



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 9.10.12 through 9.16.12

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 9.10.12 through 9.16.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECM's during daily site observations. These items are being monitored and tracked to ensure follow-up is completed in a reasonable amount of time to avoid the potential for impacts to sensitive environmental resources per the intent of the ECCMP.

Issues/Concerns with Applicable Conditions of Certification

Dust Suppression: On 9.13.12 and 9.14.12 an ECM observed dust emissions adjacent to the Laydown Yard and along Dos Cabezas Road from vehicles exceeding the posted 15 mph speed limit. In each of the aforementioned instances, the construction contractor was notified of the fugitive dust and crews are routinely reminded to not exceed the posted speed limit.

Trash Management: In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash onsite must be kept in covered trash receptacles. On 9.10.12 an ECM observed an uncovered trash bin along an access road and at the 30-acre Substation/Switchyard. In addition, on 9.12.12 an ECM observed a scrap metal dumpster left partially uncovered. The construction contractor has been actively working with construction personnel to maintain trash and to ensure all trash

receptacles are covered. In addition, “Keep Covered” signage will be affixed to all trash receptacles to ensure that construction crews securely cover trash receptacles at all times.

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 properly labeling hazardous materials stored onsite, cleaning-up soil stains, and managing concrete waste debris. The ECM’s observations were reported to OE LLC and the lead biological monitoring team and these issue/concerns were addressed in a timely manner.

Work Limits: On 9.14.12 an ECM observed tire tracks from a water wagon that were beyond the approved work area at a wind turbine pad site. The disturbance consisted of an area that measured approximately 1 meter by 1 meter with no damage to sensitive environmental resources reported by both the lead biological and archeological monitors. The construction contractor was notified to stay within the approved project disturbance limits. No corrective actions were required as the work limits were clearly delineated and the operator went beyond the approved work limits in error.

Stabilized Construction Entrances: The stabilized construction entrances to a wind turbine access road were observed by an ECM to not being maintained. The stabilized construction entrances have been established to reduce the potential for track-out along paved roadways in accordance with the Dust Control Plan (MM-Air-1). The stabilized construction entrances are scheduled to be repaired during the following reporting period.

Construction Activities

Construction activities conducted for this period consisted of establishing the pad sites for wind turbines, construction of wind turbine foundations, erecting wind turbine components, trenching the collection line corridors, constructing the structural steel, metal deck, roof, interior walls, and electrical conduit at the O&M Building, and pouring concrete foundations, erecting structural steel, and installing grounding at the 30-acre Substation/Switchyard. Eight turbines were erected during the reporting period. To date approximately 74 wind turbine foundations have been excavated, 59 wind turbine foundations concrete pours have been completed, 20 rotors have been assembled, and 16 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 including but not limited to development and implementation of pre-construction plans have been completed as indicated in NTP #1 and NTP #2.

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. 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.

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). In addition, construction crews were reminded by the foreman of the posted speed limit on project access roads during weekly construction meetings and during completion of the mandatory Worker Environmental Awareness Program (WEAP) safety training.

ECM's observed small diesel leaks from vehicles at the Substation/Switchyard and diesel spills at wind turbine pad sites on 9.12.12 and 9.16.12. In each of these cases, the leaking equipment was identified and the diesel spills were cleaned-up in accordance with the Section 4.3.4 "Good Site Management "Housekeeping"" of the SWPPP (MM-Water-9).

In accordance with the Construction Fire Safety Plan (MM-Fire-1) all machinery with an internal combustion engine must be equipped with a fire extinguisher. On 9.13.12 EMC's observed construction equipment without a fire extinguisher. Upon notification being provided to the construction contractor, fire extinguishers were secured to construction equipment.

A fuel farm has been established at the Laydown Yard to provide fuel to construction equipment onsite. Per Section F of the Construction Fire Safety Plan (MM-Fire-1), each tank is required to be grounded, secondary containment is to be put in place to accommodate the capacity of the largest tank, at least four fire extinguishers are to be onsite, no smoking signs are to be posted, NFPA/DOT placards designating the hazardous product shall be posted and no portable electrical generators shall be operated within the storage area. ECM's verified the above mentioned items are being implemented at the onsite fuel farm (see photo 2).

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. An ECM observed lighting on 9.10.11, 9.11.12, and 9.13.12 that did not meet the intent of MM-VR-2 as the lighting was not fully direct downwards per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor, the lighting was redirected downwards in accordance with the criteria established in MM-VR-2.

On 9.10.12 an ECM observed a biological monitor directing the relocation of a Wolf's Cholla Scrub (*Cylindropuntia wolfii*) in accordance with the Habitat Revegetation Plan (MM-Veg-2b) (see photo 3).

In accordance with MM-Wild-1d, the boundaries of all areas to be disturbed are 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 (see photo 4). 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 and that the work limits are properly delineated. With the exception of the instance noted above in Section “Issues/Concerns with Applicable Conditions of Certification”, all construction activities remained within the approved work limits during this reporting period. 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.

On September 10, 2012, the Bighorn Sheep Monitor observed Bighorn Sheep tracks moving through the project site near a wind turbine pad site where the tracks continued to move towards Sugarloaf Mountain and then into the I-8 island. The Bighorn Sheep track observations suggested that the animal appeared to have originated from the Coyote Mountains, passing between the mining operations located to the north of the OWEF site as it headed southeast. In accordance with the Peninsular Bighorn Sheep Mitigation and Monitoring Plan if Bighorn Sheep are found during monitoring activities, construction is required to stop until the Bighorn Sheep have moved of its own accord at least 1,000 feet from the work areas. The Bighorn Sheep Monitor continues to conduct a detailed search in accordance with Bighorn Sheep Mitigation and Monitoring Plan and no Bighorn Sheep have been observed within 1,000 feet of construction activities to date.

Transportation deliveries associated with hauling turbine components to the project site continued during this reporting period. Turbine components were delivered to the project site in accordance with the Construction Management Plan. 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.

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 period and 16 turbines have been erected to date (see photo 6).

Construction continued at the Substation/Switchyard and O&M Facility during this construction period. At the Substation/Switchyard, construction crews were observed erecting steel, continuing with the underground conduit work, and rebar construction for electrical tie-ins. Construction activities associated with establishing the foundation for the turning structures that will be utilized to tie-in the onsite Substation/Switchyard with the Sunrise Powerlink were observed being completed within the approved work limits (see photo 7). At the O&M facility, construction crews were continuing to work on the masonry block installation, structural steel installation, foundation pours, and installation of the roof (see photo 8). During the completion of specific work efforts or periods of inactivity, the gates to the O&M facility, Substation Switchyard, and Laydown Yard are closed, all trash is placed within covered bins, and all hazardous materials are properly stored.

Based on the BLM's third-party ECM's 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 9.17.12 through 9.23.12 includes:

- 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
 - Interior wall installation, metal deck and roof installation, masonry block, and structural columns.
- Switchyard/Substation
 - Continue conduit and grounding installation and erecting structural steel.
- Turbine Deliveries
 - Deliver the components for six turbines.
- Turbine Erection
 - Crews mobilizing turbine components to site and erecting turbine towers and rotors. Ten turbines are anticipated to be erected.

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 turbine 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
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.	Approved	9.17.12
20	8.31.12	Re-alignment of two access roads to wind turbines 30 and 78 to minimize potential disturbance to environmentally sensitive resources.	Approved	9.13.12

Variance Request No.	Submitted	Description	Status	Approval Date
21	9.13.12	Re-alignment of two access between wind turbines 10 and 11 and wind turbines 81 and 87 roads 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 backfilling activities in accordance with the Dust Control Plan (MM-Air-1).



Photo 2: A fuel farm has been established at the temporary Laydown Yard and was verified by ECM's to be set-up in accordance with the Construction Fire Safety Plan (MM-Fire-1).



Photo 3: A biological monitor observes the relocation of a Wolf's Cholla Scrub in accordance with the Habitat Revegetation Plan (MM-Veg-2b).



Photo 4: Survey stakes are placed at the approved project work limits in accordance with MM-Wild-1d to ensure all construction activities remain within the approved work limits.



Photo 5: A wind turbine blade is delivered to the project site via Old Mining Road in accordance with the Traffic Management Plan.



Photo 6: A crane is utilized to lift a rotor into place for assembly to the nacelle.



Photo 7: Crews continue rebar construction for a turning structure that will be utilized to tie-in energy generated onsite to the Sunrise Powerlink.



Photo 8: Construction continues at the O&M building with the installation of masonry block and roofing material.