



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 6.25.12 through 7.1.12

Summary:

The BLM is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (FEIS) for the Ocotillo Wind Energy Facility Project. 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. This ECCMP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the BLM's third-party environmental compliance monitors (ECM's), the compliance status of mitigation measures required by the ECCMP, and anticipated construction activities for the following week. This weekly report covers construction activities for the period of 6.25.12 through 7.1.12.

Site Inspections/Mitigation Monitoring:

Issues/Concerns with Applicable Conditions of Certification

Trash Management: In accordance with Section 4.1 of the Raven Control Plan (May 2012), all trash on site must be kept in covered trash receptacles with lids that can be securely fastened. An ECM identified a trash bin located within the SDG&E substation yard that had not been covered on 6.29.12. The issue/concern was reported to the foreman onsite at the time of the observation and by the end of day a cover had been placed over the trash container.

Secondary Containment: In accordance with Section 4.3.4 of the Storm Water Pollution Prevention Plan (SWPP), all materials stored onsite are to be placed within a water tight secondary containment protected from rain. An ECM observed on 6.28.12, paint cans being stored at the SDG&E substation that were not within a water tight secondary containment. The issue/concern was communicated to the lead biological monitor onsite at 12:30 PM and at

approximately 12:45 PM, the paint cans were observed being placed within a water tight secondary containment.

Dust Control: Visible dust emissions were observed along Dos Cabezas Road between the temporary laydown yard and the substation/switchyard on 6.28.12. The dust emissions were observed for short durations (less than 20 seconds) as motorists passed areas that were becoming dry along the access road. The need for watering down the access road to suppress dust was communicated to the lead biological monitor. The lead biological monitor worked with crews to apply water for dust suppression at the time of the site observation.

Work Limits: An ECM on 6.30.12 observed grading activities occurring along WT string #99 beyond the approved work limits identified in the ROW grant. The grading activities were observed being completed along an access road between WT #102 and #134 within the pending work limits associated with Variance Request #5. Biological and archeological monitors were present observing the grading activities in accordance with the project requirements. OE LLC submitted Variance Request #5 to the BLM on 6.12.12 that would potentially modify the approved work limits at several pad sites and along access roads in order to minimize impacts to environmental resources that have been identified subsequent to issuance of the ROW grant. The BLM is currently in the process of reviewing Variance Request #5 and has not issued a formal decision at this time. The BLM issued corrective actions for the work activity that occurred beyond the approved work limits identified in the ROD to OE LLC on 7.1.12 that included the following measures: (1) Apply tackifier to the disturbed area beyond WT #102 that is located within the Variance 5 work limits, (2) No additional construction activities may occur within the Variance 5 work limits between WT#102 and WT#134, (3) Temporary construction fencing shall be placed at the northern extent of WT #102 to prohibit access to the variance 5 work area and (4) All environmental monitors shall be provided with both the Variance 5 work limits and the work limits identified in the ROW grant to ensure no further construction activities occur within the Variance 5 work limits.

Potential Wildlife Pitfalls: In accordance with MM-Wild 1b, if potential pitfalls will not be immediately backfilled following inspection at the end of each day, the Biological Monitor will ensure that the construction crew slopes the ends of the excavation (3:1 slope) to provide wildlife escape ramps or will ensure that the construction crew completely and securely covers the excavation to prevent wildlife entry. Excavated foundation holes for substation components were observed on 6.26.12 to not have either wildlife escape ramps or covers. An ECM contacted the lead biological monitor at approximately 9:00 AM to determine whether the foundation holes would be covered at the end of the day in accordance with MM-Wild-1b. At 1:15 PM, an ECM observed a crew covering the potential wildlife pitfalls with visqueen.

Maintaining Wildlife Fencing at Temporary Water Pond: An ECM observed gaps in the fencing along the temporary water pond on 6.25.12. The fencing has been placed along the temporary water pond to limit the potential for wildlife to enter into the area. The gaps in the fencing were reported to the lead biological monitor on 6.25.12 and the gaps in the fencing were repaired by the construction contractor on 6.26.12.

Track-out: An ECM observed track-out along County Road S2 located immediately adjacent to the main point of ingress/egress to the project site on 6.25.12. The observation was communicated to the lead environmental monitor at 12:30 PM and crews were observed sweeping the track-out along County Road S2 at 1:30 PM.

Surface Water Management: In accordance with Section 4.2 of the Raven Control Plan (May 2012), biological monitors on site are required to check for areas of standing water, determine their cause, eliminate them, and determine how to avoid the situation in the future. An ECM observed pot holes along Dos Cabeza Road that had the potential for ponding and collecting standing water. The issue/concern was reported to the lead biological monitor at 6:35 AM on 6.29.12. The pot holes were filled and the potential for surface water collection was addressed by 5:45 P.M on 6.29.12.

Issues of Concern with or by the Applicant

None.

Construction Activities:

The construction activities conducted for this period consisted of clearing and grading access roads for wind turbines, placing gravel along access roads, clearing turbine pad sites, establishing the 12-acre temporary laydown yard, above-grade installation of substation/switchyard components at the 30-acre substation/switchyard, surveying and staking turbine access roads and geotechnical testing.

Wind Turbine Access Roads and Pad Sites: Crews were observed building the subgrade at WT-11, 50 and 67. Crews observed placing gravel to WT-11, 67, 150, 175, 176 and 150. Clearing at WT 9, 10, 11, 50, 64, 65, 66, 67, 94, 95, 96 and 97 has been completed.

12-acre Temporary Laydown Yard: Crews were observed establishing the temporary laydown yard, which primarily included the construction of temporary chain link fencing along the limits of the staging area for security purposes and installing a septic system.

30-acre Substation/Switchyard: Construction activities during this reporting period consisted of staging construction equipment and initiating work efforts to erect above-grade components associated with the 30-acre substation/switchyard.

Surveying and Staking Turbine Access Roads: Survey crews were onsite throughout the week to place survey stakes for anticipated grading activities associated with the turbine access roads. The survey stakes are being utilized to delineate the approved work limits for anticipated grading activities.

Geotechnical Testing: Crews utilized approved access routes to complete geotechnical testing at turbine pad sites located throughout the project site.

Compliance:

Environmental compliance monitors conducted site inspections of the active construction areas on a daily basis from 6.25.12 through 7.1.12. Areas of active construction were observed to verify implementation of the measures stipulated in the project's ECCMP as they pertain to current construction activities. Daily observations were documented on daily site inspection forms and applicable mitigation measures were reviewed.

Pre-construction mitigation measures have been completed as indicated in NTP #1. The Project Applicant has contracted with a biological and archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP.

In accordance with Section 4.1 of the Raven Control Plan (May 2012), all trash on site must be kept in covered trash receptacles with lids that can be securely fastened. An ECM identified a trash bin located within the SDG&E substation yard that had not been covered on 6.29.12. The issue/concern was reported to the foreman onsite at the time of the observation and by the end of day a cover had been placed over the trash container.

In accordance with Section 4.3.4 of the Storm Water Pollution Prevention Plan (SWPP), all materials stored onsite are to be placed within a water tight secondary containment protected from rain. An ECM observed on 6.28.12, paint cans being stored at the SDG&E substation that were not within a water tight secondary containment. The issue/concern was communicated to the lead biological monitor onsite at 12:30 PM and at approximately 12:45 PM, the paint cans were observed being placed within a water tight secondary containment.

Visible dust emissions were observed along Dos Cabezas Road between the temporary laydown yard and the substation/switchyard on 6.28.12. The dust emissions were observed for short durations (less than 20 seconds) as motorists passed areas that were becoming dry along the access road. The need for watering down the access road to suppress dust was communicated to the lead biological monitor. The lead biological monitor worked with crews to apply water for dust suppression at the time of the site observation.

An ECM on 6.30.12 observed grading activities occurring along WT string #99 beyond the approved work limits identified in the ROW grant. The grading activities were observed being completed along an access road between WT #102 and #134 within the pending work limits associated with Variance Request #5. Biological and archeological monitors were present observing the grading activities in accordance with the project requirements. OE LLC submitted Variance Request #5 to the BLM on 6.12.12 that would potentially modify the approved work limits at several pad sites and along access roads in order to minimize impacts to environmental resources that have been identified subsequent to issuance of the ROW grant. The BLM is

currently in the process of reviewing Variance Request #5 and has not issued a formal decision at this time. The BLM issued corrective actions for the work activity that occurred beyond the approved work limits identified in the ROD to OE LLC on 7.1.12 that included the following measures: (1) Apply tackifier to the disturbed area beyond WT #102 that is located within the Variance 5 work limits, (2) No additional construction activities may occur within the Variance 5 work limits between WT#102 and WT#134, (3) Temporary construction fencing shall be placed at the northern extent of WT #102 to prohibit access to the variance 5 work area and (4) All environmental monitors shall be provided with both the Variance 5 work limits and the work limits identified in the ROW grant to ensure no further construction activities occur within the Variance 5 work limits.

In accordance with MM-Wild 1b, if potential pitfalls will not be immediately backfilled following inspection at the end of each day, the Biological Monitor will ensure that the construction crew slopes the ends of the excavation (3:1 slope) to provide wildlife escape ramps or will ensure that the construction crew completely and securely covers the excavation to prevent wildlife entry. Excavated foundation holes for substation components were observed on 6.26.12 to not have either wildlife escape ramps or covers. An ECM contacted the lead biological monitor at approximately 9:00 AM to determine whether the foundation holes would be covered at the end of the day in accordance with MM-Wild-1b. At 1:15 PM, an ECM observed a crew covering the potential wildlife pitfalls with visqueen.

An ECM observed gaps in the fencing along the temporary water pond on 6.25.12. The fencing has been placed along the temporary water pond to limit the potential for wildlife to enter into the area. The gaps in the fencing were reported to the lead biological monitor on 6.25.12 and the gaps in the fencing were repaired by the construction contractor on 6.26.12.

An ECM observed track-out along County Road S2 located immediately adjacent to the main point of ingress/egress to the project site on 6.25.12. The observation was communicated to the lead environmental monitor at 12:30 PM and crews were observed sweeping the track-out along County Road S2 at 1:30 PM (see photo 2).

In accordance with Section 4.2 of the Raven Control Plan (May 2012), biological monitors on site are required to check for areas of standing water, determine their cause, eliminate them, and determine how to avoid the situation in the future. An ECM observed pot holes along Dos Cabeza Road that had the potential for ponding and collecting standing water. The issue/concern was reported to the lead biological monitor at 6:35 AM on 6.29.12. The pot holes were filled and the potential for surface water collection was addressed by 5:45 P.M on 6.29.12.

Stabilized construction entrances are being established and maintained at locations where project access roads intersect paved access roads (see photo 3). The stabilized construction entrances consist of rock aprons to minimize track-out from construction equipment along paved access roads. Signage has also been placed at points of ingress/egress to access roads that indicate "construction access only" for public safety.

Construction crews were observed utilizing water for dust suppression purposes during the grading of turbine string access roads and the clearing for wind turbine pad sites (see photo 4). Multiple water trucks were observed being present with each excavation crew to ensure dust emissions were minimized during construction in accordance with the dust control plan.

Construction activities occurring at the 30-acre substation/switchyard were observed being completed within the approved work limits (see photo 5). Dust emissions were being monitored on a regular basis and no issues/concerns were reported throughout the week.

Geotechnical testing activities were observed throughout the week being completed within the approved work limits and both an archeological and biological monitor approved by the BLM were present during the geotechnical testing activities. The biological and archeological monitors were observed guiding the geotechnical rigs to the testing locations along approved access roads and observing for archeological and biological resources to minimize disturbances to resources that may be present.

Based on environmental compliance monitors observations, all crew members working on the project site have been WEAP trained and sensitive environmental resources requiring avoidance within proximity to the active construction areas are being identified in accordance with the project requirements.

Construction Schedule:

Scheduled Activities for Next Week: The anticipated construction activities associated with week ending 7.08.12 consist of the following:

- Substation and Switchyard
 - Erect substation and switchyard components associated with Phase 2.

Potential Delays to the Online Date of the Project

- None identified at this time.

Plan Review Submittal Items

Submittal Type	Description
Paleontological Monitoring & Treatment Plan	In accordance with MM-Paleo-1 a monitoring plan shall be developed by a qualified paleontologist hired by the proponent who holds a current California BLM Paleontology Use Permit. The plan must be appropriately scaled to the size and complexity of the anticipated monitoring.

Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
1	5.14.12	Clearing and grading of the following facilities: <ul style="list-style-type: none"> • 12-acre temporary laydown yard • 30-acre Substation/Switchyard • Temporary and permanent access road/collection corridors and permanent turbine area for 71 turbines. • Performance of all required geotechnical studies within the Project site with access along planned access road corridors. • Buried Site Sensitivity Testing • Structure installation at the SDG&E Energy switchyard. 	Yes
2	6.27.12	Clearing and grading of the following facilities. <ul style="list-style-type: none"> • 112 turbines. • 2 MET towers • 3.4-acre O&M facility • 10-acre temporary laydown area • Temporary connex storage areas • Temporary crane walk corridors Excavation and installation for all project infrastructure including foundations, collection system, electrical utility, and communication systems. Structural erection for all approved project features including concrete foundations, structural steel, wind turbine towers, MET towers, and the wind farm substation. Electrical wiring, testing, and pre-commissioning of wind turbines, MET towers, collection electrical system and wind farm substation. Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at substation and switchyard. Structure installation at the SDG&E energy switchyard.	Yes

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
1	5.23.12	Shift of the 30-acre substation/switchyard approximately 565 feet to the north in order to minimize disturbance to areas that have the potential of cultural importance.	Approved	6.4.12
2	5.31.12	Conduct geotechnical investigations at 12 turbines sites that are within 500 feet of the Palm Springs formation.	Approved	6.12.12
3	6.4.12	Temporary use of the BLM's Western Colorado Desert Routes of Travel (WECO) in order to complete pre-construction surveys as identified in the Final EIR/EIS and Record of Decision (ROD).	Approved	6.12.12
4	6.4.12	Temporary use of BLM WECO routes outside those designated as approved project roads in the ROD for geotechnical rigs to access turbine locations to conduct the required further geotechnical investigations.	Approved	6.20.12
5	6.8.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Pending	Pending
6	6.13.12	Additional temporary work space for construction and permanent access to the transmission line turning structures at the substation/switchyard.	Pending	Pending

Photographs from Week



Photo 1: In accordance with MM-Wild-1b, construction crews place coverings over foundation holes to prevent wildlife entry.



Photo 2: A mechanical sweeper is utilized to clean trac-out along paved roadways that intersect with access roads for wind turbines.



Photo 3: Stabilized construction entrances are being maintained at locations where project access roads intersect paved access roads.



Photo 4: A water truck is utilized during grading activities associated with establishing turbine string access roads.



Photo 5: Crews place concrete within a foundation that will be utilized to place above grade components associated with the substation.



Photo 6: An excavator is utilized to place gravel along turbine access roads. The gravel base roadway will provide long-term access to the project components during operation and maintenance activities.



Photo 7: Crews were observed completing grading activities associated with establishing the Operation & Maintenance facility adjacent to Dos Cabezas Road.



Photo 8: A completed access road between WT 173 and 174. A gravel base can be seen on the left and a compacted base where a tackifier has been placed to minimize dust emissions can be seen to the right.