



## BLM Authorized Officer Weekly Report

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**Project:** Ocotillo Wind Energy Facility Project

### Weekly Project Update

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**Reporting Period:** 8.6.12 through 8.12.12

### 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 8.6.12 through 8.12.12.

### Site Inspections/Mitigation Monitoring:

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

*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. An ECM identified trash bins located within the temporary laydown yard that had not been covered on 8.6.12, 8.8.12, 8.9.12 and a trash bin located within the SDG&E substation on 8.8.12 and 8.10.12 that had not been covered. The issue/concern related to the trash receptacles being covered on a regular basis was addressed by the biological monitor and construction personnel onsite at the SDG&E substation. The cover for the trash bin located at the laydown yard has been ordered and is scheduled to be put in place during the upcoming reporting period.

*Nighttime Lighting:* An ECM observed lighting on 8.8.12 and 8.10.12 that did not meet the intent of MM-VR-2 as the lighting was not fully directed downward per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor the lighting was immediately 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.

*Storm Water Pollution Prevention Plan (SWPPP):* Crews during this reporting period were observed overall to be maintaining Good Site Management practices in accordance with Section 4.3.4 of the SWPPP (MM-Water-9). ECM's reported observations throughout the reporting period to ensure Good Site Management practices were being implemented on a day-to-day basis. Observations reported by ECM's included soil stains, concrete waste management and construction personnel litter debris. All observations reported by ECM's were followed-up to ensure soil stains had been removed, litter had been picked-up and concrete waste was properly managed per the requirements of the SWPPP.

*Dust Suppression:* An ECM observed dust emissions for less than three minutes while crews were completing excavation activities at a wind turbine pad site on 8.6.12 and 8.7.12. The foreman suspended activities in response to the dust flare ups and additional water trucks were mobilized to the excavation activities to reduce dust emissions.

*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 substation on 8.8.12 where wildlife escape ramps had not been put in place. The foreman was contacted regarding the need to place wildlife escape ramps and upon notification being provided crews worked with the ECM to construct wildlife escape ramps.

*Fire Safety:* In accordance with MM-Fire-1, no smoking is permitted except in designated safe smoking areas which include cleared areas with no combustible vegetation or materials and approved butt receptacles. An ECM observed crew members smoking on 8.10.12 in a non-designated safe smoking area. The crew members were informed of the project requirements and immediately suspended smoking activities.

*Work Limits:* A biological monitor observed unauthorized grading activities on 8.10.12 being completed at the pad site for wind turbine 103. 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 area disturbed outside of the approved work limits was within the survey area analyzed in the FEIS and a pre-construction survey was completed in accordance with requirements identified in the ECCMP. In addition, both an archaeological and biological monitor were present during the initial ground disturbance activities and no sensitive environmental resources were impacted as a result of this activity. Upon the Holder's environmental monitors observing the activities, a stop work was initiated with the associated grading activities. As seen in Weekly Report #9, several measures have been put into place to ensure work activities do not occur beyond the approved work limits. All measures that were identified in the step-by-step process included in Weekly Report #9 were implemented prior and during grading activities at wind turbine 103. The incident that occurred on 8.10.12 resulted in 0.3 acres of temporary disturbance and occurred because of operator error. BLM reviewed the incident and determined no corrective actions were required.

## 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, installation of 34.5 kV underground collection lines, building foundations at the O&M facility and above-grade installation of substation/switchyard components at the 30-acre substation/switchyard. To date approximately 37 wind turbine foundations have been excavated and 16 wind turbine foundations concrete pours have been completed.

### **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.

As specified in MM Wild-1b, biological monitors are to be present during construction activities that take place in FTHL habitat to prevent or minimize harm or injury to FTHL. ECM's observed biologists under contract with OE LLC conducting the proper clearance surveys prior to grading activities and were present during the daily work activity. Biological monitors were also observed being present in areas of initial ground disturbance along the ROW throughout the reporting period.

OE LLC has contracted with an archaeological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP (see photo 1). Archaeological monitors were observed completing ongoing monitoring in accordance with the project requirements.

Construction activities were observed being completed in accordance with the Dust Control Plan (MM-AIR-1) throughout the reporting period. Stabilized construction entrances have been established at the entryway to each wind turbine string from paved roadways. Stabilized construction entrances include a rock apron that reduces potential trac-out along paved roadways (see photo 2). Water wagons and water trucks were routinely observed watering down areas of active excavation (see photo 3).

A black-throated sparrow nest was identified on 8.9.12 that included a female incubating 3 eggs in a nest. In accordance the Nesting Bird Mitigation and Monitoring Plan (MM-Wild-2b), once a nest is found it must be monitored and a 200 foot buffer established from the nest (see photo 4). Biological monitors established a 200 foot buffer around the nest in accordance with MM-Wild-2b on 8.9.12. In accordance with Section 4.3 of the Nesting Bird Mitigation and Monitoring Plan, nest buffer reduction requests can be submitted by OE LLC and reviewed on a case by case basis

by the BLM. A nest buffer reduction request was submitted by OE LLC on 8.10.12 to reduce the buffer from 200 feet to 175 feet. The nest buffer reduction is being reviewed by the BLM.

Construction crews completing concrete pouring activities at the substation are utilizing a cement washout station located in close proximity to the substation. The cement washout consists of spoil piles lined with plastic to provide proper containment of cement debris (see photo 5).

Crew members were observed removing stained soil along the ROW through use of a shovel and bucket to ensure Good Site Management practices are being implemented in accordance with Section 4.3.4 of the SWPPP (see photo 6). Drip pans have also been observed beneath construction equipment staged along the ROW to minimize the potential for oils to stain soils. ECM's observed hazardous materials onsite being placed in proper containment as specified in the MM-Water-9.

Construction crews during this reporting period were observed completing rebar assembly for concrete foundations at the Operations and Maintenance facility (see photo 7). All work activity was observed being completed within the approved ROW limits.

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 8). 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.

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.

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 with week ending 8.19.12 consist of the following:

- Temporary Laydown Yard
  - Construct decking around the perimeter of the office trailers.
- 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
  - Complete excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
  - Building foundations, column footings, and slab.
- Switchyard/Substation
  - Continue work within substation and switchyard.
- Turbine Erection
  - Crews mobilizing and crane assembly

**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> </ul>	Yes

## Notice to Proceed

NTP No.	Date Issued	Project Component	Conditions Included (Y/N)
		<ul style="list-style-type: none"> <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.	

## 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.	Pending	Pending

## Photographs from Week



**Photo 1:** Archaeological monitors complete monitoring of the grading activities in accordance with the ECCMP.



**Photo 2:** Stabilized construction entrances are established at the entryway to each wind turbine string from paved roadways. Stabilized construction entrances include a rock apron that reduces potential trac-out along paved roadways.



**Photo 3:** Water trucks are utilized during excavation activities to minimize dust emissions in accordance with the Dust Control Plan (MM-Air-1).



**Photo 4:** A 200 foot nest buffer is established around the perimeter of a black-throated sparrow nest that was identified by a biological monitor on 8.9.12.



**Photo 5:** A concrete washout is utilized by cement truck operators to wash-out cement trucks along the ROW.



**Photo 6:** Crews remove stained soil along the ROW in accordance with the SWPPP (MM-Water-9).



**Photo 7:** Foundations being constructed to support components for the Operation & Maintenance facility.



**Photo 8:** A crew completes a bottom mat at a wind turbine foundation during the evening hours.