



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 7.30.12 through 8.5.12

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 7.30.12 through 8.5.12.

Site Inspections/Mitigation Monitoring:

Issues/Concerns with Applicable Conditions of Certification

Construction Traffic Management Plan & Transportation Plan: In accordance with the Construction Traffic Management Plan and Transportation Plan, construction crews accessing the project site are required to utilize Evan Hewes Highway to connect to the private mine bypass road, which results in construction traffic by-passing Shell Canyon Road. An ECM observed approximately six personal vehicles associated with construction personnel accessing the project site via Shell Canyon Road throughout the evening shifts on 7.30.12, 7.31.12 and 8.2.12. The construction personnel were provided verbal reminders and maps were provided by the ECM regarding the access route requirements.

Nighttime Lighting: An ECM observed lighting on 7.30.12, 7.31.12, 8.1.12 and 8.2.12 that did not meet the intent of MM-VR-2 as the lighting was not directed downward per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor the lighting was immediately re-directed downwards in accordance with the criteria established in MM-VR-2. ECM's are on site during all nighttime work to ensure the lighting being set-up on a daily basis meets the requirements established in MM-VR-2.

Leaking Equipment: An ECM observed small diesel spills on 7.30.12, 8.2.12, 8.4.12 and 8.5.12 at wind turbine pad sites that were reported to the lead biological monitor and/or foreman onsite. The small diesel spills were cleaned-up in accordance with the project requirements upon notification being provided by the ECM to the lead biological monitor onsite.

Concrete Waste Management: In accordance with the SWPPP (MM-Water-9), concrete waste shall be disposed of properly. An ECM observed concrete waste associated with wind turbine foundation construction activities along the right-of-way and not being disposed of properly per the requirements of MM-Water-9 on 8.1.12 and 8.2.12. The contractor was aware of the issue/concern and notified the ECM the concrete waste would be cleaned-up in accordance with MM-Water-9. The ECM observed crews cleaning-up the concrete waste.

Trac-Out: In accordance with MM-Air-1, trac-out should not extend beyond 25 feet. BLM ECM's observed trac-out along old mining road on 8.2.12 that extended beyond 25 feet near the primary point of ingress/egress. The trac-out along old mining road was reported to the lead biological monitor and a mechanical sweeper was utilized to remove trac-out along the roadway.

Trash Management: In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash on site must be kept in covered trash receptacles. An ECM identified a trash bin located within the temporary laydown yard that had not been covered on 7.31.12, 8.3.12, 8.4.12 and a trash bin within the SDG&E substation on 8.2.12 that had not been covered. The issue/concern was reported to the lead biological monitor onsite at the time of the observation and a cover was observed being put in place upon notification.

Vehicle and Equipment Fueling: In accordance with the SWPPP (MM-Water-9), drip pans or absorbent pads shall be used during fueling. An ECM observed refueling occurring onsite in absence of using drips pans or absorbent pads on 7.31.12, 8.2.12 and 8.4.12. The construction personnel were provided verbal reminders regarding refueling requirements.

Issues of Concern with or by the Applicant

None.

Construction Activities:

Construction activities conducted for this period consisted of clearing and grading access roads and pad sites for wind turbines, construction of wind turbine foundations, installation of 34.5 kV underground collection lines, building foundations at the O&M facility and above-grade installation of substation/switchyard components at the 30-acre substation/switchyard. To date approximately 7 wind turbine foundations have been completed and 31 wind turbine foundations have been excavated.

Compliance:

Environmental compliance monitors conducted site inspections of the active construction areas on a daily basis. 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 and NTP#2.

As specified in MM Wild-1b, biological monitors are to be present to during construction activities that take place in FTHL habitat to prevent or minimize harm or injury to FTHL. ECM's observed biologists under contract with OE LLC conducting the proper clearance surveys prior to grading activities and were present during the daily work activity. Biological monitors were also observed being present in areas of initial ground disturbance along the ROW throughout the reporting period.

OE LLC has contracted with an archaeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. Archaeological monitors were observed completing ongoing monitoring in accordance with the project requirements.

Construction activities were observed being completed in accordance with the Dust Control Plan (MM-AIR-1) throughout the reporting period. Water wagons and water trucks were routinely observed watering down areas prior to clearing and grading (see photo 1) and during active construction activities. Crews were also observed utilizing rattle plates and rock aprons placed along the entrances to paved roads to minimize trac-out.

Trash bins were observed being covered in accordance with the Raven Control Plan (MM-Wild-1j), which requires all trash on site to be kept in covered trash receptacles (see photo 2). Issue/concerns regarding implementation of MM-Wild-1j are also identified above in the section titled "Issues/Concerns with Applicable Conditions of Certification".

Drip pans have been observed beneath construction equipment staged along the ROW to minimize the potential for oils to stain soils (see photo 3). ECM's observed hazardous materials onsite being placed in proper containment as specified in the MM-Water-9.

In accordance with MM-Wild-1m, construction piping or any other construction material with a diameter greater than three inches is to be covered if the piping or materials are to be stored in staging areas or temporary impact areas for more than three days. ECM's observed covers being placed over construction piping staged at the SDG&E substation in accordance with MM-Wild-1m.

As stated in Section 2.1.3 of the OWEF Plan of Development and Section 2.1.3.2 of the EIS, to meet the project schedule it may be necessary to work early morning, evenings, or even nights and/or Sundays during the foundation concrete pours and other tasks, to take advantage of the cooler times of the day and during the turbine erection period to take advantage of the times the wind speed is below the maximum safe working conditions. Construction activities occurring during this reporting period consisted of nighttime work in accordance with the activities disclosed in the Plan of Development and EIS (see photo 5). ECM's are onsite during all nighttime work to ensure the lighting being set-up on a daily basis meets the requirements established in MM-VR-2.

Construction crews were observed completing excavation activities, base pours, foundation and pedestal pours, and backfilling at wind turbine foundations located throughout the ROW (see photos 6 and 7). All work activity was observed being completed within the approved ROW limits.

Construction crews have initiated work efforts associated with installation of the 34.5 kV underground collection lines that will transfer power generated at each wind turbine to the on-site substation (see photo 8). Crews were observed completing underground collection line installation within the approved work limits and water was being utilized during the construction activities to minimize fugitive dust emissions.

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.

See Section “Issues/Concerns with Applicable Conditions of Certification” above for a further discussion regarding environmental compliance status.

Construction Schedule:

Scheduled Activities for Next Week: The anticipated construction activities associated with week ending 8.12.12 consist of the following:

- Temporary Laydown Yard
 - Construct decking around the perimeter of the office trailers.
- Roadway Improvements & Turbine Pad Sites Clearing
 - Continue roadway and turbine pad site improvements.
- Wind Turbine Foundation Construction
 - Continue wind turbine foundation construction consisting of excavations, base pour and pedestal pour.
- Underground Collection Lines
 - Initiate ground disturbance associated with underground collection lines.
- O&M Facility
 - Complete excavations and begin pouring concrete foundations.
- Switchyard/Substation
 - Continue work within SDG&E substation.

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	<p>Clearing and grading of the following facilities:</p> <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	<p>Clearing and grading of the following facilities.</p> <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 <p>Excavation and installation for all project infrastructure including foundations, collection system, electrical utility, and communication systems.</p> <p>Structural erection for all approved project features including concrete foundations, structural steel, wind turbine towers, MET towers, and the wind farm substation.</p> <p>Electrical wiring, testing, and pre-commissioning of wind turbines, MET towers, collection electrical system and wind farm substation.</p> <p>Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at substation and switchyard.</p> <p>Structure installation at the SDG&E energy switchyard.</p>	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	7.2.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Approved	7.12.12
6	7.3.12	Additional temporary work space for construction and permanent access to the transmission line turning structures at the substation/switchyard.	Approved	7.24.12
7	6.26.12	Modify alternate turbine locations included in the Record of Decision.	Approved	8.1.12
8	7.20.12	Re-alignment of an access road to wind turbine #9 to minimize potential disturbance to environmentally sensitive resources.	Approved	7.27.12
9	7.20.12	Re-alignment of underground collection line corridor between County Route S2 and Dos Cabezas Road.	Approved	7.30.12
10	7.31.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Pending	Pending
11	7.27.12	Micro-siting turbine location to accommodate a third party interest group.	Pending	Pending

Photographs from Week



Photo 1: A water wagon is utilized to pre-water a wind turbine foundation pad prior to excavation activities to minimize dust emissions in accordance with the Dust Control Plan (MM-AIR-1).



Photo 2: Trash bins are covered at the laydown yard in accordance with the Raven Control Plan (MM-Wild-1j).



Photo 3: Drip pans are placed beneath construction equipment to minimize the potential for oils to stain soils along the ROW.



Photo 4: In accordance with MM-Wild-1m, construction piping is covered at the substation.



Photo 5: Lighting being utilized for nighttime construction work is pointed downwards in accordance with MM-VIS-2.



Photo 6: Backfill is placed along the limits of a wind turbine foundation.



Photo 7: A base pour is completed at a wind turbine foundation.



Photo 8: A track trencher is utilized to place the 34.5 kV collection lines underground within the approved work limits.