



BLM Authorized Officer Weekly Report

El Centro Field Office
1661 S. 4th Street
El Centro, California 92243
Website: www.OcotilloECCMP.com

Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

Prepared By: David Hochart, DUDEK, 605 Third Street, Encinitas, CA 92024

Reporting Period: 3.18.13 through 3.24.13

Summary

The Bureau of Land Management (BLM) 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 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 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 BLM's third-party Environmental Compliance Monitors (ECMs), 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 3.18.13 through 3.24.13.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by the BLM ECM's 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

Disturbance Limits (MM-Wild-1d) – In accordance with MM-Wild-1d, all project boundaries are to be delineated with stakes and flagging prior to construction activities and work activities are to remain within the approved work limits. An ECM observed topsoil associated with a wind turbine pad site located approximately two feet beyond the approved work limits. This incident was observed by an ECM on 3.19.13 and was immediately reported to the lead biological monitor. The lead biological monitor was observed raking the soil back to within the approved work limits on 3.19.13 and all crews were reminded that all work activities are to remain within the approved project work limits.

Track-Out – In accordance with MM-Air-1, track-out should not extend beyond 25 feet. An ECM observed track-out along Highway 98 that extended beyond 25 feet near the primary point of ingress/egress. The track-out along Highway 98 was reported to the lead biological monitor and a sweeper was utilized to remove track-out along the roadway. Construction crews were reminded to always use the rumble plates when exiting the project site to avoid vehicle track-out and to immediately report any vehicle track-out so that it may be cleaned.

Construction Activities

Construction activities consisted of building the berm for the Phase II substation (see photo 1), delivery of wind turbine components (see photo 2), erecting wind turbines associated with Phase II and weed abatement activities.

Compliance

ECMs conducted site inspections of the active construction areas on a daily basis, which 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 preconstruction plans have been completed as indicated in Notice to Proceed #1 thru #3.

Ocotillo Express 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 ensuring that flagging of Environmentally Sensitive Areas remained intact. Furthermore, archeological monitors ensured that construction crews stayed clear of all ESAs during the erection of turbines associated with Phase II.

Ocotillo Express LLC has also contracted with a biological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. ECM's observed trash bins being covered in accordance with MM-Wild-1j and the Raven Control Plan (see photo 3). In accordance with MM-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. ECM's observed excavations including the appropriate wildlife escape ramps at the end of the work day (see photo 4). ECM's also observed a biological monitor completing sweeps in FTHL habitat in accordance with MM-Wild-1g (see photo 5).

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. 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 limits are properly delineated (see photo 6).

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.

Crew members were observed removing stained soil along the ROW through use of a shovel and bucket to ensure Good Site Management practices are being implemented in accordance with Section 4.3.4 of the SWPPP (see photo 7). Drip pans have also been observed beneath construction equipment staged along the ROW to minimize the potential for oils to stain soils. ECM's observed hazardous materials onsite being placed in proper containment as specified in the MM-Water-9.

Water wagons and water trucks were routinely observed watering down areas of active construction to ensure dust emissions were minimized in accordance with the dust control plan (see photo 8). 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.

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 Traffic Management Plan. The turbine components were delivered via the I-8/Ocotillo Imperial Highway exit, and then proceeded along Highway 98. All deliveries were escorted by California Highway Patrol.

Based on the ECMs observations, all crew members working on the project site have completed the Worker Environmental Awareness Program (WEAP). Construction-phase WEAP trainings continue to occur on the project site once a week as needed.

Construction Schedule

Scheduled Activities for Next Week: The anticipated construction activities associated for 3.25.13 through 3.31.13 includes:

- Access Roads – Install low water crossings on Dos Cabezas Road.
- Substation/Switchyard – Phase II grading; substation berm and security fencing.
- O&M Facility – Carport installation and miscellaneous punchlist items.
- Turbine Deliveries – Turbine deliveries throughout the week.
- Turbine Installation – Turbine installation throughout the week.
- Revegetation – Weed abatement activities throughout the project site.

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: <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	Clearing and grading of the following facilities. <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 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.	Yes
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 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 Requests

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
37	2.20.13	Work space modifications at two planned low water crossings on the asphalt paved road between Highway S-2 and the 30-acre Substation/Switchyard	Approved	3.5.13
38	2.22.13	Micro-siting three turbine locations to mitigate geotechnical siting considerations.	Approved	3.5.13

Photographs from Week



Photo 1: Construction activities continued during this reporting period associated with the berm along the perimeter of the Phase II substation.



Photo 2: Turbine deliveries continued throughout the reporting period. Construction crews utilize large cranes to unload turbine components from truck trailers.



Photo 3: Covers are placed over trash bins in accordance with MM-Wild-1j.



Photo 4: In accordance with MM-Wild-1b, crews place slopes at the ends of the excavations to provide wildlife escape ramps.



Photo 5: A FTHL permitted biologist conducts sweeps of construction areas in accordance with MM-Wild-1g.



Photo 6: Stakes are utilized to delineate the approved work limits in accordance with MM-Wild-1d.



Photo 7: Crews utilize spill kits to remove stained soils in accordance with MM-Water-10.



Photo 8: Water trucks are utilized to water down access roads during construction in accordance with MM-Air-1.