



## **BLM Authorized Officer Weekly Report**

**El Centro Field Office**  
1661 S. 4th Street  
El Centro, California 92243  
Website: [www.OcotilloECCMP.com](http://www.OcotilloECCMP.com)

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**Project:** Ocotillo Wind Energy Facility Project

### **Weekly Project Update**

**Prepared By:** David Hochart, DUDEK, 605 Third Street, Encinitas, CA 92024

**Reporting Period:** 7.23.12 through 7.29.12

### **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 7.23.12 through 7.29.12.

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

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

*Dust Suppression:* An ECM observed dust emissions for approximately five minutes while crews were completing grading activities at a wind turbine pad site at 5 PM on 7.23.12. The foreman and lead biological monitor were informed of the dust being generated. Upon notification being provided the construction activities were ceased for the day.

*Leaking Equipment:* An ECM observed small diesel spills on 7.23.12 and 7.28.12 at wind turbine pad sites that were reported to the lead biological monitor onsite. The small diesel spills were cleaned-up in accordance with the project requirements upon notification being provided by the ECM to the lead biological monitor onsite.

*Concrete Waste Management:* In accordance with the SWPPP (MM-Water-9), concrete waste shall be disposed of properly. An ECM observed concrete waste associated with wind turbine foundation construction activities along the right-of-way and not being disposed of properly per the requirements of MM-Water-9 on 7.24.12 and 7.28.12. The contractor was aware of the issue/concern and notified the ECM the concrete waste would be cleaned-up in accordance

with MM-Water-9. The ECM observed crews cleaning-up the concrete waste within the right-of-way prior to completing the daily construction activities.

*Trash Management:* In accordance with Solid Waste Management specifications identified in the SWPPP (MM Water-9), litter and debris shall be disposed of properly. An ECM observed litter debris along the eastern limits of Dos Cabezas Road on 7.24.12 and at a wind turbine pad site on 7.28.12. The lead biological monitor was notified of the litter and debris and the litter and debris were removed by hand crews and disposed of properly into waste bins.

*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 7.24.12 and 7.28.12 that extended beyond 25 feet near the primary point of ingress/egress. The trac-out along County Highway S2 was reported to the lead biological monitor and a mechanical sweeper was being utilized at end of the day removing trac-out along the roadway.

*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 temporary laydown yard that had not been covered on 7.24.12 and a trash bin within the SDG&E substation on 7.26.12 that had not been covered. The issue/concern was reported to the lead biological monitor onsite at the time of the observation and a cover was observed being put in place upon notification.

*Wildlife Escape Ramps:* In accordance with MM-Wild-1b, at the end of each work day, the lead biologist is to inspect all potential wildlife pitfalls to ensure that the construction crew slopes the ends of the excavation to provide wildlife escape ramps or ensure that the construction crew completely and securely covers the excavation to prevent wildlife entry. An ECM observed excavations at the O&M facility on 7.25.12 where wildlife escape ramps had not been put in place. The lead biologist was contacted regarding the need to place wildlife escape ramps and upon notification crews were observed working with the lead biologist to construct wildlife escape ramps.

*Nighttime Lighting:* As stated in Section 2.1.3 of the OWEF Plan of Development and Section 2.1.3.2 of the EIS, to meet the project schedule it may be necessary to work early morning, evenings, or even nights and/or Sundays during the foundation concrete pours and other tasks, to take advantage of the cooler times of the day and during the turbine erection period to take advantage of the times the wind speed is below the maximum safe working conditions. Construction activities occurring during this reporting period consisted of nighttime work in accordance with the activities disclosed in the Plan of Development and EIS.

In order to ensure nighttime lighting meets the criteria established in MM-VR-2, lighting being utilized for nighttime work shall remain in compliance with the Construction Lighting Mitigation Plan, which includes requirements to use the minimal amount of light necessary to perform work safely and directing lights downward or toward the area to be illuminated to perform construction activities.

An ECM observed lighting on 7.25.12, 7.27.12 and 7.28.12 that did not meet the intent of MM-VR-2 as the lighting was not directed downward per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor the lighting was re-directed

downwards in accordance with the criteria established in MM-VR-2. 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.

#### 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 of wind turbine foundations and above-grade installation of substation/switchyard components at 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.

An ECM observed dust emissions for approximately five minutes while crews were completing grading activities at a wind turbine pad site on 7.23.12. The foreman and lead biological monitor were informed of the dust being generated. Upon notification being provided the construction activities were ceased for the day. With the exception of the above mentioned issue/concern, all construction activities were observed to be in compliance with the Dust Control Plan (MM-AQ-1). Crews were observed watering down areas of active construction on a regular basis (see photo 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 (see photo 2). Biological and archeological monitors were observed completing ongoing monitoring in accordance with the project requirements.

In accordance with the Integrated Weed Management Plan (MM-Veg-1d), a wheel wash station is located onsite to ensure vehicles and/or equipment that leave the site and are used on other sites are washed when leaving the site and prior to re-entering the site (see photo 3).

In accordance with Construction Fire Safety Plan (MM-Fire-1), a water drafting station has been established to provide a Fire Authority-approved fire truck access draft station at the temporary water pond (see photo 4).

An ECM observed small diesel spills on 7.23.12 and 7.28.12 at wind turbine pad sites that were reported to the lead biological monitor onsite. The small diesel spills were cleaned-up in

accordance with the project requirements upon notification being provided by the ECM to the lead biological monitor onsite.

In accordance with the SWPPP (MM-Water-9), concrete waste shall be disposed of properly. Crews were observed completed construction activities associated with wind turbine concrete pours throughout the reporting period (see photo 5). An ECM observed concrete waste associated with wind turbine foundation construction activities along the right-of-way and not being disposed of properly per the requirements of MM-Water-9 on 7.24.12 and 7.28.12. The contractor was aware of the issue/concern and notified the ECM the concrete waste would be cleaned-up in accordance with MM-Water-9. The ECM observed crews cleaning-up the concrete waste within the right-of-way prior to completing the daily construction activities.

In accordance with Solid Waste Management specifications identified in the SWPPP (MM Water-9), litter and debris shall be disposed of properly. An ECM observed litter debris along the eastern limits of Dos Cabezas Road on 7.24.12 and at a wind turbine pad site on 7.28.12. The lead biological monitor was notified of the litter and debris and the litter and debris were removed by hand crews and disposed of properly into waste bins.

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In accordance with MM-Wild-1b, at the end of each work day, the lead biologist is to inspect all potential wildlife pitfalls to ensure that the construction crew slopes the ends of the excavation to provide wildlife escape ramps or ensure that the construction crew completely and securely covers the excavation to prevent wildlife entry. An ECM observed excavations at the O&M facility on 7.25.12 where wildlife escape ramps had not been put in place. The lead biologist was contacted regarding the need to place wildlife escape ramps and upon notification crews were observed working with the lead biologist to construct wildlife escape ramps.

As stated in Section 2.1.3 of the OWEF Plan of Development and Section 2.1.3.2 of the EIS, to meet the project schedule it may be necessary to work early morning, evenings, or even nights and/or Sundays during the foundation concrete pours and other tasks, to take advantage of the cooler times of the day and during the turbine erection period to take advantage of the times the wind speed is below the maximum safe working conditions. Construction activities occurring during this reporting period consisted of nighttime work in accordance with the activities disclosed in the Plan of Development and EIS (see photo 6).

In order to ensure nighttime lighting meets the criteria established in MM-VR-2, lighting being utilized for nighttime work shall remain in compliance with the Construction Lighting Mitigation Plan, which includes requirements to use the minimal amount of light necessary to perform work safely and directing lights downward or toward the area to be illuminated to perform construction activities.

An ECM observed lighting on 7.25.12, 7.27.12 and 7.28.12 that did not meet the intent of MM-VR-2 as the lighting was not directed downward per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor the lighting was re-directed downwards in accordance with the criteria established in MM-VR-2. 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.

Construction activities occurring at the 30-acre substation/switchyard were observed being completed within the approved work limits. Crews were observed constructing the control house at the substation (see photo 7). Crews were also observed constructing above-grade components associated with foundations for substation facilities (see photo 8). Dust emissions were monitored on a regular basis and no issues/concerns were reported throughout the week.

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 8.5.12 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.
- Wind Turbine Foundation Construction
  - Continue wind turbine foundation construction consisting of excavations, base pour and pedestal pour.
- Underground Collection Lines
  - Initiate ground disturbance associated with underground collection lines.
- O&M Facility
  - Complete excavations and begin pouring concrete foundations.
- 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	<p>Clearing and grading of the following facilities:</p> <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	<p>Clearing and grading of the following facilities.</p> <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> <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.</p> <p>Construction of all buildings and associate facilities including the O&amp;M building, biological observation tower, control buildings at substation and switchyard.</p> <p>Structure installation at the SDG&amp;E energy switchyard.</p>	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.	Approved	7.26.12
7	6.26.12	Modify alternate turbine locations included in the Record of Decision.	Pending	Pending
8	7.20.12	Re-alignment of an access road to wind turbine #9 to minimize potential disturbance to environmentally sensitive resources.	Pending	Pending
9	7.20.12	Realignment of underground collection line corridor between County Route S2 and Dos Cabezas Road.	Pending	Pending

## Photographs from Week



**Photo 1:** A water truck is utilized during excavation activities to minimize dust emissions.



**Photo 2:** Archeological and Native American monitors complete monitoring of initial ground disturbance at a wind turbine foundation.



**Photo 3:** In accordance with the Integrated Weed Management Plan (MM-Veg-1d), a wheel wash station is located onsite to ensure vehicles and/or equipment that leave the site and are used on other sites are washed when leaving the site and prior to re-entering the site.



**Photo 4:** In accordance with Construction Fire Safety Plan (MM-Fire-1), a water drafting station has been established to provide a Fire Authority-approved fire truck access draft station at the temporary water pond.



**Photo 5:** A crew completes construction activities at a wind turbine foundation.



**Photo 6:** Crews complete nighttime work at wind turbine foundations. Lighting is pointed downward in accordance with the construction lighting mitigation plan (MM-VR-2).



**Photo 7:** Construction of the control house at the onsite substation.



**Photo 8:** Construction crews complete foundations at the onsite substation that will be utilized for construction of substation components.