Tri-State Montrose-Nucla-Cahone Transmission Line
Improvement Project

Plan of Development

Montrose, Ouray, San Miguel, and Dolores Counties, Colorado

Appendix G

Environmental Monitoring and Compliance Plan
Appendix G

Environmental Monitoring and Compliance Plan

Tri-State Generation and Transmission Association, Inc. (Tri-State) has developed this Environmental Monitoring and Compliance Plan as part of the Plan of Development (POD) that accompanies their application to the Bureau of Land Management (BLM) for a right-of-way (ROW) grant and to the US Forest Service (USFS) for a special use permit, collectively referred to as a ROW. If the authorizations are approved, the final POD and all appendices will be attached to the Decision Record. This plan provides guidance to Tri-State and its contractors to ensure compliance with environmental protection and mitigation measures approved in the final Environmental Assessment (EA) and agreed to under private easements to minimize environmental and land use effects during construction activities associated with Tri-State’s Montrose-Nucla-Cahone Transmission Line Improvement Project (Project). It will be the responsibility of Tri-State and its contractors, working with designated compliance monitors (monitor), to comply with environmental protection and mitigation measures as well as local, state, and federal rules and regulations and permitting requirements. The goal of this plan is to describe the monitoring of impacts from the development along with monitoring to ensure mitigation measures are implemented and are meeting the required resource goals.

The timetable for development of the final detailed Environmental Monitoring and Compliance Plan is as follows:

Table G-1: Timetable of Final Detailed Environmental Monitoring and Compliance Plan

<table>
<thead>
<tr>
<th>Timetable</th>
<th>Deliverable/Task</th>
</tr>
</thead>
<tbody>
<tr>
<td>By Preliminary Final EA (internal review step)</td>
<td>Monitoring and compliance strategy, and information necessary for the final detailed plan including locations, education requirements according to area/phase and impact/compliance reporting steps (complete). A comprehensive list of all state, federal, and local permits required for construction (complete; Appendix U)</td>
</tr>
<tr>
<td>45 Days prior to Notice to Proceed</td>
<td>Final, Detailed Environmental Monitoring and Compliance Plan Provided to BLM for each project phase prior to the NTP.</td>
</tr>
</tbody>
</table>

Proposed Construction Phasing

The construction schedule is dependent on obtaining all necessary federal, state, and local approvals, but is expected to be conducted in three phases. Phase 1 will begin in 2016 with ROW and construction preparation. These activities will include pre-construction noxious weed management, access road improvement and construction, pad site creation (where needed to safely set up construction equipment), and vegetation removal to facilitate construction and ensure the reliability and safe operation of the power line once in operation. Site grading and construction at the Montrose Substation is also expected to be ongoing in 2016. Phase 2 will begin in 2017 with construction of the Montrose to Nucla segment of the transmission line. Phase 3 will begin in 2018 when Tri-State will complete the remainder of the transmission line construction from Nucla to Cahone.
Objective of the Compliance and Monitoring Plan

This plan outlines the steps required to ensure compliance with the conditions of approval during the three phases of project construction, including environmental training and orientation, roles and responsibilities of agency and Tri-State representatives and the monitor, the communication process for reporting compliance violations, and the process for specifically addressing variances to the POD.

The plan will cover the following conditions of approval: environmental protection measures (EPMs), approved mitigation measures, and federal, state, and local rules and regulations*:

- Compliance with all applicable federal environmental laws including but not be limited to:
  - Endangered Species Act, Section 401 and 404 of the Clean Water Act, Section 106 of the Historic Preservation Act, the Migratory Bird Treaty Act, the Bald and Golden Eagle Protection Act, etc.
- Compliance with Tri-State’s committed EPMs, outlined in both the POD and EA;
- Compliance with federal, state, and local laws, regulations, and permits;
- Compliance with Conditions of Approval in the ROW and POD; and
- Compliance with implementation of conservation actions and required reclamation and mitigation measures, including monitoring of such actions.

* A detailed list of federal, state, and local permits required for project construction is included in Appendix U (Permits and Authorization Plan).

Roles and Responsibilities

Tri-State has committed to contracting a third party compliance monitor (monitor) for construction activities occurring on lands administered by the BLM. The same monitor will be used to ensure compliance on lands administered by the USFS, state lands, and areas of environmental concern on private lands. The monitor will be contracted by Tri-State, but work for the BLM and USFS. The monitor’s role will be to monitor and advise the construction contractors on compliance issues and terms and conditions of the permits to ensure compliance with the POD, ROW Grant, Special Use Permit, as well as all other federal, state, and local permits. Compliance with the permits will ultimately be the responsibility of Tri-State and its contractors.

The monitor’s role will be to enforce the terms and conditions of federal, state, and local authorizations (See Appendix U, Permits and Authorizations Plan) and ensure all required EPMs for the project were implemented. Compliance with all Project authorizations is the responsibility of Tri-State and its contractors. The monitor will seek to minimize all forms of non-compliance, resolve conflicts in the field through consultation with Tri-State and the agencies representative, provide guidance to field crews regarding environmental regulations and stipulations of the various permits and authorizations, plan ahead for areas where a construction variance may be needed prior to any violation occurring, and provide Tri-State information to support drafting of variance requests.

The monitor will be given full authority to solve problems and identify solutions to potential compliance concerns through coordination with the agencies representative. The monitor will be given full authority to cease construction without Tri-State or agency approval if the Project could or has resulted in reportable compliance violation as outlined below. The monitor will work with the affected agency to identify and ensure implementation of corrective actions required to address compliance concerns.

BLM and USFS staff will be funded by a cost recovery agreement with Tri-State. The BLM and USFS agency representatives will direct the work of the monitor. The BLM and USFS staff, through their agency representative, will work directly with Tri-State and the monitor to review non-compliance issues and process requested variances. Agency staff and the monitor will be funded for the life of the construction process.
Tri-State will designate an internal authorized representative (compliance coordinator) in the Transmission Environmental department to coordinate directly with the BLM and USFS agency representative and monitor to review compliance reports and concerns and to process variance requests. Because a variance request will result in a formal modification to Tri-State’s permit(s), the variance request will need to come from Tri-State’s compliance coordinator and will be signed by the Senior Vice President of Transmission at Tri-State. The monitor will serve as a conduit between Tri-State’s compliance coordinator and the BLM and USFS agency representatives to provide information and support in processing of variance requests.

The number of appropriate compliance monitors will be determined once the construction contractor has provided Tri-State the proposed construction schedule and staffing requirements. The final compliance staffing will be reviewed by the affected agency 30 days prior to initiation of construction activities. For example, if more than one construction crew is working concurrently, two compliance monitors will be required. In addition to the general compliance monitor, Tri-State will require the construction contractor to provide a detailed schedule for activities that occur in sensitive areas, such as in proximity to eligible cultural resources, to ensure the specialized compliance monitor will be present during construction related activities.

See Table G-2 and Figure G-1 for information on compliance roles and responsibilities.
Table G-2. Roles and Responsibilities

<table>
<thead>
<tr>
<th>Tri-State’s Compliance Coordinator</th>
<th>Third-Party Compliance Monitor</th>
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<tr>
<td>Pre-Construction Training</td>
<td>Assist with/document trainings/tailgate briefings</td>
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<td>Compliance with POD, ROW stipulations</td>
<td>Monitoring compliance/reporting non-compliance</td>
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<tr>
<td>Coordinate with Tri-State contractors and submitting documentation to support Notice to Proceed(s) (NTPs) and variances</td>
<td>Confirm documentation, track NTPs/variances, help agencies to determine adequacy of compliance</td>
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<tr>
<td>Provide documentation of compliance associated with stop work orders</td>
<td>Assist agencies with Draft Stop Work Orders, review of compliance documentation, and issuance of approval of NTPs and/or variances</td>
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</table>
| Provide information on construction and compliance status and prepare final Compliance and Monitoring Report. | Compliance reporting including:  
  - Daily reports, photos, communication on website;  
  - Weekly summary reports; and  
  - Final Compliance and Monitoring Report. |

Figure G-1: Environmental Compliance Team
**Stop Work Orders**

Reasons for a stop work order include but are not limited to:

- A safety concern to people or harm to property;
- Potential harm to threatened or endangered species or protected cultural or other resources;
- A violation of project or permit specifications and requirements;
- A violation of federal or state regulations; or
- Repeated violations of non-compliance.

Before a stop work order is issued, steps will be taken to communicate and coordinate with all appropriate personnel, unless the Project could or has resulted in a reportable compliance violation as outlined herein, in which case the monitor will have full authority to cease construction activity. A stop work order will only apply to the area where there is an issue.

After a stop work order has been issued, Tri-State will work with all affected agency representatives to identify necessary corrective actions, including timeframe for implementation, to resolve the issue of non-compliance.

Documentation of resolution provided by Tri-State must be confirmed by the monitor and approved by the agency representatives. Work may not begin again until a written Notice to Proceed has been signed by the agency representative and has been provided to Tri-State. Stop work orders will be documented in daily (if necessary) and weekly compliance monitoring reports.

**Enforcement**

The agency representative, the monitor, and Tri-State’s authorized compliance coordinator are authorized to stop work at any time if the Project is out of compliance with the POD and associated local, state, or federal permits/conditions of approval. The monitor does not need to contact Tri-State prior to stopping construction if there are compliance concerns. The monitor will report this cessation in work to the appropriate agency representative/landowner and Tri-State within 24 hours. Construction will not be permitted to continue until the time that the non-compliance issues have been rectified and the corrective measures have been documented, approved by the applicable federal, state, or local permitting representative and/or land use manager/owner.

The monitor will concurrently report any compliance concerns directly to Tri-State’s compliance coordinator representative for the Project as well as the agencies representative verbally and/or in writing either via email or memo. This process ensures that both the agencies and Tri-State are aware of any compliance concerns that may arise during construction and will enable both Tri-State and the agency to identify and implement corrective actions whenever necessary.

**Training for All Construction Personnel**

Tri-State will coordinate environmental compliance training prior to any personnel starting work on the transmission line. Tri-State will work with the BLM and USFS agency representative and the monitor to prepare environmental compliance training. Tri-State’s compliance coordinator will prepare a Power Point Presentation that all construction personnel are required to review with Tri-State’s environmental department, monitor, and the agencies representative prior to the start of construction. This format works well in the field and once printed in hard copy serves as the on-site training for those that may join the job site at a later time. Tri-State personnel, transmission construction crew, vegetation management team, grading contractors, and surveyors will be required to sign a form stating they have completed environmental training for the Project that also specifically states that they have been educated on all compliance related issues for the Project, have reviewed the Environmental Compliance and Monitoring Plan, and are entirely liable for any and all environmental violations. These records...
will be kept on file both at Tri-State and if desired at the BLM and USFS offices. As new personnel come on-site throughout various stages of the project, the training will be initiated and the records (signed forms) updated and submitted to the agencies.

Prior to construction, Tri-State will arrange a pre-construction meeting for each year of construction activities with the BLM and USFS agency representative and resource specialists, and the monitor, Tri-State construction inspectors, construction contractors, and Tri-State engineering and construction personnel. At this meeting, Tri-State environmental department will review all compliance requirements for the Project and give each agency time to discuss any additional specific concerns, requirements, and expectations.

Tri-State will create a master spreadsheet to be maintained by the Project’s monitor. The spreadsheet will outline the primary contact information for Tri-State’s environmental department, Tri-State’s construction department and inspectors, the construction contractor’s foreman and second in command, the agencies’ representative, CPW, and local emergency services and medical facilities. This spreadsheet will be updated as required to account for changes in staff and resubmitted to the larger Project team.

**Environmental Monitoring Strategy and Compliance Reporting**

The monitor will work daily with the Tri-State’s compliance coordinator to ensure the agency representative(s) are aware of where the contractors will be working from day to day, what potential challenges have arisen, and to determine if variances may be needed to the POD which will require agency approval prior to the work occurring. Environmental monitoring will be planned according to resources involved for each project phase, and coordinated with the sequence of construction (for example, for line construction the sequence will include vegetation clearing/road improvement, drilling-foundations, structure assembly, conductor stringing, clean-up and reclamation).

The overall strategy will be as follows: Monitor will meet daily or weekly as needed with the on-site supervisor(s) to determine monitoring needs and resource issues, and plan ahead for avoidance and minimization. Detailed maps 1 inch = 600 feet and drawings will be provided to the environmental monitor and the on-site coordinator, and used for field verification, resource issues, and clearance tracking. In addition to the maps, a detailed environmental line list will be updated daily by the environmental monitor and used for communication between the environmental monitor and construction on-site supervisor. An example of environmental line list is attached (see Attachment G-1).

It is Tri-State’s standard safety practice to have tail gate meetings each morning to review schedules, staff, concerns, and environmental and safety concerns. The monitor will provide weekly inspection reports to both the affected agencies representative and Tri-State’s authorized environmental compliance representative. If there is a possible compliance concern, the compliance concern will be documented the day of the occurrence and provided to Tri-State and the agencies representative on the day of the occurrence. All records of communication on the matter will be saved in the compliance record files to be managed by the monitor and submitted to both the affected agency and Tri-State’s compliance coordinator. Some form of electronic system that has been agreed upon by the local BLM and USFS specialists will be used to provide timely information to agency specialists. This could include a google drive, SharePoint site, File Transfer Protocol, or other form of electronic file sharing system.

The weekly environmental monitoring reports will include the following:

- A summary of the work completed for the week including location, land owner/manager, and any schedule changes for work in environmentally sensitive areas;
- Summary of all reportable non-compliance observed by the monitor and agency representatives during the reporting period;
Corrective actions implemented in response to all instances of non-compliance and the effectiveness of all corrective actions implemented;
Tailgate briefings and updates on new personnel on site requiring compliance training;
Summary of variance requests; and
Status of stop work orders.

Reportable non-compliance concerns will be reported within 24 hours or less of recognition of a concern. Minor compliance violations will be included in the weekly report to the agencies. Compliance related issues will be categorized in the following manner:

- **Non-reportable violations:** A non-reportable violation will be a one-time occurrence of a compliance violation resulting from authorized construction activities that do not result in unauthorized ground disturbance or adverse impacts (as defined by the agencies representative and monitors) to natural or cultural resources or land uses. (Example: inadvertently and temporarily parking outside of an authorized ROW [one time only] outside of a sensitive resource area). These types of violations will not require a formal non-compliance report and corrective action beyond a follow-up with Tri-State and its contractors and notification that a second offense will require a report to the agencies and corrective action.

- **Reportable violations:** A reportable compliance violation will include; 1) any action that is in non-compliance with the POD resulting in unauthorized ground disturbance, use of unauthorized roads, and/or impacts or risk to sensitive biological, geological, or cultural resources and land uses; or 2) results in violation of a federal, state or local permit or condition of approval that will require corrective action or; 3) a second or subsequent violation of a non-reportable violation. These compliance concerns will require agency notification, coordination and corrective action and documentation. Examples of a reportable violation include, but are not limited to: construction crews grading outside of the authorized ROW; construction actions that result in impacts to wetlands beyond that which was authorized in federal, state, or local permits; initiation of construction during a seasonal constraint for a specific resource; and any action that threatens the health and safety of construction personnel, monitors, agency representatives and the public at large.

**Construction Variance**

While Tri-State proactively plans construction activities to address potential changes/challenges that may arise during construction, it is impossible to foresee all issues that may arise over the course of the three year construction period. The construction variance process may be required for unexpected events or changes in site conditions that may occur during Project construction that will result in changes to the approved POD. For example, environmental conditions might make the level of improvement originally proposed for access roads to increase or require re-alignment. In some cases extra temporary work space may be required to facilitate construction in challenging areas. Construction variances will be required anytime disturbance, construction, or access is required outside of authorized access ROW, the transmission ROW, staging areas, and approved temporary use areas.

The construction variance process will enable Tri-State to propose a variance to request a change to the POD and ensure the affected agencies review the proposed changes/activities, complete environmental and cultural resource surveys if required, and review potential impacts prior to determining if the variance can be approved. Construction variance requests will only be submitted to the affected agency/landowner where the variance is proposed. The agency/landowner will determine if the variance can be approved as proposed, revised as appropriate, or not accepted (see process for variance approvals below). No construction activity associated with the variance can proceed until the variance checklist has been reviewed and approved and the authorized agency representative has signed off on the variance request. Approved variance requests will be saved by the monitor and Tri-State’s authorized construction coordinator.
If the construction contractor determines a variance is required, they will communicate this request to Tri-State’s designated construction inspector who will directly contact the monitor. The monitor and Tri-State’s compliance monitor will notify the affected agencies representative to discuss the request. If the agency representative determines that the proposed change/activity will require a formal variance, it will be the responsibility of Tri-State’s compliance monitor in coordination with the monitor to prepare a variance request as outlined further below. Tri-State will be responsible for contracting any additional survey work (biological and cultural resources, wetlands, etc.) required to address a variance outside of authorized disturbance areas. Tri-State must obtain formal variance approval via a written letter or signed variance request form from the BLM and/or USFS prior to the change in proposed activity is permitted to occur.

The proposed variance request form to be used for the Montrose-Nucla-Cahone Project is included below as Attachment G-2. The following discusses the specific levels of variances that will be considered for the Project and the communication, review, and approval process for each of the three variance levels.

**Variance Levels and Approval Process**

When a variance is sought, Tri-State’s Compliance Coordinator will coordinate with the monitor and the agencies representative to complete the variance request and supporting documentation. The monitor is responsible for transmitting the supporting documentation, including a summary of prior environmental analysis and their on-the-ground perspective of the requested variance to the agency representative and Tri-State for variances on BLM and USFS administered lands. Tri-State will be responsible for submitting the variance and obtaining approval of the construction variance. Tri-State will use an agency-approved Variance Request Form (see Attachment G-2) to track variances.

The variance process will allow Tri-State to submit variances for approval, depending on the scope of the proposed modification, to the monitor (Level 1 or 2 Variances) or the agency representative (Level 3 Variances). The agency representative (on federally-managed lands only) is responsible for approving, approving with revisions, or denying a Level 3 Variance request. The monitor is responsible for coordinating with Tri-State and its contractor(s) prior to implementing the variance modifications.

The monitor will participate in the variance review process and provide Tri-State and the agencies representative documentation to support the Variance Request Forms (see Attachment 1). The type of documentation and participation required will depend upon the type and level of variance requested. The monitor will also be responsible for documenting variance requests and approvals in their weekly compliance monitoring report. Agency representatives will be notified of any variance requests on lands or facilities under their jurisdiction and provided the opportunity to review and comment on such requests. The exception is Level 1 Variance requests, which will be noted in the weekly and if necessary, daily monitoring report.

The following outlines the proposed variance levels for the Project:

**Level 1 Variance (Field Decisions)** – A Level 1 Variance is a site-specific, minor change to Project specifications or mitigation measures that provides equal or better protection to environmental resources, does not alter performance-based requirements, does not violate agency requirements and does not impact new landowners. The affected area will be within the ROW and previously surveyed corridor for cultural and biological resources. These minor variance requests can be either approved or denied by the monitor in the field during normal construction operations. This will include a follow-up contact with the agency representative. Level 1 Variances may also be used to document and disseminate agency-directed changes to mitigation measures. Some examples of a Level 1 Variance include:

- Changing areas required for topsoil stripping;
- Shifting extra workspace along, but within, the ROW for a short distance and within the previously
surveyed corridor (without increasing land use disturbance in type or acreage or impacting cultural or sensitive resources); and

- Modifying setbacks at water bodies and wetlands where site-specific conditions during construction do not allow for proper placement of spoil without impacting cultural or other sensitive resources.

**Level 1 Variance:** To initiate a Level 1 Variance request, Tri-State will fill out a Variance Request Form in coordination with the monitor, who will obtain the appropriate signatures. The site-specific situation will be evaluated by the monitor, who will determine whether the variance level requested is appropriate.

The monitor may approve a Level 1 Variance request if the results of implementing the change will provide equal or better protection of the resource than the permitted environmental protection or mitigation measures, or if the measure is not applicable to that specific site. If a Level 1 Variance request is approved in the field, the monitor will sign the Variance Request Form. A Level 1 Variance request can be implemented in the field as soon as it is approved by the monitor. In some cases, the monitor may grant verbal approval and then complete the paperwork.

The monitor will document the variance approval in the weekly compliance monitoring report and send it to Tri-State and the agencies representative. If the variance exceeds the monitor’s authority level, the monitor will inform Tri-State that a Level 2 or Level 3 Variance request is required.

**Level 2 Variance:** A Level 2 Variance request exceeds the field decision authority of the monitor and requires discussion with the agency prior to submittal of a variance request. The agencies representative must approve a Level 2 Variance. Level 2 variance requests generally involve project changes that will affect an area outside of the ROW, but within the corridor previously surveyed for cultural resources and sensitive resources.

Some examples of a Level 2 Variance request include:

- Using a workspace outside of the ROW, but within the corridor previously surveyed for cultural and sensitive resources;
- Modifying a previously approved access road in ways not previously identified;
- Modifying seed mixes approved in agency documents due to unavailability;
- Incorporating a minor route realignment where no new landowners will be affected and all work areas are within previously surveyed areas; and
- Requesting entry into a Limited Operating Period Area before or after the allowed time.

To initiate a Level 2 Variance request, Tri-State’s compliance coordinator will fill out a Variance Request Form and prepare the appropriate supporting documentation. Tri-State will then obtain the appropriate signatures, and complete and submit the Variance Request Form and supporting documentation by e-mail (scanned copy) or facsimile to the agencies representative. The monitor, Tri-State’s authorized representative, and the agencies representative will discuss either in the field or via conference call and determine what situations warrant additional discussions before Level 2 variances are approved.

If the Level 2 Variance request is approved, the agencies representative will sign the Variance Request Form and e-mail the approved form (scanned copy) to the Tri-State representative, and if necessary, other applicable federal and regulatory agency representatives. The variance may be implemented in the field as soon as the approved variance is received.

**Level 3 Variance:** A Level 3 Variance request generally involves project changes that will affect an area outside of the previously approved ROW and corridor previously surveyed for cultural and sensitive resources or has potential to impact cultural resources, sensitive species or other sensitive resources.

Some examples of a Level 3 Variance include:
- Requesting extra workspaces, access roads, route re-alignments, or facility relocations that affect new landowners or sensitive environmental areas, or for which landowner approval cannot be obtained;
- Requesting project-wide changes to mitigation measures or construction/restoration procedures;
- Requesting extra workspaces, access roads, or route realignments outside of the previously surveyed corridor that require additional surveys and agency approvals that affect resources of sufficient sensitivity to require a Level 3 Variance approval as determined by the agencies representative in consultation with the affected local agencies, as needed; and
- Modifying sites potentially eligible for the National Register of Historic Places not previously addressed through the 106 consultation process or involving new/unauthorized impacts to state or federally protected species or their habitat.

The monitor will assist in providing documentation to support the processing of the request and will post the approval form on the Project website. Tri-State and the monitor will consult with the affected agencies representative on a case-by-case basis via telephone call or email. The monitor, agencies representative, and Tri-State representative will meet with the affected local jurisdictions and determine what situations warrant additional discussions with the field offices before Level 3 variances are approved.

To initiate a Level 3 Variance request, Tri-State will first seek comments from the agencies representative before filing the variance request. Any potential unauthorized changes to impacts to eligible cultural resources or federally listed species/critical habitat will require additional consultation and assessment of effect. The Variance Request Form provided below in Attachment 1 includes a checklist that must be reviewed for all levels of variance. Landowner approval must be documented, as appropriate.

Level 3 variances will likely need additional environmental review. The level of review will be determined based on the location of the variance in relation to sensitive resources and land uses as well as the extent and duration of the variance request. In cases where a major variance is required (such as a re-route of the transmission line in a particular area or construction of a brand new access road in critical habitat) additional review under NEPA may be required. NEPA compliance could be a Categorical Exclusion, Determination of NEPA Adequacy or an EA, based on the anticipated level of effect. A Level 3 variance cannot be granted until a decision document and variance has been signed by the agency’s Authorized Officer.

Final Construction Compliance Report

Within 30 days prior to the scheduled close of Project construction, the monitor will coordinate a construction closeout meeting with representatives of Tri-State, BLM, and USFS to review and document that all agency compliance requirements have been met or will be met by the end of construction, identify areas of improvement, and ensure that all compliance issues have been satisfactorily resolved or will be close to resolution by the end of construction.

All outstanding issues will include a detailed plan for closure by the end of construction. Following this field inspection, the monitor will prepare a draft Construction Compliance Report. The draft Construction Compliance Report will be submitted to the agencies representative within 30 days of completion of the field inspections. The draft report will be circulated to the agencies representative for a 30-day review period. The monitor will provide a Final Construction Compliance Report to the agencies representative within 20 days of the end of the review period. The Construction Compliance report will include the following:

- Summary of Variance Requests, including variance number; variance type, location and level; submittal date; supporting documentation; and approval date, if applicable;
- Summary of Reportable Violations, including violation date, type, and location as well as resolution and follow-up;
- Summary of additional documentation, including list of additional resource surveys and any additional
NEPA; and
- Summary of any Stop Work Orders, including issue, date, resolution, and supporting documentation.

**Post-Construction Inspections**

Once construction of the Project is complete and Tri-State’s construction contractors have demobilized, the agencies representative, Tri-State authorized representative, and the monitor will participate in one or more post-construction inspections. The monitoring contracts will remain open until all construction-related activities, including restoration and initial permanent seeding, are complete. The environmental monitor will also ensure post-construction compliance with committed conservation measures and mitigation requirements. The contract will conclude at such time during restoration mutually agreeable to the agencies representative and Tri-State. The primary purpose of the post-construction inspections is to:

- Evaluate the status of restoration and re-vegetation of the ROW;
- Monitor the effectiveness of erosion controls; and
- Document ROW areas that may need follow-up work.

The monitor and Tri-State authorized representative will participate in the post-construction inspections along with the agencies representative. The monitor will be responsible for preparing a Post-Construction Inspection Report for each post-construction inspection completed, including recommendations for the ongoing restoration, revegetation, and erosion control efforts.

**Emergencies**

Emergencies include incidents (fires etc.) and accidents (hazardous material or fuel truck spill etc.) requiring immediate action. They will be communicated immediately to Tri-State’s Dispatch and the appropriate authorities. Tri-State’s construction field supervisor is in turn responsible for notifying construction personnel, the monitor, appropriate agencies representative and landowners (if the emergency event occurs on private land). When an emergency occurs, personnel will act appropriately to preserve life, protect resources and remove immediate hazards in a manner that minimizes environmental impacts. The agencies representative will determine if the emergency resulted in non-compliance with local, state, and federal permits and conditions of approval. The agencies representative will determine what, if any, additional corrective actions are required to mitigate the compliance issue. This determination will depend on the situation and site conditions and whether contractor negligence contributed. All emergency events will be documented in weekly monitoring reports and will include the affected agency’s required corrective actions (if required).

**Attachments**

G-1 Environmental Line List for Daily Monitoring and Compliance Tracking During Construction

G-2 Tri-State Generation and Transmission Association, Inc.; Montrose-Nucla-Cahone Transmission Project Variance Request Form
Attachment G-1: Environmental Line List for Monitoring and Compliance
## Environmental Line List for Monitoring and Compliance

<table>
<thead>
<tr>
<th>POLE Structure #</th>
<th>Construction Activity</th>
<th>Timeline</th>
<th>Status of Env. Clearance</th>
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<tbody>
<tr>
<td></td>
<td>Vegetation Removal / Road Improvement/ Transmission Line Construction</td>
<td>Drilling/Foundations</td>
<td>Structure Assembly</td>
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</table>
Attachment G-2 Tri-State Variance Request Form
Montrose-Nucla-Cahone Transmission Improvement Project

Variance Request Form

<table>
<thead>
<tr>
<th>Date Submitted:</th>
<th>Variance Request # (For Office Use Only):</th>
<th>TS-</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Approval Required:</td>
<td>Applicable POD Section</td>
<td>Map Exhibit BLM 11</td>
</tr>
<tr>
<td>Agency Approval Required:</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Cost Impact?</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Variance Communication Classification:

☑ Class I: Field ☐ Class II: Internal ☐ Class III: External

Location:

☑ Access Roads ☐ Transmission Line ☐ Staging Areas

Map Atlas Sheet: 11 Landowner/Parcel: Structure: Access:

Describe variance being requested (attach drawings and photos as needed):

Provide justification for variance (attach drawings and photos as needed):

Provide a brief analysis of impacts that may result from the variance, including increases in existing effects, impacts to sensitive resources, potential stormwater concerns, and the significance levels of these impact(s):

Date variance is expected to be implemented: Requesting Party:

Attachment(s) (check one):

☐ Yes ☐ No
## Tri-State Review (Class I, II, III)

<table>
<thead>
<tr>
<th>Title</th>
<th>Name</th>
<th>Party Consulted</th>
<th>Date</th>
<th>Conditions (see attached)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Manager</td>
<td></td>
<td>☐</td>
<td>☐</td>
<td>☐ Yes ☐ No</td>
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<tr>
<td>Environmental Project Manager</td>
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<tr>
<td>Construction Inspector</td>
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<td>Lead Environmental Inspector</td>
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<tr>
<td>Land Agent</td>
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</tbody>
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### Landowner Review (if appropriate)

<table>
<thead>
<tr>
<th>Landowner Name</th>
<th>Communication Attached</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landowner Signature (if applicable)</td>
<td>N/A</td>
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</tbody>
</table>

### Agency/Organization Review (Class III)-BLM

Determine required agency approvals based on the following:

- Is the variance a substantive deviation from the POD (i.e., does the variance require additional environmental clearances)?
- Have biological resources/habitats been surveyed?
- Have cultural resources been surveyed?
- Will wetlands or waters of the U.S. be avoided?
- Is this a substantive variance from a permit?
- Does this warrant a change in the stormwater plan?
- Is the proposed work on private land?
- Is the proposed work on BLM land?

<table>
<thead>
<tr>
<th>Agency/Organization</th>
<th>Name</th>
<th>Communication</th>
<th>Date</th>
<th>Conditions (see attached)</th>
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