



BLM Authorized Officer Weekly Report

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Project: Ocotillo Wind Energy Facility Project

Weekly Project Update

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Reporting Period: 12.3.12 through 12.9.12

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 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 12.3.12 through 12.9.12.

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

Storm Water Pollution Prevention Plan (Mitigation Measure Water-9) and Spill Prevention, Control, and Countermeasure Plan (Mitigation Measure Water-10): Environmental Compliance Monitors reported concrete waste that needed to be cleaned-up in accordance with Mitigation Measure WM-8 in the Storm Water Pollution Prevention Plan. Environmental Compliance

Monitors reported this observation to the construction contractor and lead environmental monitor to ensure the concrete is cleaned-up prior to any restoration activities being completed.

Construction Activities

Construction activities consisted of erecting wind turbines, assembling rotors and blades, electrical work at turbine sites, improvement of access roads, trenching and installation of cables for the collection lines, Operations & Maintenance Building improvements (interior finishes, heating ventilation and air-conditioning installation, water and septic tank installation and testing) equipment testing at the 30-acre Substation/Switchyard and installation of the Substation/Switchyard protective berm.

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 88 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 proscribed mitigation measures. Additionally, Environmental Compliance Monitors observed progress with the Advanced Biological Observation Command and Control Center (ABOCC) at the Operations & Maintenance facility as identified in Mitigation Measure Wild-1p, the Avian and Bat Protection Plan (ABPP) and Eagle Conservation Plan (ECP). Work also continued with completing the interconnection from the SDG&E turning structures to the onsite Substation/Switchyard (see Photo 1). Testing and commissioning of the wind turbines, Substation/Switchyard, and SDG&E turning structures began during this reporting period. The testing and commissioning activities were conducted to ensure the proper operation of the wind turbines and ancillary facilities prior to commercial operation as presented in Notice to Proceed #3.

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 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.

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 monthly reports to BLM that included the Common Raven Nesting Survey Report (as required by the Raven Control Plan MM-Wild-1j) and the Burrowing Owl observation log (as required by MM-Wild-1n and 2a) to the Environmental Compliance Monitor team. During this reporting period, the biological consulting firm also provided the second quarterly flat-tailed horned lizard monitoring report (as required by MM-Wild-1g). A total of nine flat-tailed horned lizards were observed during the second quarter of construction.

The lead biological monitor was observed conducting regular vehicle inspections at the Laydown Yard to ensure that all vehicles have been washed prior to entering the project site in accordance with the Integrated Weed Management Plan (MM Veg-1d). In the event a vehicle has not been washed a “wash ticket” is issued and the operator of the equipment is required to washout the wheel wells and tires at the wash station located at the laydown yard (see photo 2).

In accordance with Section 4.1 of the Raven Control Plan, all trash onsite must be kept in covered trash receptacles. Environmental Compliance Monitors 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 (see photo 3). Environmental Compliance Monitors also reported dumpsters needing cover to the lead environmental monitor. The dumpsters were covered upon notification being provided to the lead environmental monitor.

Environmental Compliance Monitors observed construction crews completing concrete base pours for wind turbine foundations this week and ensured good housekeeping practices were being implemented during these activities in accordance with the Storm Water Pollution Prevention Plan and Mitigation Measure Water-10. The Environmental Compliance Monitors reported use of plastic sheeting placed on the ground surface during concrete pours (see photo 4) to prevent soil contamination.

Water wagons and water trucks were routinely observed watering down roadways to ensure dust emissions were minimized during construction activities in accordance with Mitigation Measure Air-1 and the dust control plan (see photo 5).

Environmental Compliance Monitors observed construction crews installing rip-rap around the 30-acre Substation/Switchyard for flood protection (see photo 6).

As discussed in the “Compliance” section of this report, Environmental Compliance Monitors observed construction progress at the ABOCC (see photo 7). The 50’ ABOCC will include 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 golden eagles. The system will also be used for data collection purposes for general avian and bat 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 and where no further construction traffic is anticipated to occur at the turbine sites. 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 12.9.12 through 12.16.12 includes:

- Access Road Improvements (south of I- 8)
- Wind Turbine Foundation excavations (south of I-8)
- O&M Facility
 - Test water and septic system, install observation tower radar, electrical and data installation
- Substation/Switchyard
 - Complete
- Turbine Deliveries
 - 2012 work complete
- Turbine Erection
 - 2012 work complete
- 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

Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
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
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.	Pending	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: Testing and commissioning of the wind turbines and Substation/Switchyard began during this reporting period.



Photo 2: Construction vehicles are washed at the temporary laydown yard in order to minimize the potential for invasive species in accordance with MM Veg-1d and the Integrated Weed Management Plan.



Photo 3: Crews remove trash along the right of way in accordance with the Raven Control Plan (Mitigation Measure Wild-1j)



Photo 4: A concrete base pour is completed at a wind turbine foundation using plastic sheets placed along the ground surface to prevent soil contamination per the Storm Water Pollution Prevention Plan and Mitigation Measure Water-10.



Photo 5: Dos Cabezas road is watered to keep dust suppressed in accordance with the Dust Control Plan (Mitigation Measure Air-1).



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



Photo 7: Environmental Compliance Monitors observed crews continuing construction activities at the ABOCC as identified in MM Wild-1p and the associated ABPP and ECP.



Photo 8: Previously disturbed top soil is used to restore a wind turbine pad site in accordance with Mitigation Measure Veg-2b and the associated Habitat Restoration/Re-vegetation Plan.

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