



## sBLM Authorized Officer Weekly Report

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**Project:** Ocotillo Wind Energy Facility Project

### **Weekly Project Update**

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**Reporting Period:** 10.29.12 through 11.04.12

### **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 10.29.12 through 11.04.12.

### **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 10.30.12. The dust flare-up was associated with turbine foundation excavation. In all instances the construction contractor was observed mobilizing additional water tenders for use during excavation activities.

A Notice of Violation (NOV) was issued to OE LLC on 10.31.12 from Imperial County Air Pollution Control District (APCD) and was reported to the lead ECM. At the time of issuance, the APCD cited the construction crew for 1) delivery trucks creating dust while traveling down access

roads to a turbine site, although a water truck was observed following the delivery trucks, 2) a trenching crew causing dust while relocating to another site, although driving at slow speeds, and 3) vehicles driving too fast, generating dust. Subsequent to the NOV, the lead construction officer required trenching crews to make sure the routes were watered before relocating equipment and reminded all personnel on site of the required speeds per MM-Air-1, Air-3, and Wild-1e.

*Storm Water Pollution Prevention Plan (SWPPP):* Track-out was observed along paved access roads. Track-out continues to be an issue/concern documented and communicated by the lead ECM to the right-of-way holder.

*Wildlife Mortality:* On Wednesday, October 31<sup>st</sup> a deceased Kit Fox (*Vulpes macrotis*) was found onsite within the manmade temporary water pond at the Laydown Yard. The temporary water pond is currently being used to supply water for construction and restoration activities. The temporary water pond will be in place through May 2013 when the Laydown Yard is anticipated to be reclaimed to pre-construction conditions. The mortality was documented by the lead biological monitor in the Wildlife Relocation and Mortality log and notification was provided to the California Department of Fish and Game (CDFG). In order to prevent the potential for a similar incident occurring, the United States Fish and Wildlife Service (USFWS) and CDFG in conjunction with the BLM identified measures that were provided to OE LLC. These measures include but are not limited to closing the gates to the temporary water pond at all times prior to 9:00 am and after 3:00 pm. Additionally, the gates are to be closed at all times between water truck visits on weekends, holidays, and any other day where activity in the laydown yard would be limited and/or when offices in the laydown yard are not at full staff. The lead environmental monitor and ECM's will be ensuring the measures recommended by CDFG, USFWS and BLM are implemented on a daily basis.

### **Construction Activities**

Construction activities conducted for this period consisted of mobilizing and erecting wind turbines, constructing wind turbine foundations, access road improvements, installation of underground collection lines, geotech borings, O&M Building improvements (and testing equipment at the 30-acre Substation/Switchyard. Ten turbines were erected during this reporting period totaling 57 turbines. To date approximately 98 wind turbine foundations have been excavated, and 93 wind turbine foundations concrete pours have been completed. All night work related to concrete foundation pours concluded this reporting period.

### **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. ECM's also observed archeological monitors and Native American Monitors onsite during initial and non-initial ground disturbing activities, monitoring in accordance with the project requirements (see photo 1).

During this reporting period, construction activities associated with grading of access roads continued. In accordance with MM-Wild 1b and 1g, ECM's observed the designated biologist relocating Flat-Tailed Horned Lizards (FTHL) during construction activities (see photo 2). MM-Wild 1g requires the relocation of FTHLs within approved work areas. FTHL relocation is conducted under the supervision of the Designated Biologist and by two or more Biological Monitors when construction activities are being conducted in occupied FTHL habitat.

The stabilized entrance at Dos Cabezas road and access to a turbine pad site was repaired in order to minimize track-out (see photos 3 and 4). Additionally, ECM's observed water wagons and water trucks 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 per MM-Air-1 (see photo 5).

Foundation work, excavations, and electrical installations continued at turbine sites this week. 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 completed routine inspections to ensure all wildlife pitfalls include wildlife escape ramps and/or have been covered per MM-Wild-1b (see photo 6). In addition, ECM's observed gates to the temporary water pond being shut during periods of minimal activity at the laydown yard (see photo 7).

Construction activities associated with installing the underground line along Highway S2 continued during this reporting period. Crews were observed trenching, placing cable in the excavated trench and backfilling. Turbine deliveries and staging also continued this reporting period (see photo 8). Environmental monitors completed routine inspections of these activities to ensure work was being completed within the approved work limits.

In accordance with Section 4.1 of the Raven Control Plan (MM-Wild-1j), all trash onsite must be kept in covered trash receptacles. ECM's and the lead biological monitors completed routine site observations to make sure trash receptacles were covered. Trash receptacles were observed being covered along the ROW. Covers consisted of tarps and plastic lids secured to the trash bins. "Keep Covered" signage has also been affixed to all trash receptacles to remind construction crews to securely cover trash receptacles at all times.

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.

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 10.5.12 through 11.11.12 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, duct, ceiling title, light, interior door, sidewalk, mezzanine, fabricating structure for tower, and pour generator pad
- Switchyard/Substation
  - Equipment testing
- Turbine Deliveries
  - Deliver the components for seven turbines.
- 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	<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

## Variance Requests

Variance Request No.	Submitted	Description	Status	Approval Date
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
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.	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

## Photographs from Week



**Photo 1:** ECMs observed crews conducting non- initial disturbance sub-grade disturbance along turbine collection line trenching areas.



**Photo 2:** The Designated Biologist for the project relocates a Flat- Tailed Horned Lizard (FTHL) during construction activities in accordance with MM-Wild 1b/1g.



**Photo 3:** Workers repair the stabilized entrance to Dos Cabezas Road.



**Photo 4:** ECMs observed repair of a rock apron at an access road to a turbine site. The rock apron was noted as needing repair the previous reporting period.





**Photo 5:** ECMs observed water trucks suppressing dust along turbine access roads in accordance with MM-Air-1.



**Photo 6:** An excavation area adjacent to a wind turbine base foundation has sloped edges in accordance with MM-Wild-1m. Sloped edges in excavation areas provide wildlife with an escape ramp to prevent entrapment.



**Photo 7:** Gates to the temporary water pond are closed during periods of minimal activity at the laydown yard.



**Photo 8:** ECM's observed turbine part deliveries and staging within the approved work limits.

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