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November 5, 2010

Ms. Marelisa Rivera,
Assistant Field Supervisor
Caribbean Ecological Services Field Office
US Fish and Wildlife Service
PO Box 491
Boquerón, PR 00622

Vía Verde Project LP-012
Puerto Rico Energy Power Authority

Dear Ms. Rivera:

As agreed during our October 26, 2010, meeting at the Fish & Wildlife Service Boquerón Office, that included representation from the US Corp of Engineers (CoE), the Puerto Rico Electric Power Authority (PREPA), will contract additional experts to undertake supplemental field surveys. These supplemental surveys are aimed to identify the presence or absence of Federal Endangered listed species along the proposed Via Verde Project alignment and will cover the potential habitats mentioned in your letters of June 30, 2010 and October 18, 2010.

Although not listed yet, surveys will also include the Coqui Llanero (*Eleutherodactylus juanariveroi*). This action is consistent with PREPA's commitment to address each and every one of the areas of concerns presented by your office.

The required and agreed upon surveys Work Plans are described below for your consideration:

1. Raptors Habitat Characterization (*Accipiter striatus venator*) and (*Buteo platypterus brunnescens*)

Mr. Derek Hengstenberg will perform a habitat characterization of the two (2) endangered raptors along the potential areas identified in his report. The purpose of the supplemental field study is to refine those potential nesting habitat areas based on a more detailed- site specific- survey. Specifically the survey will assess the presence of favorable tree species and surrounding habitat along the proposed construction temporary foot print; and if such favorable environment is present, mark it or describe it in order to avoid it and preserve said habitats during land clearing processes.

As indicated in our meeting, it is assumed that the raptors under consideration may be present in the corridor to be evaluated. Efforts to minimize and avoid impacts to critical habitat for these species will include; (1) land clearing outside of the nesting season, (2) avoiding impacts to potential nesting trees and tree species, and (3) minimization of the Right of Way (ROW) within areas inhabited by these birds whenever possible. Mr. Hengstenberg's report will include site specific recommendations for preservation of these species. PREPA would like to perform the habitat characterization mentioned above based on Mr. Hengstenberg expertise and experience gained in previous studies conducted in said corridor. A helicopter recognition and ground field inspections will be performed as part of the efforts to be undertaken. A Written Report with the findings of said habitat characterization efforts will be submitted to the US FWS once the study is completed. Said report will include all findings, methodology utilized and recommendations.

2. Potential presence of endangered plant species along the dry limestone hills (near Peñuelas Landfill), northern limestone hills (south of Manatí Town) and -Volcanic- Central Mountain Range (upper segments of the alignment at Adjuntas municipality)

Dr. Frank Axelrod, recommended to walk through the designated route and / or alignment at the Peñuelas, Adjuntas and Manatí areas. Dr. Axelrod further suggested that as part of said walk through efforts, a survey of the Endangered Plants listed in the Federal; Register be conducted. The survey will be undertaken by a team of qualified professionals who will stop at frequent intervals (about 100 meters) and will survey both sides of the trail over a distance determined by the required Right-of-Way (ROW) (100 feet each side of the centerline). Specimens of plants that are not easily identifiable in the field will be collected and identified by them at the Herbarium of the Department of Biology, University of Puerto Rico. Such specimens will be made into vouchers and stored in the said herbarium. Apart from the intervals, any area that appears to be relatively undisturbed will be surveyed extensively, including beyond the boundaries of the ROW so that any endangered plants encountered will not be impacted during construction.

A final Written Report will be submitted describing both the location and population size of endangered plants encountered including as well, all findings, methodology utilized and recommendations. The vegetation of each of the areas will also be described and duly market for future reference and required protection efforts.

3. Potential presence of the Coqui Llanero (*Eleutherodactylus juanarivero*) near flood plains of Toa Baja Municipality

Ms. Sondra Vega and Mr. Alberto Puente will survey the Coquí Llanero along the segment located at the Rio Cocal flood plains in the Toa Baja Municipality. A total of three (3) visits (day and night) will be performed in order to identify the presence or absence of the species along the proposed alignment near this area. Special emphasis will be placed near plants species associated to the known habitat of the species. A written report will be submitted describing the findings, methodology and recommendations.

The efforts mentioned above will supplement the field works performed by Dr. Neftalí Ríos during 2005 as well as Dr. Rafael Joglar during 2006 which concluded that the mentioned species was not present within the project area.

4. Potential presence of the Sapo Concho Puertorriqueño (Crested toad, English) (*Peltophryne lemur*) at the dry limestones near the Peñuelas Landfill and northern limestones south of Manatí town

A total of six (6) visits to the Manatí area and five (5) visits to the Peñuelas area will be performed during afternoons and nights by Ms. Sondra Vega and Mr. Alberto Puente. A written report will be submitted describing the findings, methodology and recommendations.

We are confident that the proposed surveys and chosen professionals will provide the additional information needed to more precisely identify, the potential impacts of the Via Verde project. This is also part of the efforts being developed by PREPA geared to avoid, minimized and compensate them in accordance with the applicable federal regulation. It is PREPA's objective to have the written reports mentioned above ready by mid December.

As soon as this proposed Work Plan is accepted by USFWS we will entrust the studies to the professionals listed above. Please do not hesitate to contact us or Eng. Daniel Pagan at 787-382-7330 at your convenience if additional information related with this important subject is needed.

Sincerely,



Francisco E. López García
Head, Environmental Protection and
Quality Assurance Division