



## **BLM Authorized Officer Weekly Report**

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**Project:** Ocotillo Wind Energy Facility Project

### **Weekly Project Update**

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**Reporting Period:** 7.9.12 through 7.15.12

### **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 period of 7.9.12 through 7.15.12.

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

#### Issues/Concerns with Applicable Conditions of Certification

*Pre-Construction Surveys:* In accordance with MM Wild-1b, a flat-tailed horned lizard (FTHL) biologist shall be present during construction activities occurring in FTHL habitat to prevent or minimize harm or injury to FTHL. An ECM observed crews staging materials in proximity to Wind Turbine 147 located within FTHL habitat prior to a biologist being present onsite. The biologist was not present as the construction contractor had not informed the biological monitor before mobilizing equipment to Wind Turbine 147. An ECM contacted the FTHL biologist to notify them of the activities being completed at Wind Turbine 147. The biologist reminded the construction contractor to always contact a biologist when working within FTHL habitat to ensure the event did not occur in the future.

*Work Limits:* An ECM observed on 7.11.12 unauthorized grading activities being completed for an underground collection cable line between Dos Cabeza Road and Wind Turbine 94. The grading activities were being completed in an area that was outside of the approved work limits identified in the ROD and ROW Grant. The ECM contacted the construction contractor and lead environmental monitors to initiate a stop work associated with the grading activities. Upon the construction contractor and lead environmental monitor verifying the grading activities were

being completed in an area outside of the approved work limits, all construction activities were suspended in this area. Grading activities were completed in the presence of an archeological and biological monitor and no impacts occurred to sensitive environmental resources.

An ECM observed a second incident on 7.11.12 where grading activities were being completed outside of the approved work limits between Wind Turbine #74 and 75. The grading activities were being completed in an area that was pending approval from BLM per Variance Request #5.

As a result of the two incidents that occurred above where crews completed activities outside of the approved work limits, corrective actions were put in place to ensure a similar event does not occur in the future. Corrective actions include the following measures:

Day before Initial Grading:

4pm meeting on afternoon before initial grading work

1. Review detailed map of areas planned for initial disturbance in next 24 hours
2. Confirm that disturbance limits are staked
3. Confirm that physical/visible markers are in place blocking areas adjacent to planned initial disturbance that have pending variance or other bio/cultural evaluation pending
4. Confirm that areas of planned initial grading are cleared biologically
5. Confirm that areas of planned initial grading are cleared culturally/archeology
6. Initiate checks of stake locations using Trimble or other GPS to re-confirm stakes are in correct location

Day of Initial Grading

5:30 am Foremen's meeting

1. Re-confirm locations of planned initial grading for the day
2. Re-confirm physical markers still in place
3. Re-confirm stake location check
4. Re-confirm biological and cultural go-ahead
5. Proceed with grading work with attending monitors in place

*WECO Routes:* An ECM observed on 7.12.12, a service truck driving along a WECO route near Wind Turbine 148 that was not an approved WECO route for construction activities. The incident was reported to the lead environmental monitor onsite. A second incident was observed on 7.13.12 where a drill rig was observed traveling along a WECO route to obtain access to Wind Turbine 21 that was not approved by BLM. As a result of the incidents noted above, the lead environmental monitor distributed maps to all construction personnel at the daily morning meeting to ensure all personnel are aware of the WECO routes that are authorized for project use.

*Trash Management:* In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash on site must be kept in covered trash receptacles with lids that can be securely fastened. An ECM identified a trash bin located within the SDG&E substation yard that had not been covered on 7.9.12. The issue/concern was reported to the foreman onsite at the time of the observation and a cover was observed in place on 7.10.12.

*Dust Suppression:* An ECM observed visible dust emissions along the Old Mining Road on 7.15.12 at 3:00 PM. The construction contractor was contacted regarding the dust emissions. Upon the notification being provided water trucks were observed watering down Old Mining Road. The application of water along the roadway was effective in minimizing dust emissions.

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

None.

#### **Construction Activities:**

Construction activities conducted for this period consisted of clearing and grading access roads and pad sites for wind turbines, construction wind turbine foundations and above-grade installation of substation/switchyard components at the 30-acre substation/switchyard.

*Wind Turbine Access Roads and Pad Sites:* Crews were observed clearing wind turbine pad sites 99, 102, 110, 131, 135 and 151.

*Wind Turbine Foundations:* Crews were observed excavating wind turbines 131, 132, 133, 147, 148, 149, 151, 169, 173 and 176.

*30-acre Substation/Switchyard:* Construction activities during this reporting period consisted of staging construction equipment and initiating work efforts to erect above-grade components associated with the 30-acre substation/switchyard.

#### **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 have been completed as indicated in NTP #1 and NTP#2.

In accordance with MM Wild-1b, a flat-tailed horned lizard (FTHL) biologist shall be present during construction activities occurring in FTHL habitat to prevent or minimize harm or injury to FTHL. An ECM observed crews staging materials in proximity to Wind Turbine 147 located within FTHL habitat prior to a biologist being present onsite. The biologist was not present as the construction contractor had not informed the biological monitor before mobilizing equipment to Wind Turbine 147. An ECM contacted the FTHL biologist to notify them of the activities being completed at Wind Turbine 147. The biologists reminded the construction contractor to always contact a biologist when working within FTHL habitat to ensure the event did not occur in the future.

An ECM observed on 7.11.12 unauthorized grading activities being completed for an underground collection cable line between Dos Cabeza Road and Wind Turbine 94. The grading activities were being completed in an area that was outside of the approved work limits identified in the ROD and ROW Grant. The ECM contacted the construction contractor and lead

environmental monitors to initiate a stop work associated with the grading activities. Upon the construction contractor and lead environmental monitor verifying the grading activities were being completed in an area outside of the approved work limits, all construction activities were suspended in this area.

An ECM observed a second incident on 7.11.12 where grading activities were being completed outside of the approved work limits between Wind Turbine #74 and 75. The grading activities were being completed in an area that was pending approval from BLM per Variance Request #5.

As a result of the two incidents that occurred above where crews completed activities outside of the approved work limits, corrective actions were put in place to ensure a similar event does not occur in the future (see section titled "Issues/Concerns with Applicable Conditions of Certification" above).

An ECM observed on 7.12.12, a service truck driving along a WECO route near Wind Turbine 148 that was not an approved WECO route for construction activities. The incident was reported to the lead environmental monitor onsite. A second incident was observed on 7.13.12 where a drill rig was observed traveling along a WECO route to obtain access to Wind Turbine 21 that was not approved by BLM. As a result of the incidents noted above, the lead environmental monitor distributed maps to all construction personnel at the daily morning meeting to ensure all personnel are aware of the WECO routes that are authorized for project use.

In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash on site must be kept in covered trash receptacles with lids that can be securely fastened. An ECM identified a trash bin located within the SDG&E substation yard that had not been covered on 7.9.12. The issue/concern was reported to the foreman onsite at the time of the observation and a cover was observed in place on 7.10.12.

In accordance with MM-Wild-1b, if potential wildlife pitfalls will not be immediately backfilled at the end of the day, the Biological Monitor will ensure that the construction crew slopes the ends of the excavation (3:1 slope) to provide wildlife escape ramps or will ensure that the construction crew completely and securely covers the excavation to prevent wildlife entry. Wildlife escape ramps were observed being constructed at foundations for the substation components in accordance with MM-Wild-1b (see photo 1).

An ECM observed visible dust emissions along the Old Mining Road on 7.15.12 at 3:00 PM. The construction contractor was contacted regarding the dust emissions. Upon the notification being provided water trucks were observed watering down Old Mining Road. The application of water along the roadway was effective in minimizing dust emissions. With the exception of the issue/concern noted above, construction crews were observed utilizing water for dust suppression purposes during the grading of turbine string access roads and construction of the substation/switchyard. Multiple water trucks were observed being present with each excavation crew to ensure dust emissions were minimized during construction in accordance with the dust control plan (see photo 2).

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 (see photo 3).

In accordance with Section 4.3.5 of the Revegetation Plan, 250 ocotillo (*Fouquieria splendens*) plants will be salvaged for transplantation into revegetation areas. Crews were observed transplanting ocotillo in accordance with Section 4.3.5 at WT43 (see photo 4).

In accordance with the Control Unauthorized Access Plan (MM CUL-11), signage has been put in place to notify OHV users of project-related access roads that are not authorized for OHV uses.

Construction activities occurring at the 30-acre substation/switchyard were observed being completed within the approved work limits (see photo 7). Dust emissions were monitored on a regular basis and no issues/concerns were reported throughout the week.

Geotechnical testing activities continued at turbine pad sites throughout the week (see photo 8). Geotechnical testing activities were monitored by a biologist, archeologist and Native American monitor to ensure activities were being completed per the project requirements.

A Storm Water Pollution Prevention Plan (SWPPP) has been prepared for the Ocotillo Wind Project in accordance with the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The SWPPP prepared for the project includes Best Management Practices (BMPs) to protect storm water runoff. BMP's being implemented onsite are monitored on a regular basis. A significant rain event occurred at 3:15 PM on 7.13.12, which produced a flash flood. The National Weather Service issued a flash flood warning for the project area at approximately 4:27 on 7.13.12 indicating that severe thunderstorms have produced widespread rainfall of 1 to 2 inches. The BMP's identified in the SWPPP are designed to meet the General Construction Permit requirements, which include an equivalent rainfall under the 10 year 24-hour storm event. The rain event that occurred on 7.13.12 resulted in a flash flood that exceeded the equivalent rainfall where BMP's would be effective as defined in the General Construction Permit (see photos 9 and 10). The rain event resulted in localized flooding that caused damage to nearby roadways including Old Mining Road and County Route S2. BMPs in place on-site were effective in preventing the discharge of non-stormwater pollutants such as concrete waste, chemicals, trash etc. Following the rain event the construction contractor completed repairs to access roads and stockpiles by re-grading, re-applying soil stabilizer and repairing BMP's (see photos 11 and 12).

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 7.22.12 consist of the following:

- Temporary Laydown Yard
  - Construct perimeter security fencing along Temporary Laydown Yard limits.
- Roadway Improvements & Turbine Pad Sites Clearing
  - Continue roadway and turbine pad site improvements
- Turbine Excavations
  - Excavate turbine foundations at WT - 99, 100, 101, 111, 112, 113, 133, 173, and 174.
- Turbine Foundation Construction
  - Complete base pour at WT-147, 148,149 and 151.
- O&M Facility
  - Initiate excavation of foundations for O&M Building.
- Switchyard/Substation
  - Continue work within SDG&E substation.

## Potential Delays to the Online Date of the Project

- None identified at this time.

## Plan Review Submittal Items

Submittal Type	Description
Paleontological Monitoring & Treatment Plan	In accordance with MM-Paleo-1 a monitoring plan shall be developed by a qualified paleontologist hired by the proponent who holds a current California BLM Paleontology Use Permit. The plan must be appropriately scaled to the size and complexity of the anticipated monitoring.

## 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
2	6.27.12	Clearing and grading of the following facilities. <ul style="list-style-type: none"> <li>• 112 turbines.</li> <li>• 2 MET towers</li> <li>• 3.4-acre O&amp;M facility</li> <li>• 10-acre temporary laydown area</li> <li>• Temporary connex storage areas</li> <li>• Temporary crane walk corridors</li> </ul> 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 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	6.8.12	Turbine micro-siting and road re-alignments to minimize potential disturbance to environmentally sensitive resources.	Approved	7.12.12
6	6.13.12	Additional temporary work space for construction and permanent access to the transmission line turning structures at the substation/switchyard.	Pending	Pending



## Photographs from Week



**Photo 1:** Wildlife escape ramps constructed at the 30-acre substation per MM-Wild-1b.



**Photo 2:** A water truck applies water during grading activities to minimize dust emissions in accordance with the Dust Control Plan.



**Photo 3:** Archeological and Native American monitors complete monitoring activities during ground disturbance activities associated with establishing the access road along Dos Cabezas Road.



**Photo 4:** A crew relocates an ocotillo per the requirements included in Section 4.3.5 of the Habitat Revegetation Plan.



**Photo 5:** Crews complete grading and clearing activities at WT 149. A biologist, archeologist and Native American monitor are present during grading activities per the project requirements.



**Photo 6:** Crews excavate a turbine pad foundation at WT 151.



**Photo 7:** Crews place steel rebar within an excavation for the foundations that will be utilized to construct substation components.



**Photo 8:** A geotechnical rig completes geotechnical testing activities within the approved work limits at Wind Turbine 50.



**Photo 9:** The rain event that occurred on 7.13.12 resulted in localized flooding as seen here along County Route S2.



**Photo 10:** The rain event that occurred on 7.13.12 resulted in localized flooding as seen here at the intersection of County Route S2 and Dos Cabezas Road.



**Photo 11:** Construction crews repair access roads following the rain event that occurred on 7.13.12.



**Photo 12:** Straw wattles are repaired in areas that were damaged during the rain event on 7.13.12.