



## BLM Authorized Officer Weekly Report

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**Project:** Ocotillo Wind Energy Facility Project

### Weekly Project Update

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**Reporting Period:** 9.3.12 through 9.9.12

### 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 9.3.12 through 9.9.12. No construction took place on Monday, September 3rd.

### Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM Environmental Compliance Monitors (ECM) during daily site observations. These items are being monitored and tracked to ensure follow-up is completed in a reasonable amount of time to avoid the potential for impacts to sensitive environmental resources.

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

*Dust Suppression:* On 9.6.12 an ECM observed dust originating from the Laydown Yard due to un-watered access roads, high winds, and increased vehicle activities. On 9.8.12 an ECM observed dust flare-ups during excavation activities at a wind turbine pad site. In each of the aforementioned instances, the operators were notified of the fugitive dust and immediately halted construction activities until additional water trucks were mobilized to adequately suppress dust.

*Trash Management:* In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash onsite must be kept in covered trash receptacles. On 9.4.12 an ECM observed that the scrap metal dumpster at the Laydown Yard was left partially uncovered and that the trash bin at the 30-acre Substation/Switchyard was left uncovered. In addition, an ECM identified trash associated with

personal debris from construction crews at the Substation/Switchyard. Each of these instances have been addressed by the lead biological monitor and construction personnel onsite by ensuring trash is placed within covered receptacles. The construction contractor has been actively working with construction personnel to maintain trash and to ensure all trash receptacles are covered.

*Storm Water Pollution Prevention Plan (SWPPP):* ECM's reported observations throughout the reporting period to ensure good housekeeping practices were being implemented on a day-to-day basis in accordance with MM-Water-9 and the SWPPP. Observations reported by ECM's included maintaining concrete washouts, properly labeling hazardous materials stored onsite, cleaning-up soil stains, the use of straw wattles to minimize erosion, and managing concrete waste debris. The ECM's observations were reported to OE LLC and the lead biological monitoring team and these issue/concerns were addressed in a timely manner.

*Work Limits:* ECM's observed portions of the excavated berm at a wind turbine to be located approximately 3 feet beyond the approved work limits. No sensitive environmental resources are located in this area and the berm that extended beyond the approved work limits has been removed.

*Maintaining Wildlife Fencing at Temporary Water Pond:* On 9.4.12 an ECM observed gaps in the wildlife fencing along the temporary water pond at the Laydown Yard. The fencing has been placed along the temporary water pond to limit the potential for wildlife to enter into the area. The gaps in the fencing were reported to the lead biological monitor on 9.4.12 and have been flagged via ribbon tied to the fence to clearly show where the tears are located. The gaps in the fencing along the temporary water pond at the Laydown Yard are scheduled to be repaired during the following reporting period.

*Maintaining ESA Fencing:* Approximately 100 feet of ESA fencing adjacent to an access road was observed by an ECM to be damaged and in need of repair. The fencing was repaired upon notification being provided by the ECM to the lead biological monitor onsite.

*Generator Emissions:* The Imperial County Air Pollution Control District (APCD) issued a notice of violation (NOV) on 9.4.12 related to emissions from a portable electrical generator that exceeded air quality standards. Subsequent to the NOV being issued by APCD, the generator was repaired and is now operating in compliance with APCD requirements.

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

None.

#### **Construction Activities**

Construction activities conducted for this period consisted of establishing the pad sites for wind turbines, construction of wind turbine foundations, trenching the collection line corridors, constructing the structural steel, metal deck, roof, and electrical conduit at the O&M Building, and pouring concrete foundations and erecting structural steel at the 30-acre Substation/Switchyard. To date approximately 65 wind turbine foundations have been excavated, 49 wind turbine foundations concrete pours have been completed, 12 rotors have been assembled, and 8 rotors have been erected.

## 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.

OE LLC has contracted with an archeological consulting firm approved by the BLM 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 establishing ESA's prior to initiating ground disturbance. ECM's were onsite during all ground disturbance activities to ensure lead archeological monitors were present completing 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. Water wagons and water trucks were routinely observed watering down areas of active grading, trenching, and excavation to ensure dust emissions were minimized during construction in accordance with the dust control plan (see photo 1). Soil stabilizers were placed on unpaved access roads to prevent fugitive dust in accordance with MM-Air-1 (see photo 2). In addition, speed limit signage has been placed along access roads to notify motorists of the speed limit. The speed limit signs have been placed on-site in accordance with MM-Air-3 (see photo 3).

On 9.5.12, 9.6.12, and 9.8.12 ECM's observed small diesel spills at the Substation/Switchyard and at wind turbine pad sites. In each of these cases, the leaking equipment was identified and the diesel spills were cleaned-up in accordance with the project requirements (see photo 4).

On two separate occasions during this reporting period, ECM's observed vehicle track-out along County Road S2 near the Laydown Yard. In each of these cases, street sweepers were observed cleaning the paved roadways at the conclusion of the workday in accordance with MM-Air-1.

In accordance with the Construction Fire Safety Plan (MM-Fire-1), ECM's observed "no smoking" signs erected adjacent to the storage/refueling area at the Laydown Yard (see photo 5).

In accordance with the Construction Traffic Management Plan and Transportation Plan, construction crews accessing the project site are required to utilize Evan Hewes Highway to connect to the private mine bypass road, which results in construction traffic by-passing Shell Canyon Road and the town of Ocotillo. On 9.4.12 and 9.5.12, ECM's observed vehicles associated with construction personnel accessing the project site via the town of Ocotillo. OE LLC and its subcontractors have been made aware of this issue and continue to work with construction personnel to ensure that they are aware of and take the approved project access routes.

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. 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. ECM's are onsite to work with crews on setting up lights at each construction activity area. Lights have been pointed away from the town of Ocotillo to the greatest extent feasible; however in order to ensure worker safety, instances have required lights to be pointed in the direction of the town of Ocotillo. An ECM observed lighting on 9.4.12 that did not meet the intent of MM-VR-2 as the lighting was not fully direct downwards per the requirements identified in MM-VR-2. Upon notification being provided to the construction contractor, the lighting was redirected downwards in accordance with the criteria established in MM-VR-2.

In accordance with MM-Wild-1d, the boundaries of all areas to be disturbed are to be delineated with stakes and flagging prior to construction activities. ECM's observed OE LLC working with land surveyors and the biological monitor to ensure all work areas are clearly delineated prior to ground disturbance. The limits of work are monitored by a biological monitor during all ground disturbance activities to ensure construction activities remain within the approved work limits.

In accordance with MM-Wild-1t, a biological consultant is to be approved by the BLM, USFWS, and CDFG to serve as the Bighorn Sheep Monitor during construction activities within USFWS Essential Habitat. BLM, USFWS and CDFG approved a biological consultant to perform the roles and responsibilities outlined in MM-Wild-1t and the Bighorn Sheep Mitigation and Monitoring Plan. ECM's have observed the biological consultant performing monitoring duties in accordance with MM-Wild-1t and the Bighorn Sheep Mitigation and Monitoring Plan when crews are working within USFWS Essential Habitat.

ECM's and the lead biological monitors completed routine site observations to make sure trash receptacles are being covered in accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j). With the exception of the instances noted above in Section "Issues/Concerns with Applicable Conditions of Certification", trash receptacles were observed being covered along the ROW. Covers consist of tarps and plastic lids that are secured to the trash bins.

Cranes were utilized to unload the turbine components to be staged along the ROW within the approved work limits. Turbine assembly continued during this reporting period and eight turbines have been erected to date (see photo 6).

Construction continued at the Substation/Switchyard and O&M Facility during this construction period. At the Substation/Switchyard, construction crews were observed erecting steel and continuing with the underground conduit work (see photo 7). At the O&M facility, construction crews were continuing to work on the masonry block installation, structural steel installation, foundation pours, and installation of the roof (see photo 8). Work activities were observed to be completed within the approved project limits at both the Substation/Switchyard and O&M Facility.

Based on environmental compliance monitors observations, all crew members working on the project site have been WEAP trained. Upon completing of WEAP training attendees are provided a sticker for their hard hat indicating they have completed required WEAP training.

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 9.10.12 through 9.16.12 includes:

- 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
  - Continue excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
  - Structural steel, metal deck and roof installation, interior wall install and electrical conduit.
- Switchyard/Substation
  - Continue conduit and grounding installation and erecting structural steel.
- Turbine Erection
  - Crews mobilizing turbine components to site and erecting turbine towers and rotors.

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

- None identified at this time.

### **Plan Review Submittal Items**

- None identified at this time.

## 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 turbine 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.	Pending	N/A
20	8.31.12	Re-alignment of two access roads to wind turbines 30 and 78 to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A

## Photographs from Week



**Photo 1:** A water truck is used to suppress fugitive dust emissions during excavation activities at a wind turbine pad site in accordance with (MM-Air-1)



**Photo 2:** Soil stabilizers are applied to access roads to minimize fugitive dust emissions in accordance with MM-Air-1.



**Photo 3:** Speed limit signs are posted along access roads in accordance with MM-Air-3.



**Photo 4:** Construction crews clean a diesel leak near the 30-acre Substation/Switchyard using a spill kit in accordance with MM-Water-10.



**Photo 5:** A “no smoking” sign is placed adjacent to the storage/refueling area at the Laydown Yard in accordance with the Construction Fire Safety Plan (MM-Fire-1).



**Photo 6:** A crane is utilized to lift a rotor into place for assembly to the nacelle.



**Photo 7:** Crews complete construction of the A-Frame steel structures at the 30-acre Substation/Switchyard



**Photo 8:** Construction continues at the O&M building with the installation of masonry block and roofing material.