



# BLM Authorized Officer Weekly Report

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**Project:** Ocotillo Wind Energy Facility Project

## Weekly Project Update

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**Reporting Period:** 11.19.12 through 11.25.12

## 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 (ECMs), 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 11.19.12 through 11.25.12.

## Site Inspections/Mitigation Monitoring

The following issues/concerns have been observed by BLM ECMs 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

*Storm Water Pollution Prevention Plan (SWPPP) (MM WATER-9) and Spill Prevention, Control, and Countermeasure Plan (SPP) (MM WATER-10):* ECM's reported concrete waste that needed to be cleaned-up in accordance with WM-8 in the SWPPP. ECM's reported the observations to the construction contractor and lead environmental monitor to ensure the concrete is cleaned-up prior to any restoration activities being completed.

ECM's reported lubricants and fluids being utilized for turbine commissioning and staged at the laydown yard that did not contain adequate secondary containment as required by WM-4 of the SWPPP. ECM's reported the observations to the construction contractor and lead environmental monitor to ensure all materials are placed in secondary containment at the completion of each work day.

*Raven Control Plan (MM-Wild-1j):* In accordance with Section 4.1 of the Raven Control Plan, all trash onsite must be kept in covered trash receptacles. ECM's reported dumpsters needing cover to the lead environmental monitor. The dumpsters were covered upon notification being provided to the lead environmental monitor.

ECM's observed litter debris from construction crews periodically throughout the reporting period. The observations were reported to the lead environmental monitor and the construction contractor has responded by reminding crews to maintain a clean work site and by designating individuals to pick-up debris at the completion of the work day.

*Ground Disturbance in Flat-Tailed Horned Lizard (FTHL) Habitat (MM-Wild-1b):* In accordance with MM-Wild-1b a FTHL monitor is required to be present during construction activities that take place in FTHL habitat to prevent or minimize harm or injury to FTHL. On November 24<sup>th</sup>, an ECM and the lead biological monitor reported ground disturbance activities occurring along a portion of an access road located within FTHL habitat with no FTHL monitor present. The construction contractor was immediately notified and ground disturbance was halted. No further work occurred along the access road for the remainder of the day. In response this issue/concern measures were identified to ensure a similar incident does not result in the future. The measures will be implemented by the lead environmental monitor and the construction contractor to ensure a FTHL monitor is present during any ground disturbance activity in FTHL habitat.

## **Construction Activities**

Construction activities conducted for this period were reduced due to the Thanksgiving holiday. Activities consisted of erecting wind turbines, rotors and blades (see photo 1), excavating and backfilling wind turbine foundations (see photo 2), access road improvements, electrical work at turbine sites (see photo 3), O&M Building improvements and testing equipment at the 30-acre Substation/Switchyard, and assembly of the lattice tower turn structures that will connect to the Southwest Power Link. Ten turbines were erected during this reporting period, totaling 79 turbines. To date approximately 108 wind turbine foundations have been excavated, and 97 wind turbine foundations concrete pours have been completed.

## **Compliance**

ECMs 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 and ensuring that flagging of ESAs remained intact. ECMs also observed archeological monitors and Native

American Monitors onsite during initial and non-initial ground disturbing activities, monitoring in accordance with the project requirements.

OE LLC has also contracted with a biological consulting firm approved by the BLM to complete day-to-day monitoring of the construction activities in accordance with the ECCMP. ECMs observed biological monitoring activities associated with PBS and FTHL in accordance with MM Wild- 1a, 1b, and 1j (see photo 5 and 6).

ECMs observed compliance with MM Veg-2b and the associated Habitat Restoration/ Re-vegetation Plan (HRRP), as crews implemented appropriate salvage, storage and reclamation use of topsoil along access roads and turbine sites (see photo 4).

ECMs continued to observe biologists completing routine inspections at potential wildlife pitfall locations, ensuring that these pitfalls included wildlife escape ramps and/or were covered per MM-Wild-1b. On 11.25.12, an ECM observed an excavated pit without a wildlife ramp and reported this issue to the lead ECM and construction manager.

Water pulls were observed pre-watering access roads and areas under active construction in order to minimize dust in accordance with the Dust Control Plan and MM Air-1 and watering excavation pits as shown in photo 2. Also in accordance with MM Air-1 and the SWPPP, ECMs noticed diligence with minimization and cleaning of track out along Highway S2 and Mine Road (see photos 7 and 8).

Based on the ECMs 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. WEAP Training continues to occur on the project site twice a week.

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 11.26.12 through 12.2.12 includes:

- Roadway Improvements
- Wind Turbine Foundation Construction
- Continue wind turbine foundation construction consisting of four foundation excavations and (four) base pours
- O&M Facility
  - Interior finishes, HVAC, Septic Tank installation, Erect Steel for observation tower
- Switchyard/Substation
  - Equipment testing
- Turbine Deliveries

- Deliver the components for six turbines.
- Turbine Erection
  - Crews mobilizing turbine components to site and erecting turbine towers and rotors. Five turbines are anticipated to be erected.
- Site Reclamation
  - Four sites are anticipated to be reclaimed in part

Potential Delays to the Online Date of the Project

- None identified at this time.

## 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                    | 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.  | Approved | 11.14.12      |
| 27                   | 10.12.12  | Micro-siting a turbine location to accommodate a third party interest group.  | Approved | 10.22.12      |
| 28                   | 10.16.12  | Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.   | Approved | 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.  | Approved | 10.26.12      |
| 30                   | 10.17.12  | Re-alignment of an access road and micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.  | Approved | 10.25.12      |
| 31                   | 10.17.12  | Micro-siting a turbine location to minimize potential disturbance to environmentally sensitive resources.   | Approved | 10.25.12      |
| 32                   | 10.19.12  | Re-alignment of an access road and underground collection line corridor.  | Approved | 10.25.12      |
| 33                   | 10.20.12  | Re-alignment of an access road to minimize potential disturbance to environmentally sensitive resources.  | Approved | 10.24.12      |
| 34                   | 11.1.12   | Shifting turbine locations to accommodate a third party interest group, re-alignment of an access road to minimize potential disturbances, and removal of an approved equipment laydown area.                               | Pending  | n/a           |
| 35                   | 11.21.12  | Work space modifications at wind turbine pad sites.   | Pending  | n/a           |

## Photographs from Week



**Photo 1:** A large crane is utilized to assemble the rotor and blades to the nacelle at a wind turbine pad site. Ten turbines were erected this reporting period.



**Photo 2:** Turbine excavation activities are watered down to prevent fugitive dust in accordance with MM-Air 1.



**Photo 3:** Electrical work associated with connecting wind turbines to the underground collector cable network continued during this reporting period.

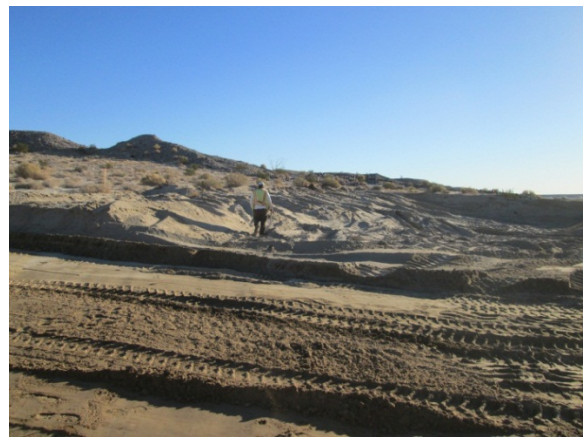


**Photo 4:** Topsoil staged onsite from initial ground disturbance is utilized to reclaim a wind turbine pad site in accordance with MM-Veg 2b.





**Photo 5:** A designated biologist monitors PBS activity in accordance with MM Wild-1a and 1b.



**Photo 6:** A designated biologist conducts FTHL surveys in accordance with MM Wild- 1a and 1g.



**Photo 7:** Highway S2 is swept and cleaned of track out in accordance with the SWPPP and MM Air-1



**Photo 8:** Old Mine Road is swept and cleaned of track out in accordance with the SWPPP and MM Air-1.

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