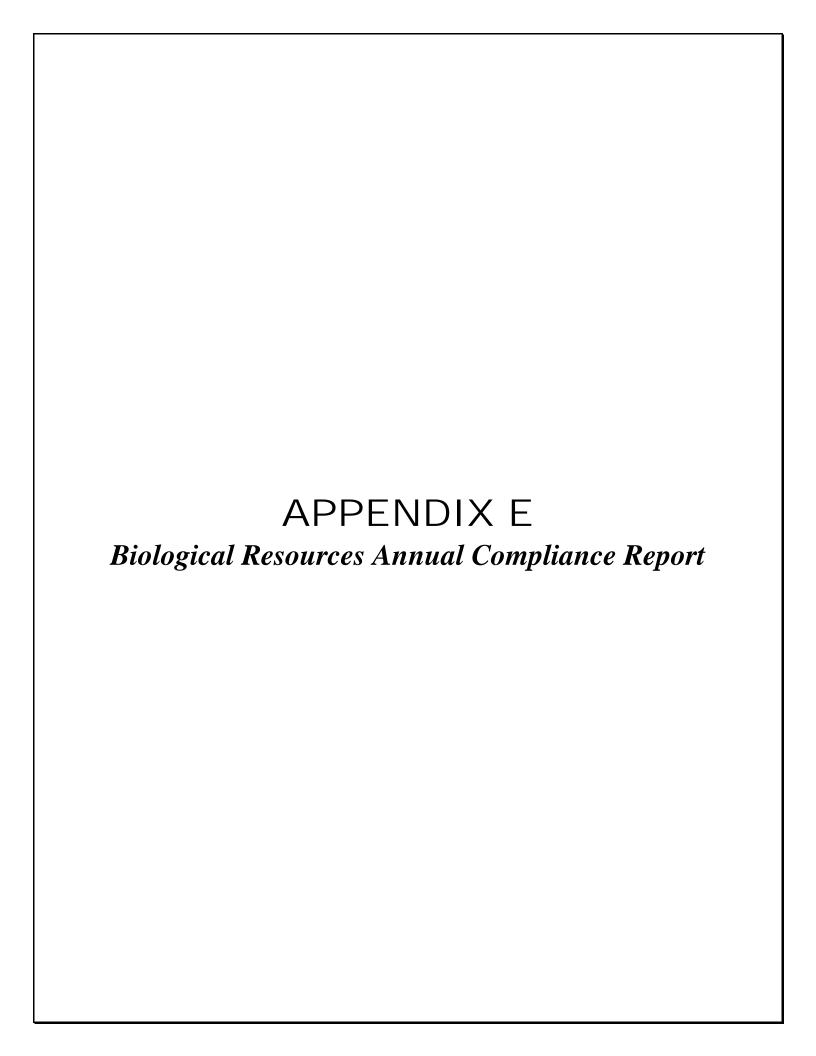
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BLYTHE SOLAR POWER PROJECT (BSPP) UNITS I & 2

Eastern Riverside County, California

RY 2019 BIOLOGICAL RESOURCES ANNUAL COMPLIANCE REPORT

Docket # 09-AFC-6C

Prepared for:

California Energy Commission Siting, Transmission and Environmental Protection (STEP) Division

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JANUARY 2020



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BSPP Biological Resources Annual Compliance Report for RY 2019

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- B Raven Nesting Bird Season Survey Data Sheets
- C Annual Weed Management Plan Report
- D Golden Eagle Annual Inventory Report

1 INTRODUCTION

1.1 Project Overview

Blythe Solar Energy Center, LLC completed construction of Units 1 and 2 of the Blythe Solar Power Project (BSPP or Project), a 485-megawatt photovoltaic (PV) solar power generation facility on over 2,000 acres of Bureau of Land Management (BLM) administered land in unincorporated Riverside County, California. The Project was initially approved by the BLM and California Energy Commission (CEC) as a 1,000-megawatt solar thermal energy generating facility before modifying the project to a PV solar facility. The completed BSPP PV facility was built within the planned footprint of the approved thermal energy facility. Construction of Blythe Units 1 & 2 included the solar arrays, support facilities, and shared linear facilities (shared with the neighboring McCoy Solar Energy Project). BSPP Units 1 & 2 entered into project operations on October 29, 2016.

1.2 Annual Reporting Requirements

The CEC Presiding Member's Proposed Decision for the modified project, which contained revised findings and the Conditions of Certification (COC), was approved by the Commission on January 15, 2014. Certain COCs require annual reporting and/or development of a mitigation plan, which may also contain operations reporting requirements.

The Bureau of Land Management (BLM), as the federal agency responsible for management of public lands on which the project is sited, approved the modified BSPP in a Record of Decision (ROD) for the project on August 1, 2014, and authorized the construction of the project in a Right-of-Way (ROW) Grant (serialized as CACA-048811) on August 12, 2014. Appendix 5, Adopted Biological Resource Mitigation Measures, of the BLM ROD, contains all ROW grant holder-proposed Design Features (DF) and Mitigation Measures for the project specific to biological resources. Design Features in the ROD incorporate CEC COCs, some of which require annual reporting.

The annual operations COC and ROD reporting requirements as they relate to biological resources are addressed in this Biological Resources Annual Compliance Report (ACR) for Reporting Year (RY) 2019.

1

2 BIOLOGICAL RESOURCES CONDITIONS OF CERTIFICATION

Compliance with the Environmental CEC Conditions of Certification (COC) and the BLM's Record of Decision specific to biological resources is categorized by COC title. Each of the COCs related to biological resources described below is presented for one, or both, of the following reasons: (1) the COC reporting requirement is specifically required to be addressed in the annual compliance report or (2) the COC is related to mitigation that was implemented during this reporting period.

2.1 BIO-2 and BIO-4: Designated Biologist and Biological Monitor Duties

During project operation, the Designated Biologist (DB) is required to submit record summaries in the ACR unless his or her duties cease, as approved by the Compliance Project Manager (CPM). The DB was on-call during this reporting period although no biological monitoring activities were required for Operations. The DB served as the lead biological contact for the project owner and the agencies. See the following sections for resource-specific compliance activities.

2.2 BIO-6, BIO-19, CUL-15, PAL-4: Worker Environmental Awareness Program (WEAP)

Personnel are required to undergo WEAP training prior to work at the BSPP. This is to ensure all project personnel are made aware of the environmental, natural, and cultural resources that exist or may exist at the BSPP, requirements for implementing work practices designed to protect those resources, and penalties associated with violating those requirements. All personnel receiving WEAP training are required to sign in at the beginning of training and receive hardhat stickers to verify that they have received training prior to work on the BSPP. WEAP attendees are also required to provide weed wash certificates for personal vehicles and are provided with a sticker to place on their vehicle as a reminder to look under the vehicle before moving. Training rosters are maintained at the project environmental office and will be kept on file for six months following termination of the individual's employment.

2.3 BIO-8: Impact Avoidance and Minimization Measures

The DB is required to report compliance with avoidance and minimization measures implemented during operation and maintenance in the ACR including a summary of revegetation activities for the year, a discussion of whether revegetation performance standards for the year were met, and recommendations for revegetation remedial action if warranted. The following provides a summary on how minimization measures were implemented at the BSPP for biological resources during this reporting period:

BSPP Biological Resources Annual Compliance Report for RY 2019

Avoid Use of Toxic Substances: Toxic soil binders were not used on the project site. An approved palliative was applied to the main project road for soil stabilization in order to reduce potential for fugitive dust.

Minimize Lighting Impacts: Facility lighting is being maintained to prevent impacts to wildlife habitat.

Avoid Vehicle Impacts to Desert Tortoise: Signage has been placed along the ROW to notify motorists of the speed limit restrictions. In addition, stickers have been placed on all project vehicles reminding personnel to look under their vehicle for desert tortoise before moving their vehicle.

Minimize Ponding Water: Panel washing application rates are limited to minimize ponding of water.

Dispose of Road-Killed Animals: Trained on-site personnel and/or operations staff perform regular inspections of the solar arrays and wildlife mortalities and injuries are addressed in accordance with the Raven Management Plan.

Minimize Spills of Hazardous Materials: Spill kits are being maintained to clean up any spills that might result during operations activities.

Worker Guidelines: The required WEAP training for all operations personnel and subcontractors includes information about worker guidelines and potential penalties associated with not adhering to these guidelines.

Erosion Control: The operations Designated Inspector is completing post-storm site inspections to identify any potential erosion control issues during operations.

Revegetation of Temporarily Disturbed Areas: The approved Revegetation Plan was implemented to restore all areas subject to temporary disturbance. The results of the implementation of this plan were detailed in the McCoy Solar Energy Project and Blythe Solar Power Project Habitat Restoration Installation Completion Report submitted under a separate cover on November 22, 2016. The third year of revegetation monitoring as described in the Habitat Restoration Plan occurred during this reporting period and quarterly site evaluations were performed.

During each quarterly evaluation period, the revegetation areas met expectations for habitat development for the current stage of the program. The Final Revegetation Report was submitted in June 2019.

DUDEK

2.4 BIO-9: Desert Tortoise Surveys and Fencing

The operations Designated Inspector conducted inspections of desert tortoise fence integrity throughout the reporting period as required by the COC BIO-9 and the approved Storm Water Damage Monitoring Response Plan. In general, the tortoise exclusion fencing was in good condition and no areas of concern were reported during this reporting period. There were no living, injured, or deceased Desert Tortoise observed during this reporting period.

2.5 BIO-13: Raven Management and Control Plan

As part of the ACR, the DB is required to provide a report that includes a summary of the results of raven management and control activities for the year, a discussion of whether raven control and management goals for the year were met, and recommendations for raven management activities for the upcoming year. The following provides a summary of the results of raven management and control activities for the third year of operation in 2019.

In accordance with section 5.1.1 of the Raven Management and Control Plan, monthly point count surveys of the Project Disturbance Area shall be conducted during the first three years of Project operations during spring (March–May) and fall (September–November). Point counts consisted of 10 minutes of observing and listening for ravens at each survey location. Survey start/stop time and weather (including temperature, average wind speed, and percent cloud cover) were collected. Point counts were not conducted during weather conditions that may have affected raven behavior, specifically when wind or rain could interfere with audible or visual detection or when the temperature was above 95°F. Table 1 provides a summary of raven point count surveys conducted during the reporting period (March–May 2019 and September–November 2019). Raven point count survey forms are included in this report as Appendix A.

In addition to point count surveys, the DB, Biological Monitor (BM), or designated on-site personnel is required to conduct biweekly surveys to identify raven nests and evidence of desert tortoise predation at raven nests. Bi-weekly surveys are to be conducted during the typical raven breeding season (mid-February to the end of June) for the first three years of Project operations. Table 2 provides a summary of raven breeding season nest surveys conducted during the reporting period. Raven nesting season survey forms are included in this report as Appendix B.

BSPP Biological Resources Annual Compliance Report for RY 2019

Table 1
Raven Point Count Observation Summary

Date	Location	Number of Ravens Observed	Description of Observations
	March 2	2019	
2019-03-15	Location 4 – Unit 1	1	One raven observed in flight.
2019-03-15	Location 5 – Unit 4	2	Two ravens observed in flight.
	April 2	019	
	There were no ravens observed for the mont	h of April 2019 during _l	point count surveys.
	May 2	019	
2019-05-22	Location 1 – Transmission Line South	2	Two ravens observed in flight.
		One raven observed perched and in flight.	
	September	er 2019	
T	here were no ravens observed for the month o	f September 2019 duri	ng point count surveys.
	October	2019	
2019-10-16	Location 4 – Unit 1	1	One raven observed perching and in flight.
	Novembe	er 2019	
Т	here were no ravens observed for the month o	f November 2019 durii	ng point count surveys.

Table 2
Breeding Season Nest Survey Summary

Date	Number of Rave Location Observed		Number of Ravens Observed	Descripti	on of Observation
			February 2	019	
	There were no ravens observed for the month of February during breeding season nest surveys.				
			March 20	19	
2019-	2019-03-14 Blythe Solar Site 2 Two ravens were observed on the ground. No nests or nesting behavior was observed.				
			April 201	9	
	There were no ravens observed for the month of April during breeding season nest surveys.				
May 2019					
2019-05-21	19-05-21 Unit 2		2	Two ravens were observed or nesting behavior was	red foraging and flying. No nests observed.
	June 2019				
	There were no	ravens of	bserved for the month of J	une during breeding seaso	n nest surveys.

Avian and Wildlife Carcass Removal

Trained on-site personnel and/or operations staff perform weekly inspections of the solar arrays and wildlife mortalities and injuries are addressed in accordance with the Raven Management Plan. In accordance with the Biological Opinion and the Special Purpose Utility Permit (SPUT), wildlife mortalities are reported on a monthly basis. All avian mortalities are collected, bagged, labeled, and kept in a designated on-site freezer. In certain occurrences of observed avian listed species mortalities, disposition requires further direction from the relevant agency. In these cases the carcass is covered under a protective cover, such as a weighted bucket, until instruction is received.

Summary

Impact avoidance measures are being implemented in accordance with the Raven Management and Control Plan. These include minimizing the ponding of water during operation activities such as washing panels, ensuring each operations employee and visiting workers receive WEAP training, and removing wildlife carcasses to reduce the site's attractiveness to ravens. As indicated by the limited raven use of the project site during point count surveys, no additional measures are recommended during the 2020 operations year. **As of the end of 2019, the third year of**

BSPP Biological Resources Annual Compliance Report for RY 2019

monitoring during the operations phase of the project has been completed and no additional Raven monitoring is required in accordance with the Raven Management and Control Plan.

2.6 BIO-14: Weed Management Plan

The DB is required to provide a report in the ACR that includes a summary of the results of noxious weeds surveys and management activities for the year, a discussion of whether weed management goals for the year were met, and recommendations for weed management activities for the upcoming year. The Annual Weed Management Report for RY 2019 is included in this report as Appendix C.

All vehicles and off-road construction equipment are required to be free of invasive debris prior to arriving on the ROW. Weed wash certificates are on file at the BSPP project site.

WEAP training was administered to all new personnel on the project site and included information regarding preventative measures for the spread of invasive weeds.

2.7 BIO-17: American Badger and Desert Kit Fox Impact Avoidance and Minimization Measures

At the conclusion of construction activities on the Project site, multiple kit foxes remained onsite. In accordance with the Desert Kit Fox and American Badger Mitigation Monitoring Plan (DKFABMMP), passive relocation will not occur during operations and maintenance unless (1) injuries or fatalities occur as a result of the Project, (2) there is the possibility of injuries or fatalities, or (3) the fox is problematic for Project operation. No kit fox injuries or fatalities were recorded during this reporting period and no concerns about kit fox safety or operations activities were reported.

2.8 BIO-18: Burrowing Owl Impact Avoidance, Minimization, and Compensation Measures

COC BIO-18 requires that the DB provide a report in the ACR for the first five years following the start of operations that describes the results of monitoring and management of the burrowing owl burrow creation or enhancement areas identified prior to excluding burrowing owls from active burrows. No burrowing owls were relocated or excluded from burrows and no artificial burrows were constructed during project construction. As a result, no post-relocation monitoring is required. In addition, no observations of burrowing owls were made within the project site during this reporting period.

2.9 BIO-19: Special-Status Plant Impact Avoidance, Minimization, and Compensation

COC BIO-19 requires the completion of an annual report to monitor effectiveness of protection measures for all avoided special-status plants including the implementation of required enhancement/restoration activities. The CPM determined that COC BIO-19 does not require any action during operations for BSPP Units 1 and 2 until further construction is required (see Section 5).

2.10 BIO-22: Change of Conditions Notification

In order to minimize and mitigate impacts to jurisdictional waters, the project owner is required to, "notify the CPM and CDFW of any change of conditions to the project, impacts to state waters, or the mitigation efforts. The notifying report shall be provided to the CPM and CDFW no later than seven days after the change of conditions is identified. A copy of the notifying change of conditions report shall be included in the annual reports or until it is deemed unnecessary by the CPM and CDFW." There have been no changes to the conditions or impacts to jurisdictional waters by the project during this reporting period and no change of conditions notification reports to include in this ACR.

2.11 BIO-24: Golden Eagle Annual Inventory

The Golden Eagle Annual Inventory is required for the first two years after commercial operation begins. The purpose of the inventory is to determine Golden eagle territory occurrences within 1 mile of the project area. The second and final Golden Eagle Annual Inventory during the operations phase of the project was completed in 2018. The 2018 Golden Eagle Inventory Report was included in the previous ACR.

2.12 BIO-25 & 26: Evaporation Pond Monitoring and Couch's Spadefoot Toad Protection and Mitigation Plan Implementation

The DB is required to conduct site visits to the evaporation ponds during each year they are in operation. No Couch's spadefoot toads (CSTs) were identified onsite during project construction. No compensatory mitigation is required, and no evaporation ponds were built during construction of Units 1 and 2. The CPM determined that COCs BIO-25 and BIO-26 do not require any action during operations for BSPP Units 1 and 2 until further construction or evaporation ponds are built (see Section 4).

3 PROJECT INCIDENTS AND CORRECTIVE ACTIONS

No non-compliance incidents or corrective actions were issued or identified during this reporting period.

4 POST-CERTIFICATION CHANGES

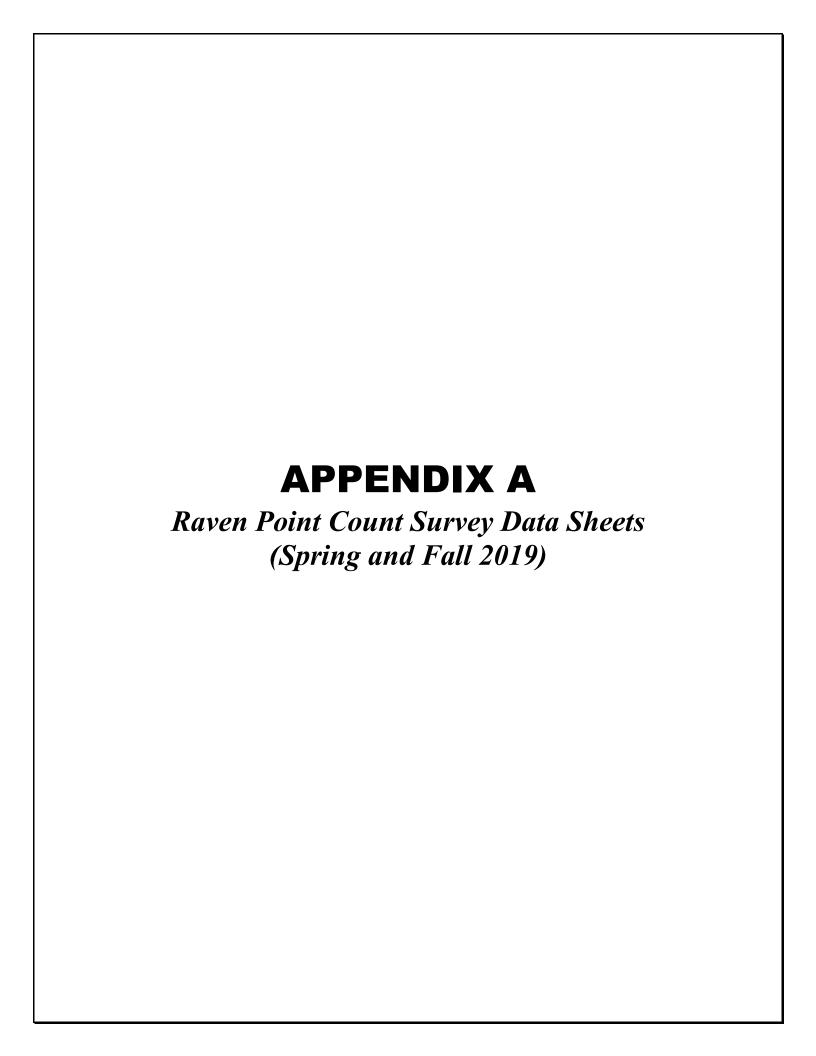
A list of CPM-approved Post-certification Changes to the operations of the BSPP is included here:

- The CPM determined that COCs BIO-19, BIO-25, and BIO-26 do not require any action during operations for Units 1 and 2 until further construction or evaporation ponds are built.
- The CPM confirmed on 8-7-2017 that an SPCC Plan is not required at BSPP and that the Oil Spill Plan submitted by BSPP is equivalent to the SPCC Plan and acceptable for the purpose of meeting HAZ-2 SPCC requirements.
- The CPM confirmed on 1-3-2017 that the Provisional Closure Plan required by COC COM-15 can be submitted one year after the start of commercial operation and that the sixty-day reference in the COC verification should be disregarded. This Plan will be prepared and submitted within one year after the final constructed unit (anticipated to be Blythe IV) begins commercial operation (commercial operation anticipated to be in late 2020) and will incorporate all 4 Units of BSPP.

BSPP Biological Resources Annual Compliance Report for RY 2019

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Record: 1262	
Monitor Name	Ben Delancey
Date	2019-04-11
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	15:46:00
End Time	15:56:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No ravens observed.
Temperature (F)	81
Cloud Cover	90%
Wind Speed	3
autoemail	ben.delancey@gmail.com

Photo Description Facing north from point 1.

Record: 1259	
Monitor Name	Ben Delancey
Date	2019-04-11
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	14:56:00
End Time	15:07:00
Duration	0.1833333333333
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No Ravens observed.
Temperature (F)	83
Cloud Cover	80%
Wind Speed	7
autoemail	ben.delancey@gmail.com

Photos

Photo



Photo Description

Facing Southwest from the point coipunt location.

Record: 1256	
Monitor Name	Ben Delancey
Date	2019-04-11
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	14:16:00
End Time	14:28:00
Duration	0.2
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No ravens observed.
Temperature (F)	83
Cloud Cover	60%
Wind Speed	4
autoemail	ben.delancey@gmail.com

Photos

Photo



Photo Description

Location 3 facing East.

Record: 1253	
Monitor Name	Ben Delancey
Date	2019-04-11
Type of Observation	Monthly Point Count Survey
Survey Location	Location 4 – Unit 1
Start Time	13:20:00
Duration	-0.3666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	79
Cloud Cover	90%
Wind Speed	5
autoemail	ben.delancey@gmail.com

Photo

Photo Description

Blythe Unit 4 point count location facing East.

Record: 1250	
Monitor Name	Ben Delancey
Date	2019-04-11
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	12:47:00
End Time	12:58:00
Duration	0.183333333333
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No ravens observed.
Temperature (F)	82
Cloud Cover	100%
Wind Speed	5
autoemail	ben.delancey@gmail.com

Photo Photo Blythe point 5 raven location.



Record: 128	
Monitor Name	Amy Anderson
Date	2019-03-15
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	07:07:00
End Time	07:17:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	49
Cloud Cover	0%
Wind Speed	3
autoemail	Amyanderson2008@hotmail.com



Record: 131	
Monitor Name	Amy Anderson
Date	2019-03-15
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	07:40:00
End Time	07:50:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	49
Cloud Cover	0%
Wind Speed	4
autoemail	Amyanderson2008@hotmail.com



Record: 134	
Monitor Name	Amy Anderson
Date	2019-03-15
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	08:27:00
End Time	08:37:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	56
Cloud Cover	0%
Wind Speed	5
autoemail	Amyanderson2008@hotmail.com

Record: 137	
Monitor Name	Amy Anderson
Date	2019-03-15
Type of Observation	Monthly Point Count Survey
Survey Location	Location 4 – Unit 1
Start Time	08:53:00
End Time	09:03:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	1
Behavior	Flying
Distance & Direction from Survey Location	10m west
Proximity to Project	0
Temperature (F)	57
Cloud Cover	0%
Wind Speed	5
autoemail	Amyanderson2008@hotmail.com

Record: 140	
Monitor Name	Amy Anderson
Date	2019-03-15
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	11:23:00
End Time	11:33:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	2
Behavior	Flying
Distance & Direction from Survey Location	175m east headed east
Proximity to Project	West of east fence
Temperature (F)	70
Cloud Cover	10%
Wind Speed	6
autoemail	Amyanderson2008@hotmail.com

Record: 152	
Monitor Name	Amy Anderson
Date	2019-05-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	10:37:00
End Time	10:47:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	2
Behavior	Flying
Distance & Direction from Survey Location	300
Proximity to Project	Near freeway southeast of location
Temperature (F)	69
Cloud Cover	60%
Wind Speed	6
autoemail	Amyanderson2008@hotmail.com

Record: 155	
Monitor Name	Amy Anderson
Date	2019-05-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	05:45:00
End Time	05:55:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	62
Cloud Cover	20%
Wind Speed	3
autoemail	Amyanderson2008@hotmail.com



Amy Anderson
2019-05-22
Monthly Point Count Survey
Location 4 – Unit 1
11:19:00
11:29:00
0.16666666666667
0
Flew west and perched in array
69
70%
6
Amyanderson2008@hotmail.com



Record: 161	
Monitor Name	Amy Anderson
Date	2019-05-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	11:50:00
End Time	12:00:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	1
Behavior	Perched, Flying
Distance & Direction from Survey Location	100
Proximity to Project	Over/in Unit 2
Notes	Flew overhead and headed west, perching approximately 300m west of location on panels
Temperature (F)	70
Cloud Cover	70%
Wind Speed	5
autoemail	Amyanderson2008@hotmail.com

Record: 164	
Monitor Name	Amy Anderson
Date	2019-05-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	13:19:00
End Time	13:29:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	72
Cloud Cover	60%
Wind Speed	6
autoemail	Amyanderson2008@hotmail.com

Record: 170	
Monitor Name	Kim Parsons
Date	2019-09-03
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	08:40:00
End Time	08:50:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No ravens observed at survey location 1
	Start and end temperature: 93F
Temperature (F)	93
Cloud Cover	10%
Wind Speed	1
autoemail	kimprsns@gmail.com

Record: 173	
Monitor Name	Kim Parsons
Date	2019-09-03
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	08:55:00
End Time	09:05:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Behavior	
Notes	No ravens observed at survey location 2.
	Start temperature: 93 End temperature: 94
Temperature (F)	93
Cloud Cover	10%
Wind Speed	1
autoemail	kimprsns@gmail.com

Record: 176	
Record. 170	
Monitor Name	Kim Parsons
Date	2019-09-03
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	09:22:00
End Time	09:32:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	No ravens observed at survey site 3.
	Start temperature: 94 End temperature: 95 Survey site 3 was the last raven point count location visited today due to temperature limitations.
Temperature (F)	94
Cloud Cover	10%
Wind Speed	2
autoemail	kimprsns@gmail.com

Record: 194	
Monitor Name	Amy Hammond
Date	2019-09-13
Type of Observation	Monthly Point Count Survey
Survey Location	Location 4 – Unit 1
Start Time	08:10:00
End Time	08:20:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	78
Cloud Cover	10%
Wind Speed	0
autoemail	tapaculo99@hotmail.com

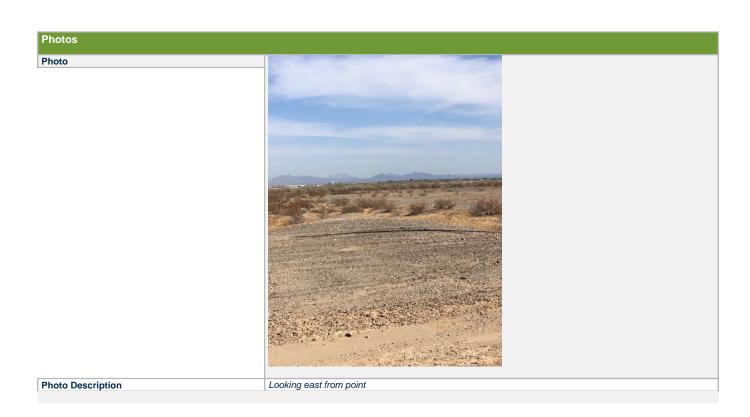
Record: 197	
Monitor Name	Amy Hammond
Date	2019-09-13
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	09:15:00
End Time	09:25:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	80
Cloud Cover	10%
Wind Speed	0
autoemail	tapaculo99@hotmail.com

Record: 224	
Monitor Name	Amy Hammond
Date	2019-10-16
Type of Observation	Monthly Point Count Survey
Survey Location	Location 4 – Unit 1
Start Time	08:35:00
End Time	08:45:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	1
Behavior	Perched, Flying, On the ground
Distance & Direction from Survey Location	350 feet N/NE of survey point
Proximity to Project	CORA is in arrays of Unit 1
Notes	Flew in low, perched on top of solar panel, then went to ground within the arrays.
Temperature (F)	72
Cloud Cover	10%
Wind Speed	0
autoemail	tapaculo99@hotmail.com

Record: 226	
Monitor Name	Amy Hammond
Date	2019-10-16
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	12:05:00
End Time	12:15:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	88
Cloud Cover	10%
Wind Speed	5
autoemail	tapaculo99@hotmail.com

Photo Photo Photo Photo Description View west from raven point

Record: 229	
Monitor Name	Amy Hammond
Date	2019-10-16
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	14:20:00
End Time	14:30:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	Hazy
Temperature (F)	94
Cloud Cover	50%
Wind Speed	10
autoemail	tapaculo99@hotmail.com



B 1 000	
Record: 232	
Monitor Name	Amy Hammond
Date	2019-10-16
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	14:55:00
End Time	15:05:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	Hazy
	Red-tailed Hawk on transmission pole
Temperature (F)	95
Cloud Cover	50%
Wind Speed	5
autoemail	tapaculo99@hotmail.com

Photo Photo Photo Looking northwest from point

Photo Description

Record: 235	
Monitor Name	Amy Hammond
Date	2019-10-16
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	15:35:00
End Time	15:45:00
Duration	0.16666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Notes	Hazy
	Fresh DKF prints around materials staged next to point.
Temperature (F)	95
Cloud Cover	60%
Wind Speed	0
autoemail	tapaculo99@hotmail.com

Photo

Looking southeast from point



FIELD DATA REPORT

Photos

Photo



Photo Description

DKF tracks around staged materials

Record: 257	
Monitor Name	Abby Bergsma
Date	2019-11-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 3 – Well Pad Site
Start Time	06:44:00
End Time	06:54:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	48
Cloud Cover	10%
Wind Speed	2
autoemail	abby.bergsma@gmail.com

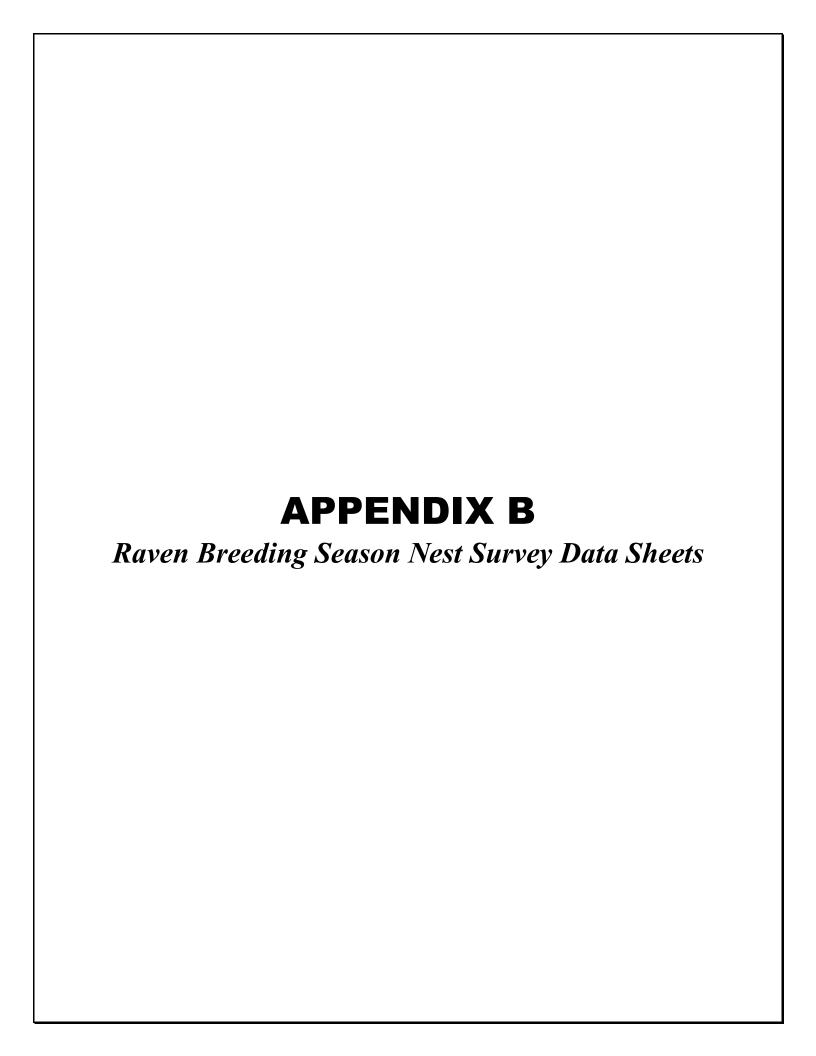
Record: 260	
Monitor Name	Abby Bergsma
Date	2019-11-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 4 – Unit 1
Start Time	07:20:00
End Time	07:30:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	48
Cloud Cover	10%
Wind Speed	2
autoemail	abby.bergsma @gmail.com

Record: 263	
Monitor Name	Abby Bergsma
Date	2019-11-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 5 – Unit 4
Start Time	09:36:00
End Time	09:46:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	61
Cloud Cover	10%
Wind Speed	5
autoemail	abby.bergsma@gmail.com



Record: 266	
Monitor Name	Abby Bergsma
Date	2019-11-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 2 – Transmission Line North
Start Time	10:20:00
End Time	10:30:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	61
Cloud Cover	10%
Wind Speed	4
autoemail	abby.bergsma@gmail.com

Record: 269	
Monitor Name	Abby Bergsma
Date	2019-11-22
Type of Observation	Monthly Point Count Survey
Survey Location	Location 1 – Transmission Line South
Start Time	10:55:00
End Time	11:05:00
Duration	0.1666666666667
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	0
Temperature (F)	63
Cloud Cover	20%
Wind Speed	6
autoemail	abby.bergsma@gmail.com



Blythe Solar - Raven Observation

Record: 1265	
Monitor Name	Ben Delancey
Date	2019-04-20
Type of Observation	Breeding Season Nest Survey
Duration	0
General Raven Observation Location	
Raven Nest Location	
Behavior	
Notes	Blythe substation, transmission line North of the Hwy 10, and the distribution line were surveyed for Raven
	nests and signs of Raven nesting activity. No raven nests or signs of raven nesting activity were observed.
Temperature (F)	88
Cloud Cover	0%
Wind Speed	2
autoemail	ben.delancey@gmail.com

Photos

Photo



Photo Description

Blythe Substation.

ID	Monitor Name	Date	Type of Observation	Survey Location
	Abby Bergsma		General Raven Observation	Ourvey Location
			General Raven Observation	
	Abby Bergsma		General Raven Observation	
	Abby Bergsma		General Raven Observation	
	Abby Bergsma			
	Abby Bergsma		General Raven Observation	
	Amy Anderson		General Raven Observation	
	Amy Anderson		General Raven Observation	
	Amy Anderson		General Raven Observation	
	Amy Anderson		General Raven Observation	
	Abby Bergsma		Monthly Point Count Survey	Location 1 – Transmission Line South
	Abby Bergsma		Monthly Point Count Survey	Location 2 – Transmission Line North
	Abby Bergsma		Monthly Point Count Survey	Location 5 – Unit 4
	Abby Bergsma		Monthly Point Count Survey	Location 4 – Unit 1
	Abby Bergsma		Monthly Point Count Survey	Location 3 – Well Pad Site
			General Raven Observation	
			General Raven Observation	
			General Raven Observation	
			General Raven Observation	
241	Amy Anderson	2019-10-18	General Raven Observation	
238	Amy Anderson	2019-10-17	General Raven Observation	
235	Amy Hammond	2019-10-16	Monthly Point Count Survey	Location 3 – Well Pad Site
232	Amy Hammond	2019-10-16	Monthly Point Count Survey	Location 2 – Transmission Line North
229	Amy Hammond	2019-10-16	Monthly Point Count Survey	Location 1 – Transmission Line South
			Monthly Point Count Survey	Location 5 – Unit 4
			Monthly Point Count Survey	Location 4 – Unit 1
	Abby Bergsma		General Raven Observation	
			General Raven Observation	
	Amy Anderson		General Raven Observation	
	Ben Delancey		General Raven Observation	
	•		General Raven Observation	
	•		General Raven Observation	
	, ,		General Raven Observation	
	•		General Raven Observation	
			Monthly Point Count Survey	Location 5 – Unit 4
			Monthly Point Count Survey	Location 4 – Unit 1
			General Raven Observation	255GGOTT OTHER
			General Raven Observation	
	Amy Anderson		General Raven Observation	
	Amy Anderson		General Raven Observation	
179	•		General Raven Observation	
	Kim Parsons		Monthly Point Count Survey	Location 3 – Well Pad Site
	Kim Parsons		Monthly Point Count Survey	Location 2 – Transmission Line North
	Kim Parsons		Monthly Point Count Survey	Location 1 – Transmission Line South
			General Raven Observation	Location 1 - Hansilission Line South
	Amy Anderson Amy Anderson			Location 5 – Unit 4
			Monthly Point Count Survey	
	Amy Anderson		Monthly Point Count Survey	Location 3 – Well Pad Site
	Amy Anderson		Monthly Point Count Survey	Location 4 – Unit 1
	Amy Anderson		Monthly Point Count Survey	Location 2 – Transmission Line North
	Amy Anderson		Monthly Point Count Survey	Location 1 – Transmission Line South
	Amy Anderson		Breeding Season Nest Survey	
146	Ben Delancey	2019-05-09	Breeding Season Nest Survey	

143	Abby Bergsma	2019-03-29	Breeding Season Nest Survey	
140	Amy Anderson	2019-03-15	Monthly Point Count Survey	Location 5 – Unit 4
137	Amy Anderson	2019-03-15	Monthly Point Count Survey	Location 4 – Unit 1
134	Amy Anderson	2019-03-15	Monthly Point Count Survey	Location 3 – Well Pad Site
131	Amy Anderson	2019-03-15	Monthly Point Count Survey	Location 2 – Transmission Line North
128	Amy Anderson	2019-03-15	Monthly Point Count Survey	Location 1 – Transmission Line South
125	Amy Anderson	2019-03-14	Breeding Season Nest Survey	
122	Amy Anderson	2019-02-20	Breeding Season Nest Survey	

	D. L	D: 1 0	Decided that a Decident
Number of		Distance &	Proximity to Project
	Flying, On		0
	Flying, On		0
2	Flying, On		0
2	Flying		0
	Flying, On		0
	Flying		Unit 3
	Flying		Unit 3
	Other		Laydown yard 1
	Flying, On		Unit 3
0			
0			
0			
0			
0			
4	Flying		Over Unit 3
1	Flying		Over Laydown Yard 1
2	Flying		Unit 3 south end
2	Flying		Over laydown yard 1
2	Perched, F		Unit 3
2	Flying		Over Unit 2
0	, ,		
0			
0			
0			
_	Perched. F	350 feet nn	CORA is in arrays of unit 1
	Flying, On		0
	Perched		0
	Flying, On		Unit 3
	Flying		Northern Unit 3.
	Flying		Unit 3
	Flying, On		Unit 3
	Flying		Unt 3
	On the grou		Far East Unit 3
0	on the giot		, a. Last Offico
0			
	On the grou		Unit3
	Flying, On		Unit 3
	On the grou		Unit3
	On the grou		Unit 3
	On the grou		Unit 3 south end
0	on the grot		OTHE O SOURT GITU
0			
0			
	Flying		Over Unit 4 West
0	i iyirig		Over Office avest
	Dorobod C	100	Over/in Unit 2
1	Perched, F	100	Over/in Unit 2
0			
0	Chrine	200	Near frequency courts and of langting
	Flying On	300	Near freeway southeast of location
2	Flying, On		Unit 2

0			
2	Flying	175m east	West of east fence
1	Flying	10m west	0
0			
0			
0			
2	On the grou		Along main, center access rd

Notes
Pair of CORA observed scavenging following mowing operations
Pair of CORA scavenging following mowing operations in Unit 4b.
Pair of CORA scavenging following mowing operations in Unit 4a
Pair of CORA observed scavenging following mowing activities.
Single CORA observed scavenging behind mowing activities in Unit 4a.
Drinking from storm related standing water
Following water truck
1 chewing water track
HazyEresh DKF prints around materials staged next to point.
HazyRed-tailed Hawk on transmission pole
Hazy
,
Flew in low, perched on top of solar panel, then went to ground within the arrays.
Five CORA were observed loitering during blading and compaction activities near Laydown Yard #1. No wildlife mo
Two ravens were observed in Laydown Yard 1 ripping up a food wrapper and carrying off a food bag from the back
7 11 3 1 11 7 3
4 Ravens observed fling East in Northern Unit 3.
That sine cases you mingact in resultant comes.
Pair of ravens observed flying around road grading activities.
Two Ravens observed on the ground near road grading operations. No foraging observed.
Two Naveris observed on the ground hear road grading operations. No loraging observed.
Foraging near cleared area
Following equipment foraging/scavenging
Following equipment
Following equipment
Pair foraging/scavenging behind mowers
No ravens observed at survey site 3. Start temperature: 94End temperature: 95 Survey site 3 was the last raven po
No ravens observed at survey location 2. Start temperature: 93End temperature: 94
No ravens observed at survey location 1Start and end temperature: 93F
Appeared to be pair with fledgling chicks
Flew overhead and headed west, perching approximately 300m west of location on panels
Flew west and perched in array
All suitable habitat in Units 1 and 2, the Transmission line (Phases 1&2), and the Distribution line were surveyed fo
Surveyed Blythe substation, distribution line, and transmission line North of Hwy 10. No nests were observed.
Carroyca Diyaro Substation, alcandation line, and transmission line front of rawy 10. No flests were observed.

All suitable nesting habitat/structures within the array (Units 1&2) and along the distribution and Transmission lines	All suitable nesting habitat/structures within the array (Units 1 & 2) and along the distribution and Transmission line
J ()	
J. , J	
J , J	
J ()	
J ()	
	All suitable nesting habitat/structures within the array (Units 1&2) and along the distribution and Transmission lines
All suitable nesting habitat within the array (Units 1&2) and along the distribution and Transmission lines (Phases 1 $\!$	All suitable nesting habitat within the array (Units 1&2) and along the distribution and Transmission lines (Phases 1

Photos	Temperatu	Cloud Cove	Wind Spee	autoemail
		10%		abby.bergsma@gmail.com
	62	0%		abby.bergsma@gmail.com
		10%		Amyanderson2008@hotmail.com
		10%		Amyanderson2008@hotmail.com
https://dude		40%		Amyanderson2008@hotmail.com
		40%		Amyanderson2008@hotmail.com
		20%		abby.bergsma@gmail.com
		10%		abby.bergsma@gmail.com
		70%		Amyanderson2008@hotmail.com
		40%		Amyanderson2008@hotmail.com
		40%		Amyanderson2008@hotmail.com
		20%		Amyanderson2008@hotmail.com
https://dude		0%		Amyanderson2008@hotmail.com
nttps://dude		0%		Amyanderson2008@hotmail.com
https://dude		60%		tapaculo99@hotmail.com
https://dude		50%		tapaculo99@hotmail.com
https://dude		50%		tapaculo99@hotmail.com
https://dude		10%		tapaculo99@hotmail.com
ntips.//dude		10%		tapaculo99@hotmail.com
		0%		
https://dude		0%		abby.bergsma@gmail.com
nups.//dude		30%		ursus_delirus@yahoo.com Amyanderson2008@hotmail.com
		30%		
		30%		ben.delancey@gmail.com
		40%		Amyanderson2008@hotmail.com
				Amyanderson2008@hotmail.com
		80%		ben.delancey@gmail.com
		0%		ben.delancey@gmail.com
		10%		tapaculo99@hotmail.com
		10%		tapaculo99@hotmail.com
		10%		Amyanderson2008@hotmail.com
		10%		Amyanderson2008@hotmail.com
		10%		Amyanderson2008@hotmail.com
		30%		Amyanderson2008@hotmail.com
		40%		Amyanderson2008@hotmail.com
		10%		kimprsns@gmail.com
		10%		kimprsns@gmail.com
		10%		kimprsns@gmail.com
		0%		Amyanderson2008@hotmail.com
		60%		Amyanderson2008@hotmail.com
		70%		Amyanderson2008@hotmail.com
		70%		Amyanderson2008@hotmail.com
		20%		Amyanderson2008@hotmail.com
		60%		Amyanderson2008@hotmail.com
https://dude		10%		Amyanderson2008@hotmail.com
https://dude	82	40%	3	ben.delancey@gmail.com

	75	0%	12	abby.bergsma@gmail.com
	70	10%	6	Amyanderson2008@hotmail.com
	57	0%	5	Amyanderson2008@hotmail.com
	56	0%	5	Amyanderson2008@hotmail.com
	49	0%	4	Amyanderson2008@hotmail.com
	49	0%	3	Amyanderson2008@hotmail.com
https://dude	68	0%	4	Amyanderson2008@hotmail.com
https://dude	54	10%	3	Amyanderson2008@hotmail.com

Record: 146	
Monitor Name	Ben Delancey
Date	2019-05-09
Type of Observation	Breeding Season Nest Survey
Duration	7.5
General Raven Observation Location	
Raven Nest Location	
Behavior	
Notes	Surveyed Blythe substation, distribution line, and transmission line North of Hwy 10. No nests were
	observed.
Temperature (F)	82
Cloud Cover	40%
Wind Speed	3
autoemail	ben.delancey@gmail.com

Photos

Photo



Photo Description

Blythe Substation. No ravens or signs of nesting were observed.

Record: 149	
Monitor Name	Amy Anderson
Date	2019-05-21
Type of Observation	Breeding Season Nest Survey
Duration	0
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	2
Behavior	Flying, On the ground
Proximity to Project	Unit 2
Notes	All suitable habitat in Units 1 and 2, the Transmission line (Phases 1&2), and the Distribution line were surveyed for CORA nests/nesting activity. No nests or nesting activity was observed. A pair of CORA were observed foraging and flying in Unit 2. Winds were extremely high this afternoon. No suitable habitat exists on Units 3 or 4.
Temperature (F)	76
Cloud Cover	10%
Wind Speed	6
autoemail	Amyanderson2008@hotmail.com





FIELD DATA REPORT

Photos

Photo



Photo Description

Phase 2 Transmission line

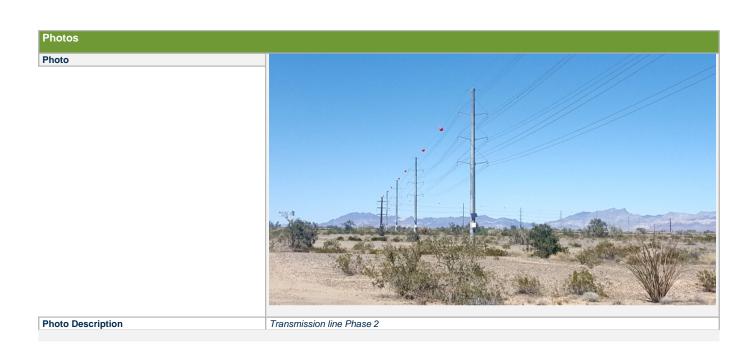
Record: 122	
Monitor Name	Amy Anderson
Date	2019-02-20
Type of Observation	Breeding Season Nest Survey
Duration	2.5
General Raven Observation Location	
Raven Nest Location	
Notes	All suitable nesting habitat within the array (Units 1&2) and along the distribution and Transmission lines (Phases 1&2) were surveyed for CORA nests/nesting activity by DB. No nests/nesting activity observed. Bi-weekly surveys will continue throughout nesting season moving forward. Little to no suitable nesting habitat occurs within fenced Units 3&4. Species Account: CORA House finch Horned lark Black throated sparrow Loggerhead shrike Says phoebe
Temperature (F)	54
Cloud Cover	10%
Wind Speed	3
autoemail	Amyanderson2008@hotmail.com



Record: 125	
1123	
Monitor Name	Amy Anderson
Date	2019-03-14
Type of Observation	Breeding Season Nest Survey
Duration	4
General Raven Observation Location	
Raven Nest Location	
Number of Ravens Observed	2
Behavior	On the ground
Proximity to Project	Along main, center access rd
Notes	All suitable nesting habitat/structures within the array (Units 1&2) and along the distribution and
	Transmission lines (Phases 1&2) were surveyed for CORA nests/nesting activity by DB. No nests/nesting activity observed. Bi-weekly surveys will continue throughout nesting season moving forward. Little to no suitable nesting habitat occurs within fenced Units 3&4. Species Account: Prairie falcon Turkey vulture CORA House finch Horned lark Loggerhead shrike Black tailed hare
Temperature (F)	68
Cloud Cover	0%
Wind Speed	4
autoemail	Amyanderson2008@hotmail.com

Photo Photo Description Substation Unit 1





Monitor Name	Abby Bergsma		
Date	2019-03-29		
Type of Observation	Breeding Season Nest Survey		
Duration	0		
General Raven Observation Location			
Raven Nest Location			
Number of Ravens Observed	0		
Notes	All suitable nesting habitat/structures within the array (Units 1 & 2) and along the distribution and Transmission lines (north of I-10) were surveyed for CORA nests/nesting activity. No nests/nesting activity observed. Bi-weekly surveys will continue throughout nesting season moving forward. Little to no suitable nesting habitat occurs within fenced Units 3 & 4.		
Temperature (F)	75		
Cloud Cover	0%		
Wind Speed	12		
autoemail	abby, bergsma @gmail.com		

Record: 146			
Monitor Name	Ben Delancey		
Date	2019-05-09		
Type of Observation	Breeding Season Nest Survey		
Duration	7.5		
General Raven Observation Location			
Raven Nest Location			
Behavior			
Notes	Surveyed Blythe substation, distribution line, and transmission line North of Hwy 10. No nests were		
	observed.		
Temperature (F)	82		
Cloud Cover	40%		
Wind Speed	3		
autoemail	ben.delancey@gmail.com		

Photos

Photo



Photo Description

Blythe Substation. No ravens or signs of nesting were observed.

Record: 149			
Monitor Name	Amy Anderson		
Date	2019-05-21		
Type of Observation	Breeding Season Nest Survey		
Duration	0		
General Raven Observation Location			
Raven Nest Location			
Number of Ravens Observed	2		
Behavior	Flying, On the ground		
Proximity to Project	Unit 2		
Notes	All suitable habitat in Units 1 and 2, the Transmission line (Phases 1&2), and the Distribution line were surveyed for CORA nests/nesting activity. No nests or nesting activity was observed. A pair of CORA were observed foraging and flying in Unit 2. Winds were extremely high this afternoon. No suitable habitat exists on Units 3 or 4.		
Temperature (F)	76		
Cloud Cover	10%		
Wind Speed	6		
autoemail	Amyanderson2008@hotmail.com		





FIELD DATA REPORT

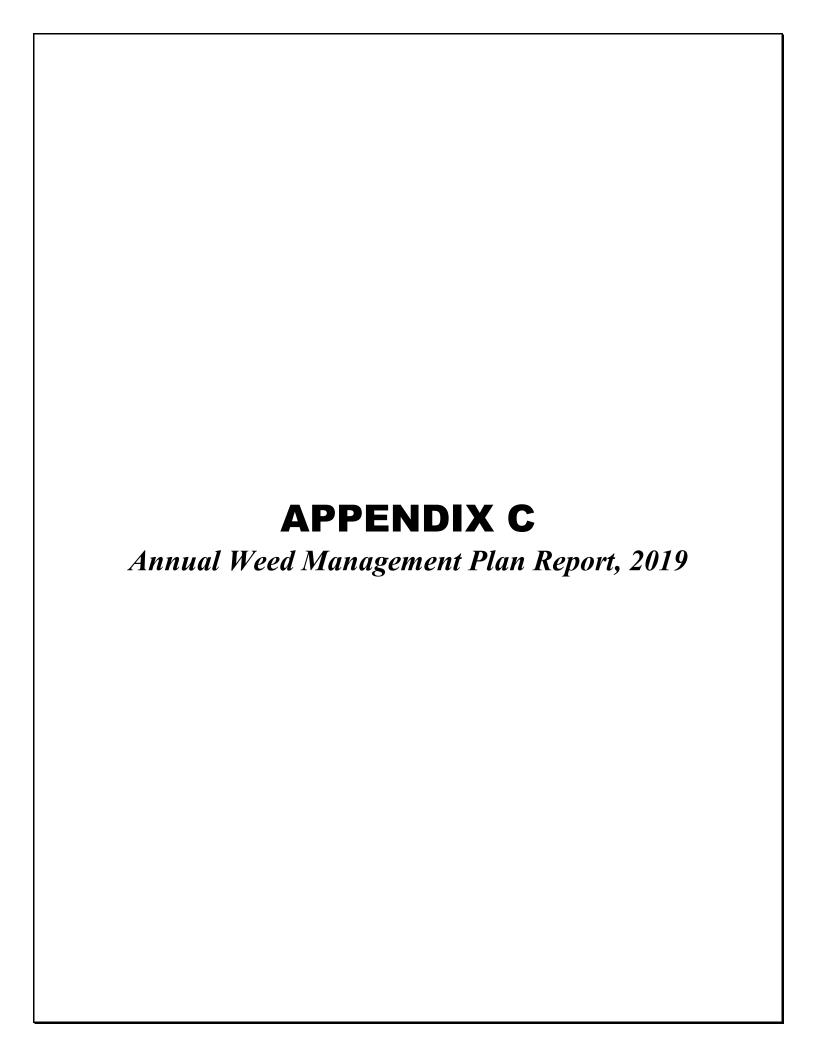
Photos

Photo



Photo Description

Phase 2 Transmission line



MEMORANDUM

To: Gil Makabenta, NextEra Energy

From: Jake Marcon, Dudek

Subject: Final Weed Monitoring Plan Report for the Blythe Solar Power Project Units I & II and

McCoy Solar Energy Project

Date: December 23, 2019 cc: David Hochart, Dudek

Attachment(s): Figures 1-5

This memorandum serves as the final monitoring report required by the Blythe Solar Power Project Weed Management Plan (BSPP WMP, AECOM 2011) and the Weed Management Plan for the McCoy Solar Energy Project (MSEP WMP, Tetra Tech 2013). This final monitoring report summarizes the results of the three-year monitoring period (2017-2019) at Blythe Solar Units I & II and at McCoy Solar for the Weed Management Area (WMA) established by the WMPs and provides recommendations for long-term management of invasive weed species at the site for the lifetime of the Project.

1 Background

The Modified Blythe Solar Power Project Weed Management Plan (BSPP WMP, AECOM 2011) and the Weed Management Plan for the McCoy Solar Energy Project (MSEP WMP; Tetra Tech 2013) were written to protect the biological resources within and surrounding the disturbance areas associated with the Blythe Solar Power Project (BSPP) and the McCoy Solar Energy Project (MSEP) from the expansion and proliferation of invasive weed species (Figures 1 and 2).

The overall goal of the BSPP and MSEP WMPs is to prevent introduction of new weeds and spread of existing weeds as a result of construction, operation, and decommissioning (AECOM 2011). The WMPs provide guidance on the implementation of early detection protocols, define containment strategies, and describe control methods to prevent the introduction and minimize the spread of invasive weeds during construction and operation activities (AECOM 2011).

Weed management objectives include controlling the spread of weed populations previously identified within the Weed Management Area (WMA) and preventing weed species introductions. The WMA consists of the solar arrays and fence lines, linear transmission corridor and access road, including a 100-foot buffer. Baseline data collection was conducted by Dudek to document weed presence prior to construction along the linear facilities and within Units 1 and 2 of the BSPP solar field (Dudek 2015). Subsequent mapping of invasive species during construction occurred in 2015 and 2016 prior to, and during weed control events, and after construction in 2017, 2018, and early 2019. As required by the WMPs, Dudek also performed transect monitoring within the WMA in early 2019 to quantitatively assess weed presence near the conclusion of the three-year monitoring period.



The WMPs require annual monitoring for three years after the completion of construction activities. This document serves as the third and final annual report for the three-year post-construction period for McCoy Solar and for Blythe Solar Units I & II.

1.1 Management Requirements

Though similar, the WMPs for BSPP and MSEP contain slight differences that affect the management of invasive species within the solar project boundaries. Compliance with both WMPs will be necessary along the linear impacts (transmission corridor, and Dracker Drive) due to the applicability of both WMPs within the shared components.

Weed management is required within temporary impact areas and any portions of the site not graded, developed, or otherwise rendered unsuitable for weed growth (AECOM 2011). Within areas subject to weed growth, NextEra Blythe Solar will approach the overall goal through controlling the spread of existing populations, preventing new weed introductions, and monitoring for early detection (AECOM 2011).

Blythe Solar Power Project

The BSPP WMP provides guidance that applies to the:

- Early Detection and Risk Assessment of Weed Species: This objective identifies presence, location, and abundance of weed species in the BSPP Disturbance Area for both existing and future conditions.
- Suppression and Control: This objective is intended to ensure that populations of existing weed species do not increase due to the BSPP.
- Containment Strategies: This objective is intended to prevent the spread of existing weeds to new areas and prevent the introduction of weed species not currently present in the Project.

In addition to these overall objectives, the BSPP WMP provides species-specific management requirements, which require eradication and suppression of invasive species to low densities within the WMA, including operation areas (Table 1).

Table 1. Weed Species Documented at BSPP

Common Name	Scientific Name	Cal-IPC Rating	Observed in 2019	Management Goal
Tamarisk	Tamarix sp.	High	-	Eradicate
Sahara mustard	Brassica tournefortii	High	Yes	Suppress
Red brome	Bromus madritensis ssp. Rubens	High	-	Suppress

Bermuda grass	Cynodon dactylon	Moderate	-	Suppress
Fescue	Festuca sp.	Moderate	-	Suppress
London rocket	Sisymbrium irio	Limited	Yes	Suppress
Russian thistle	Salsola tragus	Limited	Yes	Suppress
Mediterranean grass	Schismus arabicus	Limited	Yes	Suppress
Prickly lettuce	Lactuca serriola	Evaluated - No List	Yes	Suppress
European foxtail fescue	Vulpia bromoides	Evaluated - No List	-	Suppress
Nettle leaf goosefoot	Chenopodium murale	Not Listed	Yes	No Action
Common sow thistle	Sonchus oleraceus	Not Listed	Yes	No Action

McCoy Solar Energy Project

The MSEP Weed Management Plan (WMP) acknowledges that complete eradication of invasive weed species is not feasible due to baseline occurrences within the WMA. However, the MSEP WMP identifies the success criteria as,

"having no more than 10% increase in a weed species that has been identified for control (i.e., not Mediterranean grass) or in overall weed cover in any part of the Project Disturbance Area or off the Project Disturbance Area if the increases can be attributed to Project activities. Continued monitoring and control will be implemented as necessary throughout the life of the Project and the Weed Plan updated accordingly."

Target weed species and their management goals are included in Table 5 of the MSEP WMP and summarized in Table 2 (Tetra Tech 2013).

Table 2. Weed Species Documented at MSEP

Common Name	Scientific Name	Cal-IPC Rating	Observed in 2019	Management Goal
Red brome	Bromus madritensis ssp. rubens	High	-	Monitor and control expansion within the Project Disturbance Area.
Sahara mustard	Brassica tournefortii	High	Yes	Monitor and control expansion within the Project Disturbance Area.
London rocket	Sisymbrium irio	Limited	Yes	Monitor and control expansion within the Project Disturbance Area.
Mediterranean grass	Schismus arabicus	Limited	Yes	To the extent possible, minimize additional expansion and transport of this species off site linked to construction and operation of the project.

Puncturevine	Tribulus terrestris	Limited	-	Prevent transport of additional seeds into the Project Disturbance Area from construction equipment and minimize expansion within the Project Disturbance Area.
Russian thistle	Salsola tragus	Limited	Yes	Monitor and control expansion within the Project Disturbance Area.
Tamarisk	Tamarix aphylla	Limited	-	Eradicate and monitor any future or potential expansion of the species.
Nettle leaf goosefoot ¹	Chenopodium murale	Not Listed	Yes	Monitor and control expansion within the Project Disturbance Area.

Not listed as a "Target Weed Species" but included in Species Management Goals Table (Table 5) as "Other Non-native Species" requiring management (Tetra Tech 2013).

2 Weed Management Plan Compliance

In accordance with the BSPP and MSEP WMPs, target weed species were actively managed during the construction and operation of the Project. During construction, general measures to prevent the spread of weed propagules were implemented and included:

- Inspection of all off-road construction equipment and issuance of weed inspection certification stickers prior to arriving on site.
- Collection of weed wash certificates from personnel prior to arriving on site and administration of WEAP training for all new personnel on site.
- Ensuring all products brought on site for construction purposes are certified as weed-free.
- Limiting disturbance areas to the minimum required for construction and promptly restoring and revegetating temporarily disturbed areas.
- Actively treating target weed species during construction through manual, mechanical, and chemical control methods.

In addition to the prevention measures implemented during construction, target weed species were mapped and monitored prior to and during construction. Baseline weed mapping was conducted in 2014 prior to construction and subsequently during control events in 2015, 2016, 2017, 2018, and 2019. A detailed explanation of methods for the transect and quadrat data collected during baseline monitoring can be found in BSPP Baseline Vegetation Report (Dudek 2015). All occurrences of weed species were added to the project specific invasive weed database and a detailed inventory is shown in Figure 1 through Figure 5. During the operation phase of the Project, weed surveys and mapping were conducted annually as part of the three-year monitoring period required by the WMPs. During these focused surveys, weed populations were mapped and evaluated with respect to the success criteria of the WMPs. Data collected during these mapping events were used to make treatment recommendations and informed future management decisions on site. Final quantitative transect data collection was conducted in early 2019, following the same methods used during the baseline monitoring effort.

3 Results

In accordance with the WMPs, Dudek performed multiple quantitative weed surveys and mapping during construction and the three-year monitoring period. Quantitative monitoring was conducted throughout the WMA which includes the Solar Plant Site (fence line and solar arrays), linear facilities, and a 100-foot buffer to encompass any drainages downslope and areas downwind from the Project disturbance area. During monitoring visits, data regarding the presence, location, and abundance of all weed species were collected within the project specific WMPs. Data were collected using a handheld GPS device then analyzed to determine if invasive weed populations identified during previous surveys had increased density or extent, or if new species had established. A summary of dates and locations for all management activities, including qualitative monitoring, is found in Table 3.

Table 3. Management Activity Dates and Locations

Date	Location	Management Activity	Project Phase
October 29-30, 2014	Entire WMA	Baseline Mapping	Prior to Construction
November 11-12, 2014	Entire WMA	Baseline Mapping	Prior to Construction
December 10-11, 2014	Entire WMA	Baseline Mapping	Prior to Construction
January 19-20, 2015	Entire WMA	Mapping and Control	During Construction
March 10-12, 2015	Entire WMA	Mapping and Control	During Construction
January 27-28, 2016	Entire WMA	Mapping and Control	During Construction
May 6, 2016	Entire WMA	Mapping and Control	During Construction
May 9-10, 2017	Entire WMA	Mapping	Year 1 of Monitoring
June 5-7, 2017	Linear Facilities	Control	Year 1 of Monitoring
October 3, 2017	Entire WMA	Mapping	Year 2 of Monitoring
December 14, 2017	Entire WMA	Mapping	Year 2 of Monitoring
January 15-17, 2018	Linear Facilities	Control	Year 2 of Monitoring
February 8, 2018	Linear Facilities	Mapping	Year 2 of Monitoring
June 13, 2018	Linear Facilities	Mapping	Year 2 of Monitoring
December 18, 2018	Linear Facilities	Mapping	Year 3 of Monitoring
January 15-18, 2019	Entire WMA	Mapping and Transect Monitoring	Year 3 of Monitoring
January 23-24, 2019	Entire WMA	Transect Monitoring	Year 3 of Monitoring
March 19-22, 2019	Linear Facilities	Control	Year 3 of Monitoring
August 5-8, 2019	Linear Facilities	Control	Year 3 of Monitoring

Initial baseline mapping revealed that complete eradication of weed species would be infeasible due to the high levels of establishment already within the WMA prior to construction, however prolonged drought conditions during the construction period coupled with prompt invasive control in the winter and spring controlled population densities. A substantial infestation of Russian thistle along the southwest end of the transmission line occurred prior to project construction and while removal of Russian thistle within the weed management areas was conducted, additional seed was transported into the weed management areas each year. Treatment events coincided with the invasive weed locations as mapped and reported on. In addition to regular qualitative monitoring

visits, the WMPs required quantitative transect monitoring following the same methods used in BSPP Baseline Vegetation Report (Dudek 2015).

3.1 Blythe Solar Power Plant

Vegetative growth after construction within BSPP Units I & II was spotty, with sections of substantial native growth, sections with significant non-native plant species, and areas that remained predominantly bare. Prolonged drought conditions and prompt treatments during construction allowed for effective control before the site transitioned into the three-year monitoring period. However, significant rain events throughout the winter and spring after construction resulted in high rates of weed germination. Sahara mustard was consistently the most commonly observed species during construction and throughout the three-year monitoring period, and it remains the most predominant weed species within the project array boundary. Mediterranean grass and Russian thistle were also observed within BSPP's Units I & II's boundaries during construction and throughout the three-year monitoring period, however, the abundance and density of these two species never rose to the level of that of Sahara mustard's. The results of the quantitative monitoring in January of 2019 showed all target weed species, including Sahara mustard, were suppressed through management actions at the BSPP facility. Management actions at the BSPP facility consisted of 4 herbicide treatments during the months of June, July and August 2019.

3.2 McCoy Solar Energy Plant

Similar to BSPP's Units I & II, vegetative growth within the MSEP facility since construction is scattered. The majority of the facility remains predominantly bare, with overall reduced establishment of native and non-native species when compared to BSPP. The most commonly observed non-native species varied year-to-year as did their observed abundances. In 2017 and 2018, Prickly lettuce (*Lactuca serriola*) and common sowthistle (*Sonchus oleraceus*) were the most commonly observed non-native species, primarily occurring along the edges of smaller array roads where gravel was imported into the road bed. Neither species was included as a target species in the MSEP, however, control of both species was recommended. During the qualitative monitoring visit in January of 2019, Sahara mustard was the most commonly observed weed species. Sahara mustard is a target weed species listed in the MSEP WMP and observed quantities at the time of the monitoring visit represented a 10 percent increase in overall weed cover, therefore targeted treatments were recommended. Other weed species observed at low densities during monitoring visits such as London rocket, Russian thistle, and Mediterranean grass were recommended for treatment during targeted treatment of Sahara mustard. Management actions at the MSEP facility consisted of 1 herbicide treatments during the month of June 2019. Despite the consistent and expected presence of weed species within the MSEP facility, quantitative transect monitoring revealed insignificant cover of all target weed species in areas surrounding the facility.

3.3 Linear Facilities

Many of the linear facilities were managed and maintained as part of a revegetation effort for temporary impact areas, therefore non-native species presence was largely insignificant in these areas. The continued reestablishment of native habitat in these areas should continue to inhibit establishment of non-native species in the future. Despite the successful reestablishment of native vegetation, a robust population of Russian thistle was consistently observed along the transmission line south of Interstate 10, near the substation. This population was observed during baseline surveys prior to construction and extends well beyond the WMA, therefore, complete

eradication or control within the WMA was infeasible. The seed dispersal mechanism utilized by this species is such that mature plants outside of the WMA continually broke off when dry and tumbled across the alignment, spreading seed inside the WMA. Targeted control efforts within the WMA at this location were conducted during the three-year monitoring period to minimize the spread into other areas of the Project. Other invasive weeds observed during construction and throughout the three-year monitoring period, including London rocket, nettle leaf goosefoot, and Sahara mustard, were scattered along the linear facilities and were controlled during regular treatment visits. With the exception of the previously discussed population of Russian thistle, quantitative transect monitoring also resulted in low overall weed cover in the areas immediately adjacent to and surrounding the linear facilities.

Dudek conducted quantitative monitoring at the WMP reference transects in January and February 2019. A summary of the average percent cover of each species by vegetation community is provided in Table 4.

Species cover was characteristically low within the desert communities at the project site. For example, creosote (Larrea tridentata), which was the most abundant species in the creosote bush scrub community, consisted of only 2.8% cover in the reference areas. In general, creosote bush scrub transects were dominated by creosote, cryptantha (Cryptantha sp.), Booth's evening primrose (Eremothera boothii), desert Indianwheat (Plantago ovata), largebract spiderling (Boerhavia wrightii), and white bursage (Ambrosia dumosa). Dune transects were dominated by creosote, white bursage, cryptantha, and desert Indianwheat as well, but also included a predominance of desert sand verbena (Abronia villosa), birdcage evening primrose (Oenothera deltoides), and big galleta grass (Hilaria rigida).

Table 4. Average Percent Cover of Individual Species by Vegetation Community

Non-Native		Creosote Bush Scrub			Dunes			
Plant Species		ct baseline 015)	2019 M	lonitoring	Pre-project baseline (2015)		2019 Monitoring	
	Effects Transects	Reference Transects	Effects Transects	Reference Transects	Effects Transects	Reference Transects	Effects Transects	Reference Transects
Brassica tournefortii*	_	1	0.007%	0.03%	0.3%	0.01%	0.3%	0.5%
Chenopodium murale	_	_	0.007%	_	_	_	_	-
Salsola tragus*	_	_	_	_	0.4%	_	0.2%	0.2%
Sonchus oleraceus	_	-	0.02%	_	_	_	_	_
Schismus sp.	_	_	_	_	_	_	0.4%	0.5%

Note:

4 Discussion

The stated goal of the BSPP WMP was that invasive species identified for control must be "prevented or suppressed in operation areas." While the abundance and densities of invasive species fluctuated with variable rainfall

^{*} indicates species that are target weed species per the WMP.

patterns, targeted treatments during the monitoring period allowed for the overall goal of prevention and suppression in operation areas to be achieved. Similar to the BSPP WMP, the MSEP WMP also called for control of target invasive species within the Project Disturbance Area. Additionally, the MSEP WMP identified success criteria "having no more than 10% increase in a weed species that has been identified for control (i.e., not Mediterranean grass) or in overall weed cover in any part of the Project Disturbance Area or off the Project Disturbance Area if the increases can be attributed to Project activities." Post-construction monitoring allowed for early identification and prompt control of target non-native species to keep the site in compliance and allow for the overall goal of prevention and suppression to be achieved. Despite proactive weed control efforts, the continued presence of invasive species within the WMA is expected. Germination rates and timing are highly seasonal and will depend on variable rainfall patterns, therefore continued monitoring and control by operational staff will be required for the lifetime of the Projects.

5 Conclusion of WMP and Recommendations for Operations Monitoring

All aspects of the BSPP and MSEP WMPs have been completed. Target weed populations have not grown as a result of project activities throughout the three year monitoring period. Should target weed species be observed to expand in the future, control may be recommended within the management authority of BSPP and MSEP. Continuation of Best Management Practices (BMPs) which reduce the spread of invasive weeds should be continued. These include cultural control methods, such as limiting unnecessary ground disturbance, limiting the transport of soil from weed infested areas onto the site, etc.

The following areas should be considered for their potential for contributing additional weed seed to the sites in the future:

Temporary Disturbance Areas: Temporary disturbance areas may be subject to weed invasion. Occurrences of the target weed species within any temporary disturbance areas should be addressed in accordance with the WMP to avoid infestation at a later date.

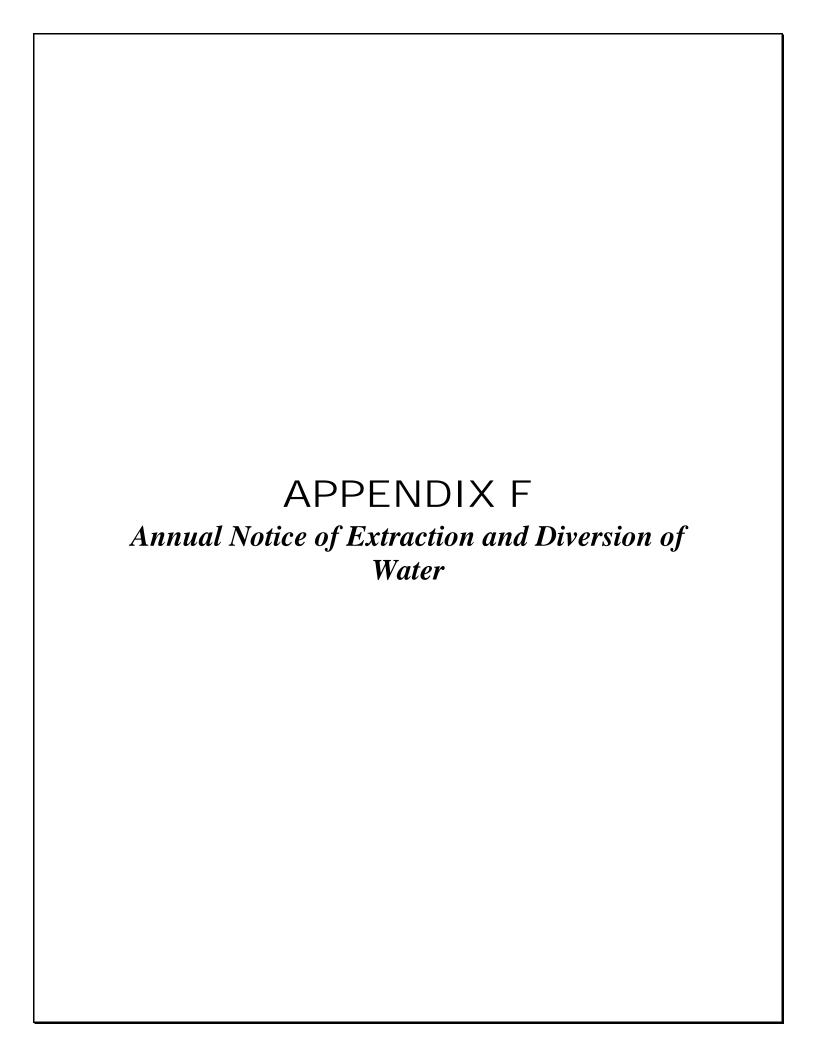
Developed Areas: Weedy species may spread into previously unoccupied developed areas, particularly in unpaved disturbed areas that are irregularly used. Within developed areas, the future management objective should be prevention and suppression. Examples of developed areas include:

- Perimeter fencing (interior and exterior)
- Access roads (roadsides)
- Parking areas
- Area surrounding the operations/maintenance building
- On-site transmission facilities, including switchyard

6 References

- AECOM. 2011. Revised by Tetra Tech, Inc. September 2014. *Modified Blythe Solar Power Project Weed Management Plan, Riverside County, California*. Prepared in 2011 for Palo Verde Solar I, LLC. Revised in 2014 for NextEra Blythe Solar Energy Center, LLC. September.
- Dudek. 2015. *Blythe Solar Power Project Baseline Vegetation Report*. Prepared for Next Era Blythe Solar Energy Center, LLC. May.
- Dudek. 2019. Final Revegetation Report for the Blythe I and II Solar Power Project and McCoy Solar Energy Project. Prepared for NextEra Blythe Solar Energy Center, LLC and McCoy Solar Energy Center, LLC. June 2019.
- Tetra Tech, Inc. 2013. Weed Management Plan for the McCoy Solar Energy Project Eastern Riverside County, California. Prepared for McCoy Solar, LLC. November.







ANNUAL NOTICE OF GROUNDWATER EXTRACTION & DIVERSION FOR 2019

Water Right ID G334539

Primary Owner CHARLYN MOSLEY

INVOICE

Your Notice of Groundwater Extraction & Diversion (G334539) has been successfully submitted.

Please mail a check or money order for the \$50.00 filing fee along with a printout of this invoice to the following address:

State Water Resources Control Board Division of Water Rights PO Box 2000 Sacramento, CA 95812-2000

Check or money order should indicate your recordation number(s) and be made payable to: State Water Resources Control Board.

Do not send cash.

DEADLINE: Payment must be postmarked no later than June 30th in order to be recorded.

THIS SPACE FOR OFFICE USE ONLY	R	AMT:

ELECTRONIC PAYMENT/AUTOMATIC CLEARINGHOUSE (ACH)

If you are paying electronically, include your groundwater recordation number when submitting your payment. Click the following link to visit the SWRCB Make a Payment webpage. Select the "Application Fees" box, then scroll to the bottom of the page and enter your application number **RAG33453919**.

After printing this invoice screen, please click the 'Return to List of Reports' button below to view reports for this Recordation Number. The listing will give you the option of printing the submitted report for your records.

Return to List of Reports

1 of 1 1/31/2020, 10:44 AM

[SUMMARY OF FINAL SUBMITTED VERSION]

ANNUAL NOTICE OF GROUNDWATER EXTRACTION AND DIVERSION FOR 2019

Primary Owner: CHARLYN MOSLEY Recordation Number: G334539 Date Submitted: 2020-01-31

1. Reporting to a Local Agency			
Local Agency	Submitter does not report to a local agency.		
2. Type(s) of Diversion			
a. Groundwater Extraction	> 25 acre-feet		
b. Surface Diversion	None		
	3. Ownership Type of Owner(s) on Record		
Ownership Type	Lessee of land on which well or point of diversion is located, a extracting/diverting water	and is	
4. A	nount of Groundwater Extracted During Calendar Year		
Amount Extracted	32.6230 Acre-Feet		
	5. Amount of Surface Water Diverted or Used		
Not appli	cable; Surface Diversion was not chosen as a type of diversion.		
Not appli	5c. Maximum Rate of Surface Water Diversion		
ілог арріі	cable; Surface Diversion was not chosen as a type of diversion.		
	6. Method of Measurement		
Method of Measurement	Water Meter		
	7. Type(s) of Use		
Other	Construction support of solar facility		
,	On a sial Han Onto maring		
C1 Are you using	Special Use Categories g any water diverted under this right for the cultivation of cannabis?	No	
O 1. Are you doing	garry water diverted under this right for the cultivation of carmabis:	110	
	Action Requested		
8. Action Requested	Record my water use		
	-		
0 1 11	9. Supplemental Information		
Supplemental Information	BSPP Well-2		
	Attachments		
File Name	Description Size		
	No Attachments		
Co	ntact Information of the Person Submitting the Form		
First Name	Arlin		
Last Name	Brewster		
Relation to Water Right	Right Agent		

Has read the form and
agrees the information in the report is true to the
best of his/her
knowledge and belief



ANNUAL NOTICE OF GROUNDWATER EXTRACTION & DIVERSION FOR 2019

Water Right ID G334540

Primary Owner CHARLYN MOSLEY

INVOICE

Your Notice of Groundwater Extraction & Diversion (G334540) has been successfully submitted.

Please mail a check or money order for the \$50.00 filing fee along with a printout of this invoice to the following address:

State Water Resources Control Board Division of Water Rights PO Box 2000 Sacramento, CA 95812-2000

Check or money order should indicate your recordation number(s) and be made payable to: State Water Resources Control Board.

Do not send cash.

DEADLINE: Payment must be postmarked no later than June 30th in order to be recorded.

THIS SPACE FOR OFFICE USE ONLY	R	AMT:

ELECTRONIC PAYMENT/AUTOMATIC CLEARINGHOUSE (ACH)

If you are paying electronically, include your groundwater recordation number when submitting your payment. Click the following link to visit the SWRCB Make a Payment webpage. Select the "Application Fees" box, then scroll to the bottom of the page and enter your application number **RAG33454019**.

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1 of 1 1/31/2020, 10:47 AM

[SUMMARY OF FINAL SUBMITTED VERSION]

ANNUAL NOTICE OF GROUNDWATER EXTRACTION AND DIVERSION FOR 2019

Primary Owner: CHARLYN MOSLEY Recordation Number: G334540 Date Submitted: 2020-01-31

	1. Reporting to a Local Agency			
Local Agency				
2. Type(s) of Diversion				
a. Groundwater Extraction	<= 25 acre-feet			
b. Surface Diversion	None			
	3. Ownership Type of Owner(s) on Record			
Ownership Type	Lessee of land on which well or point of diversion is located, and extracting/diverting water	is		
4. Ar	nount of Groundwater Extracted During Calendar Year			
Amount Extracted	1.2850 Acre-Feet			
	5. Amount of Surface Water Diverted or Used			
Not applic	cable; Surface Diversion was not chosen as a type of diversion.			
	· ·			
Not appli	5c. Maximum Rate of Surface Water Diversion			
Not applic	cable; Surface Diversion was not chosen as a type of diversion.			
	6. Method of Measurement			
Method of Measurement	Water Meter			
	7. Type(s) of Use			
Other	Construction support of solar facility			
	Special Hea Categories			
C1 Are you using	Special Use Categories	No		
O1. Are you using	re you using any water diverted under this right for the cultivation of cannabis?			
	Action Requested			
8. Action Requested	Record my water use			
•				
Cunniamental	9. Supplemental Information			
Supplemental Information	BSPP Well-3			
File Name	Attachments Description Size			
- I II I I I I I I I I I I I I I I I I	No Attachments			
	wheel Information of the Dance of Ocharities the Form			
First Name	ntact Information of the Person Submitting the Form Arlin			
Last Name	Ariin Brewster			
Relation to Water Right	=			
Training Training	дусти			

Has read the form and
agrees the information in the report is true to the
best of his/her
knowledge and belief