



BLM Authorized Officer Weekly Report

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Project: Tule Wind Energy Project

Weekly Project Update

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Reporting Period: 12.04.17 through 12.10.17

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 12.04.17 through 12.10.17.

Site Inspections, Mitigation Monitoring, and Compliance

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

Construction Activities

Road maintenance activities included blading on the access road between turbine pads E-7 through E-10, E-11 through E-13, and along the access road to turbine E-1. Motor grading was observed for shoulder work along road AA on the J-line and gravel spreading and curb grading occurred along Rough Acres Ranch Road and the G-line. Paving along the easternmost end of

the Connector Road continued during this reporting period. Additionally, riprap installation occurred between McCain Valley Road and turbine pad E-8, along with ditch digging and rock lining along the G-line.

Ongoing reclamation activities included topsoil hauling from the laydown yards near turbine pads F-1 and G-5; spreading topsoil along the E-line and laydown yard 4; re-contouring sites along the D-line, turbine pad C-2, and the pull site at overhead collector pole 40; site reclamation at turbine pad D-2, pull pads at overhead collector pole 39-41, and the access road to the pull site at overhead collector pole 1; and pulling in windrows on the C-line access road.

Throughout the reporting period, Blattner, GE, and Rosendin crews were observed conducting work inside turbines and transformers at sites A-1, A-2, A-3, B-3, B-4, B-5, D-1, E-10, G-4, G-6, G-10, G-12, and G13. Minor electrical work was completed around collection towers and junction boxes as well as wiring activities on the collector pole line towers. ECMs continued to observe the removal of cranes and materials off site including the breakdown of the “Biggie” crane on the A-line.

Cultural Resources

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

Biological Resources

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

On 12/04/2017, ECMs observed crews replanting cacti at the laydown yard near turbine pad G-11 with a habitat restoration specialist on site spot-checking the activity. This replanting was conducted in accordance with Section 5.2.4.1 of the Habitat Restoration Plan.

On 12/07/2017, ECMs observed crews conducting cacti transplant operations at Laydown Yard 8, using hand tools. However, with high winds and the Red Flag Warning in place, minimal work activities occurred. ECMs also observed paper towels that had blown outside the disturbance limits at turbine pad F-2. The lead biologist was notified and the issue was promptly resolved during the same day with the paper towels being collected and properly disposed of.

Monitor Sign-off (February 1, 2017 NTP)

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

Limits of Disturbance (MM BIO-1A)

All observed activities were being conducted within clearly delineated work limits in accordance with MM BIO-1a.

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

On 12/04/2017, installation of straw wattles was observed along Rough Acres Ranch Road and along McCain Valley Road during erosion control maintenance activities. Installation of rock line dams was also observed along the G-line by ECMs.

On 12/10/2017, ECMs observed a BMP crew installing straw wattles at collector pole site 44, in accordance with site specific SWPPP.

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

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

On 12/06/2017, an ECM observed an excavator digging in a boulder pile near turbine pad G-5 with no water tender present. Due to the Red Flag Warning conditions on this day, this activity was only allowed as long as a water tender was present. The ECM notified the Fire Safety Coordinator and in less than a half hour, a water tender had arrived to apply water to the area in compliance with MM AQ-1, the Dust Control Plan, and the conditions of the Red Flag Warning.

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

ECMs observed fire equipment and water trucks on the project site during all construction activities including vehicles equipped with fire suppression equipment within 25 feet of active work sites, in accordance with MM FF-1.

During this reporting period, a Red Flag Warning was issued from 12/05/2017 through 12/10/2017 reducing the number of activities to tower wiring, crane breakdown, paving and cacti transplant. The Fire Safety Coordinator approved boulder transplant as long as the equipment was accompanied by a water tender. Any work with equipment in close proximity to vegetation was suspended due to the high fire potential.

Hazardous Materials Management Plan (MM HAZ-1A)

The contaminated soil spots that were indicated from the previous reporting period on 12/02/2017, at turbine pads C-4, C-5, and C-6 were cleaned up and properly contained by the end of the day on 12/04/2017.

Traffic Control Plan Implementation (MM-TRA-1)

On 12/07/2017, an ECM observed multiple vehicles (three semi-trucks, one Penske truck, and multiple pickup trucks) speeding along McCain Valley Road. The ECM contacted the lead biologist and requested to remind construction crews to follow the 15 miles per hour daytime project speed limit. There were no additional observations of vehicles speeding along the right of way.

Construction Activities Schedule:

- Shoulder work along road AA on the J-line,
- Curb grading along Rough Acres Ranch Road,
- Road maintenance on McCain Valley Road,
- Spreading of gravel along Rough Acres Ranch Road,
- Spreading topsoil along the E-line,
- Re-contouring work space at turbine pad C-2 and along the D-line,
- Reclaiming a crane pad at turbine pad D-2,
- Ditch digging along the G-line,
- Reclaiming pull pads at OHC 39, 40, 41,
- Wiring activities on the Collector Pole Line tower,
- Removal of cranes and materials off site, and
- Breakdown of the “Biggie” crane on the A-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	
6	Pending	Commercial Operations: • Full commercial operations of 52 turbines and all associated project facilities.	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	Approved	06.14.17

Variance Request No.	Submitted	Description	Status	Approval Date
		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.	Approved	05.24.17
13	05.10.17	Includes adjustments to the overhead collector line pole locations, associated access roads, and construction areas to reduce impacts to recently identified environmentally sensitive areas.	Approved	06.21.17
14	06.16.17	Includes additional pull areas for wire pulling along the transmission and collector lines, the use and widening of an existing access road, and shifting of a transmission line structure.	Approved	07.27.17
15	06.16.17	Requests turbine B-5 to be approved, as an alternate turbine that would replace an approved turbine, should it be determined necessary.	Approved	07.12.17
16	07.07.17	Requests a change in the means for installing underground collector line under McCain Valley Road from boring to trenching.	Approved	07.12.17

Representative Photos



Photo 1: ECMs observed construction crews reclaiming the driveway and pull site at Overhead Collection Pole 1. A Biological Monitor was observed spot checking the activity in accordance with MM BIO-1C.



Photo 2: Water was applied to McCain Valley Road throughout the day in accordance with the Dust Control Plan and MM AQ-1.



Photo 3: ECMs observed construction crews replanting cacti at the laydown yard near turbine pad G-11 in accordance with Section 5.2.4.1 of the Habitat Restoration Plan.



Photo 4: An ECM observed paper towels blown outside of the limits of disturbance at turbine pad F-2. This issue was immediately resolved with the paper towels being picked up and properly disposed of in accordance with MM BIO-7D.

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