

Variance Request Form



Company: Avangrid
 Address: 2701 NW Vaughn Street, Suite 300
 City, State, Zip: Portland, OR, 97210
 Phone: 564.516.2740

Variance: VAR-019
 Request No.: Rev 0
 Date Submitted: 7/25/2025
 Date Approval Needed: _____
 Date Agency Received: _____
 Agency Reference No.: _____

Request Prepared by: Matthew Stelmach (Avangrid)
 Spread/Location (Milepost): N/A

Net Acreage Affected: 21.36 (0.35 additional)

Alignment Sheet/Sta. No.: _____
 Landowner: BLM
 Current Land Use/Vegetative Cover: _____

Tract No.: _____
 In or Within 50ft of a Wetland: ☐ Yes ☒ No
 Within 50ft of a Water Body: ☒ Yes ☐ No

Nearby Features (Water body, T&E Habitat, Wetlands, Noxious Weed):

See Attachment C.

Area, Residence, Cultural Resource Site (distance, etc.):

Variance Level: ☐ Level 1 ☐ Level 2 ☐ Level 3 (To Be Assigned by Designated Representative)
 Variance From: ☐ Permit ☐ Plan/Procedure ☐ Specification ☒ Drawing ☐ Mitigation Measure ☐ Other

Detailed Description of Variance: Attachments ☒ Yes ☐ No Photos? ☐ Yes ☐ No
 Variance 19 (VAR-019) is requesting civil improvements to reduce the impacts of stormwater on the Tule Wind Farm and maintain it, consistent with, and as required by the BLM ROW Grant (SERIAL NUMBER CACA-49698). The improvements are located along McCain Valley Road and other access roads, and at discrete turbine pads. According to the Tule Wind Project's Final Environmental Impact Report/Final Environmental Impact Statement (October 2011), an approximately 200-foot radius area around each turbine and an approximately 30-foot buffer from access roads is considered the permanent impact area. Avangrid proposes 34 total work zones, of which 17 work zones proposed for upgrades require installing infrastructure, such as rock chutes and riprap, beyond the existing permanent impact area in order to implement the appropriate engineering changes, 12 work zones require modifications within the existing permanent impact area, and 5 work zones require only maintenance and/or revegetation activities. This VAR-019 covers the 17 work zones that would result in additional permanent impacts outside of the existing permanent impact area. The details of the individual site upgrades including location, overall size of work zone, size of impacts beyond the existing permanent impact area, location relative to sensitive resources, construction equipment needed, estimated duration of the work, and descriptions of proposed upgrades are included in Table 1 (Attachment A). Corresponding civil upgrade plan sheets are included in Attachment B. Attachment C includes figures of the Project Overview (Figure 1), Project Features (Figure 2), Project Components and Permanent Impacts (Figure 3), and Biological Resources (Figure 4).

Variance Justification:
 VAR-019 is requested to implement civil improvements to repair and stabilize eroded areas along McCain Valley Road and other access roads, and at discrete turbine pads.

For (Company Name) Use Only

Additional Surveys Required	Surveyed Corridor Description	Additional Surveys Completed
Cultural Survey ☒ Yes ☐ No	In May 2025, cultural resources were reviewed in the vicinity of the proposed civil upgrade work zones via desktop by cultural resource specialists and areas were identified that will require cultural monitoring during activities. Biological field surveys were conducted between May 19 through May 28, 2025, to delineate jurisdictional waters, identify rare plants, map vegetation, and assess habitat for burrowing owl, Quino checkerspot butterfly, Crotch's bumble bee, and Monarch butterfly within the vicinity of the proposed civil upgrade work zones.	☒ Yes ☐ No
T & E Survey ☒ Yes ☐ No	Figure 4 showing biological resources in the vicinity of the variance areas (areas with additional permanent disturbance) is included in Attachment C.	☒ Yes ☐ No

Report Document Survey:

Sign-Off (as appropriate)	Name (print)	Approval Signature	Conditions (see attached)
Avangrid Permit Manager	Amy Parsons	NA	☐ Yes ☒ No

Lead Environmental Inspector	Jean-Luc Brulot	NA	☐ Yes	☒ No
Designated Biologist	Shawn Johnston	NA	☐ Yes	☒ No
Cultural Resource Specialist	Brian Williams	NA	☐ Yes	☒ No

For BLM Project Manager or Compliance Contact Use Only
Variance Approved: ☐ Variance Denied: ☐ Date: _____
Signature: _____

For Compliance Manager and Monitor Use Only
Variance Approved: ☐ Variance Denied: ☐ Date: _____

Signature: _____

Stipulations: _____

Spread: _____

OPPC Variance Request No.: _____

VARIANCE CONDITIONS

Name: _____ Title: _____ Organization: _____

Conditions: _____

Name: _____ Title: _____ Organization: _____

Conditions: _____

Attachment A

Proposed Civil Upgrade Details

Table 1. Proposed Civil Upgrades

Site ID	Total Work Zone (sq ft)	Additional Permanent Impact Outside of Existing Permanent Impact Area (sq ft)	Within 50 Feet of Cultural ESA	Within Quino Habitat	Equipment Needed	Estimated Duration (Days)	Description of Proposed Upgrades	Civil Upgrade Plan Sheet Page(s)
A-1 Pad	85,911	2,121	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	6	Install BMPs. Excavate channel. Reuse existing rock pad lining (swales). Excavate rock chutes. Install non-woven geotextile. Rock chute lining. Excavate berm. Form berm. Excavate piping trench. Infill piping trench. Grout. Install AASHTO #57 infiltration trench. Install solid discharge pipe. Install slotted drain pipe. Trench non-woven geotextile. Install 90 degree pipe elbow. Install end caps. Clean out/reshape existing waterbars. Standard hydroseeding. Steep slope matting BFM. Inspection/sign off.	530-01
C Road	38,614	506	-	X	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	11	Install BMPs. Regrade and recompact area. Replenish 4" gravel. Excavate channel. Install channel lining - Flexamat. Excavate LWC. Compact LWC. Install AASHTO #57 drainage layer. Install 8-oz/SY non-woven geotextile. Install R-5 apron lining. Install geocell lining. Fill geocell with gravel. Form new waterbars. Inspection/sign-off.	530-05
C-1 Pad	63,772	999	-	X	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	11	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Standard hydroseeding. Inspection/ sign-off.	530-06
C-3 Pad	49,382	446	-	X	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	11	Install BMPs. Excavate apron. Install 8-oz/SY non-woven geotextile. Install R-5 apron lining volume. Standard hydroseeding. Inspection/sign-off.	530-06
C-6 Pad	48,722	907	-	X	Backhoe, dump truck, motor grader, compactor (roller),	11	Install BMPs. Regrade and compact area. Excavate rock chute. Install non-woven geotextile.	530-08

					dozer, water truck, hydroseeding truck.		Rock chute lining. Excavate berm. Form berm. Excavate basin. Install R-5 riprap. Install 8-oz/SY non-woven geotextile. Standard hydroseeding. Install steep slope matting w/ BFM. Inspection/sign-off.	
C-7 Pad	47,324	777	-	X	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	12	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Standard hydroseeding. Inspection/ sign-off.	530-08
C-9 Pad	79,975	1,554	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	13	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Excavate berm. Form berm. Standard hydroseeding. Inspection/ sign-off.	530-09
D-1 Pad	87,508	698	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	16	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Standard hydroseeding. Install steep slope matting w/ BFM. Fill R-6 riprap in gully. Inspection/sign-off.	530-10
D-4 Pad	93,564	603	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	14	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Inspection/sign-off.	530-10
D-2 Pad	47,969	1,497	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	17	Install BMPs. Regrade and compact area. Replenish 4" gravel. Excavate channel. Install channel lining - Flexamat. Vegetated channel hydroseed. Install turf reinforcement matting. Excavate berm. Form berm. Excavate apron. Install 8-oz/SY non-woven geotextile. Install R-5 riprap lining volume. Clean out/reshape existing waterbars. Form new waterbars. Standard hydroseeding. Install steep slope matting w/ BFM. Inspection/sign-off.	530-11
E-13 Pad	86,534	299	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	2	Standard hydroseeding. Install steep slope matting w/ BFM. Inspection/sign-off.	530-13
G-6 Pad	52,058	202	-	-	Backhoe, dump truck, motor	18	Install BMPs. Excavate rock chute.	530-14

					grader, compactor (roller), dozer, water truck, hydroseeding truck.		Install non-woven geotextile. Rock chute lining. Excavate berm. Form berm. Standard hydroseeding. Install steep slope matting w/ BFM. Inspection/sign-off.	
G-10 Pad	62,621	837	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	20	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Standard hydroseeding. Install steep slope matting w/BFM. Inspection/sign-off.	530-16
G-14 Pad	64,148	1,343	X	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	20	Install BMPs. Excavate rock chute. Install non-woven geotextile. Rock chute lining. Inspection/sign-off.	530-16
MVR - Near Pole 17	10,785	503	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	14	Install BMPs. Repair ruts/replenish as necessary. Excavate channel. Reuse existing pad rock lining (swales). Excavate rock chute. Install non-woven geotextile. Rock chute lining. Form boulder berms. Excavate piping trench. Infill piping trench. Grout. Install AASHTO #57 infiltration trench. Install solid discharge pipe. Install slotted drain pipe. Trench non-woven geotextile. Install 90 degree pipe elbow. Install end caps. Standard hydroseeding. Install steep slope matting w/ BFM. Inspection/sign-off.	530-20
MVR - Near Poles 21 and 23	8,524	1,384	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	15	Install BMPs. Regrade and compact area. Replenish 4" gravel. Clean out/repair channel as needed. Form new waterbars. Inspection/sign-off.	530-21
MVR - Near Pole 37 and G-11 Pad	2,888	377	-	-	Backhoe, dump truck, motor grader, compactor (roller), dozer, water truck, hydroseeding truck.	16	Install BMPs. Repair ruts/replenish as necessary. Clean out/repair channel as needed. Clean out/reshape existing waterbars. Remove existing waterbars. Form new waterbars. Inspection/sign-off.	530-22
Total	930,299	15,053	N/A	N/A	N/A	N/A	N/A	N/A

Attachment B

Civil Upgrade Plan Sheets

Attachment C

Figures