



Iberdrola Renewables LLC
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 Portland, OR 97209
 503-796-7082

Variance Request Form

Variance: 001
 Request No.: Rev4
 Date Submit: 26 Oct. 2012
 Date Approval Needed: 31 Oct. 2012
 Date Agency Received: _____
 Agency Approval Reference No.: _____

Request Prepared by: Amy Parsons, Iberdrola Renewables, LLC
 Spread/ Location: Geotechnical activities as described in NTP-1
 (Milepost): N/A
 Alignment Sheet/Sta.
 No.: N/A

Net acreage affected: N/A

Landowner: BLM

Tract No:

In or within 50 feet of a wetland: Yes No
 Within 50 feet of a water body: Yes No

Current Land Use/ Vegetative Cover: Vacant/Chaparral
 Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weed): N/A
 Area, Residence, Cultural Resource Site (distance, etc.): N/A

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

Detailed Description of Variance: Variance Request 001 includes a request to modify a term and condition included in NTP-1 dated September 17, 2012. As identified in Exhibit 2 of the NTP-1 Terms and Conditions, Tule Wind LLC is required to operate one all-wheel drive, Type VI Skid Mount pump unit during all geotechnical activities. Variance Request 001 includes a request from Tule Wind LLC to utilize an all-wheel drive Type III engine for the entire geotech operation, as well as a 2 -wheel drive Type II Water Tender for use during any backhoe work.

Attachments? Yes No Photos? Yes No

Variance Justification:

The request to modify the equipment utilized for fire suppression during geotechnical activities is proposed by Tule Wind LLC in order to provide equal or better protection to environmental resources. The Type III engine equipment being requested for use during geotechnical activities would be in-lieu of the Type VI Skid Mount unit specified in the NTP-1 Terms and Conditions, and would provide the Tule Fire Safety Coordinator with full capabilities to access any activities associated with the geotechnical investigations. The Type III engine equipment is being provided by the San Diego Rural Fire Protection District (SDRFPD) and is commonly utilized in the area to provide fire protection services. The Type III engine equipment would be managed by two trained fire fighters (one of which will be the designated Fire Safety Coordinator) from Rural Fire Protection District who are familiar with operating the equipment in similar conditions as those present on the Tule Wind Project site. The Type III engine equipment would include a minimum of 500 gallons of water, a 350 gpm pump, and be equipped with Pre-connected 1.5" hoses capable of extending up to 1,200 feet, adjustable and smooth bore nozzles, that can be utilized for fire suppression purposes. Tule Wind project site commonly consists of unpaved roadways and steep terrain. This truck can easily traverse slopes up to 20%.

In addition, Tule Wind has contracted with the SDRFPD to provide an additional Type II Water Tender for all backhoe work. This truck will also be manned by two trained fire fighters.

As identified in Section 5 of the ECCMP, changes to previously approved mitigation measures are handled in the form of variance requests submitted by Tule Wind LLC to be reviewed and approved or denied by the BLM. The variance procedures outlined in Section 5 of the ECCMP specify three different levels that a variance request may fall under.

In accordance with the procedures and guidance provided in the ECCMP, Tule Wind LLC is requesting a Level 1 variance to modify a term and condition included in NTP-1 that specifies use of a Type VI Skid Mount pump unit for geotechnical activities. As identified in Section 5.1, Level 1 variances are changes that provide equal or better protection to environmental resources. Variance Request 001 includes use of one Type II Water Tender equipment staffed by two fire fighters (one of which would also be the designated Fire Safety Coordinator), and one Type III engine equipment staffed by two fire fighters from the SDRFPD in-lieu of a Type VI Skid Mount pump unit. The proposed variance is an anticipated result of implementing measures to provide equal or better protection of environmental resources.

