

BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 12.17.12 through 12.23.12

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 (ECMs), the compliance status of mitigation measures required by the Environmental and Construction Compliance Monitoring Plan, and anticipated construction activities for the following week. This weekly report covers construction activities for the reporting period of 12.17.12 through 12.23.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by the Bureau of Land Management Environmental Compliance Monitors 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

No issues/concerns to report during this reporting period. See discussion under the "Compliance" section below.

Construction Activities

Construction activities consisted of improvement of access roads, turbine foundation excavation and geotechnical testing at turbine pad sites located south of Interstate 8 and CA-98, Operations & Maintenance Building improvements 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. Additionally, ECMs observed installation and testing of the Advanced Biological Observation Command and Control Center (ABOCC) and the Project's System Control and Data Acquisition (SCADA) system at the Operations & Maintenance facility.

On December 21st the Bureau of Land Management issued Notice to Proceed #3 to authorize commercial operation of the Ocotillo Wind Energy Facility. Notice to Proceed #3 allows for commercial operation and maintenance for the total 112 wind turbines and all associated project facilities including but not limited to the Operations & Maintenance Facility and 30-acre Substation/Switchyard. As of December 21st, 94 wind turbines are in commercial operation and the remaining 18 wind turbines are anticipated to be in commercial operation by June 2013.

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.

ECMs have observed small construction debris at wind turbine pad sites during the restoration activities. The construction contractor and lead biological monitor were immediately notified and restoration activities at the turbine pad site were halted until the debris could be removed. The construction contractor reminded all construction crews that restoration activities should only occur where construction activities are complete.

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. During this reporting period, biological monitors were observed conducting surveys during ground disturbance activities associated with site restoration in accordance with Mitigation Measure Wild-1b (see photo 1).

ECMs observed equipment storage this week and ensured good housekeeping practices were being implemented in accordance with the Storm Water Pollution Prevention Plan (SWPPP) and MM Water-10. ECMs reported use of secondary containment under fuel storage canisters at a

turbine pad staging area (see photo 2) and beneath portable toilets (see photo 3) to minimize the potential for soil contamination.

In accordance with Mitigation Measure Wild-1d, the boundaries of all areas to be disturbed are delineated with stakes and flagging prior to construction activities. ECMs observed Ocotillo Express LLC working with land surveyors and the lead biological monitor to ensure all work areas are clearly delineated prior to construction activity and that signage is properly installed to identify non-project approved roads (see photo 4).

As discussed in the "Construction Activities" section of this report, ECMs observed construction progress and testing at the ABOCC (see photo 5). The 50' ABOCC includes a state of the art Merlin radar system onsite for the life of the project and is specifically tiered to collect data to potentially curtail turbines in order to minimize direct impacts to avian species. The ABOCC was tested by the Bureau of Land Management during this reporting period to ensure that all systems are in proper working order prior to issuing Notice to Proceed #3.

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 6). Re-vegetation activities included de-compacting and replacing topsoil in areas where construction activities are complete and where no further construction traffic is anticipated to occur at the turbine sites.

Geotechnical testing continued for the turbine pad sites located south of Interstate 8 (see photo 7). In addition, ECMs observed crews restoring railroad crossings that were previously disturbed for construction activities (see photo 8).

Based on the ECMs 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:

<u>Scheduled Activities for Next Week:</u> The anticipated construction activities associated for 12.24.12 through 12.30.12 includes:

- Railroad crossing restoration
- Wind Turbine Foundation excavations (south of I-8)
- O&M Facility
 - Interior finishes, sidewalk installation, and parking lot grading
- Substation/Switchyard
 - Berm construction and phase II grading

• Site Reclamation/Revegetation

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	Clearing and grading of the following facilities:	Yes
		 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. 	
2	6.27.12	Clearing and grading of the following facilities.	Yes
		 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/Switchyard.	
		Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at Substation/Switchyard.	
		Structure installation at the SDG&E energy switchyard.	
3	12.21.12	Full commercial operations for 112 wind turbines and all associated project facilities.	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 preconstruction 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.	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.	Approved	12.19.12

Photographs from Week



Photo 1: Biological monitors present during initial ground disturbing activities in accordance with Mitigation Measure Wild-1b.



Photo 2: A gas container is placed within a secondary containment bucket to prevent soil contamination per the SWPPP and Mitigation Measure Water-10.



Photo 3: Secondary containment is placed beneath portable toilets onsite to prevent soil contamination per the SWPPP and Mitigation Measure Water-10.



Photo 4: No access signs for non-project approved roads are placed onsite to notify construction workers that no access is permitted beyond the approved work limits.



Photo 5: ECMs observed crews continuing construction and testing activities at the ABOCC as identified in Mitigation Measure Wild-1p and the associated ABPP and ECP.



Photo 6: ECMs observed crews re-planting a Wolf's cholla (Cylindropuntia wolfii) in accordance with Mitigation Measure Veg-2b and the associated Habitat Restoration/Re-vegetation Plan.



Photo 7: A drilling rig is observed conducting geotechnical testing for turbines located south of Interstate 8.



Photo 8: ECMs observed crews restoring a railroad crossing located along a turbine access road.