

2017 QUARTERLY COMPLIANCE REPORT
Quarter No. 2
April 2017 - June 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 (Q2) 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.....	14
6 VARIANCE REQUESTS.....	14

APPENDICES

- A BLM Authorized Officer Weekly Reports
April 2017
May 2017
June 2017

TABLES

1	Notice to Proceed.....	3
2	Problem Areas, Noncompliance, Serious Violations and Corrective Actions for Q2 2017	14
3	Variance Requests.....	14

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

INTENTIONALLY LEFT BLANK

2017 Quarterly Compliance Report (Q2) 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 April 1, 2017 through June 30, 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 April 1, 2017 through June 30, 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 (Q2) for the Tule Wind Energy Project

INTENTIONALLY LEFT BLANK

2017 Quarterly Compliance Report (Q2) 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. Please note that no new NTPs were issued during this reporting period. Limited Notice to Proceed (LNTP) -2, and Notice to Proceed (NTP) 3, 4, and 5 were issued during previous reporting period.

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

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

Table 1
Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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	02.10.17	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 (Q2) 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. Westwood surveyors were on site re-staking several areas where limits of disturbance stakes were knocked over and/or missing or adjusted per the variance request approval process.

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 NTP-4 continued during this reporting period. Each of the four 10,000-gallon concrete open-topped water tanks approved as part of NTP-3 was installed during the previous reporting period. Construction activities associated with NTP-4 included grading activities along McCain Valley Road, the turbine string access roads, and turbine pads. In addition, relocation and blasting of boulders and turbine foundation excavations continued during this reporting period.

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 (Q2) for the Tule Wind Energy Project

INTENTIONALLY LEFT BLANK

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

4 MITIGATION MONITORING

A summary of the mitigation measures implemented in association with LTNP-2 and NTPs 3, 4, and 5 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, vegetation clearing, 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. The nesting bird season for 2017 will come to a close on August 31, 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 no disturbance buffer ESAs around identified nesting birds. Nesting birds and their associated ESAs were monitored throughout this reporting period.

Problem areas:

During this quarterly reporting period, ECMs observed food trash at multiple locations, including the back of construction vehicles, uncovered trash bins at laydown yards, at turbine pad sites and near staged construction equipment. The onsite-designated biologist continues to work with site superintendents to remind crews the importance of properly securing trash on site.

During the week of April 6th, a third party ECM observed construction crews parked inside a nesting bird buffer. The ECM identified the “No Parking/Idling/Loitering” signs to construction crew foreman, reminded the crews to abide by all environmental signage, and to contact the biological contractor for any questions or concerns. “No Parking/Idling/Loitering” signs were subsequently painted pink to increase visibility to construction crews.

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

On June 16th, 17th and 25th, open excavations were observed without proper wildlife ramps/coverings. ECMs notified the on-site biologist and later confirmed that ramps/coverings were installed.

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 ESAs, installed ESA signage, and were present to monitor ground-disturbing activities associated with clearing, grading, topsoil salvage, and turbine pad/conduit/collector pole and transmission tower excavations.

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.

Archaeologists and Native American monitors dug shovel test pits at archaeological sites in accordance with the approved Identification and Evaluation Plan for resources. Where bone has been identified, but cannot be determined by archaeologists as human or faunal, Tule Wind LLC has and continues to work with representatives from the San Diego Coroner's Office to examine the bone fragments uncovered to determine if they are human remains.

On May 27, 2017, the project archaeologist, Native American monitors and tribal leaders, along with a representative from the San Diego County Medical Examiner's Office were present at archaeological site CA-SDI-17,817 to determine the origin of bones discovered during phase II data recovery efforts, in accordance with the approved Treatment Plan dated May 8, 2017.

On May 30, 2017, Archaeological monitors completed excavation of 50 shovel test pits at archaeological site CA-SDI-17,817 and continued phase II data recovery efforts in accordance with the approved treatment Plan dated May 8, 2017.

On June 17, 2017, ECMs observed the relocation and identification of sensitive cultural resources along the G-line with San Diego County's forensic anthropologist. Native American and archaeological monitors were present in accordance with MM-CUL-2.

2017 Quarterly Compliance Report (Q2) 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).

Problem areas:

On multiple occasions in May and June 2017, ECMs observed construction related vehicles speeding in excess of the 15 mile per hour project speed limit. The designated biologist reminded crews during the daily tailboard meetings the importance of abiding by the project speed limit in order to minimize fugitive dust and reduce the likelihood of injuring or killing biological resources.

On June 5, 2017, a haul truck was observed travelling at speeds in excess of 30 mph. This issue was discussed with Tule Wind LLC and the construction contractor. As a safety precaution and to encourage project personnel to abide by the 15 mph speed limit, two speed radar detectors were positioned along McCain Valley Road.

As a result of installation of the radar detectors and continual reminders during the morning tailboard meetings, project personnel have been abiding by the 15 mph speed limit. ECMs continued to monitor and report any speeding issues directly to the site designated biologist and construction contractor.

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 such as 3A, 40BC fire extinguishers, 5-gallon backpack pumps, and shovels and construction vehicles parked in areas with no vegetation. Fire patrols occurred on a regular basis one hour after the end of daily construction. Water tenders were observed on-site during road construction activities, foundation construction, and hot work as outlined in the Fire Prevention/Protection Plan.

On May 24, 2017, a fire began along Rough Acres Ranch Road during rock breaking activities. The protocols outlined in the Fire Prevention/Protection Plan were implemented and all on-site personnel evacuated the site safely with no injuries or impacts to sensitive environmental

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

resources. The fire occurred on lands administrated by the County of San Diego. In response to the fire, the construction contractor has required a hot work permit for all rock breaking activities with an additional precaution of staging a water tender nearby.

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. Portable restroom facilities were seen secured with containment in place, in accordance with MM-HAZ-1a.

Problem areas:

There were 13 stained soil cases reported during this quarterly period by third party ECMs. The stained soil sites were the result of construction equipment leaks or malfunction. For each occasion, ECMs notified the designated biologist. All stained soil and absorbent materials used to clean the leaks were properly contained in a 50-gallon drums for disposal in accordance with the Hazardous Materials Management Plan per MM-HAZ-1a.

Limits of Disturbance (MM-BIO-1A)

ECMs observed work occurring within the limits of disturbance in accordance with MM-BIO-1a. Yellow tape was strung between limit stakes to enhance visibility of the limits of disturbance for equipment operators, spotters, and monitors in accordance with the Notice to Proceed issued on February 1, 2017.

Problem areas:

During this reporting period, there were two incidents where ESA fencing was damaged along the access road to the H-line and between turbine site H-1 and H-2. ECMs contacted the lead archaeologist to repair the fencing and to ensure proper delineation of the ESA. It is unknown if damage to the ESA fencing was caused by construction or public activity. No impacts to sensitive cultural or biological resources were observed.

During the week of June 18, 2017, two incidents occurred where work activities occurred outside the approved limits of disturbance. The impacts are considered unforeseen events in accordance with the protocols established by Variance Request 006. Each incident is described below:

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

- On June 15, 2017, during road widening activities along McCain Valley Road, an excavator was removing a rock near the limits of disturbance and struck a rock that was buried approximately two feet beyond the limits of disturbance. The designated biologist, lead archaeologist, along with several Native American monitors supervised the careful removal of the rock. No impacts to sensitive cultural or biological resources observed or impacted.
- On June 16, 2017, two boulders that were being excavated and appeared to be within the limits of disturbance were discovered to protrude outside the limits of disturbance beneath the ground surface. As the boulders were excavated, they caused the ground above them, located outside the limits of disturbance to cave slightly. ECMs were present for the disturbance and notified the designated biologist and lead archaeologist of the incident. Biological and cultural monitors surveyed the remainder of the work area to prepare for the potential of further disturbances outside the limits of disturbance. No sensitive cultural or biological resources observed or impacted.

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

During the previous quarterly period, 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. ECMs observed construction crews site wide install biodegradable weed free straw wattles, replacing the existing plastic encased straw wattles. The removed plastic encased wattles were hauled off site for disposal. The biodegradable straw wattles are being used to avoid wildlife from becoming entrapped in the plastic casing and to prevent plastic debris at the conclusion of construction activities.

In order to facilitate the tracking of topsoil salvage and stabilization across the project site, construction contractors developed a system to mark and track salvage stabilization pile dates with marked stakes. ECMs have confirmed with Tule Wind LLC that all inactive topsoil stockpiles are required to have a sediment barrier, in accordance with Section 7.8 of the SWPPP.

Problem areas:

Several problem areas with deficient silt fencing, concrete washout basin retention, and soil stockpile stabilization were observed throughout this reporting period. ECMs prepared a list of sediment and erosion control deficiencies site wide and provided the list to Tule Wind LLC and the construction contractor. ECMs observed construction crews repairing noted deficiencies throughout the reporting period.

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

ECMs also noted missing rock aprons around concrete washout basins as required per the grading plan design detail WM-8. Tule Wind LLC was notified and has resolved the issue by adding rock aprons to all concrete washout basins in accordance with the Stormwater Pollution Prevention Plan.

Traffic Control Plan (MM-TRA-1)

Traffic flaggers were present to notify motorists of temporary road blockages while crews widened and conducted maintenance and improvements along McCain Valley Road. ECMs observed construction crews carpooling to/from the project site as outlined in MM-TRA-1.

Problem areas:

Several traffic signs were observed knocked down along McCain Valley Road and at the entrances to the B and H lines. ECMs provided each location to the designated biologist. Shortly thereafter, ECMs observed construction crews replacing and re-installing signs in accordance with MM-TRA-1.

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

INTENTIONALLY LEFT BLANK

2017 Quarterly Compliance Report (Q2) 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, there were no noncompliance events and no serious violations to report.

Table 2
Noncompliance, Serious Violations and Corrective Actions for Q2 2017

Incident Number	Date of Incident	Description of Incident	Description of Corrective Action
<i>April 2017</i>			
There were no noncompliance or serious violations that occurred in April 2017			
<i>May 2017</i>			
There were no noncompliance or serious violations that occurred in May 2017			
<i>June 2017</i>			
There were no noncompliance or serious violation that occurred in June 2017			

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, five variance requests were submitted and eight variance requests were approved including variance requests 6, 7, 8, 9, and 10 that were previously submitted during the Quarter 1 reporting period. 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

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

Table 3
Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Approved	06.14.17
11	04.04.17	Relocation of office trailer from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

Table 3
Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
14	06.16.17	Includes additional pull areas for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure	Pending	Under BLM Review
15	06.16.17	Requests turbine B-5 to be approved as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Pending	Under BLM Review

2017 Quarterly Compliance Report (Q2) for the Tule Wind Energy Project

Representative Photos



Photo 1: Rock-breaking activities observed within the staked limits of disturbance in accordance with MM BIO-1A. Water trucks are present for dust control in accordance with MM-AQ-1 and MM-FF-1.



Photo 2: Construction crews are observed replacing silt fencing along the D1 access road in accordance with MM-HYD-1 and the project specific SWPPP.



Photo 3: On 5/31/2017, construction crews are observed using absorbent materials to address a hydraulic leak per MM-HAZ-1a and the Hazardous Materials Management Plan.



Photo 4: ECMs observed containment bins beneath 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 (Q2) for the Tule Wind Energy Project



Photo 5: Excavations are covered to prevent wildlife from becoming entrapped in accordance with MM-BIO-7A.



Photo 6: Construction crews replace and re-install traffic signs 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, a water truck, and required signs were present during hot work activities in accordance with the issued Hot Work Permit and MM-FF-1.

APPENDIX A

BLM Authorized Officer Weekly Reports

April 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: 3.27.17 through 4.2.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind, LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 3.27.17 through 4.2.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed the installation of culverts and other erosion and sediment control devices, application of hydromulch, road grading, grubbing, and aggregate installation along McCain Valley Road. Grading, rock breaking, and erosion and sediment control device installation also occurred along Rough Acres Road. Construction crews continued grading, rock breaking, cement pouring,

foundation excavation, and rebar installation at pad sites along the D through H strings. Drilling occurred along the E-String, excavation continued for the footing at transmission tower 24, and retention basins were installed. Construction activities were halted on March 30, 2017 at 2:30 pm due to sustained winds of approximately 30 miles per hour.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and erosion and sediment control device installation 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 active bird nests in accordance with MM BIO-7j. During this reporting period the following special status species were observed: three coast horned lizards, two silvery legless lizards (one deceased) and one tri-colored blackbird.

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.

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, silt fencing, dug a retention basin, and installed road ditches across the site. Construction crews hydromulched salvaged topsoil to stabilize installations along McCain Valley Road in accordance with Section 7.8 of the SWPPP.

On March 28, 2017, ECMs observed a concrete washout at turbine pad G15 without a rock apron as required by design detail WM-8 included in the grading plan. ECMs notified Tule Wind, LLC of the problem area and are working with the construction contractor to make sure a rock apron is installed per design detail WM-8.

On March 29 and March 31, 2017, ECMs reported food trash in an uncovered bin located near the laydown yard 6 trailers. The bins had been emptied per Section 7.8 of the SWPPP by afternoon on March 31.

Representatives from the State Water Resources Control Board were on-site on Wednesday, March 29, 2017 and made recommendations to the construction contractor to dig small trenches in the areas where straw wattles are being installed in accordance with design detail SE-5A. The construction contractor is in the process of installing straw wattles in accordance with the State Water Resources Control Board's recommendation and per design detail SE-5A. The construction contractor is also addressing areas where straw wattles have been previously installed, but not dug into a small trench.

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, required fire suppression equipment on site within required distances, 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 along the G-String and ECMs verified that Fire Watch personnel, as well as proper equipment and signage, were present in accordance with the hot work permit and 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.

ECMs observed stained soil at laydown yard 11 on March 31, 2017. On the same day, construction crews removed the stained soil and placed it in a secondary containment bin. ECMs will follow-up with this problem area during the next reporting period to ensure the stained soil is removed from the site in accordance with Section 5.2 of the ECMP.

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 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• footing excavation • turnout construction • forming the tanks • installation of reinforced steel • pouring footing, slab, and walls • backfill and final grading	
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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to	Pending	Resubmitted on 03.24.17.

Variance Request No.	Submitted	Description	Status	Approval Date
		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.		
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

Representative Photos



Photo 1: 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.



Photo 2: Erosion and sediment control ditches and straw wattles were installed along McCain Valley Road in accordance with the SWPPP.



Photo 3: ECMs observed the concrete washout at turbine pad G15 without a rock apron as required by design detail WM-8 included in the grading plans. ECMs notified Tule Wind, LLC of the problem area. A rock apron is anticipated to be installed in accordance with the grading plans.



Photo 4: ECMs confirmed that the required fire prevention equipment was present within the vicinity of chipping operations along McCain Valley Road in accordance with MM FF-1.

INTENTIONALLY LEFT BLANK



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: 4.3.17 through 4.9.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 4.3.17 through 4.9.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

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 C-F strings and pad grading and construction along the F-G strings. Drilling occurred at tower sites 1, 3, 18, 20, and 23 and turbine foundations were excavated, assembled, and poured along the G and E

strings. In addition, vegetation removal continued along the collection line and wattle installation occurred along the connector road.

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.

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. Monitors also documented and marked new discoveries of rare plant species for avoidance within the vicinity of work areas. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

During this reporting period the following special-status species were observed: one coastal patch nose snake, three coast horned lizards, and four black tailed jackrabbits.

Nesting Bird Buffer (MM BIO-7j) – Problem Area

On April 4, 2017, ECMs notified the onsite Designated Biologist when construction crews were observed parking inside an established nesting bird buffer. The ECM identified the “No Parking/Idling/Loitering” signs with the construction crew foreman and asked that the vehicles be moved outside the buffer. The equipment operators immediately moved the equipment.

On April 6, 2017, ECMs observed construction equipment parked within the same nesting bird buffer and reminded the crew foreman of the buffer boundaries and restrictions in accordance with MM BIO-7j. The equipment was moved outside the buffer and no sign of disturbance was observed at the active nest site. On April, 8, the “No Parking/Idling/Loitering” signs were painted pink to increase visibility and remind construction crews of the buffer restrictions. Construction crews were further reminded to abide by all environmental signage and to contact the biological and/or archaeological contractor if there are any questions or concerns.

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 as well as the biological and archaeological monitors 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)

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.

During the previous reporting period on March 28, 2017, ECMs observed a concrete washout at turbine pad G15 without a rock apron as required by design detail WM-8 included in the grading plan. In addition to the missing rock apron, ECMs noted that the washout boundary silt fence required repair. ECMs notified Tule Wind LLC of the issues and on April 7, 2017, ECMs confirmed that both issues at the G15 concrete washout had been resolved in accordance with the SWPPP and grading plan design detail WM-8.

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.

On April 4, 2017, ECMs recorded a complaint from a construction foreman that other construction related trucks had been speeding past work sites. The ECM notified Tule Wind LLC of the issue and both Tule Wind LLC and the ECMs will continue to work with construction crews to make sure crew members are reminded of the project site speed limits.

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 along the G-String and ECMs verified that Fire Watch personnel and proper equipment were present in accordance with the hot work permit and 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.

During the previous reporting period, ECMs observed stained soil at laydown yard 11 on March 31, 2017. On the same day, construction crews removed the stained soil and placed it in a secondary containment bin. When ECMs returned to check on cleanup efforts at the laydown

yard during the current reporting period, additional stained soil and soiled materials used to clean equipment remained onsite without proper containment. Following notifications to Tule Wind LLC, onsite biological monitors, and the Qualified SWPPP Practitioner; ECMs confirmed that all stained soil and materials were properly contained, cleaned, and removed from the site by April 7, 2017.

Several other incidents of stained soil were reported along the G-String and one at the laydown yard 12 during this reporting period. Each of these incidents was resolved and ECMs were able to confirm that the stained soil was removed from the site by the following day, in accordance with the Hazardous Materials Management Plan (HMMP).

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,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading at structure pad sites,
- Building pad sites and foundation excavation along the D, E, and F lines,
- Drilling at the substation and collection line,
- 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• cacti salvage • pickup truck and ATV use of BLM access routes authorized under the Eastern San Diego County Resource Management Plan (2008)	
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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
----------------------	-----------	-------------	--------	---------------

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	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
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs confirmed that the silt fence surrounding the concrete washout at turbine pad G15 was repaired and a rock apron was installed in accordance with the grading plan design detail WM-8.



Photo 2: ECMs observed construction equipment parked within an active nesting bird buffer on April 4 and 6, 2017. During both incidents, construction crews were reminded of the buffer restrictions outlined in MM BIO-7J and the equipment was moved. Following the second incident, the "No Parking/Idling/Loitering" signs have been painted pink to increase visibility.



Photo 3: ECMs reported that stained soil contained during the previous reporting period remained onsite at laydown yard 11, within a secondary containment container not intended for storage or disposal of hazardous materials. Following the identification of additional stained soil and soiled cleaning materials at the laydown yard, construction crews cleaned and removed all stained soil and materials in accordance with MM HAZ-1A.



Photo 4: ECMs observed archaeological and Native American monitors present during road work along the F String in accordance with MM CUL-1D. Water was also applied regularly during activity along the road to minimize fugitive dust in accordance with MM AQ-1.

INTENTIONALLY LEFT BLANK



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: 4.10.17 through 4.16.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 4.10.17 through 4.16.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed the continuation of road grading and widening activities along McCain Valley Road as well as grading and contouring activities at pad sites along the B through G strings. Drilling occurred along the E and D strings, grubbing occurred at laydown yard 6 and overhead structure 28, and a culvert was installed on Road AD. In addition, construction crews salvaged topsoil along

strings B through E, backfill preparation activities occurred along the G String, and vegetation removal continued along the collection line.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and erosion and vegetation removal in accordance with mitigation measure (MM) CUL-1d and the approved Tribal Participation Plan.

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 active bird nests in accordance with MM BIO-7j.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted.

On April 12th, 2017, the ICF designated biologist signed a MSOS mistakenly granting a construction crew permission to work within a drive through nesting bird buffer without a biological monitor present. The mistake was identified when a Dudek 3rd party compliance monitor noticed a vehicle within the buffer and reminded the Blattner construction team that they cannot park a vehicle within a drive through buffer. When the construction crew showed the signed MSOS to the ECM, the ICF designated biologist was contacted and identified the error. A biological monitor was immediately sent to monitor the active bird nest in accordance with MM BIO-7j. ECMs are continuing to work with the construction crews and biological monitors to ensure the required MSOS documents are filled out accurately and that appropriate monitors are present in accordance with the approved mitigation measures.

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)

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, fire suppression equipment on site within required distances, 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, as well as proper equipment and signage, were present in accordance with the hot work permit and 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 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 E Line,
- Widening, grading, and rock installation along McCain Valley Road,
- Clearing, grubbing, and grading along the C, D, and E line access roads,
- Grading, rock management, and topsoil salvage at pad sites along the B, C, E, and G lines,
- Culvert installation,
- Building pad sites and foundation excavation along the E, G, and H lines,
- Drilling at the substation and D-Line,

- Weed abatement along the E-Line,
- 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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.14.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	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	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
		near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.		
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Pending	Under BLM Review

Representative Photos



Photo 1 Nesting black throated sparrow ESA at tank 3, within which a Blattner crew was accidentally given permission to work by the ICF designated biologist when signing MSOS documents for the activity. Following identification of the issue, a biological monitor was assigned to the activity in accordance with MM BIO-7j and no impacts to the active nest were observed.



Photo 2: A water truck, fire safety coordinator, and identification signage are located where hot work was occurring in accordance with MM FF-1.



Photo 3: Shovel and a 5-gallon water pack located along McCain Valley Road within 25 feet of an active work area in accordance with MM FF-1.



Photo 4: ECMs observed ESA signage for the nesting raptor buffer zone (300'). All construction crews in the vicinity were observed working and parking equipment outside the buffer in accordance with MM-BIO-7J.

INTENTIONALLY LEFT BLANK



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: 4.17.17 through 4.23.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 4.17.17 through 4.23.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed the installation of culverts, road grading, and installation of wattles and erosion control devices along McCain Valley Road. Erosion and sediment control devices were also installed along the F and G lines. Construction crews continued road work along the B, D, and E strings, pad grading and construction along the B-D strings, and topsoil salvage along the A and B strings. ECMs

observed herbicide applied along the E string. Drilling occurred along C, D, and E strings, as well as overhead structures 3 and 18. Turbine foundations were excavated along strings F, G, and J, and poured along the E string. Vegetation removal occurred along the C string and at overhead structures 29 and 45. In addition, rock breaking occurred on the A and J string access roads, and grubbing occurred at overhead structure 30.

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.

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. ECMs observed crews using concrete washout containers to prevent contaminated discharge during foundation pouring activities in accordance with MM BIO-5.

Nesting Bird Surveys and No-disturbance Buffers (MM BIO-7j)

Biological monitors were observed performing nesting bird surveys ahead of clearing and grubbing activities in accordance with MM BIO-7j.

On April 19, 2017, ECMs notified biological monitors and the onsite Designated Biologist (DB) when a water truck was observed idling inside an established nesting bird buffer near permanent water tank 3, despite the “No Parking/Idling/Loitering” signs in place on the access road. The operator moved the truck on his own accord and was reminded of the importance to not enter any ESA.

On April 19, 2017, ECMs notified the DB that there was no buffer installed at the active nest ID #16. The following day, ECMs confirmed that the appropriate no-disturbance buffer had been delineated and marked in the field around nest #16 in accordance with MM BIO-7j.

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.

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)

Construction crews installed biodegradable and weed-free straw wattles across the project site as well as erosion control blankets at the culverts along McCain Valley Road.

On April 19, 2017, ECMs observed several topsoil salvage stockpiles that appeared to have not been properly stabilized in accordance with and Section 7.8 of the SWPPP, however it was unclear whether or not the stockpiles were inactive. ECMs notified the DB and Qualified SWPPP Practitioner (QSP) of the potential issue and confirmed that the inactive stockpiles were stabilized the following day. In order to facilitate the tracking of topsoil salvage, stockpile inactivity, and stabilization across the project site, contractors and the DB discussed developing a system to mark and track salvage and stabilization dates with marked stakes. The marked stockpiles would allow personnel to more easily identify which stockpiles are inactive and should be stabilized in accordance with Section 7.8 of the SWPPP.

On April 21, 2017, ECMs recorded a silt fence that had fallen down and concrete wash runoff surrounding the concrete washout basin at turbine site E11. The DB was notified of the incident and ECMs confirmed that the silt fence had been repaired in accordance with Section 7.10 of the SWPPP and the concrete wash surrounding the basin had been cleaned.

During this reporting period, ECMs observed two incidents where trash was left uncovered in waste bins. Both incidents were reported to the DB and the trash was covered shortly thereafter in accordance with the SWPPP.

Habitat Restoration Plan Implementation

During this reporting period, herbicide was applied by a Qualified Applicator License holder under the supervision of a Habitat Restoration Specialist in accordance with Section 6.1.2 of the Habitat Restoration Plan.

On April 21, 2017, ECMs observed erosion control wattles removed from the stabilized slope at turbine site G14. The construction crew identified the slope as having been mistakenly stabilized before salvaged topsoil had been applied across the slope. The crew removed the wattles and replaced the topsoil. The slope will be re-stabilized and the wattles replaced in accordance with Section 5.2.2.3 of the Habitat Restoration Plan. The DB suggested creating a system to mark all areas where salvaged topsoil has been applied with ESA signs so it is clear to personnel which areas have had topsoil replaced in accordance with the Habitat Restoration Plan.

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.

On April 19, 2017, ECMs recorded a truck exceeding the speed limit along McCain Valley Road. The ECM notified Tule Wind LCC of the issue. Tule Wind LLC are continuing to remind construction contractors about the requirement to follow the site speed limits.

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.

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.

On April 22, 2017, ECMs observed stained soil at turbine site G14. The construction crew removed the stained soil immediately following notification of the issue, 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 along the Connector Road and Rough Acres Ranch Road,
- Topsoil salvage along the A Line,
- Culvert installation along the E Line,
- Road work and mowing along the C Line access roads,
- Clearing/grubbing and rock management along the J Line,
- Widening, grading, and rock installation along McCain Valley Road,
- Erosion and sediment control device installation along McCain Valley Road,
- Building pad sites and foundation excavation along the C, E, G, and H lines,
- Drilling at the substation, along the G Line, and at turbine pad sites E1 and C1,
- And trenching at the O&M building

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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	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.	Approved	04.14.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	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
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review

Representative Photos



Photo 1: On April 21, 2017, ECMs recorded a downed silt fence and concrete wash runoff surrounding the concrete washout basin at turbine site E11. The DB was notified of the incident.



Photo 2: On April 22, ECMs confirmed that the silt fence surrounding the concrete washout basin had been repaired in accordance with Section 7.10 of the SWPPP and the concrete wash outside the basin containment had been cleaned.



Photo 3: Erosion control devices were installed at culverts along McCain Valley Road in accordance with the project SWPPP.



Photo 4: During this reporting period, herbicide was applied along the E String by a QAL holder and under the supervision of a Habitat Restoration Specialist, in accordance with Section 6.1.2 of the Habitat Restoration Plan.

INTENTIONALLY LEFT BLANK



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: 4.24.17 through 4.30.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 4.24.17 through 4.30.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed road grading, base spreading, and installation of culverts and erosion control measures along McCain Valley Road as well as grading along access roads near turbine sites C2-C5, B3, and along the J line. In addition, turbine pad and foundation work continued including

pad grading and contouring at E1, A2, C4, B1, B3, and B4; pad site excavation at E1, B1 and B5; foundation pouring at G14 and D4; and cage and conduit work at G14. Construction crews continued grading activities including rock breaking at turbine sites B1-B4 and along the J line access road, cut and fill work along the B and C lines, top soil salvage along the C line and at turbine pad A2, and backfilling activities along the G line. Drilling for overhead collection poles 4, 12, 16, and 23 took place as well as vegetation removal and chipping along the J line and overhead collection line.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and erosion control device installation in accordance with mitigation measure (MM) CUL-1d and the approved Tribal Participation Plan.

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 active bird nests in accordance with MM BIO-7j.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted.

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)

ECMs observed construction crews laying biodegradable and weed-free straw erosion control materials in culverts along MVR in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

In order to facilitate the tracking of topsoil salvage and stabilization across the project site, construction contractors are developing a system to mark and track salvage and stabilization dates with marked stakes. During this reporting period, ECMs followed up with the Designated Biologist in order to confirm that the contractor would start marking topsoil stockpiles with dates as originally discussed on Friday 4/21/17.

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

On April 24, 2017, ECMs observed a dozer working at Turbine site E1 and inquired about the absence of a water tender. Shortly after, a water tender was called and arrived to the construction area to apply water and control dust, in accordance with MM-AQ-1.

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, fire suppression equipment on site within required distances, 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.

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

During this reporting period, ECMs observed stained soil under equipment staged at overhead collection pole 53. The contractor properly contained the stained soil, and placed a containment bin under the machine for the remainder of the day. The contractor mentioned the equipment was recently serviced and believed that it had simply been overfilled.

On April 25th, 2017 a broken down truck at turbine site C1 was observed with stained soil beneath it and an inactive bobcat at site G6 was observed without containment beneath it. A containment bin was placed under the bobcat at site G6, in accordance with the containment and spill prevention procedures outlined in the Hazardous Materials Management Plan (MM HAZ-1a), and the Designated Biologist and contractor superintendent were notified of the leak at site C1. The following day, ECMs observed that the stained soil sites at site C1 had been properly cleaned in accordance with MM-HAZ-1a, and the bobcat was removed from site G6 for repair.

On April 25th, 2017 ECMs observed multiple stained soil sites at turbine pad site G15. The stained soil was flagged and the designated biologist and contractor superintendent were contacted. On April 27th, ECMs confirmed that all stained soil sites were properly contained, cleaned, and removed from the site 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 along the Connector Road and Rough Acres Ranch Road,
- Topsoil salvage along Rough Acres Ranch Road as well as the B and C lines,
- Erosion and sediment control device installation and repairs along the E and F lines,

- Widening, grading, rock installation, and hydro seeding along McCain Valley Road,
- Road work along Rough Acres Ranch Road as well as the B, C, and G line access roads,
- Culvert installation on the B Line,
- Building pad sites and foundation excavation along the B and C lines,
- Foundation drilling and backfill along the G Line,
- Drilling and excavation at the substation,
- Setting poles along the transmission line,
- Excavation at the O&M building,
- And Drilling and blasting along the C, E, and G 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• footing excavation • turnout construction • forming the tanks • installation of reinforced steel • pouring footing, slab, and walls • backfill and final grading	
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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to	Approved	Resubmitted on 03.24.17.

Variance Request No.	Submitted	Description	Status	Approval Date
		use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.		Approved on 04.14.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	Approved 04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	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
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	Approved on 04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review

Representative Photos



Photo 1: ECM's observed rock breaking at J string access road, with yellow tape shown delineating work limits in accordance with the February 1, 2017 NTP.



Photo 2: ECM's observed flagged, stained soil sites at turbine pad G15.



Photo 3: ECMs confirmed that stained soil was removed from the site G15, in accordance with MM HAZ-1A.



Photo 4: ECMs observed road grading on the access road between pad sites C2 and C5 with an accompanying water truck in order to minimize fugitive dust as per MM AQ-1. Yellow tape is shown marking limits of disturbance in accordance with the February 2, 2017 NTP.

INTENTIONALLY LEFT BLANK

May 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: 5.1.17 through 5.7.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 5.1.17 through 5.7.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed drilling, trenching, grading, and spreading of hydromulch along McCain Valley Road, as well as continued grading and cut and fill along the A through E and G lines. In addition, drilling and trenching occurred along the A through E lines and topsoil salvage

occurred along the B and C lines. Turbine foundations were excavated for on the C line, rebar was installed at turbine pad F-2, and new drainage pipes were installed on the access road to the G line. Drilling occurred for collector poles 13 through 38 and poles 2, 3, 7, and 10 were installed. Additionally, construction crews graded the connector road near Ribbonwood Road and spread hydro-mulch at various sediment stockpiles throughout the project area.

Cultural Resources

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

Archaeologists and Native American monitors dug shovel test pits at nine archeological sites in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads, including McCain Valley Road.

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 and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j. ECMs also observed inactive trenches and excavations covered to prevent wildlife entrapment in accordance with MM BIO-7a.

On Thursday, May 4, 2017, an ECM observed food trash that was left uncovered in a concrete wash out bin on the G string access road. The ECM notified the onsite Designated Biologist about the issue and the Designated Biologist contacted the construction contractor to address the issue. ECMs are anticipated to check the site again during the next reporting period for compliance with MM BIO-7d.

During this reporting period the following special-status species were observed: three coast horned lizards and one loggerhead shrike. Two of the three coast horned lizards were relocated and one required no action.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted.

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)

ECMs observed construction crews laying biodegradable and weed-free straw erosion control in culverts along MVR in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

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, fire suppression equipment within 25 feet of active work sites, 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.

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

During this reporting period, ECMs observed a leak from the drill at collector pole #27. Upon notification of the leak, the construction crew member immediately cleaned up the stained soil and placed a drip pan at the location in accordance with MM HA-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 E and C lines,
- Hydroseeding along McCain Valley Road and B and C lines,
- Widening, grading, and rock installation along Ribbonwood Rd. and C Line,
- Topsoil salvage at pad sites along the B and C lines,
- Foundation excavation and backfill at the substation and along the A, B, C, and G lines,
- Building pad sites along the A, C, and G lines,
- Building access roads along the B and C lines,
- Drilling at the A, B, C, G, and H lines,
- 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 - 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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	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
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed a construction crewmember cleaning up stained soil at collector pole site 27 in accordance with MM HAZ-1A.



Photo 2: Drip pans were present under staged equipment in accordance with the SWPPP and MM HAZ-1A.



Photo 3: Archaeological and Native American monitors checking spoils from drilling activities at collector pole site 33, in accordance with MM CUL-1D.



Photo 4: ECMs observed inactive excavations covered to prevent entrapment of wildlife in accordance with MM BIO-7A.

INTENTIONALLY LEFT BLANK



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: 5.8.17 through 5.14.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 5.8.17 through 5.14.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed continued drilling for the overhead collector line, application of palliative along McCain Valley Road, as well as grading and rock removal along Rough Acres Road. Grading continued along the A, B, C, E, and H lines, and topsoil salvage occurred along the A, C, and G

lines. Furthermore, turbine tower foundations were excavated along the B, C, and E lines, and pad contouring occurred along the A, C, E, and G lines. Rock removal and relocation took place along the E and G lines, rebar was installed along the D line, and vegetation removal occurred along the E line. Construction crews also repaired the access roads and assembled tower structures along the G line. Additionally, drilling occurred for collector poles 43 through 46, 31, 41, 48, and 49, and concrete was poured for poles 10, 12, and 28.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, grubbing, and foundation excavations in accordance with mitigation measure (MM) CUL-1d and the approved Tribal Participation Plan.

Archaeologists and Native American monitors dug additional shovel test pits at archeological sites in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads, including McCain Valley Road. Where bone has been identified, but cannot be determined by archaeologists as human or faunal, Tule Wind LLC has and continues to work with representatives from the San Diego County Coroner's Office to examine the bone fragments uncovered to determine if they are human remains.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j.

ECMs also observed inactive trenches and excavations covered to prevent wildlife entrapment in accordance with MM BIO-7a. On 5/9/2017, an open excavation was observed at the G10 turbine pad site with no wildlife ramp in place. ECMs notified a nearby biological monitor and confirmed at the end of the day that construction crews had returned to install a wildlife ramp in the excavation in accordance with MM BIO-7a.

A bag containing food trash was observed open near the turbine site E8 on 5/9/2017. Construction crews removed the trash immediately following notification of the issue.

During this reporting period, ECMs observed multiple incidents of project related vehicles speeding in excess of the 15 mph limit required by MM BIO-7b. ECMs and biological monitors are working with Tule Wind LLC to remind construction crews of speed limit requirements to protect wildlife and minimize fugitive dust.

During this reporting period the following special-status species were observed: one coast horned lizard located outside the work area and one deceased coastal whiptail.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is part of the conditions that allowed the temporary suspension of construction activities to be lifted.

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)

ECMs observed construction crews applying palliative to windrows along McCain Valley Road in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

On 5/11/2017, a concrete washout basin and surrounding silt fence was observed in need of maintenance. The Designated Biologist (DB) and construction crews were notified of the issue. On 5/12/2017, it was observed that the washout basin had not yet been maintained and washout breached the surrounding silt fence. The spill stayed within the staked disturbance limits and construction crews pumped excess wash water out of the basin for disposal at the 80 acre laydown yard.

On 5/13/2017, a construction crew disposed of the stained soil in accordance with MM HYD-1 and the basin was repaired in accordance with the project specific SWPPP. No impacts to biological or cultural resources were observed. The washout pit is staged over 50 feet from the nearest jurisdictional drainage and construction of new basins has been completed to accommodate additional washout needs during ongoing concrete pouring activities.

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, fire suppression equipment within 25 feet of active work sites, 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.

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

During this reporting period, ECMs observed a biological monitor cleaning stained soil along the connector road, in accordance with MM HA-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:

- Continue staking disturbance limits on Connector Road,

- Rock management and Grading along Ribbonwood side of Rough Acres Road,
- Grading A line,
- Building of turbine sites along E and A lines,
- Building access roads along the B and C lines,
- Topsoil salvage at pad sites along E line,
- Installing straw wattles in McCain Valley Road culverts and along E, G, line,
- Foundation backfill at pad sites along H and J lines,
- Drilling and blasting at pad sites along A, E and G lines,
- Digging of box pads at sites along G line,
- Excavating conduit and concrete form setting at substation,
- Drilling, pole setting, and concrete pouring along the collection line,
- Trenching underground transmission line south of I-8,
- Weed abatement along E, C, and J lines,
- And H-Frame installation at the intersection of McCain Valley Road and Old Highway 80.

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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate	Approved	02.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		construction and engineering design.		
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	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
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review

Representative Photos



Photo 1: Palliative was applied to windrows along McCain Valley Road in accordance with MM HYD-1.



Photo 2: Shovel Test Pit dug in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads.



Photo 3: Biological Monitor removing stained soil on the connector road in accordance with MM HAZ-1a.



Photo 4: The new concrete washout pits at Yard 6 were double-lined with thick poly sheeting to prevent soil contamination in accordance with MM HYD-1 and the project SWPPP.

INTENTIONALLY LEFT BLANK



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: 5.15.17 through 5.21.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 5.15.17 through 5.21.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed continued drilling and installation of straw wattles along McCain Valley Road and grading and weed management along Rough Acres Road as well as the A and B lines. Grading continued along the A, B, C, D, E, and J lines, and topsoil salvage occurred along the C,

G, and H lines. Turbine tower foundations were excavated along the E line, pad contouring occurred along the A line, and foundations were poured along the E, F, and G lines. Rock removal and relocation took place along the E and G lines, and concrete washout pits were dug at sites along the C line. Additionally, drilling occurred for collector poles 41, 43, 45, and 52, poles 37 and 38 were set, and trenching occurred at collector pole 25.

Cultural Resources

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

Archaeologists and Native American monitors dug additional shovel test pits at archeological sites in accordance with the approved Identification and Evaluation Plan for resources identified along project access routes and turbine pads, including McCain Valley Road. Where bone has been identified, but cannot be determined by archaeologists as human or faunal, Tule Wind LLC has and continues to work with representatives from the San Diego County Medical Examiner's office to examine the bone fragments and make a determination.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j. During this reporting period, ECMs did not record any incidents of project vehicles speeding in excess of the 15 mph limit in accordance with MM BIO-7b.

During this reporting period, ECMs observed scrap plastic outside a nearby dumpster staged at Lot 6 and food trash left uncovered in a roll-off bin at yard 11. The onsite Designated Biologist (DB) and construction crews were notified of each issue and reminded of the requirement to remove or cover trash in accordance with BIO-7d. ECMs plan to follow-up on the resolution of these issues in the next reporting period.

On 5/16/2017 and 5/17/2017, ECMs observed open excavations at turbine sites G8, G11, and G12 without proper wildlife ramps. The onsite DB and additional biological monitors were notified of the issue both days. ECMs confirmed ramps had been installed in accordance with MM BIO-7a by the end of the day on 5/17/2017.

Two San Diego Black-tailed jackrabbits were recorded in a single observation outside of the work area during this reporting period. No action was taken and/or required as a result of the observation.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at construction activities 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.

During this reporting period, several road maintenance crews were observed not to be in possession of the applicable MSOS at all times because only one form was completed for the road maintenance crews, which would often work in multiple areas along large access roads and be managed by a roaming foreman. ECMs and biological monitors agreed that a photo or other copy of the completed log should remain with at least one operator in each crew per the February 1, 2017 NTP.

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.

On 5/18/2017, an ECM noticed an ESA with damaged fencing between turbine sites H1 and H2. No impacts to sensitive cultural or biological resources were observed. The lead archaeological monitor was contacted to repair the ESA fencing. It is unknown if the damage to the ESA fencing was caused by construction activities or the public.

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

ECMs observed construction crews installing biodegradable straw wattles along McCain Valley Road in accordance with MM-HYD-1. In addition, ECMs confirmed with construction crews that all inactive topsoil stockpiles are stabilized in accordance with Section 7.8 of the SWPPP.

During this reporting period, ECMs observed silt fencing in need of repair, including at multiple concrete washout basins. The DB was notified of each location and ECMs will follow-up in the next reporting period to ensure BMPs are repaired in accordance with MM-HYD-1.

ECMs observed a concrete washout area on the access road to the B-line without an aggregate apron.

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

ECMs observed track-out build up on the pavement at McCain Valley Road. The onsite DB and construction contractor were notified of the issue. During this reporting period, the construction contractor installed additional aggregate at the entrance/exit to McCain Valley Road to prevent further track-out in accordance with MM AQ-1.

ECMs observed dust control best management practices being implemented including limiting vehicle idling times 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, fire suppression equipment within 25 feet of active work sites, 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.

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

On 5/16/2017, an ECM observed multiple pieces of inactive equipment at laydown yard 9 without containment. While no leaks were identified and there was no removal or changing of fluids taking place, the construction contractor was notified and the placement of containment was recommended.

During this reporting period, ECMs observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1a.

Traffic Control Plan Implementation (MM-TRA-1)

During this reporting period, several traffic signs were observed knocked down on McCain Valley Road. ECMs provided each location to the onsite DB and will follow-up in the next reporting period to ensure signs are repaired in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line, starting at G4 and working south to McCain Valley Road,
- Grading along Ribbonwood side of Rough Acres Road,
- Grading G line,
- Rock management along McCain Valley Road and Rough Acres Road,
- Building of turbine pad sites along E line,
- Building access roads along the A and E lines,
- Topsoil salvage at pad sites along G line and at the substation,
- Installing straw wattles in McCain Valley Road culverts,
- Foundation excavation along the A line,
- Foundation backfill at pad sites along the J line,
- Drilling and blasting at pad sites along the E line,
- Digging of box pads at sites along E line,
- Excavating conduit and concrete form setting at substation,
- Hydro-seeding along the B and C lines,

- Drilling, pole setting, and concrete pouring along the collection line,
- And trenching underground transmission line south of I-8.

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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road	Pending	Under BLM Review

Variance Request No.	Submitted	Description	Status	Approval Date
		near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.		
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Pending	Under BLM Review
13	05.21.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs confirmed that wildlife ramps were installed in the open excavation at turbine site G11 in accordance with MM BIO-7A.



Photo 2: Crew spraying herbicide within disturbance limits on A string. A qualified restoration monitor was present per MM BIO-3A.



Photo 3: Construction crew installing concrete washout basin at turbine pad C3 in accordance with the project SWPPP.



Photo 4: ECMs observed drilling along McCain Valley Road. Archaeological and Native American monitors were present to observe the ground disturbance in accordance with MM-CUL-1D.

INTENTIONALLY LEFT BLANK



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: 5.22.17 through 5.28.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 5.22.17 through 5.28.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed drilling, road widening/maintenance, erosion and sediment control best management practice (BMP) installation and replacement, and hydro seeding along McCain Valley Road. Additional roadwork occurred along Rough Acres Ranch Road and the access roads

along the A and E lines. Trenching activities occurred along the G line and near Interstate-80. Drilling and pole erection continued along the collector line. ECMs also observed rock management activities along the G line, connector road, and at laydown yard 10. In addition, construction crews performed pad building and backfill along the E line, concrete pouring along the D line, excavation along the A line, BMP installation along the G line, and boring at the substation.

Cultural Resources

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

Archaeologists and Native American monitors completed shovel test pits and began phase II data recovery efforts at archeological site CA-SDI-17,817 in accordance with the approved Treatment Plan dated May 8, 2017. The project archaeologist, Native American monitors and tribal leaders, and a representative from the San Diego County Medical Examiner's Office were onsite on Saturday, May 27, 2017 to determine the origin of bones discovered during the ongoing data recovery efforts.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM BIO-1c. Biological monitors were observed performing nesting bird and general wildlife clearance surveys ahead of construction activities and establishing no-disturbance buffers around observed active bird nests in accordance with MM BIO-7j. ECMs also observed inactive trenches and excavations covered to prevent wildlife entrapment in accordance with MM BIO-7a.

During the previous reporting period, ECMs observed scrap plastic outside a nearby dumpster staged at lot 6 and food trash left uncovered in a roll-off bin at laydown yard 11. On 05/22/17, ECMs confirmed that the plastic had been removed from lot 6 and the roll-off bin was covered at laydown yard 11 in accordance with MM BIO-7d.

On 05/23/17, ECMs observed trash at turbine pad site C3. A nearby biological monitor was notified of the issue and the trash was cleaned up and properly disposed of in accordance with MM BIO-7d, by the end of the day.

On 05/25/17, ECMs recorded that the open excavations at two collector poles were found to be improperly covered. The lead biological monitor was notified of the issue. The following day, ECMs confirmed that the excavation openings had been covered to prevent wildlife entrapment in accordance with MM BIO-7a.

During this reporting period, ECMs recorded several occasions where vehicles and/or construction equipment were observed speeding. The designated biologist was notified of this reoccurring issue. ECMs and biological monitors are continuing to work with Tule Wind LLC to remind construction crews of speed limit requirements to protect wildlife and minimize fugitive dust.

Construction crews were observed removing litter, installing bird deterrents to prevent nesting activity on/in equipment, placing secondary containment under equipment, and covering trash bins and open excavations in anticipation of site inactivity over the Memorial Day Holiday weekend.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM BIO-1A)

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, ECMs observed construction crews repairing BMPs throughout the project site. There were several issues identified with deficient BMPs including silt fencing and straw wattles in need of repair, concrete washout basins missing rock aprons, and sediment stockpiles at turbine sites G3 and G5 requiring stabilization during inactivity (more than 14 days). Each of these issues were discussed with the designated biologist and were in the process of being addressed. ECMs are preparing a punch list to help identify and address BMP deficiencies.

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

ECMs observed dust control best management practices being implemented including limiting vehicle idling times and watering active areas of construction at least three times per day in accordance with ROW Grant Stipulation 9, MM AQ-1, and the Dust Control Plan. The construction contractor continued to maintain aggregate at the entrance/exit to McCain Valley Road to prevent further track-out in accordance with MM AQ-1.

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, fire suppression equipment within 25 feet of active work sites, 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.

On 05/24/2017, a fire began along Rough Acres Ranch Road during rock breaking activities. The protocols outlined in the Fire Prevention/Protection Plan were implemented. All on-site personnel were evacuated and there were no injuries or impacts to sensitive environmental resources. The origin of the fire is under investigation. The fire occurred on lands administered by the County of San Diego.

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

During this reporting period, ECMs observed portable restroom facilities secured with containment in place in accordance with MM HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

During the previous and current reporting period, several traffic signs were observed to be knocked down along McCain Valley Road. ECMs reminded the designated biologist of each location and will follow-up on the resolution during the next reporting period.

ECMs observed construction crews carpooling to/from the project site during this reporting period in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Grading along Ribbonwood side of Rough Acres Road,
- Grading, rock management, and pre-trench ripping along the G line,
- Building of turbine pad sites along E line,
- Topsoil salvage at pad sites along the A and G lines as well as Rough Acres Ranch Road,
- Installing straw wattles on the B line,
- Foundation work along the B-F lines and backfill along the E and J lines,
- Drilling and blasting at pad sites along the E line,
- Digging of box pads along the J line,
- Hydro-seeding along the B and C lines,
- Pouring footings at O&M building,
- Framing at substation,
- And weed abatement along the C line, McCain Valley Road, and laydown yard 2.

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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Pending	Under BLM Review
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs confirmed that the roll-off bin at laydown yard 11 was covered in accordance with MM BIO-7d.



Photo 2: The silt fencing surrounding a concrete washout basin is maintained in good condition. A rock apron is anticipated to be installed at the washout basin in accordance with figure WM-8 of the grading plans.



Photo 3: Excavations are covered to prevent wildlife from becoming entrapped in accordance with MM BIO-7A.



Photo 4: Archaeological and Native American monitors were present for excavations associated with overhead collector pole #25 in accordance with MM CUL-1D.

INTENTIONALLY LEFT BLANK

June 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: 05.29.17 through 06.04.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 05.29.17 through 06.04.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed ongoing road maintenance, ripping, pre-trenching, trenching, rock breaking, drilling, and compacting along the G-line. Additional road maintenance, blading, grading, drilling, and pouring concrete occurred along McCain Valley Road. Grading, rock breaking,

drilling, concrete foundation pouring, slurry pouring, backfilling, and turbine construction occurred along the E-line. Grading and backfilling also occurred along the H-line. Herbicide was applied along the J & H-line access roads under the guidance of the restoration ecologist, application of road palliative occurred between the A & C lines, continued drilling occurred along the collector line, and conduit installation occurred North of Highway 80.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground disturbing activities including grading, rock breaking, conduit trenching, and drilling, in accordance with mitigation measure MM-CUL-1D and the approved Tribal Participation Plan.

On Tuesday, 05/30/2017, Archaeological monitors completed excavation of 50 shovel test pits and continued phase II data recovery efforts at archaeological site CA-SDI-17,817 in accordance with the approved Treatment Plan dated 05/08/2017. Native American monitors were present to monitor and assist with the excavation of shovel test pits and phase II data recovery efforts.

Biological Resources

Biological monitors were present to monitor initial ground disturbance, road maintenance, and vegetation clearing activities in accordance with MM-BIO-1C. Biological monitors performed nesting bird and general wildlife clearance surveys ahead of construction activities. Biological monitors established no-disturbance buffers around observed active bird nests in accordance with MM-BIO-7J.

On 06/01/2017, ECM observed inactive sediment stockpiles lacking straw wattles at collector pole sites 40 and 41. The designated biologist was contacted and informed the ECM that Mountain Power is awaiting a new shipment of BMPs that will be installed upon arrival.

On 06/02/2017 a qualified biologist swept the G-line and closely monitored a bird buffer nest at turbine pad G8 in accordance with MM-BIO-1C and BIO7J, while a bulldozer performed ripping activities.

During the reporting period, ravens were observed feeding on garbage from the bed of a pick-up truck in the O&M laydown yard and on a dead rabbit carcass along McCain Valley Road. The designated biologist was contacted and promptly removed the trash from the bed of the pick-up truck and addressed the issue of trash management with the on-site foreman. The rabbit carcass was removed from the road to prevent attracting scavengers.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM-BIO-1A)

On 06/01/2017, ECMs observed a damaged ESA fence on the access road to the H-Line. No environmental resources were affected. The lead archaeologist was notified about the damaged

fence. ECMs will follow up with project leads to ensure that the ESA is properly delineated. It is unknown if the ESA fence was damaged as a result of construction and/or public activity.

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

During this reporting period, ECMs observed multiple best management practices for storm water being replaced across the project site. ECMs are continuing to notify the designated biologists of additional locations where BMPs require repair in accordance with MM-HYD-1 and the project specific SWPPP.

On 06/01/2017, ECMs observed multiple damaged silt fences throughout the batch plant laydown yard, along the D-line, and at turbine pad B1. Concrete debris was also observed surrounding concrete washouts in the Batch Plant Laydown yard as well as two concrete washouts missing rock aggregate in laydown yard #6 in accordance with figure WM-8 of the grading plans. The designated biologist was notified and ECMs will be conducting follow up inspections.

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

ECMs observed drilling, excavations and rock breaking with water trucks present in order to control fugitive dust in accordance with MM-AQ-1 and MM-FF-1.

During this reporting period, dust was observed from multiple construction vehicles on McCain Valley Road. The dust originated due to dry road conditions and not speeding. The designated biologist was notified and requested more water to be applied on McCain Valley Road in accordance with MM-AQ-1. The additional water application helped to reduce dust to acceptable levels.

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, fire suppression equipment within 25 feet of active work sites, 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 activities in accordance with MM-FF-1.

In response to the fire that originated along Rough Acres Ranch Road reported on 05/24/17 (during the previous reporting period), rock breaking activities are being considered as “hot work”. In accordance with MM-FF-1 and the Fire Prevention/Protection Plan, all hot work requires a “hot work permit” that is issued and coordinated by the on-site Fire Safety Coordinator.

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

ECMs observed fire safety trucks and water trucks throughout the work site with each crew in accordance with MM-HAZ-1.

On 05/31/2017 ECMs observed an excavator with a malfunctioning hydraulic line leak fluid during rock breaking activities along a connector road. The leak was contained and all stained soil and

absorbent materials used to clean the leak were collected in large drums to be properly disposed of in accordance with the Hazmat Management Plan per MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

As discussed during the previous reporting period, ECMs observed several traffic signs knocked over along McCain Valley Road and at the entrances to the B and H lines. On 06/01/2017, ECMs observed construction crews replacing and re-installing signs accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Grading and rock management along Ribbonwood side of Rough Acres Road,
- Building of turbine pad E9, E10,J3 and G5,,
- Topsoil salvage from Rough Acres Ranch Road to G-line, along McCain Valley road and at J3,
- Foundation work along A,B,C and D lines,
- Drilling and blasting at pad sites along the D and E line,
- Drilling collector pole #45 and #54,
- Pouring footings at substation,
- Framing at substation,
- Pre-ripping and rock breaking along G and H lines,
- And weed abatement along the C line, McCain Valley Road, and laydown yard 2.

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

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
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 • Structure erection • Wire pulling • Restoration of temporarily impacted areas	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Pending	Under BLM Review
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed construction crews replace and re-install traffic signs along McCain Valley Road per MM-TRA-1.



Photo 2: Construction crews are observed using absorbent materials to address a hydraulic leak per the Hazardous Materials Management Plan and MM-HAZ-1A.



Photo 3: Erosion blankets and biodegradable straw wattles are installed along culverts in accordance with MM-HYD-4 and site specific SWPPP.



Photo 4: Phase II data recovery efforts continued during this reporting period in accordance with the approved Treatment Plan dated May 8, 2017.

INTENTIONALLY LEFT BLANK



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: 06.05.17 through 06.11.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 06.05.17 through 06.11.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed ongoing drilling for the overhead collector line along the H-line, at site E-10, and along Rough Acres Ranch Road. Construction crews continued grading activities along McCain Valley Road, Rough Acres Ranch Road, and at turbine sites E-5, E-9 and E-10. Road maintenance and widening continued at the G-line access road, McCain Valley Road between

the J and G-lines, and along McCain Valley Road near the J-line entrance. Subgrade work occurred along Rough Acres Ranch Road and rock management activities occurred at turbine sites E-9, E-6, and the G-line access road from turbine sites G-4 to G-6. Rock breaking continued along the connector road, Rough Acres Ranch Road, along G-line access road from turbine sites G-4 to G-6, and along the H-line.

Additionally, trenching occurred along the transmission line, G-Line access road, and from turbine sites G-4 to G-6. Concrete was poured for turbine foundations at turbine sites C-1, C-3, and E-1. ECMs observed construction crews conducting concrete washout maintenance and repair along the B, C, D, and E-lines.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities and surveys including road widening, grading, trenching, rock breaking, drilling, soil loading, cut and fill, and ripping in accordance with mitigation measure CUL-1d and the approved Tribal Participation Plan.

In accordance with the approved Treatment Plan dated May 8, 2017, archaeological and Native American monitors completed phase II data recovery efforts at archeological site CA-SDI-17,817 on 06/05/17,

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM-BIO-1c. ECMs observed construction crews removing litter, placing containment under equipment, and covering trash bins. Additionally, bird deterrents were installed on multiple rock piles along the G-line in order to deter birds from nesting within the limits of disturbance.

During this reporting period, ECMs recorded several occasions where food and construction debris were not properly contained, resulting in the attraction of ravens to feed on the trash. The designated biologist was notified of this issue and ECMs and biological monitors are continuing to work with site superintendents to remind work crews the importance of properly securing trash on-site.

On 06/08/17, ECMs observed a partially uncovered roll off bin in laydown yard 6 with ravens feeding on food trash. A nearby construction crew was notified and closed the tarp to properly secure the roll off bin.

On 06/07/17 and 06/10/17, ECMs observed ASM and ICF monitors walking along McCain Valley Road picking up trash and debris in accordance with MM-BIO-7D.

On 06/10/17, ECMs observed excess food waste and construction debris in the corner of the main 80-acre laydown yard. The designated biologist was notified, but the food waste and construction debris was not disposed of by the end of the day. This issue is anticipated to be addressed during the next reporting period.

ECMs observed qualified biologists conducting sweeps of for general wildlife and nesting bird activity prior to construction activities in accordance with MM-BIO-1C and MM-BIO-7J.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM BIO-1A)

Work occurred within the project limits of disturbance in accordance with MM BIO-1a. ECMs observed Westwood surveyors re-staking several areas where limit of disturbance stakes were knocked over and/or missing.

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

During this reporting period, ECMs observed construction crews making repairs to BMPs including straw wattles, silt fencing, and concrete washouts. There were several issues identified with deficient silt fencing in need of repair, and have been added to a list provided to the designated biologist and construction contractor.

During the previous reporting period, ECMs observed stockpiles at collector pole sites 40 and 41 without straw wattles. On 06/06/17, ECMs conducted a follow-up and observed the proper BMPs installed in accordance with MM-HYD-1.

On 06/06/17, ECMs observed concrete washouts located in the north concrete batch plant repaired in accordance with the site Storm Water Pollution Protection Plan (SWPPP).

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

ECMs observed water trucks applying water to active areas of construction at least three times per day in accordance MM-AQ-1. The construction contractor planned to add aggregate to the entrance/exit to McCain Valley Road to prevent track-out in accordance with MM-AQ-1.

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

ECMs observed fire equipment and water trucks on the project site during construction activities, including vehicles with required fire suppression equipment, fire suppression equipment within 25 feet of active work sites, and vehicles parked in areas with no vegetation in accordance with MM-FF-1.

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

During this reporting period, ECMs observed a water truck that broke down along McCain Valley Road resulting in an area of stained soil. The designated biologist was notified and the stained soil was immediately cleaned up in accordance with MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

During the previous and current reporting periods, vehicles were observed speeding along the project access roads. The designated biologist and construction contractor has addressed the speeding issue multiple times at construction meetings and informed construction crews that monitors will be stationed along access road and speeding vehicles will be reported.

The construction contractor is anticipated to install two radar speed limit signs along McCain Valley Road to help address the speeding issue. In addition, on 06/08/17 construction crews were observed replacing and installing new traffic control signs including speed limit signs in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Sub grading along Ribbonwood side of Rough Acres Road,
- Rock management along the J line,
- Building of turbine pad sites along J line,
- Topsoil salvage along MVR,
- Installing straw wattles and erosion blankets along MVR,
- Foundation excavation at E 10,
- Drilling and blasting at pad sites along the G-line, McCain Valley Road, and Rough Acres Access Road,
- Drilling for collector pole 52 and 55,
- Digging of box pads at E1, E2, F1 and F2,
- Form beams and backfill/compact at substation,
- And off load generators at 80 acre laydown yard.

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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Pending	Under BLM Review
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed a water truck providing dust control during backfilling at turbine site E-3 in accordance with MM-AQ-1.



Photo 2: A construction crew is observed adding a speed limit sign along McCain Valley road in accordance with MM-TRA-1.



Photo 3: Straw wattles are installed downslope of soil stockpiles at collector pole site 40 in accordance with the project specific SWPPP.



Photo 4: Archaeological, Native American, and biological monitors are present during drilling activities at collector pole location #54 in accordance with MM-CUL-1d and MM BIO-1C.

INTENTIONALLY LEFT BLANK



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: 6.12.17 through 6.18.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 6.12.17 through 6.18.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

During this period, third party monitors observed rock management activities including, pre-ripping along McCain Valley Road (MVR), along the C, D, E and G lines, and turbine pad F2. Rock breaking occurred along the E, G, H and J lines, and along MVR. Construction crews trenched

along old highway 80 and turbine pad E12; excavated along old highway 80 and along the E line; removed rocks at the E and G lines; and drilled overhead collector poles 45, 52, and 54.

Road maintenance activities observed during the reporting period included road widening along MVR and laydown yard 9; blading and grading MVR between the G and H lines, along the E line, and at turbine pads on the D line. Sub grading occurred on turbine pad G11, the Met Tower access road, and along MVR. Backfilling occurred on the D, E and F line and overhead collector pole installation began on pole 41. Turbine pad construction continued on pads along the A, B, C and F lines. In addition, Stormwater Pollution Prevention Plan (SWPPP) best management practice (BMP) installation and maintenance of erosion control blankets, biodegradable straw wattles, silt fence, and hydro mulch occurred throughout the work site.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities including road widening, grading, trenching, rock breaking, drilling, soil loading, cut and fill, and rock ripping in accordance with MM-CUL-1D.

On 06/15/17 during road widening along MVR, an excavator was removing a rock near the limits of disturbance and struck a rock that was buried approximately two feet beyond the limits of disturbance. The designated biologist, lead archaeologist, along with several Native American monitors supervised the careful removal of the rock. No impacts to sensitive cultural or biological resources were observed. The impacts are being considered as an unforeseen event in accordance with the protocols established by Variance Request 006.

On 06/16/17, two boulders that were being excavated and appeared to be within the limits of disturbance were discovered to protrude outside of the limits of disturbance beneath the ground surface. As the boulders were being excavated, they caused the ground above them, located outside the limits of disturbance to cave slightly. Dudek's ECM was present for the disturbance and notified the designated biologist and lead archaeologist of the incident. The remainder of the work area was surveyed by biological and cultural monitors to prepare for the potential of further disturbances outside the limits of disturbance. No sensitive resources were observed and/or impacted. The impacts are being considered as an unforeseen event in accordance with the protocols established by Variance Request 006.

On 06/17/17, ECMs observed the relocation and identification of sensitive cultural resources with San Diego County's forensic anthropologist. Native American and archaeological monitors were present in accordance with MM-CUL-2.

Biological Resources

Biological monitors were present to monitor initial ground disturbance and vegetation clearing activities in accordance with MM-BIO-1C. ECMs observed construction crews placing containment under equipment, observed monitors spot-checking trenching activities in accordance with MM-BIO-1C, and the installation of two radar speed limit signs on MVR to enforce speed limits in accordance with MM-BIO-7B.

On 06/15/17, ECMs observed ravens in the 80-acre yard pulling trash from the back of construction vehicles. Food trash continues to be an issue in the lay down yard with the potential to attract wildlife to the project site. The designated biologist has been notified of this issue and ECMs and biological monitors are continuing to work with site superintendents to remind work crews the importance of properly disposing of their trash on site.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM BIO-1A)

Work occurred within the project limits of disturbance in accordance with MM-BIO-1A, apart from the two aforementioned instances where work occurred outside the limits of disturbance requiring the protocols established by Variance Request 006 to be implemented.

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

During this reporting period, ECMs observed construction crews making repairs to straw wattles, concrete washouts, and installing erosion control blankets. There were several issues identified with deficient silt fencing in need of repair, and have been added to a list provided to the designated biologist. Construction crews began reclamation of unused concrete washout stations.

On 06/13/17, ECMs observed concrete that was disposed in the open, located by one of the water tanks on the main access road to the A line. The problem area was communicated to the lead biologist. ECM's later observed the concrete to be properly discarded in accordance with the SWPPP.

On 06/15/17, ECMs observed that the concrete washout near turbine B2 had concrete/water mixture leaking outside of the silt fence and onto the soil. The lead biologist was notified of the issue and the issue was addressed by repairing the plastic lining in the washout basin and ensuring that the washout basin does not exceed its capacity.

On 06/15/17, ECMs observed a concrete truck driver that had underestimated the distance to the washout pit and released the washout onto the ground instead of the prescribed pit. The construction foreman was contacted and he stated that he would install rock aprons in accordance with the project grading plans. The washout that affected the ground surface was appropriately cleaned and disposed of.

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

ECMs observed water trucks watering active areas of construction at least three times per day and on an as-needed basis for rock breaking activities, in accordance MM-AQ-1. Soil binders have also been applied to control sediment discharge and erosion in accordance with MM-AQ-1.

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

ECMs observed fire equipment and water trucks on the project site during construction activities, including vehicles with required fire suppression equipment, fire suppression equipment within 25 feet of active work sites, and vehicles parked in areas with no vegetation in accordance with MM-FF-1.

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

No spills were reported during this period. ECMs observed containment bins staged under construction equipment in accordance with MM-HAZ-1A.

Traffic Control Plan Implementation (MM-TRA-1)

Two speed radar signs were staged along McCain Valley Road to remind construction crews of the project specific speed limits in accordance with MM-BIO-7B and MM-TRA-1.

On 06/12/17, ECMs observed construction traffic flaggers along McCain Valley Road during road maintenance to notify motorists of temporary delays, in accordance with MM-TRA-1.

Construction Activities Schedule:

- Staking disturbance limits along the underground collection line and Rough Acres Ranch Road,
- Sub grading along Ribbonwood side of Rough Acres Road,
- Topsoil salvage in the vicinity of Lark Canyon,
- Backfill and compact substation,
- Pre-ripping along B and C line,
- Rock management, and pre-trench ripping along the B and C line,
- Building of turbine pad sites,
- Drilling and blasting at pad sites along the G line and McCain Valley Road, and
- Digging of box pads along the D, E and F 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	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• 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	
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 • Structure erection • Wire pulling	Yes

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		• Restoration of temporarily impacted areas	

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.02.12
2	05.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	05.20.13
3	12.20.16	Realignment of access roads along the A-string, F-string, and G-string to minimize disturbance to previously undisturbed areas, to avoid impacts to sensitive environmental resources, and to accommodate construction and engineering design.	Approved	02.14.17
4	01.09.17	Addition of seven areas outside of the limits of disturbance to allow for the relocation of boulders along the G-string.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Approved	06.14.17
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during	Approved	05.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
		construction.		
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17
14	06.16.17	Includes additional pull ares for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Pending	Under BLM Review
15	06.16.17	Requests turbine B-5 to be approved as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed drip pan containment bins beneath construction equipment in accordance with MM-HAZ-1.



Photo 2: Two speed limit radar signs were staged along McCain Valley Road to remind construction vehicles of the project speed limit and prevent speeding in accordance with MM-BIO-7B.



Photo 3: ECMs observed excess concrete/water mixture outside of the silt fencing in multiple locations. The construction contractor was notified to install gravel aprons in accordance with the Grading Plans (please see Photo 4) and to not fill washout basins beyond capacity.



Photo 4: Gravel apron installed as a best management practice (BMP) to prevent concrete washout discharge in accordance with the Grading Plans.

INTENTIONALLY LEFT BLANK



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: 06.19.17 through 06.25.17

Summary

The Bureau of Land Management (BLM) is responsible for overseeing implementation of the mitigation measures (MM) set forth in the *Joint Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS)* for the Tule Wind Energy Project. A federal Right-of-Way (ROW) grant (CACA-049698) for the Tule Wind Energy Project was granted by the BLM to Tule Wind LLC, a subsidiary of Avangrid Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental Compliance Monitoring Plan (ECMP) to ensure that measures approved in the FEIR/FEIS to mitigate or avoid significant impacts are implemented in the field. This ECMP status report is intended to provide a description of construction activities; a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs); the compliance status of mitigation measures required by the ECMP, Limited Notice to Proceed (LNTP) -2, Notice to Proceed (NTPs) 3, 4, 5, and the February 1, 2017 NTP, which lifted the Temporary Suspension of Construction Activities issued on January 20, 2017; and anticipated construction activities for the following week. The following weekly report covers construction activities for the reporting period of 06.19.17 through 06.25.17.

Site Inspections, Mitigation Monitoring, and Compliance

Construction activities were observed to verify implementation of the measures stipulated in the project's ECMP and conditions included in LNTP-2, NTPs 3, 4, 5, and the NTP issued on February 1, 2017 as they pertain to the current activities. ECMs documented observations on daily site inspection forms and reviewed applicable mitigation measures. The following activities were observed by third party ECMs onsite during this reporting period:

Construction Activities

ECMs observed ongoing drilling for overhead collector poles 45, 52, and 55. Construction crews continued to perform road maintenance activities such as road blading and widening along McCain Valley Road, compacting near Cottonwood Campground along McCain Valley Road, and blading along the F-line. Grubbing and vegetation removal also occurred along multiple sections

of McCain Valley Road. Rock management and rock breaking continued along the G and E lines, laydown yard 10, and Rough Acres Ranch Road, while rock removal occurred along the G-line. Pre ripping activities occurred at collector pole 1, along the access road between A and B line, the G-8 access road, along old Highway 80. Trenching occurred along McCain Valley Road and along the A, E, and G lines. Silt fencing was repaired along turbine pad D-1 and concrete washouts were reclaimed at turbine pad E-4.

Cultural Resources

Archaeological and Native American monitors were present to monitor ground-disturbing activities and surveys including road widening, grading, trenching, rock breaking, drilling, cut and fill, and ripping in accordance with MM-CUL-1D and the approved Tribal Participation Plan. In addition, cultural monitors were observed spot checking drilling for overhead collector pole sites, per MM-CUL-1D.

Biological Resources

Biological monitors were present to monitor road widening and vegetation/grubbing clearing activities in accordance with Variance Request 010 approval and MM-BIO-1C. No sensitive species were observed.

On 6/19/17, ECMs observed biological monitors present, near an active bird nest during grading activities along McCain Valley Road, near the Lark Canyon Campground. The grading activities remained outside of the active bird nest buffer and biological monitors were present to observe the bird's activity in accordance with MM-BIO-7J and the Nesting Bird Management, Monitoring, and Reporting Plan.

Monitor Sign-off (February 1, 2017 NTP)

ECMs observed monitor sign-off sheets (MSOS) at each construction activity in accordance with the February 1, 2017 NTP. This is one of the conditions that allowed the temporary suspension of construction activities to be lifted.

Limits of Disturbance (MM BIO-1A)

All construction and road widening activities observed during this reporting period were within the staked disturbance/grading limits. This includes the revised limits of disturbance established as part of the variance request approval process.

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

During this reporting period, ECMs observed construction crews repairing silt fencing in accordance with MM-HYD-1 and the SWPPP. Areas of deficient or damaged BMPs including straw wattles, silt fencing, and aggregate at washout basins have been provided to the designated biologist and construction contractor and are in the process of being addressed.

On 6/20/17, ECMs observed a concrete washout basin at laydown yard 3 with concrete water stains on the ground surface and damaged silt fencing. Upon notification, the stained soil was cleaned and the silt fencing surrounding the concrete washout basin was replaced.

On 6/20/17, ECMs observed soil stockpiles at multiple collector pole sites. Per the project specific SWPPP, fiber rolls are required when the soil stockpiles become inactive after 14 days of no use. The designated biologist was notified of the stockpiles and has contacted the construction contractor to install fiber rolls.

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

During this reporting period, ECMs observed active water application during rock breaking and earth moving activities in an effort to minimize dust in accordance with MM-AQ-1. Concrete trucks driving along the D line access road have been observed generating dust. ECMs notified the designated biologist of this observation and additional water trucks have been scheduled to apply water and suppress dust along this access road.

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

Water tenders were observed working closely with construction equipment conducting rock breaking, drilling, and rock management activities in accordance with MM-FF-1 and MM-BIO-1F. Fire suppression tools including a 5-gallon hand pump, fire extinguisher, and round tip shovel were observed within 25 feet of active work sites.

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

ECMs observed containment beneath staged equipment throughout site in accordance with the Spill Prevention Control and Countermeasure Plan and MM-HAZ-5A.

Traffic Control Plan Implementation (MM-TRA-1)

ECMs observed Blatner construction crews replacing traffic signs along McCain Valley Road in accordance with MM-TRA-1. Traffic flaggers were present during periods when access routes were temporarily blocked and traffic cones were used to identify temporary changes in roadway access.

Construction Activities Schedule:

- Red flag warning for 6/27/17: No work scheduled.
- Surveying and staking underground collection line,
- Sub grading along Ribbonwood side of Rough Acres Road,
- Rock management at G3 and Rough Acres Ranch Road,
- Turbine site build at G2, and G3,
- Foundation backfill at C and B-line,
- Silt fence repair along G and E-line,
- Foundation excavation and framing at substation,
- Setting transformers along G-line,
- Drilling and blasting at G-2,
- Drilling for collector pole 54, 56, and 45,
- Top soil relocation of drill spoil sites, and
- Digging of box pads at C4, C6, and C7.

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.	N/A	Resubmitted as part of variance request 006 on 03.24.17.
5	02.09.17	The use of generators to provide power for up to four Conex storage trailers.	Approved	02.23.17
6	02.24.17	Addition of temporary areas needed for constructability. A 20-foot buffer of the approved engineering disturbance limits is being proposed to allow construction activities to use the areas where necessary to safely construct the project while remaining in compliance with the permit conditions. Approximately 10 acres is anticipated to be impacted.	Approved	Resubmitted on 03.24.17. Approved on 04.24.17
7	03.03.17	Addition of impact areas for the installation of riprap associated with 48 culverts along project access roads.	Approved	04.14.17
8	03.24.17	Includes the addition of a concrete batch plant facility in the 2-acre laydown yard (Yard 6) to serve as the primary concrete batch plant.	Approved	04.18.17
9	03.28.17	Includes additional temporary areas needed for turbine installation for blade overhang areas, Nacelle tagline areas, and turbine top section staging areas.	Approved	05.16.17
10	03.29.17	Includes additional areas needed for constructability and safety associated with travel along McCain Valley Road near the Lark Canyon Campground and off-highway vehicle (OHV) staging areas.	Approved	06.14.17
11	04.07.17	Relocation of office trailers from San Diego County land to laydown yards 9 and 11.	Approved	04.24.17

Variance Request No.	Submitted	Description	Status	Approval Date
12	04.20.17	Includes widening portions of McCain Valley Road at three specific areas for constructability and safety during construction.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17
14	06.16.17	Includes additional pull ares for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Pending	Under BLM Review
15	06.16.17	Requests turbine B-5 to be approved as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Pending	Under BLM Review

Representative Photos



Photo 1: ECMs observed archaeological and Native American monitors present during road grading activities along McCain Valley Road in accordance with MM-CUL-1D.



Photo 2: ECMs observed construction crews replacing silt fencing along the D1 access road in accordance with MM-HYD-1 and the project specific SWPPP.



Photo 3: Rock breaking activities at turbine pad G-3 were accompanied by a water tender present in accordance with MM-FF-1.



Photo 4: ECMs observed water tenders present during drilling at collector pole 55 in accordance with MM-FF-1. Excavated holes are covered to prevent wildlife entrapment in accordance with MM-BIO-7A.

INTENTIONALLY LEFT BLANK