BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 5.20.13 through 5.25.13

Summary

The BLM is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (FEIS) for the Tule Wind Energy Project. A federal Right-of-Way (ROW) for the Tule Wind Energy Project was granted by the BLM to Tule Wind, LLC, a subsidiary of Iberdrola Renewables, Inc. on April 10, 2010.

The BLM has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the FEIS to mitigate or avoid significant impacts are implemented in the field. The ECCMP status report is intended to provide a description of construction activities, a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECMs), the compliance status of mitigation measures required by the ECCMP, and anticipated construction activities for the following week.

On September 17, 2012, the BLM issued a Notice to Proceed (NTP) #1 to Tule Wind, LLC authorizing geotechnical activities within the Tule Wind Energy Project site. The requirement for completion of design-level geotechnical investigations was analyzed as mitigation in the Final Environmental Impact Statement (FEIS), adopted as part of the Record of Decision (ROD) and further stipulated in the ROW Grant issued to Tule Wind, LLC. The requirement for design-level geotechnical activities was identified as Mitigation Measure (MM) Geo-3 in these documents.

All geotechnical testing will occur within the proposed limits of disturbance identified in the Tule Wind FEIS and more specifically at the geographic coordinates included in Appendix D to the Tule Wind Project Plan of Development (December 2011), as amended. Geotechnical activities authorized under NTP-1 include turbine borings, met tower borings, soil test pit exactions, visual examination, completion of Multichannel Analysis of Surface Waves (MASW) and seismic refraction testing. Detailed definitions of these activities can be found on the Tule Wind ECCMP website under the Notice to Proceed section (http://tulewindeccmp.com/NTP_1_Approval.pdf).

This status report is intended to provide a summary of site inspections conducted by the BLM's third party environmental compliance monitors (ECMs), and the compliance status of mitigation measures required per NTP #1 for these activities for the reporting period of 5.20.13 through 5.25.13

Site Inspections, Mitigation Monitoring, and Compliance

Areas of active geotechnical investigations were observed to verify implementation of the measures stipulated in the project's ECCMP as they pertain to current activities. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed. Pre-construction mitigation measures including but not limited to development and implementation of preconstruction plans have been completed as indicated in NTP -1. The following compliance activities were observed by third party ECMs on site during geotechnical activities:

Archaeological Resources

Tule Wind, LLC has contracted with an archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP, the Management Plan for Archaeological Resources, and the Tribal Participation Plan for the Tule Project. ECMs observed archeological monitors and Native American observers present during all ground disturbing activities and working with biological monitors to ensure avoidance and protection of resources during geotechnical activities. Observers and monitors collectively accompanied geotechnical equipment down access routes as conditioned in the NTP-1 (see photo 1).

Biological Resources

Tule Wind, LLC has contracted with a consulting firm approved by the BLM to complete day-to-day biological monitoring of the construction activities in accordance with the ECCMP and MM Bio-1c. In conformance with conditions outlined in NTP-1, biologists' resumes were submitted and approved by the BLM prior to initial geotechnical activities in November 2012, and new resumes were submitted and approved by BLM prior to the initiation of geotechnical activities conducted this month.

Surveys and Buffers

Biological monitors were observed conducting surveys (see photo 2) and establishing buffers for active bird nests prior to geotechnical activities in accordance with NTP-1.

On Tuesday, May 21, during pre-geotechnical sweeps and overland route surveys, a monitor found a nest occupied with an egg. ECMs observed the nesting bird team passively surveying the location, which was later determined to be inactive. Work did not occur in this area until the nesting bird team made this determination and had cleared the area for work.

In addition to surveys, ECMs observed biological monitors accompanying geotechnical equipment such as drill rigs, back hoes, and track hoes along the project access routes and monitoring geotechnical work. ECMs observed topsoil salvage (see photo 3) during test pit excavation in accordance with the NTP. The topsoil was used to backfill/restore areas of disturbance.

Dust Control Plan Implementation (MM-AQ-1)

In accordance with the Dust Control Plan, traffic speeds on unpaved roads and the right-of-way were limited to 15 miles per hour. ECMs observed watering and stabilizing of active unpaved access roads, parking areas, and staging areas throughout the week to suppress fugitive dust, however dust was not found to be an issue area.

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

During all construction activities, Tule Wind, LLC is required to adhere to the guidelines and commitments within the Construction Fire Prevention/Protection Plan (as applicable to geotechnical activities), NTP-1 conditions and Variance Approval #001.

As approved through Variance Approval #001, ECMs observed required fire equipment and personnel on the project site during geotechnical activities, including an all-wheel drive Type III engine, as well as a 2 -wheel drive Type II Water Tender for use during any backhoe work. The vehicles were also equipped with 1,200-foot hose extensions per NTP-1 conditions of approval (see photo 4).

In addition to the mobilized Water Tender and Type III engine, fire patrols from San Diego Rural Fire District were observed monitoring activities at each geotechnical site and were equipped with fire suppression water bladders/ backpacks at the direction of the Fire Safety Officer. ECMs observed application of water to areas prior to use or travel and ECMs observed fire patrols monitoring disturbed areas for one hour post-geotechnical activities in accordance with the conditions in NTP -1/the Construction Fire Protection/Prevention Plan. Fire personnel were also observed patrolling areas of overland travel where brush crushing occurred.

ECMs ensured crews were made aware of the requirements for having 3A, 40BC fire extinguishers, 5- gallon backpack pumps, and shovels. ECMs observed fire patrols present at all geotechnical activities.

On Tuesday, May 21, a broken steering pump on a drill rig used for geotechnical activities rendered the equipment inoperable for one day this week (see photo 5). The rig was parked along McCain Valley Road overnight. Secondary containment was placed under the drill rig and reflective safety signage was placed around the drill rig at the request of BLM. The drill rig did not preclude ingress or egress to the public and the steering pump was fixed the following workday.

Geotechnical Schedule:

Scheduled Activities for Next Week: Geotechnical activities are scheduled for 5.28.13 through 6.01.13.

Potential Delays to the Online Date of the Project

- None identified at this time.

Plan Review Submittal Items

- None identified at this time.

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

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	10.26.12	Use of one Type II Water Tender and one Type III Engine in-lieu of a Type VI Skid Mount pump unit	Approved	11.2.12
2	5.16.13	Use of additional existing roads, use of a track-mounted excavator, ability to shift small to medium sized boulders and use of a chain-saw or similar type equipment to trim vegetation	Approved	5.20.13

Photographs from the Week

Photo 1: ECMs observed archaeological monitors, Native American observers, biological monitors, and fire personnel monitoring geotechnical activities in accordance with the NTP-1 conditions of approval.

Photo 2: ECMs observed monitors conducting nesting bird surveys along proposed overland travel routes in accordance with the NTP conditions of approval.

Photo 3: ECMs observed track hoes/excavators salvaging topsoil for restoration activities at the conclusion of geotechnical activities in accordance with the NTP conditions of approval.

Photo 4: ECMs observed Type II Water Tenders mobilized on the project site in accordance with the NTP conditions of approval as amended by Variance Request 001.

Photo 5: A broken steering pump on a drill rig used for geotechnical work rendered the equipment inoperable for one day this week. Secondary containment was placed under the drill rig and reflective safety signage was placed around the rig at the request of BLM. The rig did not preclude ingress or egress to the public and the steering pump was fixed the following work day.

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