



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: 10.1.12 through 10.7.12

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 10.1.12 through 10.7.12.

Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECM's during daily site observations. These 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

Dust Suppression: On 10.5.12, ECM's observed dust emissions along access roads to wind turbine pad sites. The dust observations were reported to the construction contractor and lead environmental monitor at the time of the observation. Upon notification being provided to the construction contractor and lead environmental monitor, water trucks were mobilized to water down access roads in order to minimize dust emissions from vehicles travelling along unpaved access roads.

On 10.3.12 ECM's observed construction crews exceeding the posted speed limit. Construction crews were reminded of the posted speed limit on project access roads during weekly construction meetings. In addition, speed limit signs have been placed along access roads to

notify motorists of the speed limit. The speed limit signs have been placed on-site in accordance with MM-Air-3.

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 10.2.12, 10.4.12, and 10.5.12 ECM's observed trash bags located inside the excavation pit at wind turbine pad sites. The lead biological monitor was immediately notified to remove the trash bags in each of the excavation pits. On 10.5.12 and 10.6.12 an ECM observed two uncovered trash bins and an over-filled trash bin at the Laydown Yard. The construction contractor has been actively working with construction personnel to maintain on-site trash, to ensure all trash receptacles are covered, and that trash is picked up on a regular basis.

Stabilized Construction Entrances: The stabilized construction entrances to a wind turbine access road were observed to be partially buried. 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.

Work Limits: On 10.2.12 an ECM observed three pickup trucks and one water truck staged outside of the approved disturbance limits. Tire tracks associated with each of the vehicles extended approximately 15 feet beyond the approved work limits. The lead biological monitor was notified and no impacts to sensitive environmental resources occurred. 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.

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, masonry block, metal deck, roof, interior walls, and electrical conduit at the O&M Building, pouring concrete foundations for the turning structures for the Sunrise Powerlink energy tie-in, and pouring concrete foundations, erecting structural steel, and installing grounding at the 30-acre Substation/Switchyard. Six turbines were erected during the reporting period. To date approximately 87 wind turbine foundations have been excavated, 76 wind turbine foundations concrete pours have been completed, 33 rotors have been assembled, and 28 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 activities in accordance with the Dust Control Plan (see photo 1). Stabilized construction entrances have been established and maintained at locations where project access roads intersect paved access roads. The stabilized construction entrances consist of rock aprons to minimize track-out from construction equipment along paved access roads and to prevent fugitive dust.

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 cleaning-up soil stains (see photo 2) 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. Drip pans have also been observed beneath construction equipment staged along the ROW to minimize the potential for oil stains.

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. An ECM observed lighting on 10.3.12 and 10.5.12 that did not meet the intent of MM-VR-2 as the lighting was not fully directed 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.

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 work limits are properly delineated.

During this reporting period, ECM's observed a biological monitor directing the relocation of a California Barrel Cactus (*Ferocactus cylindraceus*) in accordance with the Habitat Revegetation Plan (MM-Veg-2b) (see photo 3).

Turbine base concrete pours continued during this construction period (see photo 4). In addition to the turbine base pours, ECM's observed construction crews completing the concrete base pour for the turning structures associated with the tie-in to the Sunrise Powerlink. Per the Construction Waste Management Plan (MM-PHS-9), construction crews

were observed properly cleaning and disposing of concrete waste within the concrete washout basins (see photo 5).

Construction continued at the Substation/Switchyard and O&M Facility during this construction period. At the Substation/Switchyard, construction crews were observed erecting steel and continuing with the underground conduit work (see photo 6). 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 7). Wind turbine erection continued during the reporting period with a total of 28 wind turbines erected to date (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 10.8.12 through 10.14.12 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 drywall and wall installation, duct installation, ceiling tile and roof installation, electrical conduit installation, and fire suppression tank installation.
- Switchyard/Substation
 - Control wiring and buss installation, equipment assembly, and transformer testing.
- Turbine Deliveries
 - Deliver the components for eight turbines.
- Turbine Erection

- Crews mobilizing turbine components to site and erecting turbine towers and rotors. Eight 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	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. Construction of all buildings and associate facilities including the O&M building, biological observation tower, control buildings at substation and switchyard. Structure installation at the SDG&E energy switchyard.	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	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.	Pending	N/A
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.	Pending	N/A
25	10.4.12	Re-alignment of an access road between wind turbines 16 and 17 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 grading activities at the 30-acre Substation/Switchyard in accordance with the Dust Control Plan (MM-Air-1).



Photo 2: An oil leak is properly cleaned-up and disposed of in accordance with the SWPPP (MM-Water-9) during the evening hours.



Photo 3: A construction crew relocates a California Barrel Cactus in accordance with the Habitat Revegetation Plan (MM-Veg-2b).



Photo 4: A concrete base pour is completed at a wind turbine foundation during the evening hours.



Photo 5: The secondary containment from a concrete washout basin is properly disposed of in accordance with the Construction Waste Management Plan (MM-PHS-9).



Photo 6: Construction crews continue construction at the 30-acre Substation/Switchyard.



Photo 7: Construction continues at the O&M building with the installation of roofing materials.



Photo 8: A large crane is utilized to lift a rotor into place.