

# **APPENDIX D. ENVIRONMENTAL AND CONSTRUCTION COMPLIANCE MONITORING PLAN**





# **BARREN RIDGE RENEWABLE TRANSMISSION PROJECT**

## **Environmental and Construction Compliance Monitoring Program**

Los Angeles Department of Water and Power

For the

**California Desert District Office**  
Moreno Valley, California

September 2012

Case File Number: CACA-48871

# Table of Contents

<b>1.0</b>	<b>Introduction.....</b>	<b>1-1</b>
1.1	Purpose of This Report .....	1-1
<b>2.0</b>	<b>Objectives of the Environmental and Construction Compliance Monitoring Program.....</b>	<b>2-1</b>
<b>3.0</b>	<b>Environmental Compliance Monitoring and Management.....</b>	<b>3-1</b>
3.1	Construction Plan .....	3-1
3.2	Compliance Monitoring and Management .....	3-2
3.2.1	BR RTP Contacts.....	3-3
3.2.2	Compliance Manager.....	3-3
3.2.3	Coordinate with the BLM and other agencies, as determined necessary, on reviewing and approving variance requests. ....	3-4
<b>4.0</b>	<b>Reporting and Documentation .....</b>	<b>4-1</b>
4.1	Weekly Reports .....	4-1
4.1.1	Communication.....	4-2
4.1.2	Acceptable .....	4-2
4.1.3	Problem Area.....	4-2
4.1.4	Noncompliance .....	4-3
4.1.5	Serious Violation .....	4-3
4.2	Monthly Summary Reports.....	4-4
4.3	Non-Public Project Website .....	4-5
<b>5.0</b>	<b>Variations .....</b>	<b>5-1</b>
5.1	Level 1 Variations (Field Decisions).....	5-1
5.2	Level 2 Variations .....	5-2
5.3	Level 3 Variations .....	5-3
<b>6.0</b>	<b>Stop Work Authority.....</b>	<b>6-1</b>
<b>7.0</b>	<b>Training and Preconstruction Meeting .....</b>	<b>6-1</b>
<b>8.0</b>	<b>Equipment.....</b>	<b>6-1</b>

## Figures

Figure 1:	Electronic Web-Based Reporting System .....	4-5
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## **Attachments**

- A: Monitoring Report Cover Page Form
- B: Monitoring Report Form
- C: Monthly Summary Report Form
- D: BLM Authorized Officer Weekly Report
- E: Certification of Completion of Worker Environmental Awareness Program
- F: Complaint Report/Resolution Form
- G: Key Events List
- H: Non-Conformity Report
- I: Variance Request Form

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## List of Acronyms and Abbreviations

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AO	Authorized Officer
BLM	Bureau of Land Management
BR-RIN	Barren Ridge-Rinaldi
BR RTP	Barren Ridge Renewable Transmission Project
CDFG	California Department of Fish and Game
CM	Compliance Manager
CMO	Construction Monitor
CPM	Compliance Project Manager
ECCMP	Environmental and Construction Compliance Monitoring Plan
EI	Environmental Inspector
FLPMA	Federal Land Policy and Management Act
LADWP	Los Angeles Department of Water and Power
NFS	National Forest System
NOP	Notice of Preparation
PDCI	Pacific Direct Current Intertie
POD	Plan of Development
ROD	Record of Decision
ROW	Right-of-way
USFWS	U.S. Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program

# **1.0 Introduction**

## **1.1 Purpose of This Report**

This report presents the objectives of the United States Bureau of Land Management (BLM) Environmental and Construction Compliance Monitoring Program (ECCMP) for the Barren Ridge Renewable Transmission Project (BR RTP or Project). This report:

- Describes the responsibilities of the contractor hired to conduct the ECCMP on behalf of the BLM (referred to in this report as the Monitoring Contractor);
- Outlines the level of effort anticipated from the Monitoring Contractor in implementing the ECCMP;
- Defines the decision-making authority of the Monitoring Contractor; and
- Describes participation by the Monitoring Contractor in the BR RTP Worker Environmental Awareness Program (WEAP).

The BLM requires holders of right-of-way grants to prepare and fund an environmental compliance monitoring program to ensure compliance with the BLM terms, conditions, and stipulations in the right-of-way grants, the Plan of Development (POD), and other project specific mitigation, terms, and conditions (listed in detail in Chapter 2.0, Objectives of the Environmental and Construction Compliance Monitoring Program).

This report also discusses the monitoring, reporting, and documentation requirements, stop work authority, and the variance process.

## **2.0 Objectives of the Environmental and Construction Compliance Monitoring Program**

The overall objective of the ECCMP for the BRRTP is to conduct inspections of construction activities, evaluate compliance or noncompliance with the Project measures and conditions during Project construction, and document that compliance or noncompliance. This ECCMP specifically focuses on the construction phase of the BRRTP. A similar program with phase-specific measures and conditions would be developed and implemented during the Project operation and decommissioning phases. The contractor hired to implement the ECCMP on behalf of the BLM, referred to in this report as the Monitoring Contractor, will provide a Compliance Manager and on-the-ground Compliance Monitors to meet this objective.

The environmental mitigation requirements for BRRTP comprise the following:

- The Adopted Avoidance, Minimization, and Mitigation Measures provided in the Final Environmental Impact Statement/Environmental Impact Report as included in Appendix C to the BLM Record of Decision (ROD).
- Terms, conditions, and stipulations in the BLM ROD, right-of-way (ROW) grant, and Notices to Proceed for the Project;
- Construction procedures and mitigation measures in the approved POD for the Project;
- Stipulations, terms, conditions, and other measures from other authorizing Federal agencies' permits and approvals;
- Stipulations, terms, conditions, and other measures from State and regional agencies' permits and approvals.

During construction of the BRRTP, the Environmental Inspectors will conduct inspections of construction activities and the implementation of the required mitigation measures, and will provide regular feedback through the Construction Monitors (CMOs) to the Compliance Manager (CM) on compliance issues to the BLM. The CM will involve other agencies such as the U.S. Fish and Wildlife Service (USFWS) or the California Department of Fish and Game (CDFG) in the monitoring and documenting of

environmental compliance to the extent requested by those agencies and authorized by the BLM. The CM will provide BLM with status updates on the construction and monitoring efforts and will provide BLM with copies of the quarterly monitoring reports and the final monitoring report. Construction progress and environmental compliance will be tracked and documented in quarterly reports prepared and submitted as described in detail later in Section 4.0, Reporting and Documentation. The CMOs will report directly to the CM. The CM will report directly to the BLM Compliance Project Manager (BLM CPM or Authorized Officer [AO]) and other identified Compliance Contacts as directed by the BLM.

Other objectives of the ECCMP are to:

- Facilitate the timely resolution of compliance-related issues in the field
- Provide continuous information to the BLM and other agencies and parties as authorized regarding noncompliance issues and their resolution
- Review, process, and track construction-related changes to Project plans (as described later in Section 5.0, Variances, the Monitoring Contractor will assist with implementation of the variance process in accordance with a predetermined level of decision-making authority granted by the BLM)
- Develop and implement a system for storing the information collected during the ECCMP in a format that will allow easy retrieval and search functions

## **3.0 Environmental Compliance Monitoring and Management**

### **3.1 Construction Plan**

In the event the BLM approves the BR RTP, a ROW grant will be issued to the Los Angeles Department of Water and Power (LADWP). LADWP filed an application with the BLM for a ROW grant pursuant to the Federal Land Policy and Management Act (FLPMA). Under FLPMA Title V (Rights-of-Way), the United States Secretary of the Interior is authorized to grant rights-of-way for the purpose of allowing systems for generation, transmission, and distribution of electric energy.

BR RTP includes the following five Project components:

- Expansion of the existing Barren Ridge Switching Station
- Construction of a new switching station in Haskell Canyon
- Reconductoring of 76 miles of the existing Barren Ridge-Rinaldi (BR-RIN) 230 kV transmission line with larger-capacity conductor between the Barren Ridge Switching Station and Rinaldi Substation
- Addition of 12 miles of new 230 kV circuit on the existing double-circuit structures from Haskell Canyon to the Castaic Power Plant
- Construction of 61 miles of new 230 kV double-circuit transmission line from the Barren Ridge Switching Station to the proposed Haskell Canyon Switching Station

The new 61-mile 230 kV double-circuit transmission line for the Selected Alternative would begin at the Barren Ridge Switching Station and run south, paralleling LADWP's existing 230 kV BR-RIN and 500 kV Pacific Direct Current Intertie (PDCI) transmission lines. It would extend south from the unincorporated community of Mojave through the Antelope Valley and approximately one mile east of the Antelope Valley California Poppy Reserve before continuing onto National Forest System (NFS) lands and ending at the proposed Haskell Canyon Switching Station.

To implement the BR RTP on lands managed by the BLM, the following actions are required by the BLM:

- Granting of 3.7 miles of new 200-foot-wide ROW adjacent to existing transmission lines for the new 230 kV double-circuit transmission line;
- Authorization of 3.8 miles of reconductoring of the existing BR-RIN 230 kV transmission line on an existing ROW on BLM-managed lands (BLM Right-of-Way Grant LA-088876) as authorized by Congress in the Act of October 10, 1949; and
- Authorization of 275 feet of new 230 kV circuit on existing double-circuit structures on an existing ROW on BLM-managed lands (BLM Right-of-Way Grant RI-2811).

## **3.2 Compliance Monitoring and Management**

The BLM's compliance representatives for the BRRTP are:

- BLM Authorized Officer (AO): the BLM Ridgecrest Field Office official with the administrative authority for the right-of-way grant issuance and authority for accepting and approving Project-related changes
- BLM Compliance Project Manager (BLM CPM): staff level position designated by the BLM AO as the point of contact for all compliance issues.
- Ridgecrest Field Office Compliance Lead: The BLM may also identify additional persons as designated Compliance Contacts, as needed.

The Monitoring Contractor's compliance team will consist of the following personnel:

- Compliance Manager: point of contact position designated by the Monitoring Contractor for all compliance-related issues; reports to the BLM Authorized Officer or the designated BLM Compliance Project Manager for all compliance-related issues.
- Compliance Monitors: on-the-ground Monitoring Contractor personnel responsible for observing and reporting compliance with the terms and conditions of the BLM right-of-way authorization for all phases of Project construction.

The Monitoring Contractor will shall enter into a contract for the Project with LADWP for the payment of the BLM compliance monitoring services provided by the Monitoring Contractor. Those fees will be based on hourly rates, or as otherwise agreed to by the Monitoring Contractor and LADWP.

### 3.2.1 BRRTP Contacts

LADWP has designated the following contact persons for the construction of the BRRTP\*:

- Eric Montag, Project Manager, 213-367-0642
- Chuck Holloway, Manager of Environmental Planning and Assessment, 213-367-0285

\*LADWP maintains the right to update or revise the contact persons for BRRTP.

### 3.2.2 Compliance Manager

The Monitoring Contractor's Compliance Manager for the BRRTP will oversee management of the Environmental and Construction Compliance Monitoring Program, prepare Project materials, participate in any BLM preconstruction meeting; participate in LADWP's Worker Environmental Awareness Program; supervise the monitoring activities, materials, and schedules; supervise the Compliance Monitors; provide guidance on and review of compliance issues; review and process variance requests; and review and distribute weekly reports.

Specific Monitoring Contractor's Compliance Manager responsibilities are:

- Report directly to the BLM CPM or BLM AO or other designated BLM Compliance Contacts;
- Participate in the preconstruction meeting;
- Participate in Worker Environmental Awareness Program/kick-off;
- Verify LADWP's compliance with the BLM's Project environmental requirements;
- Supervise the monitoring activities, materials, and schedules;
- Supervise the Compliance Monitors;
- Ensure that all reported noncompliance is tracked for resolution by LADWP;
- Review, approve, and distribute monitoring reports, correspondence, and scope of work and schedule changes;
- Review work progress, schedules, and budgets related to compliance monitoring activities;

- Confer with the BLM CPM and Compliance Contacts on a regular basis;
- Serve as the contact between BLM and LADWP for compliance issues;
- Serve as BLM's representative to permitting agencies, private landowners, and special interest groups regarding the environmental mitigation efforts on the Project; and
- Coordinate with the BLM and other agencies, as determined necessary, on reviewing and approving variance requests.

The Compliance Manager will be selected from one of the Compliance Monitors. The responsibilities of this individual will consist of both Compliance Manager and Compliance Monitor. In effect, when only one Compliance Monitor is onsite, that individual will serve as the Compliance Manager. On occasions when more than one Compliance Manager is onsite, the Monitoring Contractor will identify one of the Compliance Monitors to act as the Compliance Manager.

### **3.2.3 Coordinate with the BLM and other agencies, as determined necessary, on reviewing and approving variance requests.**

**Compliance Monitors** The Monitoring Contractor will provide sufficient on-the-ground Compliance Monitors during construction of all phases of the Project. The number of Compliance Monitors will be determined based on the specific activities during each construction phase. Specifically, the need for the full-time Compliance Monitors may be re-evaluated throughout the construction phase and the schedule adjusted, as necessary, and as conditions demand.

During construction, many factors may affect the specific deployment of the Compliance Monitors. These include the activity occurring at specific times of inspection, any noncompliance or problem areas documented during previous inspections by the Compliance Monitors, site-specific conditions at the time of construction, skill levels and attitudes of the contractor crews and foremen, and the number of inspection team members.

The Monitoring Contractor's planned monitoring coverage assumes that the construction contractors will demonstrate a high level of environmental compliance, and that LADWP's environmental inspectors and biological monitors will be qualified and experienced.

The Compliance Manager will regularly evaluate the effectiveness of the environmental compliance monitoring in consultation with the BLM and Compliance Contacts to ensure adequate staffing. If determined necessary, the Monitoring Contractor will provide

additional, adequately trained support staff to act as Compliance Monitors on an as-needed basis.

The primary responsibility of the Compliance Monitors will be to monitor and document LADWP's construction, compliance, and/or noncompliance with the Project building, engineering, installation, and environmental requirements. The Compliance Monitors will also review and approve variance requests, as appropriate to their authority level, for implementation of limited variations from mitigation measures previously agreed to by LADWP or stipulated by other agencies (refer to Section 5.0, Variances).

Prior to the start of construction, the Compliance Monitors will become familiar with the LADWP environmental compliance management program, participate in the preconstruction meeting, participate in the LADWP Worker Environmental Awareness Program, and receive additional training as needed from the Monitoring Contractor. The Compliance Monitors will become familiar with the roles and responsibilities of the LADWP field team, environmental inspectors, the required building codes, fire codes, construction documents, other relevant building standards, environmental reporting responsibilities, and the chain of communication. It is assumed that LADWP will provide the Compliance Monitors and the Compliance Manager with copies of all permit requirements for the Project prior to initiation of construction.

At a minimum, the Compliance Monitors will maintain contact with the LADWP environmental compliance staff. Construction activities will be inspected by the Compliance Monitors, and environmentally sensitive areas will be regularly inspected to ensure protection of the identified resources.

The Compliance Monitors will communicate with the LADWP compliance staff on a regular basis. This approach will allow the Inspectors and the Compliance Monitors to exchange information on the status of construction and to discuss any significant construction events scheduled over the next 2 or 3 days. The Compliance Monitors may inspect all activities either with the LADWP inspectors or independently. The Compliance Monitors will have the authority to order the halt of a specific noncompliance activity that is damaging, has the potential to damage a sensitive environmental resource, or is not being performed according to building and construction standards.

The Compliance Monitors will record observations, including digital photo documentation at each location visited. This process will ensure consistent and accurate reporting of site conditions at the time of inspection. Each activity monitored will be assigned a compliance level and documented in a weekly report (refer to Section 4.1, Weekly Reports).

## 4.0 Reporting and Documentation

It is anticipated that the Monitoring Contractor and all compliance monitoring personnel will use a comprehensive weekly summary database reporting system that is posted on a BR RTP website (refer to Section 4.3, Non-Public Project Website) and available for review to other jurisdictional agencies. Under this program, each entire weekly report, consisting of all compliance levels and any photographic documentation from logs, will be available each week and will provide the BLM Project personnel, LADWP, and applicable agencies with a readily accessible record of construction progress, photographic documentation, and documentation of compliance with the Project environmental requirements. The specifics of the reporting and documentation to be used for the BR RTP are described in the following sections.

### 4.1 Weekly Reports

Each Compliance Monitor will compile his/her activity logs and contact information documents into a weekly report on the required cover and form provided in Attachments A and B, respectively. A weekly report will be maintained for the BR RTP. The Compliance Monitor will document the construction level as a percent complete or other identifying method as agreed to by the BLM; document the presence of sensitive species or habitat and culturally sensitive sites; and provide a brief description of the construction activities observed (such as road grading, erosion control, etc.). When appropriate, relevant digital photographs will be taken and included in the weekly report.

Each separate activity monitored and documented in a log will be assigned a compliance level. The compliance levels that will be used for the BR RTP are:

- Communication;
- Acceptable;
- Problem Area;
- Noncompliance; and
- Serious Violation.

### **4.1.1 Communication**

A Communication Report will be prepared when necessary to document and track relevant meetings or discussions between the Compliance Monitor and agencies, LADWP representatives, monitors, inspectors, or other contractor personnel.

### **4.1.2 Acceptable**

An Acceptable Report will be prepared when a Compliance Monitor determines that an inspected area or activity is in compliance with the Project specifications and all mitigation measures have been adequately implemented.

### **4.1.3 Problem Area**

The Compliance Monitor will prepare a Problem Area Report to record an observation that a location or activity does not meet the definition of acceptable but is not considered a noncompliance. The problem area category will be used to report a range of events and observations including:

- An incident that is accidental or unforeseeable but is not out of compliance with the Project specifications, and LADWP's response is appropriate and timely. An example would be a fuel leak where Project personnel respond properly by stopping, containing, and cleaning up the spill in accordance with the Project specifications.
- A location where the Project is not out of compliance with the specifications but, in the judgment of the Compliance Monitor, damage to resources could occur if corrective actions are not taken. Some examples are:
  - A topsoil pile located on the bank of a drainage; or
  - An improperly constructed/located erosion control structure.
- An activity that the Compliance Monitor determines is an unintentional and isolated departure from the Project specifications, with no damage to resources. An example would be a small amount of blading outside the access pathway that has no effect on sensitive resources such as sensitive plant habitat or a water body.

If a problem area is resolved in a timely manner, it will not be considered a noncompliance. If a problem area is found to be a repeat situation or multiple instances of a similar nature occur, is not corrected within the established time frame, or results in

resource damage because timely corrective action failed to occur, the Compliance Monitor may document the problem area as a noncompliance as described in the following section.

#### **4.1.4 Noncompliance**

A Noncompliance Report will be issued when a Compliance Monitor observes an activity that violates (defined as not in compliance with) the Project specifications, building codes, or other requirements; results in damage to resources; or places sensitive resources, personal safety, or worker safety at unnecessary risk. Some examples of noncompliance activities are:

- Failure to install or maintain required erosion control devices;
- Surface-disturbing activities conducted without an appropriate biological or cultural resources monitor present.

The Compliance Monitor will notify LADWP compliance staff about a noncompliance before issuing a Noncompliance Report. The Noncompliance Report will include the name of the inspector or monitor and the time of notification. Where practicable and where the nature of the noncompliance activity warrants, the inspector or monitor will work closely and collaboratively with the Compliance Monitor to determine the appropriate corrective action.

Resolution of noncompliance activities will involve close coordination with the LADWP compliance staff, the BLM Compliance Project Manager (BLM CPM), and contractor construction supervisory personnel to ensure that the corrective measures are properly understood and implemented. It is the responsibility of the LADWP compliance staff to provide follow-up documentation to the BLM and other agencies with appropriate jurisdiction over the issue as well as to the Compliance Manager. Once LADWP documents the resolution of a noncompliance, the applicable Compliance Monitor will inspect the area and verify and document that the noncompliance has been adequately resolved.

#### **4.1.5 Serious Violation**

A Serious Violation Report will be issued by a Compliance Monitor immediately on observing an activity that is not in compliance with the Project specifications and causes substantial harm to resources or poses a serious threat to sensitive resources or worker/public safety. Examples of serious violations include deliberately conducting an activity that results in disturbance within an exclusion zone for a sensitive resource, repeated or cumulative noncompliance activities that could lead to a substantial impact

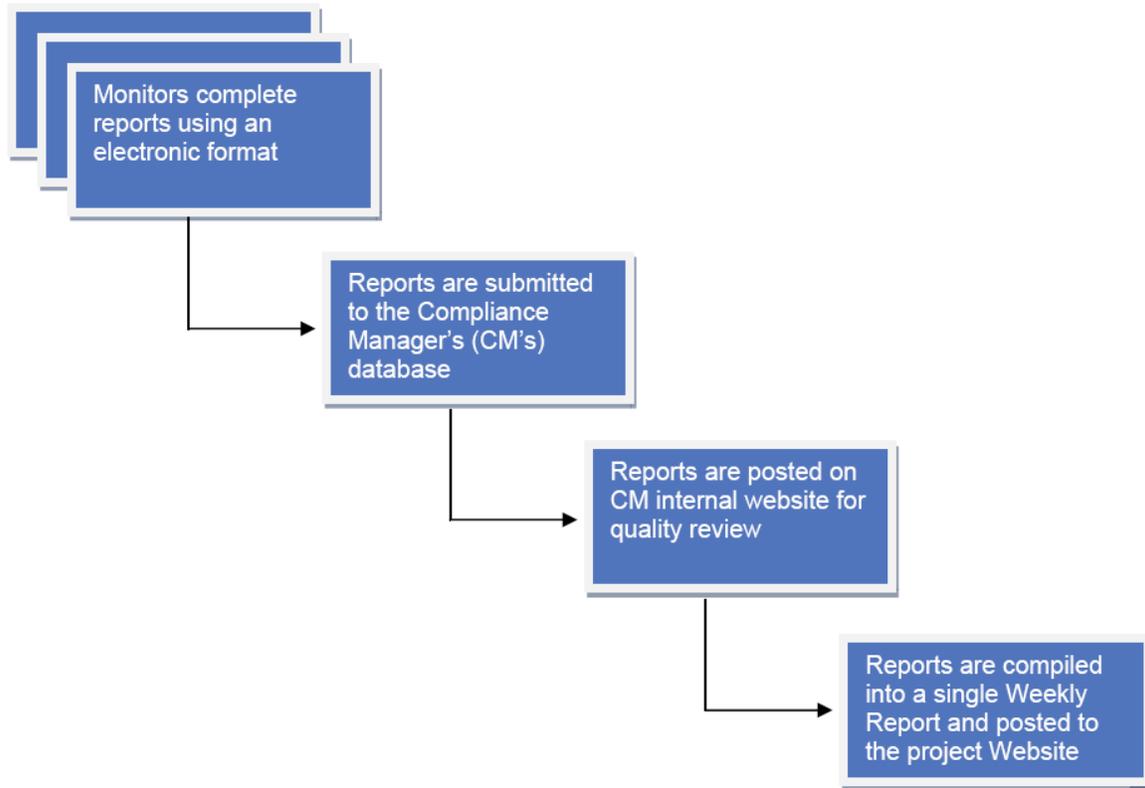
on resources, and failure to correct previously identified noncompliance activities in an established time frame.

A Serious Violation Report requires that the Compliance Manager and the BLM CPM participate in a conference call or meeting with the LADWP compliance staff for the Project and Compliance Manager to discuss the violation, the proper corrective actions, and possible follow-up enforcement actions that could be imposed. It will be the responsibility of the LADWP environmental inspection team to provide follow-up documentation to the BLM and other agencies with appropriate jurisdiction over the issue as well as to the Compliance Manager. Once LADWP documents the resolution of a serious violation, the Compliance Monitor will inspect the area and verify that the issue has been adequately resolved.

Inspections and relevant photo documentation completed by each Compliance Monitor will be sent electronically to the Monitoring Contractor's database server at the end of each work week. The following morning, the separate reports will be compiled into one Weekly Monitoring Report, reviewed by the Compliance Manager, and posted on the non-public password-protected Project website (refer to Section 4.3, Non-Public Project Website). A flow diagram of the electronic web-based reporting system is shown on Figure 1. When the reports are posted, the Compliance Manager will send an email to the authorized distribution stating that the reports are available. The email will summarize the compliance levels for the reports issued each day and include the link to the website. The BLM, Monitoring Contractor, and authorized LADWP representatives will be included in the distribution for all reports.

## **4.2 Monthly Summary Reports**

Monthly Summary Reports will be issued that briefly describe construction activities during the reporting period and summarize by compliance level the number of reports completed by the Compliance Monitors during that reporting period and cumulatively for the construction period for that project phase. The Monthly Summary Report will also include a table of Problem Area and Noncompliance Reports issued by the Compliance Monitors during the reporting period and the Level 1, 2, and 3 variance requests approved by the Compliance Monitors and the Compliance Manager during the reporting period. The Monthly Summary Report will also include a table summarizing the net acreage of land affected by approved variances on federal land and, for the Archaeological Resources Protection Act and Endangered Species Act, nonfederal land for the reporting period as well as cumulatively. The Monitoring Contractor's baseline electronic database reporting system will be designed to generate all the information in the tables of the Monthly Summary Report.



**Figure 1: Electronic Web-Based Reporting System**

The Monthly Summary Reports will be posted on the non-public Project website (refer to Section 4.3). When the Monthly Summary Report is posted, the Compliance Manager will send an email to the authorized distribution that it is available. The email will include the link to the website. The BLM, Monitoring Contractor, and LADWP representatives will be included in the distribution for the Monthly Summary Report. A sample Monthly Summary Report is provided in Attachment C.

### **4.3 Non-Public Project Website**

The Monitoring Contractor will establish and maintain a non-public, password-protected, and secure Project website to display the weekly and monthly monitoring reports and the approved Level 1, 2, and 3 variances (refer to Section 5.0, Variances). The BR RTP website may also be used to post meeting minutes, notes from conference calls, and guidance from agencies regarding interpretation of environmental requirements. The BLM and Monitoring Contractor representatives will have access to the entire website. The LADWP representatives will have access to the website.

## 5.0 Variances

During construction of the BRRTP, unforeseen or unavoidable site conditions could result in the need for changes from the approved mitigation measures and construction procedures. Additionally, the need for route realignments, extra workspace, or changes to previously approved construction work areas may arise. Changes to previously approved mitigation measures, construction procedures, and construction work areas will be handled in the form of variance requests to be submitted by LADWP and reviewed and approved or denied by the BLM, with the delegation of some authority for variances to the Monitoring Contractor. The variance process will also be a good mechanism to clarify discrepancies or inconsistencies discovered in Project materials and/or to distribute information to the entire project team.

A system of three variance levels (Levels 1, 2, and 3) will be used to categorize and process variance requests. The three variance levels, the review and distribution process, and the decision-making authority proposed for each level are discussed in the following sections. A sample Variance Request Form is provided in Attachment I.

### 5.1 Level 1 Variances (Field Decisions)

Level 1 variances are site-specific, minor, performance-based changes to Project specifications, construction methods, or mitigation measures that provide equal or better protection to environmental resources or better constructability. These minor variance requests can be reviewed and either approved or denied by the Compliance Monitors in the field during normal construction operations.

Examples of Level 1 variance requests include:

- Allowing rubber-tired vehicles to use additional access roads that would not require any improvement to the road or repairs after construction (“like use”);
- Modifications to erosion control structure locations to minimize erosion potential;
- Minor variations in site-specific plans that reflect differences in site conditions from those that were expected when the plan was developed (e.g., relocation of a spoil storage area within previously approved work areas); and
- Minor changes to the Project design that are required due to site-specific restrictions.

Level 1 variances may also be used to document and disseminate agency-directed changes to mitigation measures.

To initiate a Level 1 variance request, LADWP's representative will fill out a Variance Request Form using the form in Attachment H and obtain the appropriate signatures. LADWP's representative will then contact a Compliance Monitor to review the proposed change. LADWP's representative and the Compliance Monitor will work together to evaluate the site-specific situation and determine if the variance request is appropriate.

The Compliance Monitor may approve a Level 1 variance request if the results of implementing the change will provide equal or better protection for the resource than the original mitigation measure or if the original mitigation measure is not applicable to that specific site. If a Level 1 variance request is approved in the field, the Compliance 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 Compliance Monitor.

The Compliance Monitor will document the variance approval in his/her log and will include the variance in the weekly report (refer to Section 4.1, Weekly Reports) and will transmit the approved form to the Compliance Manager for posting on the Project website (refer to Section 4.3, Non-Public Website).

If the requested variance exceeds the Compliance Monitor's authority level, the Compliance Monitor will inform LADWP's representative that a Level 2 or Level 3 variance request is required.

## 5.2 Level 2 Variances

A Level 2 variance request exceeds the field decision authority of the Compliance Monitor and requires processing by the Compliance Manager. Before the Compliance Manager can issue approval of a Level 2 variance request on federal land, the BLM CPM must approve the request. Level 2 variance requests generally involve Project changes that would affect an area outside the previously approved work area, but within the areas previously surveyed for cultural resources, sensitive species, and biological resources. Level 2 variance requests typically require the review of supplemental documents, correspondence, and records.

Examples of Level 2 variance requests include:

- The use of extra workspace outside the previously approved work area but within previously surveyed areas;

- The use of existing access roads that have not been previously approved if the use would not be considered “like use” that could be approved as a Level 1 variance (refer to Section 5.1, Level 1 Variances);
- Modifying a previously approved erosion control structure in ways not previously identified; and
- Modifications to the plans that are specifically different than those in the approved POD.

To initiate a Level 2 variance request, LADWP’s representative or other designated representative will fill out a Variance Request Form, prepare the appropriate supporting documentation, and obtain the required signatures.

An LADWP representative will complete and submit the Variance Request Form and supporting documentation by e-mail (scanned copy) or fax to the applicable BLM CPM with a copy to the Compliance Manager. Once the approval of the BLM CPM is obtained, the Compliance Manager will process the request.

If the Level 2 variance request is approved, the Compliance Manager will sign the variance request and e-mail the approved form (scanned copy) to the designated LADWP representatives, the Compliance Monitors, and the BLM CPM and Compliance Contacts. The variance may be implemented in the field as soon as the approved variance is received. Verbal approval for Level 2 variance requests will not be granted. The Compliance Manager will document the variance approval in the log and will include it in the weekly report (refer to Section 4.1) and post the approved Variance Request Form on the Project website (refer to Section 4.3).

### **5.3 Level 3 Variances**

Level 3 variance requests generally involve Project changes that would affect an area outside the previously approved work area that are outside the areas previously surveyed for cultural resources, sensitive species, and biological resources, or one that would change the function, structure, technology required, or other part of the Project previously approved in the POD. Level 3 variances may need to be implemented through an amendment to the ROW grant.

To initiate a Level 3 variance request, LADWP’s representative or other designated representative will fill out a Variance Request Form, prepare the appropriate supporting documentation, and obtain the required signatures.

The designated LADWP representative will complete and submit the Variance Request Form and supporting documentation by e-mail (scanned copy) or fax to the applicable

BLM CPM and the Compliance Manager. Once the approval of the BLM CPM is obtained, the Compliance Manager will process the request.

Level 3 variance request approvals must be signed by the BLM CPM or the BLM AO in the case of a ROW grant amendment. The variance may be implemented in the field as soon as the approved variance is received. The Compliance Manager will document the variance approval in the log and weekly report (refer to Section 4.1) and post the approved Variance Request Form on the Project website (refer to Section 4.3).

## **6.0 Stop Work Authority**

The BLM has the authority to stop construction of the BRRTP if an activity is determined to be a deviation from the Project environmental and cultural resource protection requirements or approved construction plans authorized by the BLM ROW grant. This authority may be delegated to the Monitoring Contractor, the Compliance Manager, and/or the Compliance Monitors, as determined appropriate by the BLM. Any order to stop an activity will be followed by a formal written immediate temporary suspension from the BLM CPM or the BLM AO.

## **7.0 Training and Preconstruction Meeting**

The Monitoring Contractor will ensure that LADWP prepares and conducts a Worker Environmental Awareness Program (WEAP) for the construction contractor personnel prior to the start of construction. The BLM Project Manager and Compliance Contacts, and the Monitoring Contractor's Compliance Manager, Assistant Compliance Manager, and Compliance Monitors will participate in the WEAP to present an overview of the ECCMP and to become familiar with LADWP's environmental inspection program and personnel. The Monitoring Contractor's Compliance Manager or the BLM BLM CPM will explain the various components of the ECCMP, emphasizing the objectives of the ECCMP. The discussion will focus on the activities of the Compliance Monitors and their interactions with LADWP compliance staff and construction personnel.

The monitoring and documentation of compliance issues and construction progress will be described. A clear and concise explanation will be presented with respect to the variance request decision authority that the Compliance Monitors will have in the field. Procedures that may be required to address variance requests will also be presented, as well as the time frame required for decisions to be made prior to implementation.

Before the LADWP training, the Monitoring Contractor will ensure that BLM participates in a preconstruction meeting. At that meeting, the BLM CPM will discuss the requirements of the ROD, the additional stipulations, and the ROW grant as well as those of the POD. The Mitigation Monitoring Contractor's Compliance Manager and one Compliance Monitor will participate in this preconstruction meeting.

In addition to participation in the LADWP's WEAP and the preconstruction meeting, the Monitoring Contractor will train the Compliance Monitors in all Project-specific procedures, duties, responsibilities, reporting requirements, and authorities, which includes the authority to grant variances, to complete their assigned tasks during monitoring of the BRRTTP construction activities.

## **8.0 Equipment**

Personnel responsible for monitoring and documenting compliance with the measures in the ECCMP will require field support equipment. Specifically, the Monitoring Contractor's Compliance Manager, Assistant Compliance Manager, and each Compliance Monitor will be equipped with a digital camera and a cellular phone. Additional equipment such as binoculars may also be needed, but would be provided on an as-needed basis.

# **Attachment A**

## **Monitoring Report Cover Page Form**

**PROJECT: Barren Ridge Renewable Transmission Project**

**COMPLIANCE MONITORING PROGRAM MONITORING**

**REPORT COVER PAGE**

**SAMPLE MONITORING REPORT (COVER PAGE)**

The following report is a compilation of the monitoring reports issued by the Compliance Monitors and/or Compliance Manager for activities conducted on [Month] [Day], 20[XX]. Should you have any questions regarding the information contained in this report, please contact MONITOR at (XXX) XXX-XXXX (office) or (XXX) XXX-XXXX (cell phone).

**Communication**  
**Acceptable**  
**Problem Area**  
**Noncompliance**  
**Serious Violation**

**Approved Level 1 Variance**  
**Approved Level 2 Variance**  
**Approved Level 3 Variance**

**Compliance Level**

---

**Total Reports**

# **Attachment B**

# **Monitoring Report Form**

**PROJECT: Barren Ridge Renewable Transmission Project**  
**ENVIRONMENTAL COMPLIANCE MONITORING PROGRAM**  
**MONITORING REPORT**

Report Number: \_\_\_\_\_

Date of Report: \_\_\_\_\_

Compliance Monitor: \_\_\_\_\_

Compliance Level: \_\_\_\_\_

Environmental Inspector: \_\_\_\_\_

Construction Method: \_\_\_\_\_

Location

Construction Spread: \_\_\_\_ Tract#: \_\_\_\_\_

Tract#: \_\_\_\_ Tract#: \_\_\_\_\_

Begin Milepost: \_\_\_\_\_

End Milepost: \_\_\_\_\_

Begin Station: \_\_\_\_\_

End Station: \_\_\_\_\_

Inspection Notes:

Photos:

# **Attachment C**

## **Monthly Summary Report Form**

**DEVELOPER: Los Angeles Department of Water and Power**

**PROJECT: Barren Ridge Renewable Transmission Project**

**Environmental Compliance Monitoring Program  
Summary Report for the Period: XX-XX, 20XX**

The following is a summary of the reports issued by the Compliance Monitors and Compliance Manager for activities conducted between XX-XX, 20XX. This report also summarizes Level 1, 2, and 3 variance requests approved during the same period. The environmental compliance monitoring program for the Barren Ridge Renewable Transmission Project is being implemented under the direction of the Bureau of Land Management (BLM). Copies of the monitoring reports and approved Level 1, 2, and 3 variance requests are posted and available for review on the environmental compliance monitoring program website.

Should you have any questions regarding the information contained in this report, please contact MONITOR at (XXX) XXX-XXXX (office) or (XXX) XXX-XXXX (cell phone).

## SUMMARY OF ACTIVITIES

Between XX-XX, 20XX, the Compliance Monitors and Compliance Manager issued eight monitoring reports. A tabular summary of the reports by compliance level is presented below.

### PROJECT: Barren Ridge Renewable Transmission Project

#### ENVIRONMENTAL COMPLIANCE MONITORING PROGRAM Summary of Monitoring Reports for the Period: XX-XX, 20XX

Compliance Level	Compliance Reports for the Period	Cumulative Compliance Reports for the Project
Communication	X	X
Acceptable	X	X
Problem Area	X	X
Noncompliance	X	X
Serious Violation	X	X
Approved Level 1 Variance	X	X
Approved Level 2 Variance	X	X
Approved Level 3 Variance	X	X
<b>Total Reports</b>	<b>X</b>	<b>X</b>

During this period, three full-time Compliance Monitors conducted inspections of project-related activities and documented LADWP's compliance with the project documents and permits. The Compliance Monitors continued to coordinate with LADWP's Lead Environmental Inspectors (Lead EIs) and other EIs to inspect and discuss areas of concern prior to construction, review areas potentially subject to variance requests, assist with resolution of landowner complaints, and clarify interpretations of the project requirements. The activities of the three Compliance Monitors were directed by the Compliance Manager who continued to coordinate with the BLM as well as with \_\_\_\_\_'s field management and support staff.

A brief summary of the activities conducted during the reporting period is presented below. Copies of the detailed monitoring reports that were used to prepare this summary are posted and available for review on the environmental compliance monitoring program website.

<b>Summary of Activities</b>
<p>A brief text summary of activities that occurred by spread during the reporting period will be provided here</p>

**PROBLEM AREAS AND NONCOMPLIANCES**

One Problem Area Report and no Noncompliance Reports were issued by the Compliance Monitors between XX-XX, 200X as shown in the table below. The Compliance Monitors were notified of one Noncompliance Report issued by LADWP’s EIs.

**SUMMARY OF PROBLEM AREA AND NONCOMPLIANCE REPORTS**

Compliance Level/Report Number	Date Issued	Location (Spread/ Milepost)	Description	Corrective Action
<b>Problem Area</b>				
-None-				
Monitoring Report #XX	X/X/200X	Spread X – X.X	A construction vehicle was parked outside of the approved right-of-way.	The Lead EI was notified and contacted the foreman to have the vehicle moved back onto the approved workspace.
<b>Noncompliance</b>				
-None-				
It was reported to the Compliance Monitors that the _____ EIs issued one noncompliance report. This noncompliance occurred on Spread X on XX, 200X and was issued to the trenching crew for partially burying the windrowed seedbank with trench spoil for approximately 1,000 feet.				

**VARIANCES**

One Level 1 variance request was approved during the period. No Level 2 and no Level 3 variance requests were approved between XX-XX, 200X as shown in the table below. A summary of the acreage of land affected by the approved variance requests is also provided below.

**SUMMARY OF APPROVED LEVEL 1, 2, AND 3 VARIANCES**

Variance Number	Date Issued	Location (Spread/Milepost)	Brief Description	Net Acreage Affected – Federal Land	Net Acreage Affected – Non-Federal Land
<b>LEVEL 1</b>					
XX-XX001	X/X/200X	Spread X -X.X	Approved the like-use of an existing gravel road. This road is needed to allow travel around and 8-inch diameter aboveground waterline that crosses the right-of-way.	X.X	X.X
<b>LEVEL 2</b>					
-None-					
<b>LEVEL 3</b>					
-None-					

**SUMMARY OF ACREAGE AFFECTED BY VARIANCES**

	Acreage Affected This Reporting Period	Cumulative Acreage Affected
Federal Land	X.X	X.X
Non-Federal Land with some Federal Jurisdiction	X.X	X.X
<b>Total</b>	<b>X.X</b>	<b>X.X</b>
Includes variances on non-Federal land that are within 300 feet of previously identified cultural resources or listed species or their habitat.		

# **Attachment D**

## **BLM Authorized Officer Report**



## BLM Authorized Officer Weekly Report

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Address:  
City, State Zip

Phone:  
Fax:

Website:

---

**Project:** Barren Ridge Renewable Transmission Project

### Weekly Project Update

**Project:**

**Week Ending:**

**Prepared By:**

### 1. Executive Summary of Current Issues

The following construction activities were observed onsite:

**General:**

**Civil:**

**STG:**

**BOP Equipment:**

**Concrete Placement:**

**BLM Authorized Officer NOTE:**

**Plan Review Submittal Items**

Submittal Type	Description
Received, Review Pending	
Reviewed and Approved / Conditionally Approved	
Reviewed and Correction List Issues	

Inspection:

**2. General Activities Occurring at the Project Site**

**3. Completion Percentage of Overall Construction**

WEEK	PERIOD OF PROJECTION	% COMPLETE (PROJECTED)	% COMPLETE (UPDATED)

Table Note 1: The percentage complete is an estimate only and is not derived directly from the project schedule.

Table Note 2: Number of weeks from project CEC Notice to Proceed/Start Date.

**4. Compliance Issues with Applicable LORS and Applicable Conditions of Certification (e.g., areas out of compliance, interpretational disagreements, etc.)**

**5. Issues of Concern with or by the Applicant**

**6. Status of Interconnections (e.g., Fuel Gas, Water Connections, Electricity to Grid, etc.)**

**7. Scheduled Activities for Next Week**

**8. Potential Delays to the Online Date of the Project**

**9. Project Photographs from Week**

# **Attachment E**

## **Certification of Completion of Worker Environmental Awareness Program**

## Certification of Completion Worker Environmental Awareness Program

This is to certify these individuals have completed a mandatory Worker Environmental Awareness Program (WEAP). The WEAP includes pertinent information on cultural, paleontological, and biological resources for all personnel (that is, construction supervisors, crews, and plant operators) working on site or at related facilities. By signing below, the participant indicates that he/she understands and shall abide by the guidelines set forth in the program materials. Include this completed form in the Monthly Compliance Report.

No.	Employee Name	Title/Company	Signature
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			
25.			

---

Cultural Trainer: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_  
 Paleo Trainer: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_  
 Biological Trainer: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_

# **Attachment F**

## **Complaint Report/Resolution Form**

## COMPLAINT REPORT/RESOLUTION FORM

PROJECT NAME: AFC Number:
<b>COMPLAINT LOG NUMBER</b> _____ Complainant's name and address:  Phone number: _____
Date and time complaint received:  Indicate if by telephone or in writing (attach copy if written)  Date of first occurrence:
Description of complaint (including dates, frequency, and duration):
Findings of investigation by project personnel:  Indicate if complaint relates to violation of the ROW Grant. Indicate if complaint relates to violation of a BLM requirement.  Date complainant contacted to discuss findings: _____
Description of corrective measures taken or other complaint resolution:  Indicate if complainant agrees with proposed resolution. If not, explain:  Other relevant information:
If corrective action necessary, date completed: _____ Date first letter sent to complainant: _____ (copy attached) Date final letter sent to complainant: _____ (copy attached)
This information is certified to be correct. Project: _____  Manager's Signature: _____ Date: _____

(Attach additional pages and supporting documentation, as required.)

# **Attachment G**

## **Key Events List**

## KEY EVENTS LIST

PROJECT: \_\_\_\_\_ DOCKET #: \_\_\_\_\_

BLM'S AUTHORIZED OFFICER: \_\_\_\_\_

COMPLIANCE PROJECT MANAGER: \_\_\_\_\_

EVENT DESCRIPTION	DATE
Certification Date	
Obtain Site Control	
Online Date	
<b>PROJECT SITE ACTIVITIES</b>	
Start Site Mobilization	
Start Ground Disturbance	
Start Access Road Improvements	
Start Construction	
Begin Pouring Major Foundation Concrete	
Begin Installation of Structures	
Completion of Structures	
Begin Wire Stringing Operations	
Complete Wire Stringing Operations	
Start Commercial Operation	
Complete Restoration and All Construction	
<b>GENERATION TIE LINE ACTIVITIES</b>	
Start Generation Tie Line Construction	
Synchronization with Grid and Interconnection	
Complete Generation Tie Line Construction	
<b>FUEL SUPPLY LINE ACTIVITIES</b>	
Start Gas Pipeline Construction and Interconnection	
Complete Gas Pipeline Construction	

# **Attachment H**

# **Non-Conformity Report**



# NON-CONFORMITY REPORT

Company Name \_\_\_\_\_

Address:  
City, State Zip

Phone:  
Fax:

Website:

<b>Inspection Agency:</b>	<b>Date:</b>
<b>Building:</b>	<b>Reference:</b>
<b>Type of Inspection:</b>	<b>Inspected By:</b>

**DATE, LOCATION AND ITEMS INSPECTED:**

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**DATE, LOCATION & TESTS PERFORMED:**

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**LIST NON-CONFORMING ITEMS WITH CORRECTIONS:**

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**LIST NON-CONFORMING ITEMS WITHOUT CORRECTIONS:**

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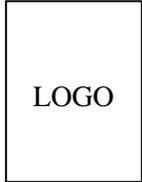
**LIST AUTHORIZED CHANGES TO THE APPROVED PLAN – INCLUDE R.F.I. NUMBER**

R.F.I. #	

# **Attachment I**

# **Variance Request Form**

### Variance Request Form



Company  
Address  
City, State Zip  
Phone

Variance: \_\_\_\_\_  
Request No.: \_\_\_\_\_  
Date Submit: \_\_\_\_\_

Date Approval Needed: \_\_\_\_\_  
Date Agency Received: \_\_\_\_\_  
Agency Approval Reference No.: \_\_\_\_\_

Request Prepared by:  
Spread/ Location  
(Milepost):  
Alignment Sheet / Sta.  
No.:  
Landowner:

Net acreage affected:

Tract No.:

In or within 50 feet of a wetland: Yes No

Current Land Use/ Vegetative Cover:

Within 50 feet of a water body: Yes No

Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weed)  
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 Justification:**

**For (Company Name) Use Only**

Additional Surveys Required	Surveyed Corridor Description	Additional Surveys Completed
Cultural Survey <input type="checkbox"/> Yes <input type="checkbox"/> No T&E Survey <input type="checkbox"/> Yes <input type="checkbox"/> No Report Documenting Survey:		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Sign-off (as appropriate)	Name (print)	Approval Signature
Contractor Sup't. or Env. Coordinator Lead Environmental Inspector Spread Supervisor Environmental Field Manager ROW Agent		
		Conditions (See Attached) <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> 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.:
<b>VARIANCE CONDITIONS</b>		
Name:	Title:	Organization:
Conditions:		
Name:	Title:	Organization:
Conditions:		
Name:	Title:	Organization:
Conditions:		