



## **BLM Authorized Officer Weekly Report**

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**Project:** Ocotillo Wind Energy Facility Project

### **Weekly Project Update**

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**Reporting Period:** 6.4.12 through 6.10.12

### **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, 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 period of June 4, 2012 through June 10, 2012.

### **Site Inspections/Mitigation Monitoring:**

#### Compliance Issues with Applicable Conditions of Certification

*Absorbent Pads:* BLM third-party environmental compliance monitors (ECM) observed construction crews utilizing absorbent pads beneath the construction equipment to prevent leaking equipment from staining the soils. The absorbent pads presented concerns to the BLM ECM's as they appeared to be ineffective in the windy environment and it was recommended that containment bins be utilized that would not be susceptible to windy environments. BLM ECM's reported the concern to the construction contractor on 6.4.12 and drip pans and similar containment bins, which meet the intent of the SWPPP (MM-Water-1) were being utilized on 6.7.12 (see photo 1).

*Trac-Out:* In accordance with MM-Air-1, trac-out should not extend beyond 25 feet. BLM ECM's observed trac-out along County Highway S-2 on 6.4.12 that extended beyond 25 feet near the

primary point of ingress/egress. The trac-out along County Highway S2 was reported to the construction contractor on 6.4.12 and a mechanical sweeper was being utilized at end of the day removing trac-out along the roadway.

*Gaps in Fence Surrounding Temporary Storage Pond:* BLM ECM's identified gaps in the 10-foot exclusionary fence surrounding the temporary storage pond on 6.5.12. The gaps were observed along the 10-foot fence where water trucks deliver water to the temporary storage pond. The BLM ECM's notified the lead biological monitor at 6:22 AM. It was determined the problem was arising due to the gravel substrate on the ground surface, which was not allowing the fence gate to close properly. The contractor leveled out the gravel and the issue/concern was resolved by 6:45 AM.

*Armor Balls Movement in High Winds:* A BLM ECM observed portions of the water surface at the temporary water storage pond being exposed during high wind events. The ability for the armor balls to effective in high wind events was communicated to the construction contractor on 6.9.12. The construction contractor identified the issue/concern associated with armor ball movement in the high winds will be remedied by placing a tarp or similar material along the southwest portion of the exclusionary fence, which will reduce the wind strength from disturbing the armor balls. The issue/concern associated with movement of the armor balls in high winds will be resolved by 6.13.12 when the material is put in place to reduce the strength of the wind.

#### Issues of Concern with or by the Applicant

None.

#### **Construction Activities:**

The construction activities conducted for this period consisted of establishing the 12-acre temporary laydown yard and grading activities at the 30-acre substation/switchyard.

*12-acre Temporary Laydown Yard:* Crews were observed constructing a 10-foot tall chain-link fence along the perimeter of the water storage pond. Two pumps are being utilized to transfer water from the temporary water storage pond to water trucks being utilized for grading and dust suppression. The temporary laydown yard is being utilized to stage construction equipment and materials. A rock apron and rattle plate are being maintained at the point of ingress/egress to minimize trac-out along County Route S-2.

*30-acre Substation/Switchyard:* Construction activities during this reporting period consisted of grading activities associated with establishing the pad foundation for the 30-acre substation/switchyard. Heavy construction equipment utilized to complete grading activities consisted of loaders, tractors, and graders. Multiple water trucks were observed onsite for both compaction and dust suppression purposes.

## **Compliance:**

Environmental compliance monitors conducted site inspections of the active construction areas on a daily basis from 6.4.12 through 6.10.12. 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 have been completed as indicated in NTP #1. The Project Applicant has contracted with a biological and archeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP.

BLM third-party ECM's observed construction crews utilizing absorbent pads beneath the construction equipment to prevent leaking equipment from staining the soils. The absorbent pads presented concerns to the BLM ECM's as they appeared to be ineffective in the windy environment and it was recommended that containment bins be utilized that would not be susceptible to windy environments. BLM ECM's reported the concern to the construction contractor on 6.4.12 and drip pans and similar containment bins, which meet the intent of the SWPPP (MM-Water-1) were being utilized on 6.7.12 (see photo 1).

In accordance with MM-Air-1, trac-out should not extend beyond 25 feet. BLM ECM's observed trac-out along County Highway S-2 on 6.4.12 that extended beyond 25 feet near the primary point of ingress/egress. The trac-out along County Highway S2 was reported to the construction contractor on 6.4.12 and a mechanical sweeper was being utilized at end of the day removing trac-out along the roadway.

BLM ECM's identified gaps in the 10-foot exclusionary fence surrounding the temporary storage pond on 6.5.12. The gaps were observed along the 10-foot fence where water trucks deliver water to the temporary storage pond. The BLM ECM's notified the lead biological monitor at 6:22 AM. It was determined the problem was arising due to the gravel substrate on the ground surface, which was not allowing the fence gate to close properly. The contractor leveled out the gravel and the issue/concern was resolved by 6:45 AM.

A BLM ECM observed portions of the water surface at the temporary water storage pond being exposed during high wind events. The ability for the armor balls to be effective in high wind events was communicated to the construction contractor on 6.9.12. The construction contractor identified the issue/concern associated with armor ball movement in the high winds will be remedied by placing a tarp or similar material along the southwest portion of the exclusionary fence, which will reduce the wind strength from disturbing the armor balls. The issue/concern associated with movement of the armor balls in high winds will be resolved by 6.13.12 when the material is put in place to reduce the strength of the wind.

ECM's did not observe excessive amounts of fugitive dust during this reporting period. The construction contractor has been observed actively watering down construction areas during ground disturbance activities in accordance with MM-AIR-1 (see photo 2). Public informational signage has been placed along S-2 and Dos Cabezas Road to provide the public with contact information during construction regarding dust complaints (see photo 3). Signage has also been placed along the access road between the temporary laydown yard and the substation/switchyard to inform construction crews vehicle speeds are limited to 15 miles per hour (see photo 4).

In accordance with the Raven Control Plan (MM-Wild-1J), trash bins are being covered (see photo 5). In addition, armor balls have been placed along the water surface at the temporary water pond per Section 4.2 of the Raven Control Plan (see photo 6). A 10-foot tall chainlink fence has also been erected along the perimeter of the temporary water storage pond per the recommendations of the Wildlife Agencies and BLM (see photo 7).

Hazardous materials being stored onsite within the temporary laydown yard are being placed within secondary containment (see photo 8). Portable toilets have also been observed to have secondary containment. Spill clean-up kits are being maintained and utilized by construction crews in accordance with the SWPPP (MM-Water-1).

Based on environmental compliance monitors observations, all crew members working on the project site have been WEAP trained and sensitive environmental resources requiring avoidance within proximity to the active construction areas are being identified in accordance with the project requirements.

### **Construction Schedule:**

Scheduled Activities for Next Week: The anticipated construction activities associated with week ending 6.17.12 consist of the following:

- Once 404 permits are issued, the remainder of the laydown area will be cleared and graveled
- Build access roads to WTG 152-175, 150-151, and 131-148
- Stake access road offsets 149-176, 113-174, and 173-112.
- Grading operations will continue on Phase 1 and clearing on Phase 2.
- Geotechnical borings at wind turbine foundations

### Potential Delays to the Online Date of the Project

- None identified at this time.

**Plan Review Submittal Items**

Submittal Type	Description
N/A	N/A

**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"> <li>• 12-acre temporary laydown yard</li> <li>• 30-acre Substation/Switchyard</li> <li>• Temporary and permanent access road/collection corridors and permanent turbine area for 71 turbines.</li> <li>• Performance of all required geotechnical studies within the Project site with access along planned access road corridors.</li> <li>• Buried Site Sensitivity Testing</li> <li>• Structure installation at the SDG&amp;E Energy switchyard.</li> </ul>	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.	Pending	Pending
5	6.8.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Pending	Pending

## Photographs



**Photo 1:** A drip pan is utilized beneath construction equipment.



**Photo 2:** Active construction areas are being watered down for dust suppression purposes during grading activities at the substation/switchyard.



**Photo 3:** Public informational signage has been placed along S-2 and Dos Cabezas Road to provide the public with contact information during construction.



**Photo 4:** Signage is placed along the access road between the temporary laydown yard and the substation/switchyard to inform construction crews vehicle speeds are limited to 15 miles per hour.



**Photo 5:** Dumpsters are covered in accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j).



**Photo 6:** Armor balls have been placed along the water surface at the temporary water pond in accordance with Section 4.2 of the Raven Control Plan (MM-Wild-1j).



**Photo 7:** A 10-foot tall chainlink fence is constructed along the perimeter of the temporary water storage pond.



**Photo 8:** Secondary containment is utilized for storage of hazardous materials onsite during construction.