



## BLM Authorized Officer Weekly Report

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**Project:** Ocotillo Wind Energy Facility Project

### Weekly Project Update

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**Reporting Period:** 10.15.12 through 10.21.12

### 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 10.15.12 through 10.21.12.

### Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECM's during daily site observations. These following issues/concerns are being monitored to ensure follow-up is completed in a reasonable amount of time to avoid potential impacts to sensitive environmental resources per the intent of the ECCMP.

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

*Dust Suppression:* Dust flare-ups were observed during this reporting period by an ECM on 10.17.12 and 10.18.12. The dust flare-ups were associated with construction vehicles travelling along unpaved access roads and excavation activities at a wind turbine pad site. In both instances the construction contractor was observed proactively watering down the access road and mobilizing additional water tenders for use during excavation activities.

*Storm Water Pollution Prevention Plan (SWPPP):* Stabilized construction entrances have been established where paved roadways intersect with unpaved access roads. The stabilized construction entrances are being put in place per MM-Air-1 to reduce the potential for trac-out along paved roadways. ECM's observed stabilized construction entrances in need of repair and maintenance and trac-out along paved access roads. The construction contractor

has been observed maintaining the stabilized construction entrances and has also been observed cleaning paved access roads on a daily basis. ECM's will continue to monitor the effectiveness of stabilized construction entrances.

## **Construction Activities**

Construction activities conducted for this period consisted of mobilizing and erecting wind turbines, constructing wind turbine foundations, installation of underground collection lines, access road improvements, O&M Building improvements, and installing wiring and testing transformer equipment at the 30-acre Substation/Switchyard. Eight turbines were erected during this reporting period. To date approximately 94 wind turbine foundations have been excavated, 88 wind turbine foundations concrete pours have been completed, 49 rotors have been assembled, and 43 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 including but not limited to development and implementation of preconstruction plans 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 (see photo 1). ECM's were onsite during all ground disturbance activities to ensure lead archeological monitors were present completing monitoring in accordance with the project requirements.

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 completely and securely covers the excavation to prevent wildlife entry. ECM's complete routine inspections to ensure all wildlife pitfalls include wildlife escape ramps and/or have been covered per MM-Wild-1b.

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 activities in accordance with the Dust Control Plan (MM-Air-1). Stabilized construction entrances have been established and maintained at locations where project access roads intersect paved access roads. The stabilized construction entrances consist of rock aprons to minimize track-out from construction equipment along paved access roads and to prevent fugitive dust. Crews were observed cleaning the paved roadway surface via a mechanical sweeper and water trucks during this reporting period (see photo 2).

ECM's reported observations to ensure good housekeeping practices were being implemented on a day-to-day basis in accordance with the MM-Water-9 and MM-Haz-6. The ECM's

observations were reported to OE LLC and the lead environmental monitor to ensure all issues/concerns were addressed in a timely manner. Drip pans have been observed beneath construction equipment staged along the ROW to minimize the potential for oil stains (see photo 3).

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 were onsite during all nighttime work to ensure the night lighting met the requirements established in MM-VR-2 and worked with crews to set up lights at each construction activity area (see photo 4).

In accordance with MM-Wild-1d, 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 were monitored by a biological monitor during all ground disturbance activities to ensure construction activities remain within the approved work limits and that the work limits are properly delineated (see photo 5).

A paleontological monitor was onsite when excavation activities were being completed in sensitive fossil bearing formations per MM-Paleo-1 (See photo 6). The paleontological monitor completed monitoring in accordance with the Paleontological Monitoring and Treatment Plan.

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.

Transportation deliveries associated with hauling turbine components continued during this reporting period. Turbine components were delivered to the project site in accordance with the Construction Traffic Management Plan (POD-14 and POD-15). The turbine components were delivered via the I-8/Ocotillo Imperial Highway exit, and then proceeded east along W Evan Hewes Highway to a private road (Old Mining Road). All deliveries were escorted by California Highway Patrol and per the requirements identified in the transportation permits issued by the State of California Department of Transportation.

Based on the BLM's third-party ECM's 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.

Construction activities associated with installing the underground 34.5 kV underground collection lines continued during this reporting period (see photo 7). Crews were observed trenching, placing cable in the excavated trench and backfilling. Environmental monitors completed routine inspections of these activities to ensure work was being completed within the approved work limits and dust control measures were being implemented.

Crews were also observed completing the concrete foundations associated with the Sunrise Powerlink turning structures (see photo 8). The turning structures will be utilized to transfer energy generated onsite to the Sunrise Powerlink

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 10.15.12 through 10.21.12 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 pedestal pour, and backfill.
- Underground Collection Lines
  - Continue excavation, conductor placement and backfill associated with underground collection lines.
- O&M Facility
  - Interior drywall, insulation, ceiling tile, light, door, mezzanine and electrical conduit installation.
- Switchyard/Substation
  - Control wiring and buss installation, equipment assembly, and transformer testing.
- Turbine Deliveries
  - Deliver the components for six turbines.
- Turbine Erection
  - Crews mobilizing turbine components to site and erecting turbine towers and rotors. 12 turbines are anticipated to be erected.

### 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.	Approved	9.17.12
20	8.31.12	Re-alignment of two access roads to wind turbines 30 and 78 to minimize potential disturbance to environmentally sensitive resources.	Approved	9.13.12

Variance Request No.	Submitted	Description	Status	Approval Date
21	9.13.12	Re-alignment of two access between wind turbines 10 and 11 and wind turbines 81 and 87 roads to minimize potential disturbance to environmentally sensitive resources	Approved	9.28.12
22	9.19.12	Re-alignment of underground collection line corridor from wind turbine 90 to 93 and extension of two turning radii near wind turbines 92 and 95.	Approved	10.2.12
23	9.21.12	Re-alignment of underground collection line corridor along County Highway S2, relocation of a crane walk corridor from wind turbine 107, and medication of a collection line corridor and access road near wind turbine 64.	Approved	10.15.12
24	9.27.12	Re-alignment of an access road between wind turbines 19 and 20 and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Approved	10.9.12
25	10.4.12	Re-alignment of an access road between wind turbines 16 and 17 to minimize potential disturbance to environmentally sensitive resources.	Approved	10.10.12
26	10.11.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
27	10.12.12	Micro-siting a turbine location to accommodate a third party interest group.	Pending	N/A
28	10.16.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Pending	10.19.12
29	10.16.12	Re-alignment of an access road and shifting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
30	10.17.12	Re-alignment of an access road and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
31	10.17.12	Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A
32	10.19.12	Re-alignment of an access road and underground collection line corridor.	Pending	N/A
33	10.20.12	Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.	Pending	N/A

## Photographs from Week



**Photo 1:** Archeological monitors complete monitoring of initial ground disturbance per the project requirements.



**Photo 2:** Trac-out is cleaned-up along County Highway S2 via use of a water truck and street sweeper.



**Photo 3:** Drip pans are placed beneath construction equipment in accordance with MM-Haz-6 and MM-Water-9.



**Photo 4:** Construction night lighting is oriented downward in accordance with MM-VR-2.





**Photo 5:** Biological monitors are present during ground disturbance activities to ensure all activities are completed within the approved work limits per MM-Wild-1d.



**Photo 6:** A paleontological monitor completes monitoring during excavation activities within sensitive fossil bearing formations per MM-Paleo-1.



**Photo 7:** Crews backfill along the collection line corridors following the installation of 34.5 kV collection lines that will be utilized to deliver power from the wind turbines to the onsite substation.



**Photo 8:** Construction activities continued during this reporting to establish the concrete foundations for the Sunrise Powerlink turning structures.