



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 12.10.12 through 12.16.12

Summary

The Bureau of Land Management is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement for the Ocotillo Wind Energy Facility Project. The Bureau of Land Management has established a third-party monitoring program and adopted an Environmental and Construction Compliance Monitoring Plan (ECCMP) to ensure that measures approved in the Final Environmental Impact Statement 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 Bureau of Land Management's third-party Environmental Compliance Monitors, 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 12.10.12 through 12.16.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by the Bureau of Land Management Environmental Compliance Monitors (ECMs) during daily site observations. The following issues/concerns are being monitored to ensure follow-up is completed in a reasonable amount of time to avoid potential impacts to sensitive environmental resources per the intent of the ECCMP.

Issues/Concerns with Applicable Conditions of Certification

Initial Ground Disturbance Environmental Monitoring Requirements (Mitigation Measure Wild-1a, 1b, Veg-1a, Veg-1b): ECMs reported on December 14, 2012 an equipment operator performing initial ground disturbance activities in absence of environmental monitors being present. The ECM observing the activity notified the operator of the project requirements and immediately ceased grading activities. The environmental monitors were contacted by the ECM and surveys of the ground disturbance area were conducted to determine whether any sensitive environmental resources were impacted. No sensitive environmental resource impacts were found. As a result of the operator failing to observe the environmental commitments of the ROW Holder (OE LLC), removed the equipment operator from the project site and the operator will no longer be

permitted to work onsite. In addition, an all-hands environmental awareness review was held by the environmental monitoring team to ensure all workers are refreshed on the environmental measures that are required to be implemented on a daily basis.

Flat-tailed Horned Lizard (FTHL) Monitoring: In accordance with Mitigation Measure Wild-1b, FTHL monitors must be present during construction activities that take place in FTHL habitat to prevent or minimize harm or injury to FTHL. ECM's observed construction crews performing reclamation activities within FTHL habitat before an environmental monitor performed FTHL clearance surveys. Upon notification, reclamation activity ceased and the lead biological monitor immediately performed FTHL clearance surveys. No evidence was found to suggest that the FTHL had been harmed by the incident and reclamation crews were cleared to perform work. To resolve this issue the construction contractor now provides a morning briefing with the environmental monitors present to review all reclamation activities anticipated for the day to ensure adequate coverage of FTHL clearance surveys.

Construction Activities

Construction activities consisted of improvement of access roads, electrical work at turbine sites, turbine foundation excavation for turbines located south of Interstate 8, Operations & Maintenance Building improvements, observation tower radar installation (see photo 1), and installation of the Substation/Switchyard protective berm. Construction activities associated with turbine foundation pours, foundation backfills, trenching and installation of cables for the collection lines, turbine deliveries, and turbine erection are complete for the 2012 calendar year.

To date approximately 101 wind turbine foundations have been excavated and 101 wind turbine foundations concrete pours have been completed. Approximately 84 percent of the project's turbines (94 turbines) have been erected and approximately 92 percent of the initial ground disturbance has been completed.

Ocotillo Express LLC is continuing with site reclamation activities in accordance with the Habitat Revegetation Plan (MM-Veg-2b), Plan of Development (POD), and prescribed mitigation measures. Testing and commissioning of the Substation/Switchyard and SDG&E turning structures was completed during this reporting period.

Compliance

ECMs 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 Environmental and Construction Compliance Monitoring Plan 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 preconstruction plans have been completed as indicated in Notice to Proceed #1 and #2.

On December 13th an ECM reported a water truck applying water for dust control in accordance with Mitigation Measure Air-1. As a result of watering down the access road for dust suppression the soils became oversaturated resulting in water flowing downhill into a

jurisdictional drainage area. The lead biological monitor directed construction crews to place straw-wattles and appropriate best management practices (BMP's) to minimize the potential for discharge to occur in the future in accordance with the Storm Water Pollution Prevention Plan (SWPPP) (Mitigation Measure Water-9). In addition, ECMs observed the lead environmental monitor removing sediment that transported beyond the approved work limits in accordance with the ECCMP. OE LLC has contracted with an archeological consulting firm approved by the Bureau of Land Management 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 ensuring that flagging of Environmentally Sensitive Areas remained intact.

Ocotillo Express LLC has also contracted with a biological consulting firm approved by the Bureau of Land Management to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. The biological consulting firm submitted the Burrowing Owl observation log (as required by MM-Wild-1n and 2a) to the ECM team. During this reporting period, the lead biological monitor was observed staking jurisdictional waterways in accordance with Mitigation Measure Veg-3 (see photo 2).

In accordance with Section 4.1 of the Raven Control Plan, all trash onsite must be kept in covered trash receptacles. ECMs observed litter debris from construction crews periodically throughout the reporting period. The observations were reported to the lead environmental monitor and the construction contractor has responded by reminding crews to maintain a clean work site and by designating individuals to pick-up debris at the completion of the work day. In accordance with the waste management procedures, ECMs also reported dumpsters that needed to be covered to the lead environmental monitor. The dumpsters were covered upon notification being provided to the lead environmental monitor (see photo 3).

ECMs observed construction crews completing geotechnical trenching excavations at turbine pad sites located south of Interstate 8 this week. Water tenders were observed during the excavation activities to suppress fugitive dust in accordance with the Dust Control Plan (Mitigation Measure Air-1) (see photo 4).

In accordance with Mitigation Measure Wild-1b, at the end of each work day, the lead biologist is to inspect all potential wildlife pitfalls to ensure that the construction crew slopes the ends of the excavation to provide wildlife escape ramps or completely and securely covers the excavation to prevent wildlife entry. Environmental Monitors completed routine inspections to ensure all wildlife pitfalls include wildlife escape ramps and/or have been covered per Mitigation Measure Wild-1b. In addition, ECM's observed gates at the temporary water pond at the Laydown Yard being shut during periods of minimal activity (see photo 5).

ECMs observed construction crews installing rip-rap around the 30-acre Substation/Switchyard for flood protection (see photo 6). The rip-rap is being installed for flood protection purposes in accordance with the building and grading permits approved by Imperial County.

As discussed in the "Construction Activities" section of this report, Environmental Compliance Monitors observed construction progress at the Operations & Maintenance Facility (see photo 7) and the ABOCC. Construction activities included the installation of a sidewalk at the front of the Operations & Maintenance Facility and the installation of a state of the art Merlin radar

system onsite to collect data and potentially curtail turbines in order to minimize impacts to avian species.

Construction activities related to site restoration continued this week, including re-vegetation activities at turbine pad sites in accordance with Mitigation Measure Veg-2b and the associated Habitat Re-vegetation Plan (see photo 8). Re-vegetation activities included de-compacting and replacing topsoil in areas where construction activities are complete. Cultural and biological monitors were present during re-vegetation activities that required ground disturbance in accordance with the ECCMP.

Based on the Environmental Compliance Monitors observations, all crew members working on the project site have completed the Worker Environmental Awareness Program. Upon completing of the Worker Environmental Awareness Program attendees are provided a sticker for their hard hat indicating they have completed required Worker Environmental Awareness Program training. Trainings continue to occur on the project site once a week.

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 12.17.12 through 12.23.12 includes:

- Access Road Improvements (south of I- 8)
- Wind Turbine Foundation excavations (south of I-8)
- O&M Facility
 - Interior finishes and sidewalks.
- Site Reclamation

Potential Delays to the Online Date of the Project

- None identified at this time.

Notice to Proceed (NTP)

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/Switchyard.</p> <p>Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at Substation/Switchyard.</p> <p>Structure installation at the SDG&E energy switchyard.</p>	Yes
3	11.27.12	Full commercial operations for 112 wind turbines and all associated project facilities.	Pending

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
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	Approved	9.28.12
22	9.19.12	Re-alignment of underground collection line corridor from wind turbine 90 to 93 and extension of two turning radii near wind turbines 92 and 95.	Approved	10.2.12
23	9.21.12	Re-alignment of underground collection line corridor along County Highway S2, relocation of a crane walk corridor from wind turbine 107, and medication of a collection line corridor and access road near wind turbine 64.	Approved	10.15.12
24	9.27.12	Re-alignment of an access road between wind turbines 19 and 20 and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.9.12
25	10.4.12	Re-alignment of an access road between wind turbines 16 and 17 to minimize potential disturbance to environmentally sensitive resources.	Approved	10.10.12
26	10.11.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Approved	11.14.12
27	10.12.12	Micro-siting a turbine location to accommodate a third party interest group.	Approved	10.22.12
28	10.16.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.19.12
29	10.16.12	Re-alignment of an access road and shifting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.26.12
30	10.17.12	Re-alignment of an access road and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.25.12
31	10.17.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.25.12
32	10.19.12	Re-alignment of an access road and underground collection line corridor.	Approved	10.25.12
33	10.20.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Approved	10.24.12
34	11.1.12	Shifting turbine locations to accommodate a third party interest group, re-alignment of an access road to minimize potential disturbances, and removal of an approved equipment laydown area.	Approved	12.6.12
35	11.21.12	Work space modifications at wind turbine pad sites.	Approved	12.7.12
36	11.27.12	Micro-siting a turbine location to mitigate geotechnical siting considerations.	Pending	n/a

Photographs from Week



Photo 1: ECMs observed crews continuing construction activities at the ABOCC including installation of the avian radar system as identified in MM Wild-1p and the associated ABPP and ECP.



Photo 2: A biological monitor places stakes to delineate a jurisdictional waterway in accordance with Mitigation Measure Veg-3.



Photo 3: Trash bins are observed to be covered at the laydown yard in accordance with the Raven Control Plan (Mitigation Measure Wild-1j).



Photo 4: A water tender is observed suppressing fugitive dust during wind turbine foundation excavations in accordance with the Dust Control Plan (Mitigation Measure Air-1).



Photo 5: The gates to the temporary water pond in the Laydown Yard are closed during periods of minimal activity to prevent wildlife from entering.



Photo 6: ECMs observed crews installing rip-rap around the substation switchyard for flood protection.



Photo 7: ECMs observed crews installing a sidewalk at the front of the O&M Facility.



Photo 8: ECMs observed crews re-planting an Ocotillo in accordance with Mitigation Measure Veg-2b and the associated Habitat Restoration/Re-vegetation Plan.