



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 8.20.12 through 8.26.12

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 8.20.12 through 8.26.12.

Site Inspections/Mitigation Monitoring

Issues/Concerns with Applicable Conditions of Certification

Nighttime Lighting: An ECM observed lighting on 8.22.12, and 8.24.12, 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. Several light plants were set-up on 8.22.12 and 8.24.12 and the observations made on these dates consisted of one of the four lights not being fully directed downward. Upon notification being provided to the construction contractor, the lighting was re-directed downwards in accordance with the criteria established in MM-VR-2.

Dust Suppression: Construction equipment was observed on 8.23.12 exceeding the posted speed limit of 15 MPH. The operator was notified of the speed limit onsite and ECM's will continue to observe for construction equipment exceeding the posted speed limit.

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 at the SDG&E substation on 8.21.12 associated with personal debris from construction crews. On 8.22.12, 8.23.12, and 8.25.12 an EMC identified trash at the O&M yard associated with personal debris from construction crews. No ravens were observed during any of the aforementioned dates.

The issue/concern was addressed by the biological monitor and construction personnel onsite by ensuring trash was placed within covered trash receptacles.

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 managing concrete waste debris. The ECM's observations were reported to OE LLC and the lead biological monitoring team and improvements have been observed to ensure these issue/concerns are addressed in a timely manner.

Work Limits: ECM's observed portions of the excavated berm at a wind turbine pad site to be located beyond the approved work limits. The area extends approximately 3 feet beyond the approved work limits. No sensitive environmental resources are located in this area and OE LLC will be removing the soils located beyond the approved work limits during the following reporting period.

Maintaining Wildlife Fencing at Temporary Water Pond: On 8.21.12 an ECM observed gaps in the fencing along the temporary water pond at the Laydown Yard. 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 8.21.12. The gaps in the fencing along the temporary water pond at the Laydown Yard are scheduled to be repaired during the following reporting period.

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 around the northwest pump area and between two pumps at the laydown yard. The issue/concern was reported to the lead biological monitor on 8.21.12. On 8.22.12 an ECM observed puddling in the cement washout area at the O&M yard due to recent rain. These issues/concerns were addressed by OE LLC on 8.22.12.

Issues of Concern with or by the Applicant

None.

Construction Activities

Construction activities conducted for this period consisted of establishing the pad sites for wind turbines, construction of wind turbine foundations, constructing the concrete wall and slab of the O&M Building, and pouring concrete foundations at the 30-acre Substation Switchyard. To date approximately 54 wind turbine foundations have been excavated, 35 wind turbine foundations concrete pours have been completed, 4 rotors have been assembled, and 1 nacelle has been erected.

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 is required to be conducted no more than 7 days prior to vegetation clearing. 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. Daily Nesting Bird Survey reports are provided to BLM identifying the results of the surveys. 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 1). 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 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 of active grading and excavation (see photo 2).

In accordance with MM-Wild-1b, construction crews were observed building wildlife escape ramps at all potential wildlife pitfalls (see photo 3). In addition in accordance with Section 4.4.2 of the Burrowing Owl Mitigation and Monitoring Plan (MM Wild-1n and 2a), Shelter In Place is to be utilized if active nesting is documented during the breeding or non-breeding seasons in order to minimize impacts to BUOW whenever the established buffer is determined not to be effective and when avoiding construction of the area is determined not to be feasible. BUOW shelters were erected adjacent to burrows in accordance with the MM-Wild-1n and 2a (see photo 4).

ECM's observed biologists completing routine inspections of construction piping with a diameter greater than three inches in accordance with MM-Wild-1m (see photo 6).

In accordance with MM-Wild-1d, the boundaries of all areas to be disturbed are to be delineated with stakes and flagging prior to construction activities. ECM's observed OE LLC working with land surveyors and the biological monitor to ensure all work areas are clearly delineated prior to ground disturbance. The limits of work are monitored by a biological monitor during all ground disturbance activities to ensure construction activities remain within the approved work limits.

In accordance with MM-Wild-1t, a biological consultant is to be approved by the BLM, USFWS, and CDFG to serve as the Bighorn Sheep Monitor during construction activities within USFWS

Essential Habitat. BLM, USFWS and CDFG approved a biological consultant to perform the roles and responsibilities outlined in MM-Wild-1t and the Bighorn Sheep Mitigation and Monitoring Plan. ECM's have observed the biological consultant performing monitoring duties in accordance with MM-Wild-1t and the Bighorn Sheep Mitigation and Monitoring Plan when crews are working within USFWS Essential Habitat.

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. Lights have been pointed away from the town of Ocotillo to the greatest extent feasible; however in order to ensure worker safety, instances have required lights to be pointed in the direction of the town of Ocotillo.

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 continued through 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). 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. Turbine assembly began during this reporting period and the first wind turbine has been erected (see photo 7).

Construction continued at the Substation Switchyard with the pouring of foundations, erecting structural steel, and the continuing underground conduit work (see photo 8). Work activities were observed to be complete within the approved project limits.

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.

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 for 8.27.12 through 9.2.12 include:

- 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
 - Complete masonry block installation, complete structural steel installation, interior wall, pour slab, and pour foundation.
- Switchyard/Substation
 - Erecting structural steel, grounding and conduit work.
- 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	<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.	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
14	8.21.12	Micro-siting wind turbines 86 and 87 and a road re-alignment to minimize potential disturbance to environmentally sensitive resources.	Approved	8.21.12
15	8.22.12	Micro-siting wind turbines 26, 27, and 28 to accommodate a third party interest group.	Approved	9.4.12
16	8.20.12	Work space requirements associated with support safety tag lines.	Approved	8.23.12
17	8.22.12	Work space modifications at wind turbine 69 pad site.	Approved	8.30.12

Photographs from Week



Photo 1: Archaeological monitors survey grading activities in accordance with the ECCMP.



Photo 2: Water trucks are utilized during access road grading to minimize dust emissions in accordance with the Dust Control Plan (MM-Air-1).



Photo 3: Wildlife escape ramps are put in place when excavating building foundations at the O&M facility in accordance with MM-Wild-1b.



Photo 4: A BUOW Shelter In Place is constructed in accordance with MM-Wild-2a.



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



Photo 6: A biologist inspects pipes for wildlife at the 30-acre Substation Switchyard in accordance with MM-Wild-1m.



Photo 7: A crane is utilized to lift the rotor and blades in place in order to be attached to the nacelle.



Photo 8: A frame structures are erected with cranes at 30-acre Substation/Switchyard.