

Variance Request Form



Ocotillo Express Wind LLC
Pier 1 Bay 3
San Francisco CA 94111
415-283-4000

Variance: 016
Request No.: Rev 0
Date Submit: 8/20/2012
Date Approval Needed: 8/23/2012
Date Agency Received: _____
Agency Approval Reference No.: _____

Request Prepared by: Joan Inlow

Spread/ Location: Turbine Assembly Tag Lines

(Milepost):

Net acreage affected: 6.17 acres

Alignment Sheet/Sta. ALL

No.: All turbines

Tract No:

Landowner: BLM

In or within 50 feet of a wetland: Yes No

Within 50 feet of a water body: Yes No

Current Land Use/ Vegetative Cover: Desert vegetation

Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weed):

Area, Residence, Cultural Resource Site (distance, etc.):

Variance Level: Level 1 Level 2 Level 3 **(To Be Assigned by Designated Representative)**

Variance From Permit Plan/Procedure Specification Drawing Mitigation Measure Other:

Detailed Description of Variance: Attachments? Yes No Photos? Yes No

Variance 016 requests that drive-and-crush operations beyond the existing graded boundaries at individual turbine sites be allowed during the final assembly steps for the wind turbines. This access is required in order to support the safety tag lines needed to install the turbine nacelles and rotor assemblies. Nacelles and rotor assemblies can become unstable when being lifted by the main crane and wind industry safety standards dictate that in order to stabilize the component, there must be lines connected and secured at the ground level for the duration of the lift. For this operation, which typically takes less than 2 hours per unit assembly, a vehicle must drive in to an area, pause for the lift operation (i.e., act as tie-off/support for the tag line) and then drive back to the original location near the turbine base.

In order to complete crane lifts for the project in a safe manner during turbine construction a rubber-tired vehicle will drive to a designated area to support the tag line during the lift and then will drive back to the turbine base. Tag lines are typically utilized at a 45 degree angle between the tie-off point located on the ground and the tie-off on the wind turbine component. Under a worst-case scenario a tag line tie-off with a distance of up to 200 feet beyond the graded disturbed footprint may be required. Per a worst-case 200 foot distance beyond the graded areas and use of up to four tag lines per wind turbine with a three foot wide rubber tire track would result in approximately 0.06 acres of additional disturbance at individual turbine sites for a total of approximately 6.17 acres of disturbance for all 112 wind turbines.

The steps that will be completed throughout the tag line support operations are further described below (see attached process steps and figures).

Pre-Tag Line Survey and Flagging: Prior to completing any work beyond the limits of graded disturbance at a wind turbine pad site, a biological monitor approved by the BLM will complete pre-construction surveys to identify special-status plants and wildlife in accordance with MM-Veg-1c, Wild-1b, Wild-2a, Wild-2c, Wild-1t, and Wild-2b. In addition, an archeological monitor approved by the BLM will complete an intensive pedestrian survey to identify the presence of sensitive archeological resources. All sensitive resources identified during the Pre-Tag Line Surveys and surveys conducted to date for OWEF will be flagged by the biological monitor and/or archeological monitor to ensure construction crews avoid the environmental resource during tag line activities. Different color pin flags will be used to identify the following based on the results of the pre-construction surveys: (1) Sensitive resources that require avoidance and the appropriate buffer to protect the environmental resources and (2) Centerline route to access the tag-line tie-down (see below). Crews will not complete any activities beyond the area surveyed by environmental monitors.

Blade Tie-Downs: Blade-tie downs will be utilized to secure the rotor and blades prior to completing a crane lift. The blade tie-downs will consist of a concrete block placed on the ground and a rope tied around the blade. The concrete block will be put in place via use of a rubber tired fork lift or similar rubber tired vehicle. The concrete block will be placed in areas surveyed as part of the pre-tag line survey and flagging process described above.

Name:

Title:

Organization:

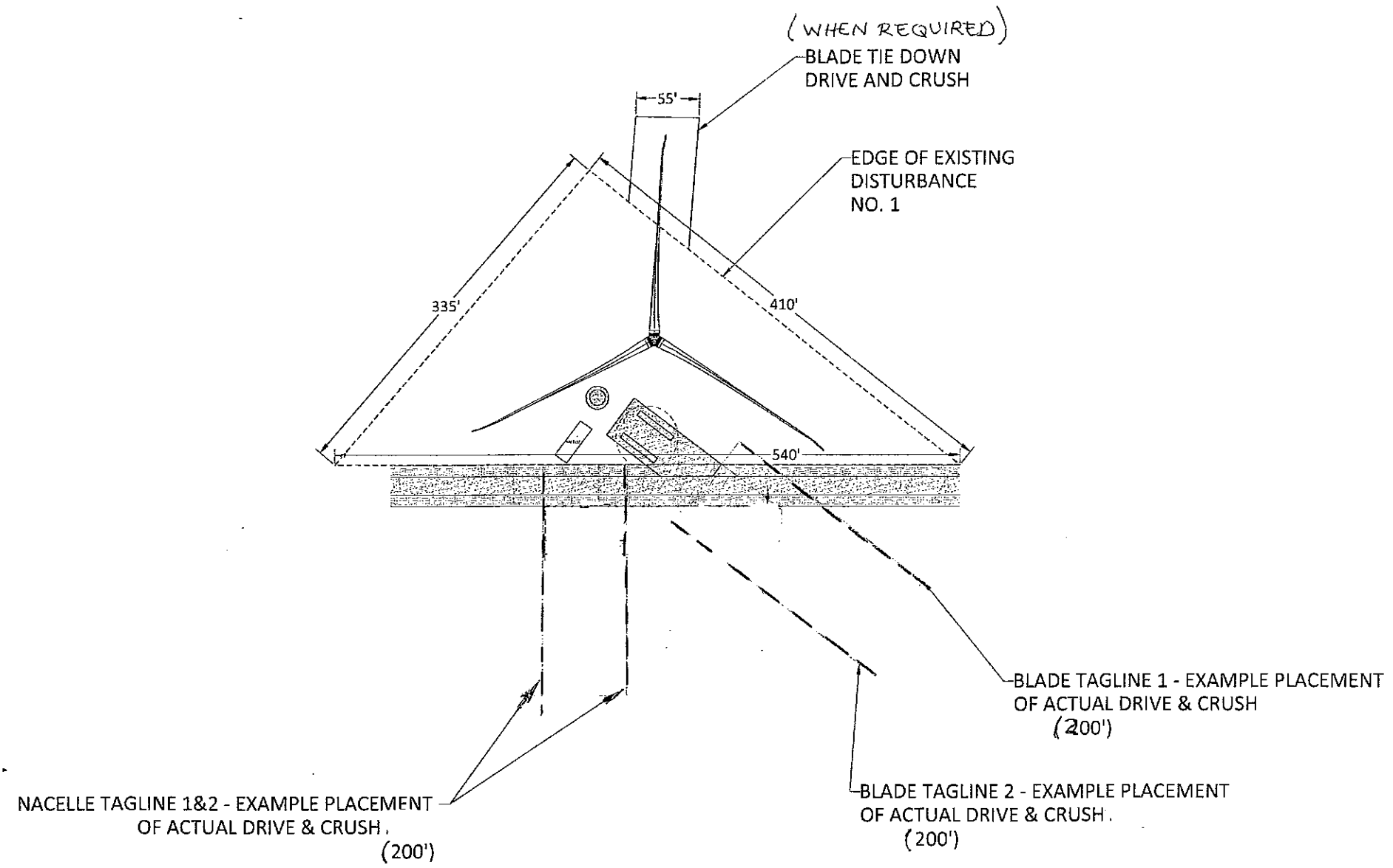
Conditions: The Contractor Sup't., Lead Environmental Inspector (Bio), Archeology Principal Investigator, and/or Environmental Field Manager did not identify any variance conditions.

Name:

Title:

Organization:

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TYPICAL SITE DISTURBANCE AREA