BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 8.27.12 through 9.2.12

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 8.27.12 through 9.2.12. No construction took place on Sunday, September 2nd.

Site Inspections/Mitigation Monitoring:

<u>Issues/Concerns with Applicable Conditions of Certification</u>

Nighttime Lighting: An ECM observed lighting on 8.27.12 and 8.29.12, that did not meet the intent of MMR-VR-2 as the lighting was not fully directed downward per the requirements identified in MM-VR-2. In addition, ECM's observed lights being turned on in excess of one hour prior to work activities commencing. Upon notification being provided to the construction contractor, the lighting was re-directed downwards and turned off when the area was unoccupied in accordance with the criteria established in MM-VR-2.

Dust Suppression: Construction crews were observed on 8.28.12 and 8.30.12, exceeding the posted speed limit. The operators were provided verbal reminders of the posted speed limit. On 8.27.12, 8.28.12, and 9.1.12 ECM's observed dust originating from O&M building construction, construction activity associated with construction wind turbine excavations, and during trenching activities associated with the underground collection cable network, respectively. In each of the aforementioned instances, the operators were notified of the fugitive dust and immediately halted construction activities until water trucks were brought on site to suppress the dust.

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. On 8.27.12 an ECM identified trash associated with personal debris from construction crews at the O&M yard and along Dos Cabeza Rd. On 8.28.12 an ECM observed an uncovered, overfilled trash dumpster located at the western portion of the Laydown Yard. On 8.29.12 an ECM observed an uncovered dumpster at the O&M yard. No ravens were observed during any of the aforementioned dates. Each of these issues/concerns were addressed by the biological monitor and construction personnel on site by ensuring trash was hauled off site more frequently, trash was placed within covered receptacles and that all trash receptacles are covered.

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 on site, 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 an excavated berm at a wind turbine foundation to be located approximately 3 feet beyond the approved work limits. No sensitive environmental resources were observed to be located in this area. OE LLC has been notified of this issue and is anticipated to be address during the next 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 8.28.12. The gaps in the fencing along the temporary water pond at the Laydown Yard are scheduled to be repaired during the following reporting period.

Maintaining ESA Fencing: ECM's reported damage to ESA fencing located adjacent to construction activities that appeared to have been cut by members of the public. The ESA fencing has been repaired by the archaeological monitoring team.

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. On 8.28.12 ECM's observed foundation trenches at the Substation/Switchyard with no wildlife ramps installed. Upon notification being provided to the construction contractor, wildlife ramps were installed to allow for all species of wildlife inhabiting the area to escape.

<u>Issues of Concern with or by the Applicant</u>

None.

Construction Activities:

Construction activities conducted for this period consisted of establishing the pad sites for wind turbines, construction of wind turbine foundations, trenching the collection line corridors, constructing the structural steel and masonry block at the O&M Building, and pouring concrete foundations and erecting structural steel at the 30-acre Substation/Switchyard. To date approximately 60 wind turbine foundations have been excavated, 43 wind turbine foundations concrete pours have been completed, 8 rotors have been assembled, and 5 rotors have 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 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 and establishing ESA's prior to initiating ground disturbance. ECM's were on site during all ground disturbance activities to ensure lead archaeological 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, trenching, and excavation to ensure dust emissions were minimized during construction in accordance with the dust control plan (see photo 1). Stabilized construction entrances have been established and maintained at locations where project access roads intersect paved access roads. The stabilized construction entrances consist of rock aprons to minimize track-out from construction equipment along paved access roads and to prevent fugitive dust in accordance with MM-Air-1 (see photo 2).

In accordance with Section 4.2 of the Raven Control Plan, in order to prevent ravens and other wildlife from accessing the water storage pond constructed on site, armor balls are required to completely cover the surface of the water. Armor balls were observed by ECM monitors covering the surface of the temporary water pond in accordance with the Raven Control Plan.

ECM's observed hazardous materials being stored on site using secondary containment to ensure that materials and equipment do not leak directly onto the ground surface. Portable toilets have been observed to have secondary containment to prevent spills or leaks to become in contact with exposed soils in accordance with MM-HAZ-7.

In accordance with the Construction Fire Safety Plan, all vehicles and equipment with an internal combustion engine must be equipped with a fire extinguisher to help prevent and contain fires within the project area. ECM's observed and documented construction equipment with fire extinguishers in compliance with the Construction Fire Safety Plan (see photo 3).

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 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. ECM's are on site 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 observed construction crew members orienting lights downwards and away from the town of Ocotillo during this reporting period in accordance with MM-VIS-2 (see photo 4).

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.

Construction continued at the Substation/Switchyard and O&M Facility during this construction period. At the Substation/Switchyard, construction crews were observed erecting structural steel and continuing with the underground conduit work (see photo 5). Construction crews were observed creating a pad site for the turning structures that will be used to deliver power generated from the wind turbines via the Substation/Switchyard to the Sunrise Powerlink (see photo 6). At the O&M facility, construction crews were continuing to work on the masonry block installation, structural steel installation, and foundation pours (see photo 7). Work activities were observed to be completed within the approved project limits at both the Substation Switchyard and O&M Facility.

Cranes were utilized to unload the turbine components to be staged along the ROW within the approved work limits. Turbine assembly continued during this reporting via the use of cranes and five turbines have been erected to date (see photo 8).

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 9.3.12 through 9.9.12 includes:

- 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
  - Continue excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
  - Structural steel, metal deck, and roof installation. Install interior walls and electrical conduit.
- Switchyard/Substation
  - No planned activities
- Turbine Erection
  - Crews mobilizing turbine components to site and erecting turbine towers and rotors.

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: • 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. • 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
14	8.21.12	Micro-siting wind turbines 86 and 87and 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
18	8.28.12	Re-alignment of underground collection line corridors near wind turbines 88 and 131.	Approved	9.5.12
19	8.31.12	Re-alignment of an access road to wind turbine 73 to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
20	8.31.12	Re-alignment of two access roads to wind turbines 30 and 78 to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A

Photographs from Week

	
Photo 1: Construction crews utilize water to minimize dust emissions during trenching activities for installation of the 34.5 kV underground collection lines in accordance with the Dust Control Plan (MM-Air-1).	**Photo 2:** Stabilized construction entrances are placed at locations where project access roads intersect paved access roads in accordance with the Dust Control Plan (MM-Air-1).
	
Photo 3: Fire extinguishers are placed within construction equipment in accordance with the Construction Fire Safety Plan.	**Photo 4:** A construction worker orients lights downwards during nighttime construction activity in accordance with MM-VIS-2.

	
Photo 5: A-Frame steel structures are erected at the substation/switchyard.	**Photo 6:** Construction crews were observed creating a pad site for the turning structures that will be used to deliver power generated from the wind turbines via the Substation/Switchyard to the Sunrise Powerlink
	
Photo 7: Crews complete construction activities associated with building the walls of the O&M facility.	**Photo 8:** Wind turbines are erected on site via use of a large crane.