



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 8.13.12 through 8.19.12

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 reporting period of 8.13.12 through 8.26.12.

Site Inspections/Mitigation Monitoring:

Issues/Concerns with Applicable Conditions of Certification

Nighttime Lighting: An ECM observed lighting on 8.13.12, 8.14.12 and 8.15.12 that did not meet the intent of MM-VR-2 as the lighting was not fully directed downward per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor the lighting was re-directed downwards in accordance with the criteria established in MM-VR-2. 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.

Dust Suppression: An ECM observed dust emissions for less than two minutes while crews were completing excavation activities at a wind turbine pad site on 8.13.12, 8.15.12 and 8.7.12. The crews responded to the dust flare ups by mobilizing additional water trucks to the excavation activities to reduce fugitive dust emissions.

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 trash bins located within the temporary laydown yard that had not been covered on SDGE substation on 8.13.12 and 8.16.12, near wind turbine 112 on 8.14.12 and at the temporary laydown yard on 8.14.12.

The issue/concern related to the trash receptacles being covered on a regular basis was addressed by the biological monitor and construction personnel onsite at the SDG&E substation.

Storm Water Pollution Prevention Plan (SWPPP): ECM's reported observations throughout the reporting period to ensure good housekeeping practices were being implemented on a day-to-day basis in accordance with MM-Water-9 and the SWPPP. Observations reported by ECM's included maintaining concrete washouts, properly labeling hazardous materials stored onsite, soil stains and concrete waste management. All observations reported by ECM's were followed-up to ensure concrete washouts were being maintained, hazardous materials were properly being labeled, soil stains had been removed, and concrete waste was properly managed per the requirements of the SWPPP.

Fire Safety: In accordance with MM-Fire-1, no smoking is permitted except in designated safe smoking areas which include cleared areas with no combustible vegetation or materials and approved butt receptacles. An ECM observed crew members smoking on 8.17.12 in a non-designated safe smoking area. The crew members were informed of the project requirements and immediately suspended smoking activities.

Work Limits: A biological monitor observed on 8.16.12 a discrepancy between the staked survey limits and the survey limits shown in the biological monitor's hand-held GPS equipment along an access road. Based upon a review completed by the land surveyors and biological monitors it was determined that an area consisting of approximately 0.05 acres was graded outside of the approved work limits. In accordance with the checklist that is being implemented on a day to day basis (see Weekly Report 09) the biological monitor is to initiate checks of survey stakes using a Trimble or other GPS device to re-confirm stakes are in the correct location the day prior to grading. A biological monitor completed checks of the stake locations prior to grading occurring in this area; however when the checks were completed it was based on dated disturbance limits data. To ensure that a similar instance does not result in the future the biological monitor and land surveyors re-survey all stakes in areas where project modifications have been approved by BLM to ensure survey stakes accurately reflect the approved work limits. The cross-check includes marking the survey stakes twice to notify the grading crews that the survey stakes have been verified subsequent to a project modification being approved by BLM.

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 by-pass road, which results in construction traffic by-passing Shell Canyon Road. An ECM observed approximately 10 personal vehicles associated with construction personnel accessing the project site via Shell Canyon Road throughout the evening shifts on 8.16.12 and 8.17.12. The construction personnel were provided verbal reminders and maps were provided by the ECM regarding the access route requirements.

Maintaining Wildlife Fencing at Temporary Water Pond: An ECM observed gaps in the fencing along the temporary water pond on 8.13.12 and 8.16.12. 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 8.13.12 and 8.16.12 and the gaps in the fencing were repaired by the construction contractor on 8.20.12.

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 ponding water beneath the water pumps located adjacent to the temporary storage pond. The issue/concern was reported to the lead biological monitor on 8.14.12. The ponding issue/concern was addressed by crews on 8.18.12.

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 47 wind turbine foundations have been excavated, 16 wind turbine foundations concrete pours have been completed, and 3 wind turbine components have been delivered.

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.

In accordance with MM Wild-2b and the Nesting Bird Mitigation and Monitoring Plan, a pre-vegetation clearing survey for avian nesting will be conducted prior no more than 7 days prior to vegetation clearing. If any active nest is located, the nest area will be flagged or otherwise marked for avoidance, and a buffer zone will be established. Lead biologists approved by the BLM were observed completing pre-construction nesting bird surveys in accordance with the Nesting Bird Mitigation and Monitoring Plan and MM-Wild-2b throughout the reporting period (see photo 1). 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 archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP (see photo 2). Archeological monitors were observed completing ongoing monitoring in accordance with the project requirements and establishing ESA's prior to initiating ground disturbance. ECM's were onsite during all ground disturbance activities to ensure lead archeological monitors were present completing monitoring in accordance with the project requirements.

Construction crews completing concrete pouring activities at the wind turbine foundations are utilizing plastic sheets placed beneath the concrete truck and conveyor belt in order to

minimize the potential for concrete spills along the ROW (see photo 3). By placing plastic sheets beneath the concrete trucks and conveyor belt has proved to be an effective method for minimizing the potential for concrete waste to be discharged along the ROW. Crews have also been observed regularly cleaning-up any concrete waste debris in accordance with the SWPPP (MM-Water-9).

Construction activities were observed being completed in accordance with the Dust Control Plan (MM-AIR-1) throughout the reporting period. Stabilized construction entrances have been established at the entryway to each wind turbine string from paved roadways. Stabilized construction entrances include a rock apron that reduces potential trac-out along paved roadways (see photo 2). Water wagons and water trucks were routinely observed watering down areas of active excavation and along access roads. Signage has been posted along the ROW notifying construction personnel that speeds should be reduced to 15 MPH along access roads per MM-AIR-1.

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. 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. ECM's are onsite to work with crews on setting up lights at each construction activity area (see photo 4). Lights have been pointed away from the town of Ocotillo to the greatest extent feasible considering worker safety..

ECM's and the lead biological monitors completed routine site observations to make sure trash receptacles are being covered in accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j). With the exception of the instances noted above in Section "Issues/Concerns with Applicable Conditions of Certification", trash receptacles were observed being covered along the ROW. Covers consist of tarps and plastic lids that are secured to the trash bins (see photo 5).

Transportation deliveries associated with hauling turbine components to the project site were initiated during this reporting period. Turbine components were delivered to the project site in accordance with the Construction Traffic Management Plan (POD-14 and POD-15). The turbine components were delivered via the I-8/Ocotillo Imperial Highway exit, and then proceeded east along W Evan Hewes Highway to a private road (Old Mining Road) (see photo 5). All deliveries were escorted by California Highway Patrol and per the requirements identified in the transportation permits issued by the State of California Department of Transportation.

Cranes were utilized to unload the turbine components to be staged along the ROW within the approved work limits (see photo 6). Turbine assembly is scheduled to begin during next week's reporting period.

Geotechnical activities were completed during this reporting period in accordance with MM-Soils-1 and PHS-3. Geotechnical testing is completed at all approved turbine locations to

confirm soil characteristics and final foundation designed. Following the required testing being completed for each turbine, a final geotechnical report is submitted to the County of Imperial, California's (County's) Building Department and the BLM. OE LLC is required to submit all documentation identified under PHS-3 and Soil-1 prior to obtaining building permits from the County's Building Department.

Based on environmental compliance monitors observations, all crew members working on the project site have been WEAP trained. Upon completing of WEAP training attendees are provided a sticker for their hard hat indicating they have completed required WEAP training. Approximately 730 individuals have attended WEAP training to date.

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 8.26.12 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
 - Complete excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
 - Pour building foundations, column footings, and slab.
- Switchyard/Substation
 - Continue work within substation and switchyard.
- Turbine Erection
 - Crews mobilizing turbine components to site and erecting turbine towers.

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	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	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.	Approved	8.10.12
11	7.27.12	Micro-siting turbine location to accommodate a third party interest group.	Approved	8.16.12
12	8.14.12	Work space for wind turbine 103, 134 and 135	Approved	8.17.12
13	8.16.12	Collection line routing for wind turbines 155, 156 and 159.	Approved	8.17.12

Photographs from Week



Photo 1: A lead biologist contracted under OE LLC and approved by BLM completes pre-construction nesting bird surveys in accordance with the Nesting Bird Mitigation and Monitoring Plan (MM-Wild-2b).



Photo 2: Archeological and biological monitors complete monitoring activities in accordance with the ECCMP during initial ground disturbance associated with establishing an access road to a wind turbine pad site.



Photo 3: Plastic sheets are placed beneath concrete trucks and a conveyor belt to minimize the potential for concrete waste to be spilled onto the ROW during a wind turbine foundation pour.



Photo 4: Night lights are oriented downwards during nighttime construction work associated with a concrete pour in accordance with MM-VIS-2.



Photo 5: Covers are placed over waste bins in accordance with the Raven Control Plan requirements (MM-Wild-1j).



Photo 6: A wind turbine blade is delivered to the project site via Old Mining Road.



Photo 7: A crane is utilized to unload a nacelle from a haul truck to be staged along the ROW.



Photo 8: A crew completes geotechnical investigations at a wind turbine pad site in accordance with MM-Soils-1 and PHS-3.