

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

Draft Plan of Development

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

Appendix G

Draft Environmental Monitoring and Compliance Plan

Appendix G

Draft Environmental Monitoring and Compliance Plan

Tri-State Generation and Transmission Association (Tri-State) has developed this environmental monitoring and compliance plan (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 (FS) 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 Records. 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.

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 would begin in 2016 with ROW and construction preparation. These activities will include pre-construction noxious weed management, access road improvement/construction, pad site creation where needed at various structures to safely set up construction equipment, and vegetation removal to facilitate construction and to 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 would begin in 2017 with construction of the Nucla-Cahone segment of the transmission line. Phase 3 would begin in 2018 where Tri-State would complete the remainder of the transmission line construction from Montrose to Nucla.

Objective of the Compliance and Monitoring Plan

This Plan outlines the steps required to ensure compliance with all conditions of approval during all three phases of project construction including environmental training and orientation; roles and responsibilities of agency, and Tri-State representatives and the monitor; 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 may not be limited to the 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 and regulations and permits.
- Compliance with Conditions of Approval in the ROW and POD.

*Once a final alternative has been selected and final engineering is complete, the Plan would incorporate a more detailed list of federal, state, and local permits that will be required for project construction.

Roles and Responsibilities

Tri-State has committed to contracting 3rd party compliance monitor(s) (hereafter referred to as the "monitor") for construction activities occurring on lands administered by the BLM. The same monitor would be used to ensure

compliance on lands administered by the U.S. Forest Service (FS), State lands and areas of environmental concern on private lands. The monitor will be contracted by Tri-State but work for the BLM and FS. 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 is ultimately the responsibility of Tri-State and its contractors.

The monitor's role is to enforce the terms and conditions of federal, state and local authorizations (See *Appendix U*) are met and all EPM's required for the project are 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 FS's staff will be funded by a cost recovery agreement with Tri-State. The BLM and FS agency representatives will direct the work of the monitor. The BLM and FS staff through their agency representative would work directly with Tri-State and the monitor to review non-compliance issues and process any requested variances. Agency staff and the monitor would be funded for the life of construction process.

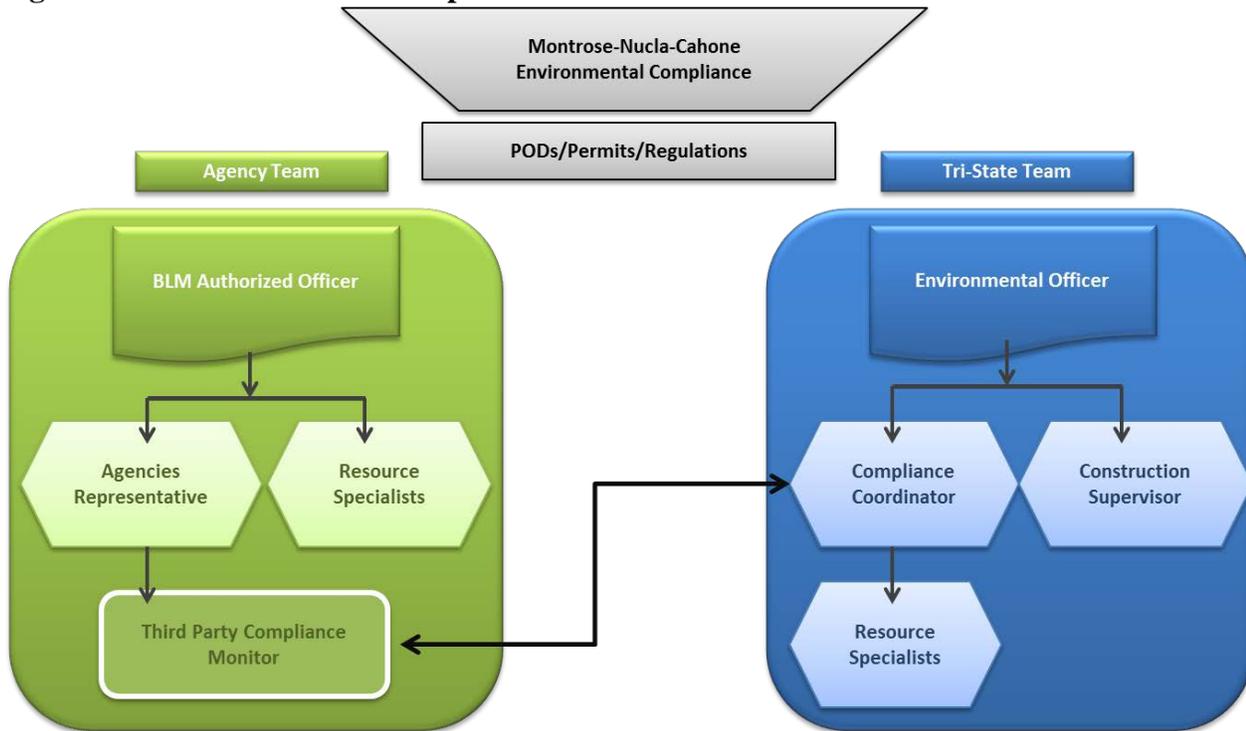
Tri-State will designate an internal authorized representative (hereafter referred to as the compliance coordinator) in the Transmission Environmental department to coordinate directly with the BLM and FS agency representative and monitor to review compliance reports and concerns, and to process variance requests. As 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 FS agency representatives to provide information and support in processing of variance requests.

See Table G-1 and Figure G-1 for information on compliances roles and responsibilities.

Table G-1: Roles and Responsibilities

Tri-State's Compliance Coordinator	Third-Party Compliance Monitor
Pre-Construction Training	Assist with/document trainings/tailgate briefings
Compliance with POD, ROW stipulations	Monitoring compliance/reporting non-compliance
Coordinate with Tri-State contractors and submitting documentation to support Notice to Proceed(s) (NTPs) and variances	Confirm documentation, track NTPs/variances, help agencies to determine adequacy of compliance
Provide documentation of compliance associated with stop work orders	Assist agencies with Draft Stop Work Orders, review of compliance documentation, and issuance of approval of NTPs and/or variances
Provide information on construction and compliance status and prepare final Compliance and Monitoring Report.	Compliance reporting including: <ul style="list-style-type: none"> • Daily reports, photos, communication on website • Weekly summary reports • Final Compliance and Monitoring Report

Figure G-1: Environmental Compliance Team



Stop Work Orders

Reasons for a stop work order may 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;
- or a violation of federal or state regulations.
- a stop work order may also be issued to address 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 reportable compliance violation as outlined herein in which case the monitor has full authority to cease construction activity. A stop work order would 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, 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 would report this cessation in work to the appropriate agency representative/land owner 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 FS agency representative and the monitor to prepare environmental compliance training. Tri-State's compliance coordinator would 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 would 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 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 FS offices. As new personnel come on-site throughout various stages of the project, the training would 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 FS 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 would review all compliance requirements for the Project and give each agency time to discuss any additional specific concerns, requirements, and expectations.

Tri-State would create a master spreadsheet to be maintained by the Project's monitor. The spreadsheet would 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, and CPW, and local emergency services and medical facilities. This spreadsheet would be updated as required to account for changes in staff and resubmitted to the larger Project team.

Environmental Monitoring and Compliance Reporting

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 would 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 would 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 would require a report to the agencies and corrective action.
- **Reportable violations:** A reportable compliance violation would 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 would require corrective action or; 3) a second or subsequent violation of a non-reportable violation. These compliance concerns would 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.

The monitor would 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 would require agency approval prior to the work occurring. 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 would 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 FS specialists will be used to provide timely information to agency specialists. This could include a google drive, SharePoint site, FTP, or other form of electronic file sharing system.

The weekly environmental monitoring reports would 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
- Status of stop work orders

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 would 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 would 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 would 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 FS 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-1. 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 FS 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-1) 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 shall 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);
- 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.

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 would 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 would 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 should 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 would 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 FS 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.
- 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 shall remain open until all construction-related activities, including restoration and initial permanent seeding, are complete. 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 Tri-State Generation and Transmission Association, Inc.; Montrose-Nucla-Cahone Transmission Project Variance Request Form

Attachment G-1: Tri-State Variance Request Form

Montrose-Nucla-Cahone Transmission Improvement Project Variance Request Form

Date Submitted:				Variance Request # (For Office Use Only):		TS-	
Date Approval Required:				Applicable POD Section		Map Exhibit BLM 11	
Agency Approval Required:		<input type="checkbox"/> Yes	<input type="checkbox"/> No	Cost Impact? No		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Variance Communication Classification:							
<input checked="" type="checkbox"/> Class I: Field		<input type="checkbox"/> Class II: Internal		<input type="checkbox"/> Class III: External			
Location:							
<input checked="" type="checkbox"/> Access Roads		<input type="checkbox"/> Transmission Line		<input type="checkbox"/> 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):				<input type="checkbox"/> Yes		<input type="checkbox"/> No	

Date Submitted:		Variance Request # (For Office Use Only):	TS-	
Tri-State Review (Class I, II, III)				
Title	Name	Party Consulted	Date	Conditions (see attached)
Project Manager		<input type="checkbox"/>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Environmental Project Manager		<input type="checkbox"/>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Inspector		<input type="checkbox"/>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Lead Environmental Inspector		<input type="checkbox"/>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Land Agent		<input type="checkbox"/>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Landowner Review (if appropriate)				
Landowner Name	Communication Attached		Date	
Landowner Signature (if applicable)	N/A			
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)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Have biological resources/habitats been surveyed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Have cultural resources been surveyed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Will wetlands or waters of the U.S. be avoided?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Is this a substantive variance from a permit?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Does this warrant a change in the stormwater plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Is the proposed work on private land?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Is the proposed work on BLM land?	<input type="checkbox"/> Yes	<input type="checkbox"/> No		
Agency/Organization	Name	Communication	Date	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
				<input type="checkbox"/> Yes <input type="checkbox"/> No