLC may file a written request for permission to resume construction activities with supporting facts and reasons as to why the BLM should lift the order.

A copy of the Notice of Temporary Suspension of Construction Activities letter has been posted onto the Tule Wind ECCMP website under the Construction Information Updates section.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2 and NTPs 3 and 4 as they pertain to the limited activities authorized in the Notice of Temporary Suspension. 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 the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road. In addition ECMs observed crews planting salvaged cacti at the E-String laydown yard.

Cultural Resources

Cultural monitors were present to monitor the installation and maintenance of erosion and sediment control devices as well as the planting of salvaged cacti in accordance with mitigation measure (MM) CUL-1d.

Monitors have been maintaining ESA signs and fencing in accordance with MM CUL-1a.

Biological Resources

Biological monitors/Habitat Restoration Specialists were present to monitor the installation and maintenance of erosion and sediment control devices and the planting of salvaged cacti in accordance with MM BIO-1c. The cacti planted at the E-String laydown area will be moved and replanted in the habitat restoration areas as identified in the Habitat Restoration Plan.

Monitors have been maintaining ESA signs and fencing in accordance with MMs BIO-5a and BIO-2a.

Limits of Disturbance

All work observed occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1) – Problem Area

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Some devices were found to be ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite on a daily basis repairing, maintaining, and installing erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

Since the reporting period starting on 12.19.16 (documented in the Weekly Report 14), SWPPP and third party compliance monitors have documented recurring failures of the installed erosion and sediment control devices due to the amount of precipitation that has occurred during rain events in December and January (approximately 12 inches). The recurring issues have been recorded as a “Problem Area” according to Section 5.2 of the ECCMP. To address this problem area, crews began installing rip-rap devices to replace failing straw wattles and damaged sand/gravel bags. Crews also began digging catch basins and drainage channels to manage the unanticipated amount of sediment generated during the rain events so far this season.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Traffic Control Plan Implementation (MM TRA-1)

ECMs observed the maintenance of traffic signs in accordance with MM TRA-1.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the secondary containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a.

On Friday, January 27, 2017 a portable sanitation facility, which was previously secured using a tie-down strap, was discovered overturned along McCain Valley Road. ECMs observed fluid discharge from the overturned facility. The stained soil was contained and removed from the site in accordance with Section 8.3 of the Hazardous Materials Management Plan. The facility was righted and secured with additional tie-down straps.

While this facility was secured with additional tie-down straps, all new portable restroom facilities installed since the reporting period between 1.16.17 and 1.22.17 have been secured with wire in accordance with ROW Grant Stipulation 78 and the Hazardous Materials Management Plan. It is anticipated that the new securing protocol will reduce the possibility of additional portable facilities tipping over. The BLM will work with Tule Wind, LLC to assess the effectiveness of the securing procedures currently in use on the project site.

Waste Management (MM-BIO-7d) – Problem Area

On Friday, January 27, 2017 the portable sanitation facility at the H-String laydown area had toilet paper blow into nearby vegetation during a period of high winds (gusts over 40 mph). ECMs notified the designated biologist and environmental lead. This issue has been recorded as a “Problem Area” according to Section 5.2 of the ECCMP. At the end of this reporting period, the resolution to this problem area was still in progress. Biological monitors are anticipated to sweep the area to clean up all remaining litter in accordance with MM BIO-7d.

Construction Activities Schedule:

Due to the Notice of Temporary Suspension of Construction Activities, limited construction activities have been allowed to continue including:

- Erosion and sediment control device installation and repairs
- And planting salvaged cacti at the temporary staging area at structure E12.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	9.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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

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	11.2.12
2	5.16.13	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	5.20.13
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Crews began installing catch basins and rip-rap sediment and erosion control devices to replace damaged and failing straw wattles and sand/gravel bags in accordance with MM HYD-1 and the SWPPP. Photo shows a completed catch basin along McCain Valley Road where sediment was previously documented leaving the project site during SWPPP inspections.



Photo 2: ECMs observed cultural and biological monitors/Habitat Restoration Specialists monitoring the planting of salvaged cacti at the E-String laydown area in accordance with MM CUL-1D and BIO-1C.



Photo 3: ECMs and SWPPP inspectors checked the project site for areas where erosion and sediment control devices were missing or failing. These issues were documented and reported to Tule Wind, LLC. During this reporting period, construction crews were onsite daily to repair, maintain, and install additional erosion and sediment control devices in accordance with MM HYD-1 and the SWPPP.



Photo 4: On Friday, 1.27.17 ECMs observed toilet paper, which had blown out of the portable sanitation facility at the H-String laydown area into nearby vegetation during the windy conditions (gusts over 40 mph). This issue has been recorded as a "Problem Area" according to Section 5.2 of the ECCMP. Biological monitors are anticipated to sweep the area to clean up all remaining litter in accordance with MM BIO-7D.

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February 2017



BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 1.30.17 through 2.5.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively. All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, and NTP-4. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3 and 4, and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 1.30.17 through 2.5.17.

¹ <http://tulewindeccmp.com/#NTP>

Notice to Proceed, February 1, 2017

On Friday, 1.20.17 the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. The Notice was issued in response to compliance issues/concerns associated with ground disturbing activities on the project site.

On January 31, 2017, Tule Wind, LLC submitted a revised written assessment of the factors that caused the compliance issues/concerns to occur and proposed corrective actions to prevent further issues/concerns. On February 1, 2017 the BLM issued a Notice to Proceed to lift the Temporary Suspension of Construction Activities. The BLM determined that the corrective actions identified by Tule Wind, LLC in the letter dated January 31, 2017 provide adequate assurances that similar issues/concerns would not likely result in the future. The full text of this NTP can be viewed on the ECCMP website under the heading "Construction Information Updates".

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP and conditions included in LNTP-2, NTPs 3 and 4, and the most recent 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 the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road. In addition, crews planted salvaged cacti at the E-String laydown yard.

Following the NTP issued on February 1, 2017, crews continued grubbing at turbine pads E1-4, C1-3, and along the access roads and laydown yards near these structure sites. ECMs also observed crews mulching previously removed vegetation along McCain Valley Road.

Cultural Resources

Cultural monitors were present to monitor the installation and maintenance of erosion and sediment control devices, the planting of salvaged cacti, and the clearing and grubbing of turbine pads and access roads in accordance with mitigation measure (MM) CUL-1d.

Biological Resources

Biological monitors/Habitat Restoration Specialists were present to monitor the installation and maintenance of erosion and sediment control devices, the planting of salvaged cacti, and the clearing and grubbing of turbine pads and access roads in accordance with MM BIO-1c. ECMs observed completed monitor signature logs at grubbing activities in accordance with the February 1, 2017 NTP.

ECMs confirmed that biological monitors have been performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Limits of Disturbance

All work observed occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

In accordance with the February 1, 2017 NTP, bulldozers drove along the outside edge of the disturbance limits ahead of grubbing activities to help make the limit stakes more easily visible for the masticator operators. ECMs observed spotters walking ahead of the bulldozers to assist operators in viewing the disturbance limit stakes.

On Friday, February 3, 2017 an ECM observed a bulldozer operator stopping the equipment and walking ahead to check stake locations prior to proceeding in areas where vegetation was thick. While the operator was following the terms and conditions of the NTP, the ECM reminded Tule Wind, LLC that a spotter is required to help locate stakes during initial clearing adjacent to the limits of disturbance. Tule Wind, LLC mentioned that there was a spotter present, but that the spotter got too far ahead of the bulldozer requiring the operator to get out of the equipment. Tule Wind, LLC indicated that they will continue to work with the equipment operators and spotters to provide spotters at a safe distance ahead of the equipment, but close enough to allow for adequate communication both via radios and by visual hand signals.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1) – Problem Area

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Some devices were found to be ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

Since the reporting period starting on 12.19.16 (documented in the Weekly Report 14), SWPPP and third party compliance monitors have documented recurring failures of the installed erosion and sediment control devices due to the amount of precipitation that has occurred during rain events in December and January (approximately 12 inches). The recurring issues have been recorded as a “Problem Area” according to Section 5.2 of the ECCMP. To address this problem area, crews began installing rip-rap devices to replace failing straw wattles and damaged sand/gravel bags. Remaining straw wattles were replaced with mulch wattles during this reporting period. Crews continued digging catch basins and drainage channels to manage the unanticipated amount of sediment generated during the rain events so far this season. In addition, crews began hydromulching topsoil salvage piles to protect them from erosion in accordance with the SWPPP.

On February 1, 2017, a meeting was held by Tule Wind, LLC to discuss BMP installation and maintenance across the project site.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

During this reporting period, ECMs observed a water truck producing visible, dark emissions on three separate days. ECMs contacted Tule Wind, LLC about this issue and the truck was removed from the site on February 3, 2017.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

ECMs observed a crew welding an excavator bucket in the laydown yard along the H String. A Hot Work Permit had been obtained from the Fire Safety Coordinator who was present to monitor the work along with an additional Fire Watch monitor. A 3-A-40 BC fire extinguisher, 5-gallon backpack pump, and shovel were present within 25 feet of the work area and proper warning signage was placed to notify individuals entering the area of the work. The monitoring and safety equipment were all in accordance with Section W of the Fire Prevention/Protection Plan.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a.

Waste Management (MM-BIO-7d) – Problem Resolution

On Friday, January 27, 2017 the portable sanitation facility at the H-String laydown area had toilet paper blow into nearby vegetation during a period of high winds (gusts over 40 mph). At the end of the previous reporting period (1.23.17 through 1.29.17), the resolution to this problem area was still in progress. On January 30, 2017 ECMs confirmed that biological monitors had cleaned up all remaining litter in accordance with MM BIO-7d.

Construction Activities Schedule:

- Erosion and sediment control device installation and repairs,
- Planting salvaged cacti at the temporary staging area at structure E12,

- Mulching along McCain Valley Road,
- Clearing and Grubbing along the B-Line,
- And grading and moving rocks along the C-Line, McCain Valley Road, and at the Substation.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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
5	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

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	11.2.12
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	5.20.13
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed containment drip pans under parked equipment to prevent potential leaking equipment from staining soils in accordance with MM HAZ-1A and the Hazardous Materials Management Plan.



Photo 2: ECMs observed a water truck producing visible, dark emissions on several occasions during this reporting period. The truck was removed from the project site on February 3, 2017.



Photo 3: Hydromulch was applied to salvaged topsoil storage piles to prevent erosion in accordance with MM HYD-1 and the SWPPP.



Photo 4: Biological monitors were present to observe grubbing activities in accordance with MM BIO-1C. All observed activities occurred within the disturbance limits in accordance with MM BIO-1A. Yellow tape was strung between disturbance limit stakes to increase visibility of limits for masticator operators in accordance with the NTP issued on February 1, 2017.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 2.6.17 through 2.12.17

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.

On October 12, 2016, the BLM issued a Limited Notice to Proceed (LNTP)-2 to Tule Wind, LLC authorizing limited preconstruction activities within the Tule Wind Energy Project site. The preconstruction activities are being completed to prepare the project site for construction activities as described in the revised Plan of Development (POD), dated April 22, 2016. Preconstruction activities authorized under the LNTP-2 include disturbance limit staking, limited vegetation clearing associated with line of sight staking, staking of Environmentally Sensitive Areas, weed removal, cacti salvage, and truck and ATV use of BLM access routes.

On November 18, 2016, the BLM issued Notice to Proceed (NTP) 3 and 4 to Tule Wind, LLC authorizing clearing and grading activities, and construction and installation of four 10,000-gallon fire tanks, respectively.

On February 10, 2017, the BLM issued NTP 5 to Tule Wind, LLC authorizing the balance of plant construction activities including 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 lines system, structure erection, wire pulling, and restoration of temporarily impacted area.

All construction activities that occurred on BLM-administered land during this reporting period were performed under LNTP-2, NTP-3, NTP-4, and NTP-5. The full text of all issued NTPs and the details of the covered activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section¹.

¹ <http://tulewindeccmp.com/#NTP>

On January 20, 2017, the BLM issued a Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16. The Notice was issued in response to compliance issues/concerns associated with ground disturbing activities on the project site. On January 31, 2017, Tule Wind, LLC submitted a revised written assessment of the factors that caused the compliance issues/concerns to occur and corrective actions to prevent further issues/concerns. The BLM issued a Notice to Proceed to lift the Temporary Suspension of Construction Activities on February 1, 2017. The BLM determined that the corrective actions identified by Tule Wind, LLC in the letter dated January 31, 2017 provide adequate assurances that similar issues/concerns would not likely result in the future. The full text of this NTP can be viewed on the ECCMP website under the heading “Construction Information Updates”.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, NTPs 3, 4, 5, and the February 1, 2017 NTP; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 2.6.17 through 2.12.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project’s ECCMP 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 the installation, maintenance, and repair of erosion and sediment control devices along McCain Valley Road and the D, G, and H strings. In addition, crews planted salvaged cacti at the E-String laydown yard.

Crews continued grubbing and grading along the B and C strings, at turbine pads E2, C1-3, G5-6, and along the access roads and laydown yards near these structure sites. ECMs also observed crews mulching previously removed vegetation and road widening activities along McCain Valley Road. Drilling along the H and G strings occurred in anticipation of the start of blasting activities.

Cultural Resources

Cultural monitors were present to monitor the installation and maintenance of erosion and sediment control devices as well as the clearing and grubbing of turbine pads and access roads in accordance with mitigation measure (MM) CUL-1d. Cultural monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Biological Resources

Biological monitors/Habitat Restoration Specialists were present to monitor the installation and maintenance of erosion and sediment control devices, the planting of salvaged cacti, and the clearing and grubbing of turbine pads and access roads in accordance with MM BIO-1c. ECMs observed completed monitor signature logs at grubbing activities in accordance with the February 1, 2017 NTP.

ECMs confirmed that biological monitors have been performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Resource Monitoring – Non Compliance

On February 10, 2017, ECMs inspected an approximately 35-foot by 110-foot area along the access road, within the limits of disturbance between the H2 turbine and temporary staging area, on lands administered by the BLM. A bulldozer had smoothed the access road to fill-in a large hole created by boulder removal. Construction activities were approved for work without full-time cultural or biological monitoring at turbine sites H1 and H2, but not at the location where the hole was filled.

Upon inspection of the disturbed area, no impacts to biological or cultural resources were observed. The lead resource specialists and monitors determined that the root cause of the issue was a miscommunication between the operator that graded the access road and the drill and blast crew that was working at turbine sites H1 and H2. Tule Wind, LLC reiterated to their construction crews that whenever there is a change in activities that the entire crew gets together and discusses the Monitor Sign-off Form to ensure that there is a complete and consistent understanding about when monitors are/are not required.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a with the exception of the noncompliance events described below. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period. When ECMs observed incorrect, downed, or ambiguous stakes, they informed Tule Wind, LLC and the areas were re-staked.

In accordance with the February 1, 2017 NTP, bulldozers drove along the outside edge of the disturbance limits ahead of grubbing activities to help make the limit stakes more easily visible for the masticator operators. ECMs observed spotters walking ahead of the bulldozers to assist operators in viewing the disturbance limit stakes. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators and monitors.

Limits of Disturbance – Noncompliance Events

On February 9, 2017, ECMs observed a noncompliance event where an equipment operator caused disturbance beyond the limits of disturbance during grading activities along McCain Valley Road, on lands administered by the BLM. The operator inadvertently pushed soil outside the

limits of disturbance at a location where the limits of disturbance jut out towards the center line of the road. One of the limits of disturbance stakes was missing and the operator could not see the stake that was missing. Soil that was in front of the blade was pushed past the limits of disturbance and then pushed back into the limits of disturbance. As a result of this occurrence, contractors will review the grading plans ahead of time to identify areas of concern prior to grading activities due to irregular (non-linear) staking. The contractor will then have personnel identify these irregular disturbance limit boundaries in the field with GPS. Additional staking will be added or steel posts, with PVC extensions, will be installed where needed to give the operators greater visibility of limit of disturbance markers. In these irregular areas, the grading operators will walk the boundary prior to grading to make sure that they clearly understand the limits of disturbance.

Two additional issues regarding ground disturbance occurring outside of the staked limits of disturbance were identified on Wednesday, February 8 and Thursday, February 9, 2017. Each of these observations were made by cultural monitors monitoring ground disturbing activities on land administered by the County of San Diego, in accordance with Section 106 of the National Historic Preservation Act. In each case corrective actions were implemented to avoid similar issues from reoccurring. The corrective actions include installation of rope or caution tape at the limit of disturbance prior to any work associated with the overhead transmission and collector lines, ensuring that limit of disturbance stakes are placed a distance that can be easily discerned by equipment operators, and to completely finish staking the limits of disturbance in an area prior to moving to another area on-site.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Some devices were found to be ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

During this reporting period, ECMs also observed the installation of sediment control devices and the application of hydromulch around and over the salvaged topsoil stockpiles in accordance with Section 7.8 of the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times to a maximum of five minutes, maintaining traffic speeds at or below the 15 mile per hour speed limit, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during preconstruction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Fire Prevention/Protection Plan Section II R – Problem Area

On February 10, 2017, a third party ECM observed a construction crew member refueling a skid steer without shutting the equipment engine off prior to fueling. ECMs discussed this problem area and the need to remind all construction crews about shutting off equipment before fueling at the daily compliance meeting.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. In addition, ECMs observed crews removing stained soil in accordance with the HMMP.

Additional portable restroom facilities were installed and secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance along the southern portion of McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Erosion and sediment control device installation and repairs along McCain Valley Road and the E and F lines,
- Planting salvaged cacti at the temporary staging area at structure E12,
- Mulching along McCain Valley Road,
- Clearing and Grubbing along McCain Valley Road near the A and B lines and pad C8,
- Widening and spreading gravel along McCain Valley Road,
- Blasting at pad H1 and drilling along the H line access road,
- Continuing geotechnical drilling and excavations along the D, F, and G lines,

- And grading and moving rocks along the G-Line, McCain Valley Road, and at the Substation.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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: • Foundation drilling and blasting • Installation of seal slabs • Installation of turbine foundations • Installation of MET towers	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• 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 • 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	11.2.12
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	5.20.13
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.	Pending	Under BLM Review
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.	Pending	Under BLM Review
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Pending	Under BLM Review

Representative Photos



Photo 1: On February 9, 2017, ECMs observed a noncompliance event where an equipment operator caused disturbance beyond the limits of disturbance by first pushing soil outside the limit and then back-dragging the soil back into the limits of disturbance.



Photo 2: Contractor personnel added steel posts and PVC extensions where needed to give equipment operators greater visibility of limit of disturbance markers in response to the noncompliance event on February 9, 2017 (described in the caption of Photo 1).



Photo 3: Resource monitors and equipment operators cut pre-grubbing lines in thick vegetation along the yellow tape disturbance limits with monitors acting as spotters ahead of the equipment in accordance with the February 1, 2017 NTP.



Photo 4: Crews observed installing erosion and sediment control devices around salvaged topsoil stockpiles in accordance with the Habitat Restoration Plan and Section 7.8 of the SWPPP.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 2.13.17 through 2.19.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, 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 2.13.17 through 2.19.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the installation and maintenance of erosion and sediment control devices along the F and E strings. In addition, crews continued planting salvaged cacti at the E-String laydown yard, working on the permanent water tanks along McCain Valley Road near the G and J strings, and grading pad sites along the G-String. Crews also continued grubbing and grading along the B and C strings, at the A-String laydown yard, and along McCain Valley Road. ECMs also observed crews

mulching previously removed vegetation, performing road widening activities, and adding rock along McCain Valley Road.

Drilling and blasting activities were performed along the H-String on Road AA during this reporting period. Crews also began grubbing and grading along the transmission alignment and performing geotechnical testing of soil and bedrock depth along the E, F, G and J strings.

Cultural Resources

Cultural monitors were present to monitor ground disturbing activities including grading, grubbing, and geotechnical testing in accordance with mitigation measure (MM) CUL-1d. Cultural monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities, the planting of salvaged cacti, and clearing and grubbing activities in accordance with MM BIO-1c. ECMs observed completed monitor signature logs at construction activities in accordance with the February 1, 2017 NTP. Biological monitors have been performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Noxious Weed and Non-Native Species Control Plan Implementation (MM BIO-3A)

During this reporting period, ECMs verified equipment wash certificates with contractors to confirm compliance with Section 5.2.1 of the Noxious Weed and Non-Native Species Control Plan.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a with the exception of the noncompliance event described below. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. Crews installed additional staking or steel posts with PVC extensions where needed to give the operators greater visibility of limit of disturbance markers. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators, spotters, and monitors in accordance with the NTP issued February 1, 2017.

Limits of Disturbance – Noncompliance Event

On February 14, 2017, the Dudek third party lead ECM along with a survey and engineering team verified a breach of the approved limits of disturbance along the C-String. During the event, a rubber tracked skid steer travelled approximately seven feet outside the staked limits of disturbance and travelled approximately 35 feet before re-entering the limits.

The lead ECM recorded that the skid steer was conducting clearing activities when it travelled along the staking tape that was bowed outside of the limits of disturbance by the wind. The skid steer operator followed the arc of the staking tape rather than travelling in a straight line between the stakes. The limit stakes were spaced approximately 100 feet apart from one another. The lead ECM and an archaeological monitor examined the disturbance area and determined that there were no impacts to sensitive biological or cultural resources. There were no environmentally sensitive areas (ESAs) in the vicinity of the unauthorized disturbance.

Per discussions between the BLM and Tule Wind, LLC, to avoid similar events from reoccurring, Tule Wind, LLC will be installing staking at a maximum of 25-foot increments. For the areas that have already been staked at 100-foot increments, new stakes would be placed inbetween the stakes placed at 100 feet. No work is authorized to occur in any area until the additional stakes are placed in the area.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Some devices were found to be ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

During this reporting period, ECMs observed the stockpiling of salvaged topsoil at the laydown yard near site G5. While topsoil salvage activities continue along the G-String, these stockpiles are still considered active. ECMs confirmed that following the completion of these salvage activities, installation of sediment control devices and the application of hydromulch around and over the salvaged topsoil stockpiles will occur in accordance with Section 7.8 of the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, maintaining traffic speeds at or below the 15 mile per hour speed limit, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during construction and geotechnical testing activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along the southern portion of McCain Valley Road in accordance with MM TRA-1.

Waste Management (MM-BIO-7d) – Problem Area

On February 14, 2017, the portable sanitation facility at the F-String access road had toilet paper blow into nearby vegetation during a period of high winds. ECMs notified the designated biologist and the litter was removed upon notification.

Blasting Plan Implementation (BLM Stipulation 73)

On February 17, 2017, an ECM monitored the seismic and acoustic activity during the blasting activities occurring along the H-String to ensure compliance with the allowable thresholds in the Blasting Plan. The pre-blast warning and time signals were also observed in accordance with the Blasting Plan.

Construction Activities Schedule:

- Surveying and staking along strings to be filled and the G-Line,
- Erosion and sediment control device installation and repairs along McCain Valley Road and the E-Line,
- Mulching along McCain Valley Road,
- Widening along McCain Valley Road,
- Clearing and Grubbing along McCain Valley Road, the overhead line alignment, and the A, G, and E lines,
- Culvert installation at the J-Line bypass,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- And building pad sites along the G and H lines.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 - 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 - 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 - 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 - 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: - 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)
		• 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.	Pending	Under BLM Review
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Pending	Under BLM Review

Representative Photos



Photo 1: On February 14, 2017, the portable sanitation facility at the F-String access road had toilet paper blow into nearby vegetation during a period of high winds. ECMs notified the designated biologist and the litter was removed upon notification.



Photo 2: On February 9, 2017, a breach of the approved limits of disturbance along the C-String was observed.



Photo 3: Archaeological and Native American monitors observed the installation of silt fence near site E13 in accordance with MMs CUL-1D and HYD-1.



Photo 4: Crews observed verifying disturbance limit stake locations and installing yellow tape prior to the start of disturbance activities in accordance with the NTP issued February 1, 2017.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 2.20.17 through 2.26.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, LNTP-2, 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 2.20.17 through 2.26.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the installation and maintenance of erosion and sediment control devices along the G-String and the installation of a culvert west of pads E11-E13. In addition, crews continued planting salvaged cacti at the E-String laydown yard and grading pad sites along the G-String. Crews also continued grubbing and grading along the G and H strings, the road between G14 and G15 included in Variance 001, the overhead alignment, and McCain Valley Road. ECMs also observed crews

mulching previously removed vegetation and performing road widening activities along McCain Valley Road. Drilling in anticipation of blasting activities was performed at pad G5 during this reporting period.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and geotechnical testing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities, the planting of salvaged cacti, and clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Biological Resources – Noncompliance Event

On Thursday, February 23, 2017, an excavator was used to remove vegetation along the access road north of turbine G9 without a biological monitor present. Archaeological and Native American monitors were present. The third party ECM stopped the vegetation removal activity after realizing that there was no biological monitor present. The monitor signature log was signed by the biologist after an initial work site sweep was completed, but the only activity listed on the log under the column “Construction Activity” was “subgrade on roads,” which does not require a full-time biological monitor if no vegetation clearing occurs.

The crew foreman indicated that the vegetation removal activity was communicated to the biologist, but the Designated Biologist and biological monitor who conducted the morning sweep of the area indicated that they were unaware of vegetation removal.

The area where the vegetation was removed was inspected by a biological monitor and it was determined that there was no impact to sensitive environmental resources. There were no ESAs in the vicinity of the disturbance and the activity was allowed to resume once a full-time biological monitor was present.

The construction foremen, monitors, and Tule Wind, LLC are working together to ensure the monitor signature logs accurately and completely identify the work activities occurring at each location in accordance with the February 1, 2017 NTP.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs continued to verify the disturbance limit stakes throughout the project site during this reporting period.

ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. Crews installed additional staking or steel posts with PVC extensions where needed to give the operators greater visibility of limit of disturbance markers. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits for equipment operators, spotters, and monitors in accordance with the NTP issued February 1, 2017.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Most were in good condition, however, some devices were found to be damaged or ineffective at preventing sediment discharge from the site and were in need of maintenance or repair. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

Per direction from the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board on Thursday, 2/23/17, Tule Wind, LLC has ceased the use of all plastic encased straw wattles. Tule Wind, LLC has ordered biodegradable weed free straw wattles that will be used to replace the existing plastic encased straw wattles that have been currently installed. The biodegradable straw wattles will be used to avoid wildlife from becoming entrapped in the plastic casing and to prevent plastic debris at the conclusion of construction activities.

During this reporting period, ECMs observed the stockpiling of salvaged topsoil along the G-String. While topsoil salvage activities continue along the G-String, these stockpiles are still considered active. In accordance with Section 7.8 of the SWPPP, ECMs observed topsoil stockpiles which had been stabilized using hydromulch and wattles as well as windrows of topsoil covered with fabric secured with sandbags. Some of the fabric protecting windrow stockpiles was observed to be pulling away from the topsoil on February 23, 2017. These issues were discussed with the contractor to ensure inactive topsoil stockpiles continue to be protected during construction activities according to the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

ECMs observed two incidents where construction vehicles were not following the posted 15 mph project site speed limit. ECMs spoke directly with the vehicle operators involved in the incidents and reported the issue to the Designated Biologist and Tule Wind, LLC in order to ensure that all on-site personnel abide by the project speed limit.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during construction and geotechnical testing activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred on a regular basis one hour after the end of daily construction in accordance with MM FF-1.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along the southern portion of McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along the C-Line,
- Stabilizing topsoil stockpiles along McCain Valley Road,
- Mulching along McCain Valley Road,
- Widening and installing gravel along McCain Valley Road,
- Clearing and Grubbing along the overhead line alignment and A-line,
- Grading along the E and G lines,
- Pipe installation at the H-line,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- Building pad sites along the G-line.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 - 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 - 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 - 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 - 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: - 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• Drilling and setting of overhead line systems • 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.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Spotters walked ahead of bulldozer operators who cleared large vegetation along the taped disturbance limits ahead of grubbing activities to help increase visibility for masticator operators in accordance with the February 1, 2017 NTP.



Photo 2: During this reporting period, crews repaired a damaged silt fence on the McCain Valley cutoff road per direction provided by the QSP and ECMs in accordance with the SWPPP.



Photo 3: ECMs observed windrowed topsoil salvage stockpiles along McCain Valley Road covered in fabric secured with sand bags in accordance with the SWPPP.



Photo 4: Biological, archaeological, and Native American monitors were present during road widening activities along McCain Valley Road in accordance with MM CUL-1D and BIO-1C. Water was applied regularly to reduce dust in accordance with the Dust Control Plan and MM AQ-1.

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March 2017



BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 2.27.17 through 3.5.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, 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 2.27.17 through 3.5.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the installation and maintenance of erosion and sediment control devices along McCain Valley Road and the C-String as well as the installation of culverts along McCain Valley Road and the H-String. Crews also continued grubbing and grading along the overhead alignment, McCain Valley Road, and the A, G, H, and J strings. ECMs also observed crews mulching previously

removed vegetation and performing road widening activities along McCain Valley Road. In addition, blasting occurred along the G and H strings, work continued on the fire tank pads along McCain Valley Road, and a rock pit was excavated at the G12 pad during this reporting period.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on ESA fencing where necessary, in accordance with APM-TULE-CUL-1, and recording unanticipated discoveries in accordance with MM-CUL-1e.

Cultural Resources – Noncompliance Event

On Tuesday, February 28, 2017, a third party archaeological monitor observed a D6 Bulldozer grading a pad for a drill rig north of the G6 turbine pad without archaeological or Native American monitors present. The third party monitor stopped the grading activity to ask where the required monitors were. The operator responded that he had thought the monitors were present and pointed out a biological monitor's truck that was parked approximately 20 meters away. A biological monitor was present, however there were no archaeological or Native American monitors at the location of the activity. The third party monitor notified the Lead Archaeological Monitor who dispatched an available archaeological monitor to the location.

Upon inspection of the monitor sign-off form associated with this activity, the construction crew foreman indicated that grading was not included on the monitor sign-off sheet as it was associated with the drilling activity. Archaeological monitors informed the crew foreman that because drilling and grading result in different levels of disturbance they require different levels of monitoring in accordance with MM CUL-1D. The drilling and grading activities should be listed separately on the monitor sign-off sheet.

The approximately 300 square meter area of unauthorized disturbance was inspected by an archaeological and Native American monitor and no impacts to cultural resources were identified. There were no ESAs in the vicinity of the disturbance.

Archaeological monitors continue to work with construction crews and Tule Wind, LLC to ensure monitor sign-off sheets are properly and completely filled out so that monitors and crews understand when monitors are required at construction activities in accordance with the February 1, 2017 NTP and MM CUL-1D.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Most were in good condition, however, some areas where recent grading activities had occurred required additional BMP installations to prevent sediment from leaving the ROW. These issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

In accordance with Section 7.8 of the SWPPP, ECMs observed crews stabilizing topsoil stockpiles using hydromulch and wattles. Some of the windrowed stockpiles were temporarily covered with fabric to protect against erosion. The fabric is removed as crews are able to hydromulch and install wattles in accordance with the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during construction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, the mulching of previously removed vegetation along McCain Valley Road, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

On Monday, February 27, 2017, a third party ECM reported a portable restroom facility that had blown over along the D-String during a period of high winds. The portable restroom was staked down. The following day, the portable restroom was turned upright and re-staked to prevent the issue from reoccurring. Stained soil from the overturned portable restroom was removed in accordance with the Hazardous Materials Management Plan.

Waste Management Plan Implementation – Problem Area

On Saturday, March 4, 2017, a third party ECM observed a trash bin at the E-String laydown yard, containing food waste, which had been left uncovered overnight. The ECM had observed the uncovered trash containers at the laydown yard and reported the issue to the Designated Biologist and construction contractor the previous day. Since the original notification, only one of the three bins had been covered and one of the bins left uncovered still contained food waste and other trash. The ECM contacted the Designated Biologist about the incomplete resolution. The ECM verified that the trash bins were covered by the end of the day in accordance with Section 2.1.1.6 of the Waste Management Plan.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Silt fence installation and repairs along the A-Line,
- Stabilizing topsoil stockpiles along the J and H lines,
- Mulching along McCain Valley Road,
- Widening and grading along McCain Valley Road,
- Clearing and Grubbing along the C-line,
- Grading along the E and G lines,
- Culvert installation along McCain Valley Road,
- Drilling and blasting along the G-Line,
- Continue working at the fire tank locations along McCain Valley Road,
- Building pad sites along the G-line,
- Meteorological tower installation.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 - 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 - 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 - 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 - 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: - 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• Drilling and setting of overhead line systems • 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.	Pending	Under BLM Review
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.	Pending	Under BLM Review
7	0.3.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs and SWPPP monitors observed and reported locations along McCain Valley Road where recent grading activities changed the path of overland flow and additional BMPs are required to ensure sediment remains on the ROW. Tule Wind, LLC had BMP installation and maintenance crews onsite to resolve these issues during this reporting period.



Photo 2: The portable restroom which had blown over during a period of high winds on February 27, 2017 was turned upright and staked the following day to prevent the issue from reoccurring. The stained soil was removed in accordance with MM HAZ-1A.



Photo 3: Traffic control flaggers and signs were present to notify motorists of work areas while crews worked along McCain Valley Road in accordance with the Traffic Control Plan (MM TRA-1).



Photo 4: Archaeological and Native American monitors were present during road widening activities along McCain Valley Road in accordance with MM CUL-1D. Water was applied regularly to reduce dust in accordance with the Dust Control Plan and MM AQ-1 and disturbance limits were demarcated with yellow tape in accordance with the February 1, 2017 NTP.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 3.6.17 through 3.12.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, 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 3.6.17 through 3.12.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the installation and maintenance of erosion and sediment control devices along the C-String and the J3 and A3 turbine pads. The installation of culverts also continued along the C and G strings. Construction crews continued grubbing and grading along McCain Valley Road and the G and E strings. Pad preparation activities also included rock breaking and topsoil salvage. ECMs

observed construction crews performing road widening and rock installation activities along McCain Valley Road. In addition, drilling and blasting occurred along the G-String, work continued on the fire tanks along McCain Valley Road, and meteorological tower foundations were excavated and poured along the A-String.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on and installing new ESA fencing where necessary, in accordance with APM-TULE-CUL-1. Unanticipated new discoveries were recorded in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities and marking ESAs were established to protect nesting birds discovered during surveys in accordance with MM BIO-7j. ECMs also verified that wildlife ramps were installed in meteorological tower foundation excavations when left open and were covered when possible in accordance with MM BIO-7a.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

ECMs and SWPPP monitors inspected erosion and sediment control devices including straw wattles, silt fencing, sandbags, check dams, and culverts along McCain Valley Road. Most erosion and sediment control devices were in good condition. All issues were documented and reported to Tule Wind, LLC. During this reporting period, Tule Wind, LLC had construction crews onsite to repair, maintain, and install erosion and sediment control devices per direction provided by the Qualified SWPPP Practitioner (QSP) and third party ECMs in accordance with MM-HYD-1 and the project specific SWPPP.

Per direction from the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board, Tule Wind, LLC has ceased the use of all plastic encased straw wattles. Tule Wind, LLC has ordered biodegradable weed free straw wattles that are being used to replace the existing plastic encased straw wattles that have already been installed. The removed plastic encased wattles are being hauled off site for disposal. The biodegradable straw wattles will be used to avoid wildlife from becoming entrapped in the plastic casing and to prevent plastic debris at the conclusion of construction activities.

In accordance with Section 7.8 of the SWPPP, ECMs observed crews hydromulching topsoil stockpiles. Some of the windrowed stockpiles were temporarily covered with fabric to protect against erosion. The fabric is removed as crews are able to hydromulch and install wattles in accordance with the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during construction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1. ECMs also verified that Fire Watch crews were present while the meteorological tower foundations were poured along the A-String.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along the G-Line,
- Stabilizing topsoil stockpiles along McCain Valley Road and the G and H lines,
- Widening and grading along McCain Valley Road,
- Clearing, grubbing, and grading along the Rough Acres Ranch Road and C-Line,
- Grading along the E and G lines,
- Culvert installation along the G-line,

- Drilling and blasting along the G and E lines,
- Building pad sites and foundation excavation along the G and E lines,
- Geotechnical investigation along the overhead line and H-line,
- Meteorological tower installation.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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: • 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• Drilling and setting of overhead line systems • 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.	Pending	Pending resubmittal by Tule Wind, LLC.
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.	Pending	Pending resubmittal by Tule Wind, LLC.
7	0.3.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed biological monitors establishing and marking ESAs around active nests discovered during surveys in accordance with MM BIO-7J.



Photo 2: Archaeological and Native American monitors were present during grading activities along the G-String in accordance with MM CUL-1D.



Photo 3: ECMs observed construction crews hydromulching topsoil salvage windrows along McCain Valley Road in accordance with the SWPPP.



Photo 4: The meteorological tower foundation excavations were covered when not in use to avoid trapping or injuring wildlife in accordance with MM BIO-7A.

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 3.13.17 through 3.19.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, 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 3.13.17 through 3.19.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the replacement of sediment control devices along the H and J strings. The installation of culverts also continued along the G-String and McCain Valley Road. Construction crews continued grubbing and grading along McCain Valley Road as well as the G and E strings. Pad preparation activities also included rock breaking and topsoil salvage. ECMs observed construction

crews performing road widening and rock installation activities along McCain Valley Road. In addition, drilling and blasting occurred along the G-String, work continued on the fire tanks along McCain Valley Road, the foundation assembly continued at Tower 4, and turbine foundations were excavated and poured along the G-String.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on and installing new ESA fencing where necessary, in accordance with APM-TULE-CUL-1. Unanticipated new discoveries were recorded in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities. ECMs also verified that wildlife ramps were installed in turbine foundation excavations in accordance with MM BIO-7a.

Monitor Sign-off

During this reporting period, ECMs recorded two incidents where a foreman left the active work site with the monitor signature log and signed job hazard analysis (JHA). While the monitoring log and JHA were observed to be completed in accordance with the February 1, 2017 NTP when the foreman returned to the work site, the documents are required to be available at the area where construction activities are occurring. ECMs are continuing to work with the construction foremen to ensure the required documents remain where the construction activities are occurring.

Limits of Disturbance

Work occurred within the project limits of disturbance in accordance with MM BIO-1a except during the incidents described below. ECMs observed construction crew members walking disturbance limits prior to the start of ground disturbance activities to ensure limits were staked correctly. In addition, yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

During blasting activities on March 16, 2017, rock debris fell outside the disturbance limits near the turbine pad G15. The pieces of rock were recorded and left in place to avoid creating additional unauthorized disturbance.

Limits of Disturbance – Problem Areas

On March 13, 2017, two incidents occurred where work activities occurred outside of the approved limits of disturbance. Each of the incidents is described below:

- During grading activities, a blade hit a rock located below the ground surface along the access road north of turbine pad G8. When the blade hit the rock, it lost balance and travelled outside of the approved limits of disturbance while trying to regain balance. An approximately 40-foot by 10-foot area was disturbed outside of the approved limits of disturbance. Per ECM's conversations with the equipment operator, if the equipment had not travelled outside of the approved limits of disturbance to regain balance, the blade could have tipped over.
- A D8 bulldozer slipped down the slope of turbine pad G6 during grading activities. The bulldozer did not cross the limits of disturbance, but dirt extending approximately 100 square feet was pushed outside of the limits of disturbance.

In each case, archaeological and Native American monitors were present at the time of the incident and the area had been swept by a biological monitor. The areas of disturbance were inspected and it was determined that no damage to sensitive environmental resources occurred.

These incidents are being reported as Problem Areas in accordance with Section 5.2 of the ECCMP.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

Per direction from the BLM, California Department of Fish and Wildlife (CDFW), and the California State Water Resources Control Board, Tule Wind, LLC has ceased the use of all plastic encased straw wattles. During this reporting period, Tule Wind, LLC had construction crews onsite to install biodegradable and weed-free straw wattles. Tule Wind, LLC is replacing the existing plastic encased straw wattles that have previously been installed. The removed plastic encased wattles are being hauled off site for disposal.

In accordance with Section 7.8 of the SWPPP, ECMs observed crews hydromulching topsoil stockpiles. Some of the windrowed stockpiles were temporarily covered with fabric to protect against erosion. The fabric is removed as crews are able to hydromulch and install wattles in accordance with the SWPPP.

During this reporting period, construction crews also continued installing silt fence along the G-String in accordance with the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed required fire equipment and best management practices on the project site during construction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing

activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1.

Hot work permits were issued for tower foundation work and ECMs verified that the Fire Safety Coordinator as well as Fire Watch personnel were present to monitor the hot work activities. Proper equipment was also present and warning signs were posted at the work site in accordance with the hot work permit and MM FF-1. Fire Watch personnel remained at the work site with required equipment for an hour after the work was completed.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along McCain Valley Road in accordance with MM TRA-1.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along McCain Valley Road,
- Widening and grading along McCain Valley Road,
- Clearing, grubbing, and grading along Rough Acres Road and the A, C, E, F, and G lines,
- Culvert installation along McCain Valley Road,
- Building pad sites and foundation excavation along the G and J lines,
- Meteorological tower installation.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 - 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 - 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 - 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 - 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: - 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• Drilling and setting of overhead line systems • 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.	Pending	Pending resubmittal by Tule Wind, LLC.
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.	Pending	Pending resubmittal by Tule Wind, LLC.
7	0.3.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review

Representative Photos



Photo 1: On March 13, 2017, disturbance beyond the staked limits of disturbance occurred when a piece of construction equipment hit a subsurface rock and lost control. The area of disturbance was inspected and it was determined that no damage to sensitive environmental resources occurred.



Photo 2: During blasting activities on March 16, 2017, rock debris fell approximately 10 feet outside the staked disturbance limits. The pieces of rock were left in place to avoid creating additional unauthorized disturbance.



Photo 3: ECMs observed construction crews installing biodegradable and weed-free straw wattles at the H1 turbine pad in accordance with the SWPPP and per direction from the BLM, CDFW, and State Water Board.



Photo 4: Required equipment and warning signs were present at the Transmission Line Pole 4 during hot work activities in accordance with the issued hot work permit and the Fire Prevention/Protection Plan (MM FF-1).

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BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El 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: 3.20.17 through 3.26.17

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 and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECCMP 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 ECCMP, 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 3.20.17 through 3.26.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECCMP 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

ECMs observed the installation of culverts, road grading, and aggregate installation along McCain Valley Road. Construction crews continued grading, rock breaking, and soil salvage along the E, F, G, and J strings. Drilling and blasting occurred along the G and E strings, miscellaneous geotechnical testing activities occurred along the A-String and at the H2 turbine pad, and turbine foundations

were excavated, assembled, and poured along the G-String. In addition, vegetation removal continued along the collection line, tower footings were drilled in the 80-acre parcel, and transmission line poles were set.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading and grubbing in accordance with mitigation measure (MM) CUL-1d. Archaeological and Native American monitors were also observed performing maintenance activities on and installing new ESA fencing where necessary, in accordance with APM-TULE-CUL-1. Unanticipated new discoveries were recorded in accordance with MM-CUL-1e.

Biological Resources

Biological monitors were present to monitor initial ground disturbance activities as well as clearing and grubbing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities and establishing no-disturbance buffers around observed nesting birds in accordance with MM BIO-7j. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted. ECMs are continuing to work with the construction foremen to ensure the required documents are filled out completely and clearly.

Limits of Disturbance (MM BIO-1a)

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. Yellow tape was strung between disturbance limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the NTP issued on February 1, 2017.

Stormwater Pollution Prevention Plan (SWPPP) (MM HYD-1)

During this reporting period, construction crews installed biodegradable and weed-free straw wattles. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times, cleaning track-out along the paved entrance to McCain Valley Road, and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9 and the Dust Control Plan.

Fire Prevention/Protection Plan Implementation (MM-FF-1; MM Bio-1f)

ECMs observed best management practices on the project site during construction activities, including vehicles with required fire suppression equipment, vehicles parked in areas with no vegetation, and the wetting of vegetation ahead of clearing activities. Fire patrols occurred one hour after the end of daily construction in accordance with MM FF-1.

Hot work permits were issued for tower foundation work and ECMs verified that Fire Watch personnel and proper equipment were present in accordance with the hot work permit and MM FF-1.

Fire Prevention/Protection Plan Implementation – Problem Area

On Monday, March 20, 2017, ECMs observed a construction crew drilling at turbine pad E1 without a 5-gallon backpack pump as required by Section J of the Fire Prevention/Protection Plan (FPPP). The construction crew informed the ECM who discovered the issue that the backpack was on a truck that had temporarily left the work area. The foreman and ECM agreed that the work activity would be in compliance with the FPPP if a water truck was staged at the worksite until the truck with the 5-gallon backpack could return. The ECM reminded the crew of the FPPP requirements and the ECM remained at the work site with his 5-gallon backpack pump so the work could continue until a water truck arrived.

Hazardous Materials Management Plan (MM-HAZ-1a)

During this reporting period ECMs observed the placement of drip pans under equipment not in use in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan, MM HAZ-1a. ECMs also observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

Flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvement activities along McCain Valley Road in accordance with MM TRA-1. In addition, construction crews were onsite to install, maintain, or replace traffic and speed limit signs along McCain Valley Road.

Construction Activities Schedule:

- Surveying and staking disturbance limits,
- Erosion and sediment control device installation and repairs along Rough Acres Road,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading along Rough Acres Road and the D, E, and F lines,
- Culvert installation along McCain Valley Road,
- Building pad sites and foundation excavation along the G-Line,

- Drilling at the substation,
- And concrete pouring and setting poles along the transmission line.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	09.17.12	Geotechnical Activities per MM-Geo-3 • 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 • 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 • 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 • 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: • Foundation drilling and blasting • Installation of seal slabs • Installation of turbine foundations • Installation of MET towers	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• 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 • 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.	Pending	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.	Pending	Resubmitted on 03.24.17.
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Pending	Under BLM Review
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.	Pending	Under BLM Review

Representative Photos



Photo 1: Concrete washout containers were used during foundation pouring activities to ensure contaminated discharge was contained in accordance with MM BIO-5.



Photo 2: Fire prevention equipment was staged within 30 feet of chainsaw work along the collection line in accordance with the Fire Prevention/Protection Plan (MM FF-1).



Photo 3: Archaeological and Native American monitors were present during grading activities along McCain Valley Road in accordance with MM CUL-1D.



Photo 4: ECMs confirmed that no-disturbance buffers have been installed to minimize impacts to nesting birds in accordance with MM BIO-7J.

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APPENDIX B

Bureau of Land Management Notice of Temporary Suspension



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243



January 20, 2017

In Reply Refer To
CACA-49698/2800(P)
CA670.25

NOTICE

Tule Wind, LLC	:	Tule Wind Project
Kristen Goland, Western Regional Permit Manager, Permitting and Environmental 1125 NW Couch Street, Suite 700 Portland, OR. 97209	:	CACA-49698

Notice of Temporary Suspension of Construction Activities

Construction began on the Tule Wind Energy Project on December 6, 2016. Since that date there have been six confirmed violations of terms and conditions of the right-of-way (ROW) grant, including three incidents of ground disturbing work without a cultural monitor present and three incidents of clearing beyond the disturbance limits at four different locations. Two of those locations were areas where variances had been requested but were pending, and one of those included 0.2 acres of ground that was outside the boundary of approved biological and cultural resource surveys. No biological or cultural resource damage has been confirmed to date, but the violations are repeated and their frequency is increasing. Efforts by the grant holder to correct the conditions which allowed them to occur have been ineffective.

The Bureau of Land Management (BLM) is issuing this Notice of Temporary Suspension of Construction Activities pursuant to 43 CFR 2807.16 as a safeguard to ensure that the pattern of violations in connection with ground disturbing activity ceases until such time as the holder files a written request for permission to resume activities and the BLM issues a written notice to proceed with those operations. This order excludes work on site required to maintain erosion control devices and measures required per the approved Plan of Development.

Pursuant to 43 CFR 2807.16(c), you may file a written request for permission to resume activities at any time. The request should give the facts supporting your request and the reasons you believe that the BLM should lift the order. Your request should describe in sufficient detail the factors that caused the violations to occur and should detail corrective actions that have been taken to prevent further violations. Given that previous corrective actions have been ineffective, the corrective actions proposed should be above and beyond those already attempted to prevent the recurring violations.

Thank you for your strict adherence with this order and for your continuing cooperation with the BLM. I can be reached at 760-337-4400 or please contact Carrie Sahagun, BLM Assistant Field Manager, at 760-337-4437, or Miriam Liberatore, BLM Project Manager, at 541-618-2412 if you have any questions.



(Action for)

Thomas F. Zale
Field Manager

APPENDIX C

*Bureau of Land Management
Notice to Proceed*



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243



February 1, 2017

In Reply Refer To
CACA-49698/2800(P)
CA670.25

NOTICE

Eric Lallum	:	
Vice President, Engineering and Construction	:	Tule Wind Project
Avangrid Renewables	:	CACA-49698
1125 NW Couch Street, Suite 700	:	
Portland, OR 97209	:	

Notice to Proceed With Construction Activities

Background

One January 20, 2017, the Bureau of Land Management (BLM) issued a Notice of Temporary Suspension of Construction Activities pursuant to the regulations at 43 CFR 2807.16. The Notice was issued as a safeguard to halt a pattern of violations in connection with ground disturbing activities on the Tule Wind project while the right-of-way grant holder determined the factors that caused the violations to occur and identified corrective actions to be taken to prevent further violations.

On January 25, 2017, the holder submitted a written assessment of the factors that caused the violations to occur and proposed corrective actions to prevent further violations. The holder requested that the BLM authorize construction operations to be resumed on January 31, 2017. On January 27, 2017, the BLM requested additional clarification from the holder and participated on conference calls with the holder on January 30 and 31, 2017, to obtain further clarification regarding proposed corrective actions. On January 31, 2017, the holder revised the assessment to include the requested clarification and requested that the BLM authorize construction operations to be resumed on February 1, 2017. Later on January 31, 2017, the holder submitted a final version of this document with further clarification and corrections.

Notice to Proceed With Construction Activities

With this Notice, the Temporary Suspension of Construction Activities is lifted for the Tule Wind project subject to the implementation of all safeguards and corrective actions identified by the holder in the letter of January 31, 2017 (copy attached). These safeguards and corrective actions are hereby incorporated by reference as additional stipulations into right-of-way grant CACA-49698.

Please be advised that all other terms and conditions of the Record of Decision and right-of-way grant CACA-49698 continue to apply to the Tule Wind project.

How to Appeal This Decision

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the enclosed Form 1842-1 (Enclosure 3). If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (request) pursuant to regulations 43 CFR 2801.10 or 2881.10 for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

Please contact Miriam Liberatore, BLM Project Manager, at 541-618-2412 if you have any questions about this Notice. Alternatively, I can be reached at 760-337-4410. Thank you for your cooperation with the BLM.



Thomas F. Zale
Field Manager

Enclosures (2):

1. Letter from Avangrid Renewables dated January 31, 2017 (with attachments)
2. Form 1842-1



January 31, 2017

Tom Zale
Field Manager
Bureau of Land Management (BLM), El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243
Via e-mail: tzale@blm.gov

RE: Tule Wind permission to resume activities associated with temporary suspension

Dear Mr. Zale,

Tule Wind (BLM Project Number CACA-49698) is in receipt of your letter dated January 20, 2017 providing notice of the temporary suspension of construction activities at the Tule Wind Project (BLM Notice). Tule Wind is committed to constructing and operating this project in accordance with its permitted terms and conditions. As such, we respectfully request permission to resume activities at the Tule Wind site once all additional compliance measures identified in this letter have been implemented. Tule Wind originally replied to the temporary suspension letter on January 25, 2017 requesting a start date of today, January 31, 2017. Upon review, your office provided a list of clarifying questions for our consideration which was discussed with Tule Wind on January 30, 2017. This updated letter provides the requested clarification and a request to commence construction activities on February 1, 2017.

Tule Wind recognizes that there have been project challenges which have led to the compliance incidents observed by the BLM. We have dedicated millions of dollars towards compliance activities; however, we have reviewed your notice and our current processes concluding that increased effort and investment is required. It is unfortunate that these violations have occurred and Tule Wind believes the initiatives described in this letter address the root causes of the incidents and will prevent to the greatest extent possible recurrence of them. Compliance on this project, like any other aspect, is a team effort. It requires an aligned understanding of the rules and regulations by all parties, clear communications across the entire construction team including contractors, compliance monitors, regulatory representatives, and construction management, and a team culture with a shared goal of achieving success and maintaining compliance. To this extent, Tule Wind has discussed the importance of communication and culture of compliance with representatives of all partners on this project and feels we are aligned as one team. The additional initiatives expressed in this letter are aimed at promoting clear communications among all parties and establishing a site culture where compliance is a shared mission by all.

The following list represents a few of the actions Tule Wind, and our project team, have already undertaken to improve and enforce a culture of compliance:

- Creation of a Compliance Matrix with all permit conditions from major permits.
- Creation of a Plan Matrix with applicable plan requirements.
- Appointment of a full-time on-site Environmental Compliance Lead.

- Establishment of clear lines of communication regarding site protocols through the creation of a draft Compliance Manual.
- Comprehensive management training for all high level site management.
- Creation of a comprehensive WEAP program with voice over.

Additionally, Tule Wind is currently collaborating with our construction contractors and qualified monitors to identify and implement additional measures to help ensure compliance with the permit conditions and specifically address the concerns summarized in the referenced notice. From this collaboration, Tule Wind recognizes that beyond the specific act resulting in the notice of violation, we have recognized that communication errors and misunderstandings related to the compliance conditions contributed in part to the incidents. As a result of this collaboration effort, Tule Wind has identified several improvements to implement in our construction practices aimed at eliminating the types of compliance issues referenced in the BLM Notice.

Communication between monitoring crews and construction crews is pivotal to remaining in compliance. Contractors have high band hand held radios for monitors as well as operators and foreman. Informational training is given explaining channels to utilize, how to communicate with the appropriate language, and only communicate necessary information. Trucks, equipment and hand held radios use channel 3. Channel 1 is the safety channel and is only used for emergencies. When project infrastructure NTP is received and/or the building permit for the temporary construction trailer is approved, radio communications will be improved with signal boosters and the installation of repeaters. Tule Wind has used this time of this stand down to examine organization and communication and ensure that everyone on site understands each other's role and that the Tule Wind Site Manager, or his designee, has ultimate responsibility to all activities on site. Site organization and communication is detailed in the attached file.

Clearing beyond the approved disturbance limits- instances

The BLM Notice references three instances in which clearing activities have occurred beyond the approved disturbance. The first of these instances involved an equipment operator placing a boulder beyond the approved limit of disturbance at a project intersection. The second instance of clearing beyond the approved disturbance limit was a result of an operator mistaking a disturbance limit demarcation with a stake in the field depicting an offset of that limit of disturbance. The third instance of clearing beyond the approved disturbance limit occurred because clearing limits were staked in an area where a pending variance had not yet been approved. All three of these isolated issues occurred due to different reason and thus different corrective measures are necessary. Each instance is discussed below with the corresponding corrective action noted.

- On December 7, 2016, a boulder was pushed outside of the approved limits of clearing. An equipment operator placed a boulder outside of the limit of disturbance to avoid it being too near the flow of construction traffic where a blind spot exists at an intersection with an access road and the primary public access road. Although we commend the operator for thinking about safety, we recognized the need to reiterate the importance of compliance. At the time this instance occurred, the operator inspected the area with the compliance monitor and they discussed the incident. Additionally, the next day the incident was discussed in the daily POD and manager's meeting. Finally, a slide was added to the site orientation slide deck which depicts limits of disturbance flagging and discusses the importance and rules surrounding limits of disturbance. We have informed all personnel that anyone has the right and responsibility to stop work at any time if

they believe there is a compliance or safety concern, or have doubts of where they are going or what they are doing. Work will not begin without all monitors executing the signoff sheet (bio, arch, and native). If the task or location changes, work will again stop and the crew will wait and contact monitors to get the appropriate review and sign off before starting work.

Response: The Clearing and Grading Superintendent is now assigned to regularly check in with the construction team to discuss areas which are problematic for large boulders. Since these measures were put in place, there have been no other instances of a contractor placing any materials outside of the approved disturbance limits.

- On January 11, 2017, a contractor operating a skid steer mistook an "offset stake" with a limit of clearing stake which resulted in the clearing of approximately 230 square feet outside the disturbance limits. In this instance, the error was immediately noted in the field by the environmental monitors, as well as, by the equipment operator. The error occurred because the operator had limited visibility in front of his equipment due to the placement of the masticator required to perform the job and thus did not see the offset mark on the stake. Additionally, due to the unsafe conditions associated with the operations of a masticator, monitoring personnel were not near the equipment and were not able to stop it until it had cleared the area. Furthermore, the flagging of offset stakes were not differentiated in any way from regular clearing disturbance limit stakes, thus requiring that the operator see the offset mark on the stake to know it is not a clearing limit stake.

Response: The site was shut down to discuss this instance and to assess the number of offset stakes placed on site with the goal of providing assurances that this had not happened elsewhere on the site. Because all stakes have GPS locations recorded in the field, the contractor quickly assessed that a total of forty-five (45) offset stakes had been placed throughout the project. A new protocol was put in place requiring removing offset stakes and clarifying the limits of disturbance when a rock or other immobile object blocked appropriate stake placement. Specifically, these new protocols consist of staking on either side of the object at the clearing limits. If for any reason this is not possible, an offset stake will only be placed within the limit of clearing. Moving forward, two colors of ribbon (both green and yellow) will be tied onto any offset stakes. An update will be made to the safety orientation training slide which notes flagging color keys. Additionally, surveyors will verify that existing stakes are flagged with the correct color. Clearing activities near limits of disturbance were ceased until all offset stakes were removed and new staking was in place following new protocols. Additionally, areas already cleared near offset stakes were reviewed to ensure that this was a one-time error. It was confirmed to be a single event error.

- On January 18, 2017 clearing was discovered outside of approved disturbance limits due to a set of stakes placed in the field from a not yet approved Variance Request. The Variance was requested to avoid a cultural ESA on the F-String which was discovered in pre-construction sweeps in the early fall. Additionally, grading occurred along an unauthorized portion of the existing McCain Valley Road which leads to the A-string. These areas were both part of the Variance Request 001. These clearing errors occurred because the two variance areas were included as part of the Issued For Construction (IFC) drawings provided to the BLM on July 19, 2016 and updated on November 11, 2016. The drawings did not delineate the areas associated with the Variance Request and were mistakenly

staked prior to BLM approval. Because these two areas were known to need a variance, they were engineered accordingly and included as part of the design set. When survey crews went into the field they recorded staking points for both the variance and approved limits of staking. This resulted in clearing approximately 0.06 additional acres along the F string. In the instance near the A-string, where McCain Valley Road cannot be closed off, the limits of disturbance associated with the variance contained no differential markings. As such, when grading took place in early December along McCain Valley Road, approximately 0.2 acres of McCain Valley Road was graded outside of approved survey corridors. It should be noted that no additional widening of McCain Valley Road occurred as a result of the grading work.

Response: After these incidents were discovered on January 18, 2017, the site was shut down and the incidents were assessed. At that time, the only remaining variance staking in the field was on the G-line associated with the last area in Variance 001. To avoid risk of grading in this area, those stakes were pulled from the field. Staking points will only be re-established if Variance 001 is approved. To avoid confusion with future variances, any design layout changes will be provided to monitors in the form of shapefiles for cultural and biological monitoring teams to conduct appropriate surveys using handheld GPS equipment. Shapefiles for variance areas will only be released to the construction contractor and staked once the variance has been approved. Therefore, we believe that this is also a one-time error. Going forward we will make sure to use purple ribbon on any variance stakes. We will update slides and make sure surveyors verify that they are flagged with the correct color.

Clearing beyond the approved disturbance limits – additional safeguards

Because incidents involving clearing beyond the limits of disturbance were not replicated, we believe that the field changes we have implemented provide adequate safeguards. However, to provide further assurances that there are no staking errors in our staking data, the waypoints of every stake has been overlaid with the approved limits of clearing and reviewed for potential errors. While we did not find any errors during this exercise, these data will be provided to Dudek and the BLM for review as well. With most staking already completed for the project, we believe that this approach to staking will greatly increase confidence that appropriate staking has occurred in the field.

Additionally, contractors will change methods of initial clearing in areas where brush requires the use of a masticator, which limits operator visibility and affects the monitors' proximity to the work for safety reasons. Specifically, the initial clearing areas will first be walked down with bulldozers to provide better operator visibility from an elevated position to ensure the operation can see limits of clearing demarcation. The use of this alternate equipment also has the benefit of allowing monitors to walk closer to equipment which provides additional assurance that the operator will stay within the limits of clearing. As a final precautionary measure, contractor spotters will verify all upcoming staking and road alignments with the survey crews ahead of clearing. As part of this verification process rope or construction tape will be used to visually demark the limits of clearing creating a visible linear boundary. This process will result in the contractor spotter becoming educated with each area through visual inspection and direct question and answers from the surveyor which will provide the clearing crews more direct access to survey methodologies and field implementation. The spotter will walk ahead of the dozer to locate stakes ahead of the clearing and identify any irregular boundaries that an operator might miss. The spotters would have hand held radios and the operators have radios mounted in their equipment. The operator and the spotter would communicate both by radio and by

visual hand signals. Our contractors use spotters extensively in our operations and they are already an integral part of the crew. We do not use them with the masticators as that equipment throws rocks and debris so it can be quite dangerous to stand in front of or in close proximity to this equipment. As with the rest of the crew, the spotter will report directly to the crew Foremen and working directly in conjunction in the operator. The spotter has the authority to stop the work.

By implementing the measures referenced above in addition to the measures already put in place at each instance noted, we believe that we can safely, efficiently, and effectively clear the tough terrain associated with the Tule Wind Project and stay within the confines of our limits of disturbance and permit conditions.

Grading without required monitoring – incidents

There have also been three instances where grading activities occurred without the required monitoring crews present. All three incidents involve grading of previously disturbed earth with based on a misunderstanding of when monitors were required.

- On December 16, 2016 equipment was discovered grading previously disturbed earth that had not yet been cleared for work without a cultural monitor present. In this instance equipment traveling to perform work elsewhere dropped its blade and began to grade a location which had been previously disturbed the day before. The operator dropped the blade to smooth out a 'bump' in the road to allow easier access on the rough graded road. When monitors noted the activity, they flagged the operator who immediately ceased work. At that time, the Tule Wind team was unaware that a monitor was needed in areas previously disturbed the day before when new vertical strata are disturbed.

Response: A meeting was held to discuss both the permit conditions surrounding the use of monitors as well as the purpose of each monitor resulting in additional clarification around the use and need for Cultural and Biological Monitors. New definitions were circulated and agreed upon and these were shared with the Tule Wind construction team via e-mail. They were also discussed at the first POD of the New Year once the construction team returned to the site.

The new definitions are as follows:

Cultural Monitors must continue to work in an area until it has been cleared for a particular activity to a particular grade. If clearance is not received, no work activities can occur in that area without cultural monitors until clearance is received. The clearance will be granted based on consultation with the BLM and will be granted subject to the availability of appropriate BLM staff. Just because a team went somewhere yesterday doesn't mean they can go back there without monitors.

Biological Monitors shall monitor all brush removal, topsoil removal, and initial excavations. In regard to excavations, the biological monitor shall monitor the initial removal of soil and inspect the area of excavation including all areas adjacent to the work area for signs of potential biological resources, including burrowed animals.

Once this has occurred in a work area, then daily biological sweeps of that area before subsequent work and roving monitoring of all active work areas throughout the shift would occur. Daily clearance will not be granted until the sweep has been completed and deemed clear by the environmental monitor.

- On January 16, 2017 a second instance, similar to the instance on December 16, 2017 occurred. Equipment moved from the H line to the G line to smooth already disturbed areas on the G line. The BLM monitor observed this grading activity without the appropriate monitors present. The BLM monitor discussed this activity with the operator and the activity ceased. In this instance, corrective actions taken several days before failed because of communication errors. The operator thought the area was part of an area cleared for additional ground disturbance without monitors. By stating previously that no work would occur without a monitor, Tule Wind failed to take into account instances when it was indeed OK to work without a full-time monitor and switching locations. The operator was previously working in an area for which no full-time monitoring was required and did not realize the change in requirements when shifting locations. This was a scenario that was not fully thought out, thus Tule Wind believed that no additional incidents involving clearing without a monitor would occur. Both the operator and monitors were made aware of the previous commitment to not perform any work without a monitor. However, the first activity of the crew was cleared for full-time monitoring days prior for cultural and was slated for a bio sweep that morning and was not contemplated at the morning POD.

Response: As a result of this second incident of grading activity without a monitor, the site was shut down and the team started to brainstorm options to alleviate any confusion related to the need for monitors for previously disturbed areas.

- On January 12, 2017 a third instance of work without a cultural monitor present happened along the east/west access road. In this instance equipment separated from a crew which had appropriate coverage for monitoring. The cultural monitor felt that both areas could be adequately covered with one cultural monitor and the original team stood down while the solo piece of equipment and cultural monitor went to a new location. At this new location, the monitor surveyed the area and concluded that there would be no cultural resource damage if work occurred in the area. Then, the monitor left the equipment operating without a monitor present; therefore, the operator was under the mistaken assumption that he had the approval of the cultural monitor to proceed to perform grading activities.

Response: When discovered, this issue was discussed with the BLM and the management lead for the cultural monitoring team. The monitor was removed from site the next day and retrained. Additionally, monitoring crews were increased to include three floater monitors per day to avoid situational dilemmas of a monitor choosing what activity to monitor and the on-site contractor noted that no activities would occur without a monitor going forward. Roving (floating) monitors are assigned to sites and/or activities that do not require full time monitoring. Roving monitors will be scheduled to "spot check" multiple sites and/or other biological tasks (including but not limited to preconstruction sweeps, nesting bird surveys, updating ESAs, and/or SWPPP inspections). Roving monitors' schedules are based on the number of activities requiring spot checks, the intensity of the activities, and the proximity of the locations. Sites or activities will be prioritized based on the risk to biological resources. We believe this was a one-time error

Grading without required monitoring – safeguards

All three monitoring incidents involved communication errors resulting in the failure to comply with the established guidelines, field whether they were by the monitoring team or the contractor team. As such, Tule Wind is implementing measures to help clarify the use of monitors. First, we believe that increasing the use of floater monitors is a cost effective



measure to manage this compliance effort by ensuring that additional monitors are available if the POD changes throughout the day. The inclusion of these monitors will be identified as part of the three (3) Day Look Ahead. Second, effective immediately, Tule Wind and its contractors will be implementing a monitor signature log for all activities on site. Construction foremen will be responsible for seeking and obtaining appropriate monitor signatures daily prior to each activity to occur at each location. In addition, the foreman will sign each log. Construction activities will not commence without completed monitor approval forms. These forms note the activity, location of activity, start time, and signature of the monitors present. These forms will be audited by the Environmental Compliance Lead and will be kept on site and will be made available for Dudek/BLM review. Third, more environmental training will be provided. Each and every person on site will be WEAP trained a second time prior to conducting new work on site. In addition to the second round of WEAP training, additional training will also include reinforcement and restatement of monitoring requirements in addition to the BLM approved slides and voiceover. Additional slides will be added to the contractor orientation training which addresses breaks. In addition, the foreman and construction staff will be trained by the contractor management to stop work when asked to do so by the, BLM, Dudek, and ICF or ASM monitoring teams. The monitoring requirements discussed on December 28 with the BLM and noted in this letter will be visually depicted in a secondary component to the WEAP training. A ten question test will be given with this training and reviewed at the end of the training session.

Communications have been reviewed and new communication protocols will be implemented. In field training will take place reminding all field personnel of the requirements for monitoring at each days' POD meeting. Additionally, as part of the initiative to create a compliance first culture, monitors will engage construction crews in daily discussion topics about what resource they are monitoring for and why it is important. The Site Management team meets daily at 6:30 AM, which include lead monitors, contractor site management safety coordinators and foreman. During this meeting the daily work tasks, location of the work, and monitoring needs are discussed. The Management team then moves to the laydown area at 7AM to discuss the plan of the day which includes safety and compliance topics with all personnel including the managers, foreman, monitors, operators and laborers. Once these discussions are completed crews split into their respective teams and work with their assigned monitors to discuss and determine the level of monitoring needed at each location and task. Next, the teams travel to their work site and the assigned monitors perform a review of the location and tasks, and then execute the monitor sign off sheet. If during the day a task or location changes, the monitors and foreman/crews will reconvene to review the new task, location, and execute a new monitoring sign off sheet.

Tule Wind and our contractors take all incidents seriously and are committed to continued training and finding new ways to solve the complex problems that occur on site. Contracts between Tule Wind and our contractors include language which requires adherence to all permits and permit conditions. Contract Section 3.3 regarding compliance is attached. Additionally, Tule Wind held a project realignment meeting on January 26, 2017 with all team members including our BOP contractor, electrical contractor, foundation contractor, environmental monitor leads, cultural monitor leads, and BLMs 3rd party monitor to focus on what compliance means to our company and how we can create and uphold a culture of compliance at the Tule Wind site. We have increased the number of monitors, improved the communication amongst the site team and created a policy to halt work if a question arises whether a monitor is required. We have taken the past several days to

reflect upon these actions and discuss the impact of the measures proposed in this letter. We will be implementing the following management practices immediately:

- Survey points will be verified;
- Spotters will work with Survey teams to ask questions and rope disturbance limits;
- Low visibility areas will incorporate different clearing methods;
- Implement floater monitors;
- Monitor signature and sign off sheets will be implemented;
- Retraining will occur including WEAP, daily POD reinforcement of monitoring requirements, and in field training; and
- Using the same methods and strategies Avangrid Renewables uses to create a safety first culture, the project team will begin Incorporating compliance first topic discussions at PODs and other construction meetings.

Although we are making every effort to stay in compliance, should future instances occur, Avangrid renewables will reply with a written report documenting the incident, potential damages or plan to evaluate potential damages, and corrective actions within 48 hours of written notification of a non-compliance or a serious violation. .

As such, we request that full activities be allowed to resume on BLM controlled land on Wednesday, February 1, 2017.

We look forward to continuing this partnership which began a decade ago and thank you for your efforts and the efforts of the staff at the El Centro office in making Tule Wind a reality. If you have any questions at all please do not hesitate to contact me directly at Erik.Lallum@Avangrid.com (503-478-6361) or Kristen Goland at Kristen.Goland@Avangrid.com (503-478-6360).

Yours Sincerely,



Erik Lallum
Vice President Engineering and Construction
Avangrid Renewables

CC: Miriam Liberatore, Carrie Simmons (BLM), David Hochart, Keith Carwana (Dudek), Kamber, McAllister, Talia Haley, John Rodgers (ICF), Ed Clark, Mark Croissant, Chris Wyly, Laura Nagy (Avangrid Renewables), Mark Larum (BEI)

Attachments:

Construction Service Agreement 3.3_Compliance
Tule Monitor Signoff log
Tule Organization and Communication flow charts
Supplemental training powerpoint

Tule Wind Responses to BLM clarifying questions. Responses are pulled directly from letter and are offered to provide quicker reference to responses.

General Comments:

1. Please clearly articulate how Avangrid will hold contractors accountable to adherence with the project requirements and permits.

RESPONSE: Tule Wind and our contractors take all incidents seriously and is committed to continued training and finding new ways to solve the complex problems that occur on site. Contracts between Tule Wind and our contractors include language which requires adherence to all permits and permit conditions. A redacted copy of our standard contract is attached. Additionally, Tule Wind held a project realignment meeting on January 26, 2017 with all team members including our BOP contractor, electrical contractor, foundation contractor, environmental monitor leads, cultural monitor leads, and BLMs 3rd party monitor to focus on what compliance means to our company and how we can create and uphold a culture of compliance at the Tule Wind site. We have increased the number of monitors, improved the communication amongst the site team and created a policy to halt work if a question arises whether a monitor is required.

2. We understand that Tule Wind will be implementing a "monitor signature log". Please provide a copy of the proposed monitor signature log and ensure that construction contractors, including foremen and operators will be signing the monitor signature log.

RESPONSE: These forms note the activity, location of activity, start time, and signature of the foreman and monitors present. (SEE ATTACHMENT - Monitoring Signoff log).

3. Include a graphic or table of how communications should flow between foremen, operators, and monitors, including floating monitors. Please indicate the different authorities of the foreman, operators, and monitors and clearly define who on-site has the ultimate authority.

RESPONSE: Communication between monitoring crews and construction crews is pivotal to remaining in compliance. Tule Wind has used this time of this stand down to examine organization and communication and ensure that everyone on site understands each other's role and that the Tule Wind Site Manager, or his designee, has ultimate responsibility to all activities on site. Site organization and communication is detailed in the attached file. SEE ATTACHMENT - *Site Organization and Communication which outlines the site construction organization and communication flow between the monitors and the crews.*

4. Please clearly define how communication between monitors, operators, and foreman will improve. For example, implementation of a radio program (or other communication program) with training on how to use radios and radio etiquette.

RESPONSE: Communication between monitoring crews and construction crews is pivotal to remaining in compliance. Contractors have high band hand held radios for monitors as well as operators and foreman. Informational training is given explaining channels to utilize, how to communicate with the appropriate language, and only communicate necessary information. Trucks, equipment and hand held radios use channel 3. Channel 1 is the safety channel and is only used for emergencies. When project infrastructure NTP is received and/or the building permit for the temporary construction trailer is approved, radio communications will be improved with signal boosters and the installation of repeaters.

Additionally, the Site Management team meets daily at 6:30 AM, which will include lead monitors, contractor site managers and foreman.

5. Please describe what improvements will be made to provide both the BLM and San Diego County with timely reporting of on-site problem areas and non-compliance events. Reporting should clearly define the issue, potential damages to environmental resources, and what corrective actions are being taken and/or proposed to prevent similar issues from reoccurring beyond those that are already in place.

RESPONSE: Although we are making every effort to stay in compliance, should future instances occur, Avangrid renewables will reply with a written report documenting the incident, potential damages or plan to evaluate potential damages, and corrective actions within 48 hours of written notification of a non-compliance or a serious violation.

6. The training program and/or WEAP should clearly define when an operator must stop work. For example, when a monitor uses the restroom or takes a lunch break. How will the monitors assigned to a specific activity notify a roaming team that they are going on lunch break and ensure that the activity continue only when monitors are present?

RESPONSE: Additional slides will be added to the contractor orientation training which addresses breaks and denotes when an operator must stop work. In addition to undergoing another round of WEAP training, all project personnel will receive this supplemental portion of the training prior to the start of work. A copy of the additional slides is attached. In addition, the foreman and construction staff will be trained by the contractor management to stop work when asked to do so by the BLM, ICF, ASM, and Dudek monitoring teams.

Specific Comments

1. First bullet, page 2 – The permission to resume activities letter states: “Finally, a slide was added to the site orientation slide deck which depicts limits of disturbance flagging and discusses the importance and rules surrounding limits of disturbance”.

In this case the operator didn’t recognize that the limits are absolute and did not know the communications protocol for conveying his/her safety concern. Please elaborate on what communication protocols will be put in place to prevent a reoccurrence or similar issue from occurring.

RESPONSE: We have informed all personnel that anyone has the right and responsibility to stop work at any time if they believe there is a compliance or safety concern, or have doubts of where they are going or what they are doing. Work will not begin without all monitors executing the signoff sheet (bio, arch, and native). If the task or location changes, work will again stop and the crew will wait and contact monitors to get the appropriate review and sign off before starting work.

2. Second bullet, page 2 – In the “response” section, the permission to resume activities letter states “Specifically, these new protocols consist of staking on either side of the object at the clearing limits. If for any reason that is not possible, an offset stake will only be placed within the limits of clearing”. Please specify that a new color code will be used for offset stakes and describe how all contractors will be made aware of what this new staking color represents.

RESPONSE: Moving forward, two colors of ribbon both green and yellow ribbon will be tied onto any offset stakes. An update will be made to the safety orientation training slide which notes flagging color keys. This update is included in the additional slides discussed in general comment #6. Additionally, surveyors will verify that existing stakes are flagged with the correct color.

3. Third bullet, page 2 – Please delete “occurred” in the sentence “On January 18, 2017 clearing occurred outside of approved disturbance limits due to a set of stakes placed in the field from a not yet approved Variance Request”.

RESPONSE: Updated to “was discovered”.

4. Page 3, sentence 4 – In the future it may be necessary to stake future variance proposal for planning purposes. How would you avoid confusion when staking future variance requests (i.e. different staking and staking reference sheet)?

RESPONSE: Going forward we will make sure to use purple ribbon on any variance stakes. We will update slides and make sure surveyors verify that they are flagged with the correct color.

5. Page 3, third paragraph – Tule Wind is proposing the use of contractor spotters to verify all upcoming staking and road alignments with the survey crews ahead of clearing. Can you please further describe the contractor spotter role?

RESPONSE: The spotter will walk ahead of the dozer to locate stakes ahead of the clearing and identify any irregular boundaries that an operator might miss.

In particular, how and when would they interact with the operator?

RESPONSE: The spotters would have hand held radios. The operators have radios mounted in their equipment. The operator and the spotter would communicate both by radio and by visual hand signals.

How is their role conveyed to anyone else on the crew?

RESPONSE: Our contractors use spotters extensively in our operations and they are already an integral part of the crew. We have not used them with the masticators as that equipment throws rocks and debris so can be quite dangerous to stand in front of or in close proximity.

How do they fit into the hierarchy?

RESPONSE: As with the rest of the crew the spotter will report directly to the crew Foremen.

When they are spotting they will be working directly in conjunction in the operator. Do they have any authority?

RESPONSE: Yes, the spotter will have the authority to stop the work.

Similarly, please provide details of how floater monitors will be used, assigned, requested, and moved around. What if there are more activities than monitors?

RESPONSE: Roving (floating) monitors are assigned to sites and/or activities that do not require full time monitoring. Roving monitors will be scheduled to “spot check” multiple sites and/or other biological tasks (including but not limited to preconstruction sweeps, nesting bird surveys, updating ESAs, and/or SWPPP inspections). Roving monitors' schedules are based on the number of activities

requiring spot checks, the intensity of the activities, and the proximity of the locations. Sites or activities will be prioritized based on the risk to biological resources.

6. Page 4, first bullet – The permission to resume activities letter includes the protocols that Tule Wind and the BLM agreed to in regards to when biological and cultural monitors are required. Please further describe the mechanisms that Tule Wind will use to remind the team of these protocols (i.e. tailboard meeting, team meetings, email notifications, etc.). Please add a description of how Tule Wind will accomplish this as part of the permission to resume activities letter.

RESPONSE: The Monitor Leads and our Foremen will meet at our 6:30 POD meeting to discuss work for the day and areas of concern. The monitors will later meet in the field with the crews to discuss the specific activity that is taking place, compliance concerns and safety concerns. The Monitoring Sign Off form will be completed by the Foreman/Lead person and Monitors prior to proceeding with any work.

7. Page 4, second bullet – In the description of the incident that occurred on 1/16/17 where a BLM monitor observed grading activities without the appropriate monitors present, please describe why the prior corrective actions did not prevent this incident from occurring? What else needs to be addressed to prevent another occurrence? What led Tule wind to believe the issue has been corrected sufficiently to allow work to resume? We would like to further understand how both the operator and monitor failed to prevent this incident from occurring. Were the monitors and operators aware of the new direction provided after the incident that occurred on 12/16/17?

RESPONSE: In this instance, corrective actions taken several days before failed because of communication errors. The operator thought the area was part of an area cleared for additional ground disturbance without monitors. By stating previously that no work would occur without a monitor, Tule Wind failed to take into account instances when it was indeed OK to work without a full-time monitor and switching locations. The operator was previously working in an area for which no full-time monitoring was required and did not realize the change in requirements when shifting locations. This was a scenario that was not fully thought out, thus Tule Wind believed that no additional incidents involving clearing without a monitor would occur. Both the operator and monitors were made aware of the previous commitment to not perform any work without a monitor. However, the first activity of the crew was cleared for full-time monitoring days prior for cultural and was slated for a bio sweep that morning and was not contemplated at the morning POD.

8. Page 5, second paragraph – Please clarify the “judgement errors”. We are interpreting this as more of a failure to apply established guidelines, not misjudgments.

RESPONSE: All three monitoring incidents involved communication errors resulting in the failure to comply with the established guidelines, field whether they were by the monitoring team or the contractor team.

9. Page 5, second paragraph – This paragraph states “Each and every person on site will be WEAP trained a second time prior to conducting new work on site”. Will this be the same training?

RESPONSE: Everyone on site will be WEAP trained again with the same original material. In addition the monitoring requirements discussed on December 28, 2016 will be visually depicted in the supplemental training. Everyone on site will also receive the supplemental training.

How will that assure better understanding and compliance? One suggestion would be to provide a test at the end of the training to ensure that the team is understanding how important these requirements are.

RESPONSE: A ten question test will be given with this training and reviewed at the end of the training session. The test will be reviewed by the group and correct answers will be discussed to assure test takers understanding of the questions.

10. Page 5, second paragraph – This paragraph states “monitors will engage construction crews in daily discussion topics about what resource they are monitoring for and why it is important”. Please define when these discussions are anticipated to take place. Will they occur at the daily tailboard meetings?

RESPONSE: The Site Management team meets daily at 6:30 AM, which include lead monitors, contractor site management safety coordinators and foreman. During this meeting the daily work tasks, location of the work, and monitoring needs are discussed. The Management team then moves to the laydown area at 7AM to discuss the plan of the day which includes safety and compliance topics with all personnel including the managers, foreman, monitors, operators and laborers. Once these discussions are completed crews split into their respective teams and work with their assigned monitors to determine the level of monitoring needed at each location and task. Next, the teams travel to their work site and the assigned monitors perform a review of the location and tasks, and then execute the monitor sign off sheet. If during the day a task or location changes, the monitors and foreman/crews will reconvene to review the new task, location, and execute a new monitoring sign off sheet.

3.3 **Compliance.** Contractor shall ensure that all Work conforms to and is in accordance with the Contract Documents (including the Specifications and any design Work required in accordance with Section 3.2), Prudent Wind and Utility Practices, Applicable Laws, Applicable Standards, Quality Assurance Procedures, Permits, the Project Site Plan (collectively, "**Requirements**"),. At least monthly, or at more frequent intervals if requested by Owner, Contractor shall provide a written report to Owner detailing Contractor's compliance with the Requirements.



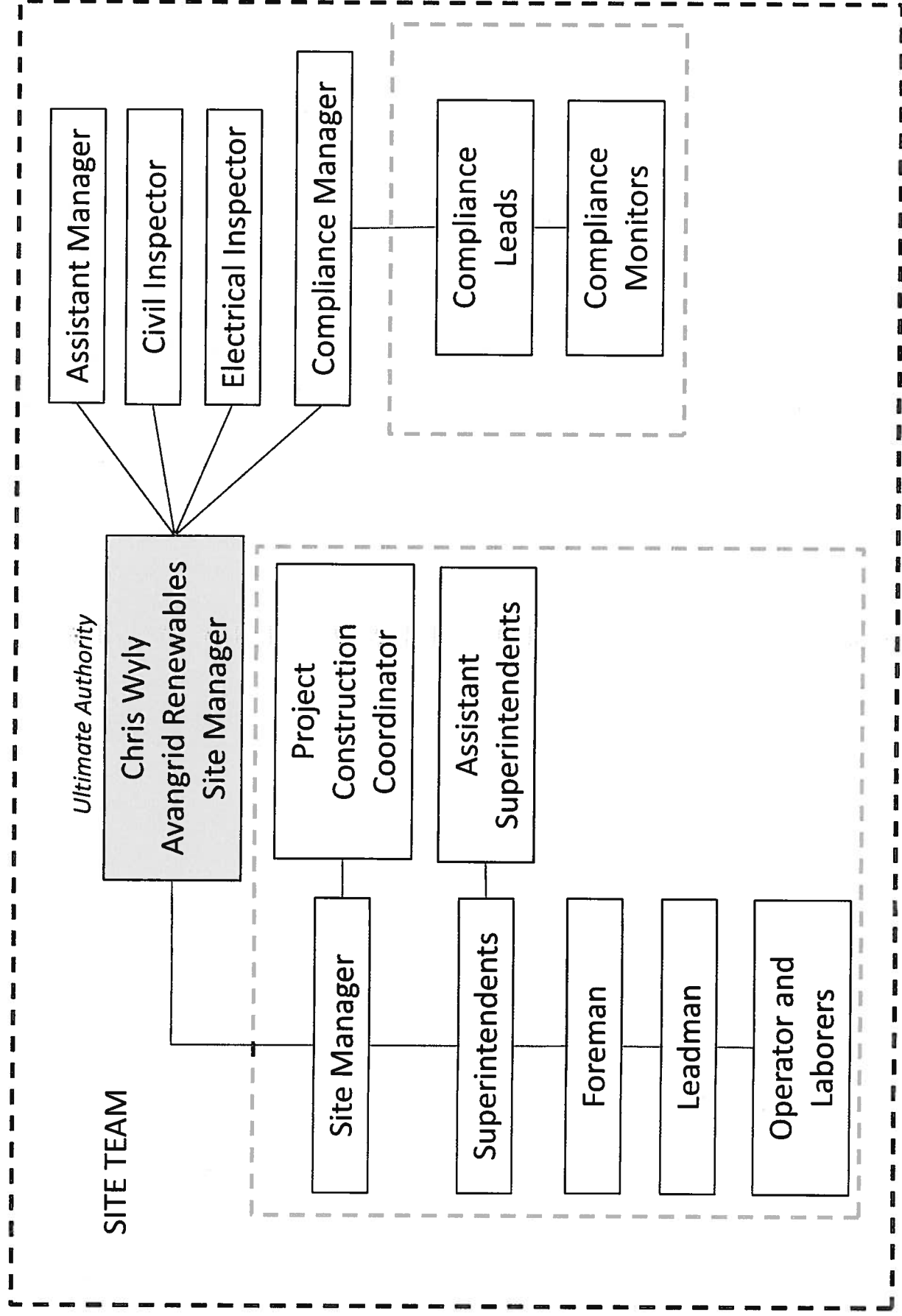
Date: _____

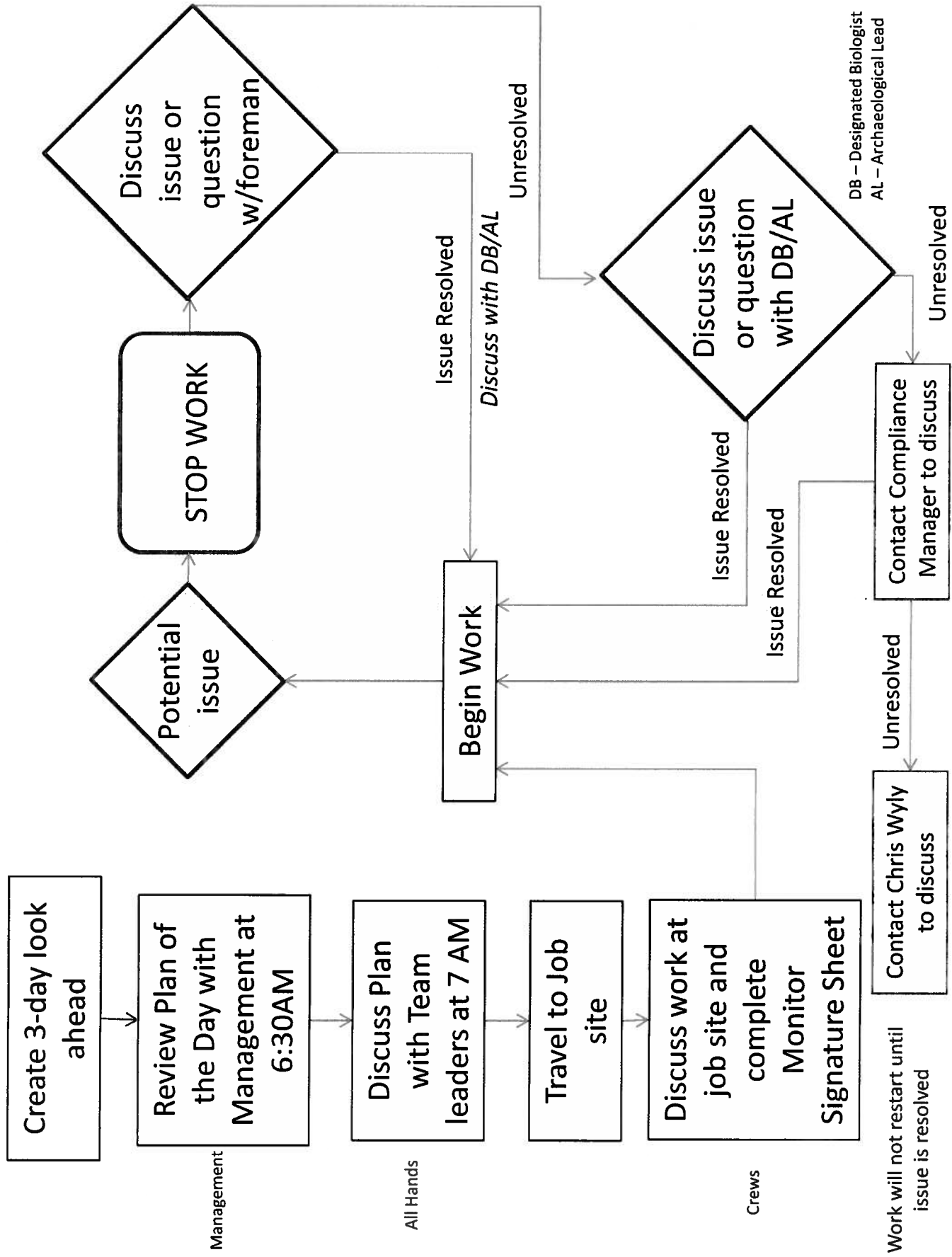
Foreman (Signature) _____ Phone # _____

Time	Work Area	* Only list one construction activity per line	Monitor Name & Company (Print)	Monitor Signature	Required Monitoring (circle if sweep was conducted and monitoring requirement)		
					Arch Monitoring	Tribal Monitoring	Environmental Monitoring
					Sweep Conducted	Sweep Conducted	Sweep Conducted
					Full Time Monitor	Full Time Monitor	Full Time Monitor
					Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
					No Monitor Required	No Monitor Required	No Monitor Required
					Sweep Conducted	Sweep Conducted	Sweep Conducted
					Full Time Monitor	Full Time Monitor	Full Time Monitor
					Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
					No Monitor Required	No Monitor Required	No Monitor Required
					Sweep Conducted	Sweep Conducted	Sweep Conducted
					Full Time Monitor	Full Time Monitor	Full Time Monitor
					Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
					No Monitor Required	No Monitor Required	No Monitor Required
					Sweep Conducted	Sweep Conducted	Sweep Conducted
					Full Time Monitor	Full Time Monitor	Full Time Monitor
					Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
					No Monitor Required	No Monitor Required	No Monitor Required

List possible risks (Similar to JHA) such as rocks on boundary, possible biological or environmental concerns to watch:

Site Organization





Communication Flow

Communication flow between the monitors and the crews.

1. If the monitor foresees a potential issue prior to work (after reading the JHA, for example) the monitor will discuss the issue prior to signing off on the monitor signature sheet. If there is a potential issue while work is occurring, the monitor stops the equipment by signaling to the operator to stop.
2. The monitor discusses the issue or question with the operator or foreman as appropriate.
3. If they are able to resolve the issue there, work can resume. The monitor will discuss the potential issue with the Designated Biologist (DB) and/or Archaeological Lead (AL) so they are aware of the discussion.
4. If the issue could not be immediately resolved and monitor needs additional input, the monitor calls the DB/AL to discuss the issue. If the DB/AL can resolve the issue after coordinating with the monitor, work will resume. If the issue cannot be resolved,
5. DB/AL coordinates with the correct personnel to address the issue (foreman and/or Compliance Manager).
6. The DB/AL provides guidance back to the monitor.
7. Work does not resume until the monitor informs the crew they are clear to resume.
8. If Compliance Manager was not previously informed by the DB/AL, the DB/AL informs Compliance Manager of the issue prior to the end of the day.
9. Compliance Manager contact Talia and/or Brian before elevating anything that comes from the field.
10. Compliance Manager reports the issue and how it was resolved to Chris Wyly in the evening summary email.

Staking color codes

- **Pink** - Centerline
- **Orange** - Environmentally Sensitive Area
- **Yellow** - Grading/Disturbance Limits
- **Yellow /Green** - Offset Staking
- **Green** - Turbine Centerpin
- **Blue** - Jurisdictional waterways.
- **Red/Yellow** - Turning or angle point of centerline
- **Purple** — Variance staking

Disturbance Limits

- Below is an example of the staking for our grading/disturbance limits. As well as an example of what not to do to stay in compliance. It is critical to the project that we take all necessary actions to stay within compliance.
- The blatant disregard for complying with any limit requirements will result in disciplinary action.



Monitor Roles

- *Biological Monitors shall monitor all brush removal, topsoil removal, and initial excavations. In regards to excavations, the biological monitor shall monitor the initial removal of soil and inspect the area of excavation including all areas adjacent to the work area for signs of potential biological resources including burrowed animals.*
- *Once this has occurred in a work area, then daily biological sweeps of that area before subsequent work and roving monitoring of all active work areas throughout the shift would occur. Daily clearance will not be granted until the sweep has been completed and deemed clear by the environmental monitor.*

Monitor Roles

- Cultural Monitors must continue to work in an area until it has been cleared for a particular activity to a particular grade. If clearance is not received, no work activities can occur in that area without cultural monitors until clearance is received. The clearance will be granted based on consultation with the BLM and will be granted subject to the availability of appropriate BLM staff. Just because a team went somewhere yesterday doesn't mean they can go back there without monitors.

- We have had a couple issues with judgment and miscommunication on site when it comes to monitors. To prevent this from happening, all our foreman will be using a monitor sign off sheet for each activity that they are doing.

Monitor Sign Off



Date: _____

Foreman (signature) _____ Phone # _____

Time	Work Area	* Only list one construction activity per line	Construction Activity*	Monitor Name & Company (Print)	Monitor Signature	Required Monitoring (circle if sweep was conducted and monitoring requirement)		
						Arch Monitoring	Tribal Monitoring	Environmental Monitoring
						Sweep Conducted	Sweep Conducted	Sweep Conducted
						Full Time Monitor	Full Time Monitor	Full Time Monitor
						Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
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						Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
						No Monitor Required	No Monitor Required	No Monitor Required
						Sweep Conducted	Sweep Conducted	Sweep Conducted
						Full Time Monitor	Full Time Monitor	Full Time Monitor
						Spot Check Monitor	Spot Check Monitor	Spot Check Monitor
						No Monitor Required	No Monitor Required	No Monitor Required

List possible risks (Similar to JHA) such as rocks on boundary, possible biological or environmental concerns to watch:



Protocol for Clearing

- Foreman and surveyors will do a walk through and check the location accuracy of each lath in designated area.
- Once locations are confirmed, caution tape will be strung lath to lath.
- With a spotter in front, we will track a dozer around the perimeter of the area that needs to be cleared.
- Once we have an outline of the area that needs to be cleared, we will have masticators go in and clear the area that is defined by the dozer.

Stop Work Authority

- Everyone on site has the right and the responsibility not only to stop any work for a Safety concern but also for a Compliance concern.

Protocol for stop work

- BEI expects all employees (laborer, operator, foreman, manager, monitor, etc) to stop work if there is any question about safety or compliance. If a full-time monitor is required but not present due to any reason (break, travel, etc.) work will stop until the required personnel are present and have given the required clearance as indicated on the monitor sign off log. This is ANY and EVERYONES responsibility if questions arise.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

INFORMATION ON TAKING APPEALS TO THE INTERIOR BOARD OF LAND APPEALS

DO NOT APPEAL UNLESS

1. This decision is adverse to you,
AND
2. You believe it is incorrect

IF YOU APPEAL, THE FOLLOWING PROCEDURES MUST BE FOLLOWED

1. NOTICE OF
APPEAL.....

A person who wishes to appeal to the Interior Board of Land Appeals must file in the office of the officer who made the decision (not the Interior Board of Land Appeals) a notice that he wishes to appeal. A person served with the decision being appealed must transmit the *Notice of Appeal* in time for it to be filed in the office where it is required to be filed within 30 days after the date of service. If a decision is published in the FEDERAL REGISTER, a person not served with the decision must transmit a *Notice of Appeal* in time for it to be filed within 30 days after the date of publication (43 CFR 4.411 and 4.413).

2. WHERE TO FILE

NOTICE OF APPEAL.....

Bureau of Land Management
El Centro Field Office
1661 S. 4th Street
El Centro, CA 92243-4561

WITH COPY TO
SOLICITOR.....

Office of the Solicitor
Pacific Southwest Region
1800 Cottage Way, Room E1712
Sacramento, CA 95825-1890

3. STATEMENT OF REASONS

Within 30 days after filing the *Notice of Appeal*, file a complete statement of the reasons why you are appealing. This must be filed with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. If you fully stated your reasons for appealing when filing the *Notice of Appeal*, no additional statement is necessary (43 CFR 4.412 and 4.413).

WITH COPY TO
SOLICITOR.....

Office of the Solicitor
Pacific Southwest Region
1800 Cottage Way, Room E1712
Sacramento, CA 95825-1890

4. ADVERSE PARTIES.....

Within 15 days after each document is filed, each adverse party named in the decision and the Regional Solicitor or Field Solicitor having jurisdiction over the State in which the appeal arose must be served with a copy of: (a) the *Notice of Appeal*, (b) the Statement of Reasons, and (c) any other documents filed (43 CFR 4.413).

5. PROOF OF SERVICE.....

Within 15 days after any document is served on an adverse party, file proof of that service with the United States Department of the Interior, Office of Hearings and Appeals, Interior Board of Land Appeals, 801 N. Quincy Street, MS 300-QC, Arlington, Virginia 22203. This may consist of a certified or registered mail "Return Receipt Card" signed by the adverse party (43 CFR 4.401(c)).

6. REQUEST FOR STAY.....

Except where program-specific regulations place this decision in full force and effect or provide for an automatic stay, the decision becomes effective upon the expiration of the time allowed for filing an appeal unless a petition for a stay is timely filed together with a *Notice of Appeal* (43 CFR 4.21). If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Interior Board of Land Appeals, the petition for a stay must accompany your *Notice of Appeal* (43 CFR 4.21 or 43 CFR 2801.10 or 43 CFR 2881.10). A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the *Notice of Appeal* and Petition for a Stay **must** also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay. Except as otherwise provided by law or other pertinent regulations, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards: (1) the relative harm to the parties if the stay is granted or denied, (2) the likelihood of the appellant's success on the merits, (3) the likelihood of immediate and irreparable harm if the stay is not granted, and (4) whether the public interest favors granting the stay.

Unless these procedures are followed, your appeal will be subject to dismissal (43 CFR 4.402). Be certain that **all** communications are identified by serial number of the case being appealed.

NOTE: A document is not filed until it is actually received in the proper office (43 CFR 4.401(a)). See 43 CFR Part 4, Subpart B for general rules relating to procedures and practice involving appeals.

43 CFR SUBPART 1821--GENERAL INFORMATION

Sec. 1821.10 Where are BLM offices located? (a) In addition to the Headquarters Office in Washington, D.C. and seven national level support and service centers, BLM operates 12 State Offices each having several subsidiary offices called Field Offices. The addresses of the State Offices can be found in the most recent edition of 43 CFR 1821.10. The State Office geographical areas of jurisdiction are as follows:

STATE OFFICES AND AREAS OF JURISDICTION:

Alaska State Office ----- Alaska
Arizona State Office ----- Arizona
California State Office ----- California
Colorado State Office ----- Colorado
Eastern States Office ----- Arkansas, Iowa, Louisiana, Minnesota, Missouri
and, all States east of the Mississippi River
Idaho State Office ----- Idaho
Montana State Office ----- Montana, North Dakota and South Dakota
Nevada State Office ----- Nevada
New Mexico State Office ---- New Mexico, Kansas, Oklahoma and Texas
Oregon State Office ----- Oregon and Washington
Utah State Office ----- Utah
Wyoming State Office ----- Wyoming and Nebraska

(b) A list of the names, addresses, and geographical areas of jurisdiction of all Field Offices of the Bureau of Land Management can be obtained at the above addresses or any office of the Bureau of Land Management, including the Washington Office, Bureau of Land Management, 1849 C Street, NW, Washington, DC 20240.

(Form 1842-1, September 2006)