1. Introduction

Under ECSEE (formerly SEEREM), the power transmission component will consist mainly of rehabilitation of existing power lines, new 154 kV power lines, new 380 kV power lines, rehabilitation of substations and new 380 kV substations. The power lines will follow existing rights-of-way, where possible, which ensures that environmentally sensitive areas outside the road envelope will not be adversely affected.

The procedures presented in this Framework Document details actions, which will be taken to ensure compliance with Turkish Environmental Regulations and Procedures (basically Environmental Impact Assessment (EIA) Regulation) and the World Bank environmental assessment (EA) policies and procedures as specified in the World Bank Operational Policy OP/BP/GP 4.01 (Environmental Assessment) for a “Category A” and a “Category B” project.

The procedures consist of the following nine elements, which address both design/construction and operational aspects:

Design/Construction Phase

- Project Screening
- EA Documentation/Document Content
- Consultation
- EA Review and Approval
- Disclosure
- Implementation Conditions/Obligations
- Environmental Standards/Guidelines
- Licensing and Permitting
Implementation Phase

- Institutional arrangements for environmental management
- Reporting

Descriptions for the above elements, basically the procedures, which will be followed, are presented below.

2. Design/Construction Phase

2.1. Project Screening

The planning and design of power transmission lines are under the responsibility of TEIAS General Directorate, Department of Electric Transmission Lines Project Design, Expropriation and Environment. This department identifies the corridor for the project right-of-way and establishes a project design, which will be the basis for the implementation tender of the project. The Environmental Unit of TEIAS, which is a subunit of the above mentioned department, decides and coordinates the requirement for the preparation of an environmental assessment report (EAR) or an environmental management plan (EMP) in accordance with the Turkish EIA Regulation and the World Bank requirements for Category A and B projects.

According to Turkish EIA Regulation (Annex 1) a full EIA report and process (that is the classification equivalent to the EA requirements of the World Bank for a Category A project) is required for the power transmission line projects of 154 kV or above that has a length of more than 15 km, including transformer stations or switchyards as a part of the project.

For the transmission line projects the EIA service tenders are conducted by the Environmental Unit of TEIAS based on the prequalification of independent consulting companies (consultants), which are already given license by the Turkish Ministry of Environment and Forestry (MoEF) specifying that these consultants are eligible to prepare EIA reports for the Ministry of Environment and Forestry. The Turkish process for full EIA requirements can be followed from the flowchart provided below.
Turkish Environmental Impact Assessment Regulation
Flow Scheme
(Regulation of December 16, 2003 (Official Gazette No. 25318))

1. Project Description Brief is prepared and submitted to the MoEF
2. The MoEF reviews the Project Description Brief and Review Committee is formed
3. Public Participation Meeting
4. Scoping Meeting
5. Ministry of Environment and Forestry provides the Project Specific Format
6. Preparation of the EIA report and Submission of the report to the MoEF
7. Review of the MoEF and Review Committee Meetings
8. EIA Report is finalized based on the comments of the Review Committee and Final Report submitted to the MoEF
9. "EIA Positive / Negative" Verdict is given by the MoEF
10. Project approved (with conditions) or Project rejected
Annex 2 of the Turkish EIA Regulation lists the projects where a Project Description Brief is required by the MoEF in order to screen these projects, that is to decide if a full EIA is necessary or not. This Annex includes power transmission lines of 154 kV and more, which has a length shorter than 15 km.

The power transmission line projects are generally classified as Category B by the World Bank OP 4.01. For the projects under this classification generally preparation of and EMP is required based on the criteria provided in Annex A to this document. For the projects that are classified in Annex 2 of the Turkish EIA Regulation and decided by the MoEF that a full EIA is not needed, the Environmental Unit of TEIAS will decide if an EMP will be required for the project based on the above mentioned criteria given in Annex A to this document. With this regard if it is decided that the project is small and/or with negligible environmental issues that no EMP is required, no further environmental procedures are necessary. The Environmental Unit of TEIAS will document this decision together with the reasons for it.

2.2. EA Documentation/Document Content

For the projects that require the preparation of a full EIA report (Category A projects according to World Bank classification), the reports will be prepared in accordance with the project specific format to be provided by the MoEF. However, this format will have some differences with the general format of the World Bank. The World Bank general EA format includes the following chapters:

- Introduction
- Policy, Legal and Administrative Framework
- Project Purpose
- Project Description
- Baseline Data
- Environmental Impacts
- Analysis of Alternatives
- Environmental Management Plan
• Record of Public Consultation

Basically all of these headings are covered in the specific format provided by the MoEF for the full EIA reports. However, there is naturally no “Policy, Legal and Administrative Framework” chapter. In addition, mitigation actions are required to be specified for the adverse impacts and a monitoring plan is required as a part of the EIA report by the MoEF. However, they may not be in the form of an environmental management plan as required by the World Bank. Furthermore, institutional requirements for the monitoring actions are not much explicitly specified as required by the World Bank. Following chapters are included in a typical EIA format for a power transmission line:

• Project Purpose and Description
• Characteristics of the Project Area
• Economic and Social Dimensions of the Project
• Impact Area of the Project and Baseline Characteristics of this Area
• Environmental Impacts of the Project and Mitigation Measures
• Analysis of Alternatives
• Conclusions
• Therefore, for a project that requires a full EIA report according to Turkish EIA Regulation, the appendices of this report will include and appendix for the Policy, Legal and Administrative Framework in Turkey, an appendix for the EMP (including mitigation and monitoring activities as a plan) and the institutional requirements to carry out the mitigation and monitoring measures and an Appendix for the Record of Public Consultation.

For the projects that are classified in Annex 2 of the Turkish EIA Regulation and decided by the MoEF that a full EIA is not needed, the Environmental Unit of TEIAS will decide if an EMP will be required for the project based on the above mentioned criteria given in Annex A to this document. If the preparation of an EMP is required by TEIAS, it will be prepared in accordance with the format provided in Annex B1 (Format for an Environmental Management Plan) of this document. As can be seen
from this Annex the key elements of the EMP are the Mitigation and Monitoring Plan for which samples are provided in Annex B2. Other key components of an EMP are Institutional Arrangements and Consultation with Local NGOs and Project-Affected Groups.

The final EIA report (for the projects requiring a full EIA) and the final EMP for any project will be translated into English and copies of each will be submitted to the World Bank by TEIAS. In addition, the approval documents for the EMP and the verdicts of the MoEF will be provided to the World Bank as well.

2.3. Consultation

For the projects requiring full EIAs, the public consultation process of Turkish EIA Regulation is basically compatible with the World Bank. According to this regulation a public information and consultation meeting is held in the scoping stage of the EIA process. The issues identified in this meeting are taken into account in the formation of the specific format for the project and preparation of the EIA report.

For this consultation meeting announcements are made in at least one of the newspapers published countrywide, in the local governorate, municipality, and by the headmen in the villages. The announcements include the subject (project name, place etc., date and place of the meeting). Generally places suitable for the participation of everybody is selected, such as a village coffeehouse. In addition, if it is found necessary arrangements for the transportation of locals to the meeting place are made.

Public consultation for discussion is also a part of the review process of the EIA report. When the review period is started by the MoEF it is announced to the public and the EIA report is opened to public review at the local governorates. The locals are informed via the written announcements in the local authorities (municipalities, governorates etc.). Public consultation at this stage aims to determine if any other issues should be added or removed from the EIA report. By these means the voice of the locally affected groups are fully recognized in the final EIA report.
For a project that does not require a full EIA, but decided by TEIAS that it requires an EMP, public consultation will be announced, organized, conducted and documented as described in Annex B1 (Section E - Consultation with Local NGOs and Project-Affected Groups) to this document. The purpose of the consultation is to obtain views of the local people concerning the environmental issues related to the project, which they feel are important. These issues will then be included in the EMP. The consultation meeting(s) will be conducted before a draft EMP is prepared and when preparing the EMP the issues identified in the consultation will be included. The final EMP will be open to public access in the local governorates and TEIAS will make it available in its website on the internet as well.

2.4. EA Review and Approval

For the projects requiring a full EIA, the review and approval is the responsibility of the MoEF. When the EIA report is completed in accordance with the project specific format provided by the MoEF in the end of the scoping phase, it is submitted to the MoEF. The MoEF first reviews the report according to the format and then calls the review committee to meetings, called as review committee meetings. In these meetings the report is presented and the questions or concerns of the Review Committee are answered and necessary changes, additions to, or removals from the report are done. The committee members review the statement according to their scope of responsibilities. Representative organizations on the Committee may include:

- Related General Directorates of the MoEF
- The General Directorate of State Hydraulic Works (DSI)
- General Directorate of State Meteorological Works (DMI)
- The General Directorate of Forestry
- Provincial Environment and Forestry Directorate
- The Ministry of Agriculture and Rural Affairs
- The Ministry of Health.
- Provincial Health Directorate
- Municipalities
- Experts from University (if found necessary)
- Project owner (TEIAS)
- EIA Consultant

As a result all Committee Members provide their opinion regarding to approval of the EIA report and the project. Based on this review results the MoEF, General Director of Planning and EIA either gives an EIA positive or negative decision. The positive decision means project is approved (generally with conditions at least indicating that the EIA report is a commitment for the project implementation and has to be complied with by the project owner and all relevant contractors of the project) and the activities should be commenced in 5 years (if they are not commenced in 5 years a new EIA report is required for the project). The negative decision indicates that project is rejected and cannot be carried out.

For the projects requiring the preparation of an EMP, the Environmental Unit of TEIAS will review and approve the EMP. TEIAS experts will review the EMP in accordance with the requirements specified in Annex B1 of this framework document. The EMP will be finalized according to the comments of the Environmental Unit of TEIAS and will be approved. The MoEF will not be a part of review or approval process for the EMPs of such projects.

2.5. Disclosure

As described in Heading 2.3 above, the EIA report will be disclosed by the MoEF. This approved EIA report will be available in the offices of local authorities and are publicized on the website of the MoEF. Similarly, the approved EMP will be available to public in local TEIAS offices, where it will be convenient to the people living in or near the area, where the project is to be implemented. In addition, these EMPs will be available in the internet on the website of TEIAS.

2.6. Implementation Conditions/Obligations

As mentioned before, the EIA report is a commitment by TEIAS to the MoEF and the World Bank regarding its’ obligation for agreed upon measures of environmental
management throughout the life of the project. This commitment is the responsibility of the project owner and all related contractors. Thus, prior to contract award by TEIAS the Environmental Unit of TEIAS will insure that all bid documents contain conditions (or articles) specifying that the approved (not needed since the Category A EIA will have an EMP as an Annex) EMP are a part of the conditions to be complied with and must be included in all bid documents.

The monitoring of the performance of the contractor during construction will be carried out by the responsible parties specified in the monitoring plan. Environmental Unit of TEIAS will be the authority to make the final check with regard to the performance of the Contractor with regard to the relevant specifications in the bid documents and EMP. For the case of an EIA report, TEIAS will have “first line” responsibility for assurance compliance with conditions of the EMP (Category A or B). However, the MoEF is the ultimate responsible agency for auditing and ensuring that the conditions in the EIA report are complied with.

2.7. Environmental Standards/Guidelines

TEIAS will use Turkish or World Bank environmental standards and standards (which ever is stricter) for electric power transmission line projects. These standards are basically related, but not limited, to the following:

- Environmental impact assessment
- Solid and hazardous waste management
- Noise levels (during construction)
- Electric and magnetic field intensities at ground level (transmission/distribution) or at the fence line (transformer substation)
- Polychlorinated biphenyls (PCBs) are to be prohibited from use in any equipment purchases (e.g. transformers, capacitors) or any replacement components
- Right-of-way selection
- Environmental auditing
- Health and safety
• Pesticide use for land clearance
• Cultural Heritage
• Natural Habitats

The criteria and standards for the above mentioned issues, and any other relevant issue can be found in the Turkish Regulations and the Pollution Prevention and Abatement Handbook of the World Bank (which ever applicable). With regard to these issues the requirements of Turkish Regulations will be certainly complied with. If there are no standards or requirements in Turkish Regulations or if the standards of the World Bank are stricter these will be used in construction and operation. The major World Bank documents related to these issues are Bank Operational Policies, EA Sourcebook and Updates, and the above mentioned handbook available from the website of the World Bank. Some of the directly related Turkish Environmental Regulations are:

- Noise Control Regulation
- Water Pollution Control Regulation
- Solid Waste Control Regulation
- Soil Pollution Control Regulation
- Environmental Impact Assessment Regulation
- Environmental Auditing Regulation
- Harmful Chemical Substances and Products Control Regulation
- Hazardous Waste Control Regulation
- Workers Health and Safety Regulation
- Regulation regarding Safety in Electricity Facilities

2.8. Licensing and Permitting

The necessary licenses and/or permits will be obtained by TEIAS itself or via its contractors for various services, such as environmental impact assessment, equipment procurement, construction etc., from the MoEF or other governmental agencies as required. Some of the permits that will be required are:
- EIA positive or EIA not necessary certificates
- Permit for water discharge to receiving bodies (if there is such a discharge from the construction camp facilities)
- Hazardous waste disposal permit for Hazardous Waste Storage, or Intermediate Storage (if applicable)
- Solid waste disposal permit (disposal of the solid wastes to the landfill site of the municipality due to solid waste generation in the camp facilities and during construction and operation activities)
- Permit to pass through a forest area (if applicable)

3. Implementation Phase

3.1. Institutional Arrangements for Environmental Management

During construction, the Environmental Unit of TEIAS, in cooperation with the regional offices, will check the performance of the contractor to assure the works reflects the requirements specified in the EIA reports and EMPs, which ever is applicable. With this regard periodic reports will be required from the construction contractors and on-site checks will be carried out if found necessary.

During operation, the Environmental Unit of TEIAS, will assist the operations department and review their performance with regard to the obligations specified in the EIA report or the EMP for the operation phase of the projects. The representatives of the Environmental Unit of TEIAS will review the environmental management performance of the regional offices of TEIAS with respect to the projects of concern in a quarterly basis.

3.2. Reporting

TEIAS will include a discussion of environmental progress and status in implementing the requirements in the EIA reports or the EMPs for the relevant projects in their quarterly report to the World Bank. This information will be based on the status reports to be prepared by the Environmental Unit of TEIAS.
ANNEX A
ENVIRONMENTAL SCREENING CRITERIA FOR DECIDING THE PREPARATION
OF AN ENVIRONMENTAL MANAGEMENT PLAN

If any of the following factors are assessed to be significant by the Environmental Unit of TEIAS, an EMP will be required for the project of concern:

- Change in land use or land surface contours (altering runoff patterns)
- Possible use of polychlorinated biphenyls (PCBs) in equipment (transformers or capacitators) to be purchased or disposal of PCBs in in equipment to be rehabilitated or decommisioned
- Soil erosion (land clearing)
- Possible impact to public health
- Removal of considerable number of trees
- Public exposure to electric or magnetic fields
- Interference with local aesthetic characteristics
- Permanent loss of productive land from support structure placement
- Environmental sensitive areas involved (protected area, sensitive ecosystems, etc.)
- Culturally sensitive areas involved (structures/locations of historical or archeological significance)
ANNEX B1: FORMAT FOR AN ENVIRONMENTAL MANAGEMENT PLAN (EMP)

**Responsible Party**
The name of the TEIAS staff member who prepared the EMP should be specified, his title and the date when it was prepared.

**Project Description**
Present a brief description of the subproject. Include the nature of the investment, the location, and any characteristics of the area that are of particular interest, e.g. near a protected area, area of cultural, historical, religious interest etc. Also, very briefly describe the general land use characteristics (farming, small industry etc.), and the location(s) of the nearest population centers. If available, a simple map should be included.

**A. MITIGATING PLAN**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Issue</th>
<th>Mitigating Measure</th>
<th>Responsibility*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning/Design</td>
<td></td>
<td></td>
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<tr>
<td>Construction</td>
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<td></td>
<td></td>
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<tr>
<td>Operation</td>
<td></td>
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</tr>
</tbody>
</table>

* Items indicated to be the responsibility of the contractor shall be specified in the bid documents.
### B. MONITORING PLAN

<table>
<thead>
<tr>
<th>Phase</th>
<th>What parameter is to be monitored?</th>
<th>Where is the parameter to be monitored?</th>
<th>How is the parameter to be monitored? type of monitoring equipment?</th>
<th>When is the parameter to be monitored? frequency of measurement or continuous?</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct</td>
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<td></td>
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<tr>
<td>Operate</td>
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</table>

**NOTE:** Any item identified in the mitigation plan must have a corresponding entry in the monitoring plan. For example, if noise is an issue presented in the mitigating plan, than noise should be an item in the monitoring plan.
C. SCHEDULE
Present (preferably in Chart Form) Start Dates and Finish Dates for:

- Mitigation Activities
- Monitoring Activities

D. INSTITUTIONAL ARRANGEMENTS
A narrative discussion supported by organizational charts detailing:

- Institutional responsibilities and procedures for mitigation and monitoring and how they are linked for environmental management
- Environmental information flow (reporting—from who and to who and how often)
- Decision making chain of command for environmental management (to take action, to authorize expenditures, to shut down, etc.)

In short, how is all the monitoring data going to be used to maintain sound environmental performance—who collects the data, who analyzes it, who prepares reports, who are the reports sent to and how often, and who does that person send it to, or what does he/she do with the information—who has the authority to spend, shutdown, change operations etc.

E. CONSULTATION WITH LOCAL NGOs AND PROJECT-AFFECTED GROUPS
Provide documentation of the following:

- Date(s) consultation(s) was (were) held
- Location(s) consultation(s) was (were) held
- Who was invited
  Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Who attended
  Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Meeting Program/Schedule
  What is to be presented and by whom
- Summary Meeting Minutes (Comments, Questions and Response by Presenters), including the name(s) of the EdL staff member(s) who participated in the Consultation
- Any agreed actions or necessary follow-on work and agreed schedule
ANNEX B2: SAMPLE MITIGATING PLAN
AND
SAMPLE MONITORING PLAN

**MITIGATING PLAN**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Issue</th>
<th>Mitigating Measure</th>
<th>Responsibility*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning/Design</td>
<td>- Area includes sites of significance to human and natural environment (historical/religious/cultural value or ecologically significant or protected) or high population density clusters,</td>
<td>Route selection to avoid areas of significance to human and natural environment and migratory bird paths</td>
<td>Local population must indicate where such areas are located</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Route selection to follow existing rights-of-way to the greatest extent possible</td>
<td>TEIAS Branch Planning Unit and Environment Unit incorporate select route to avoid these special sites/area.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Existing access roads should be used wherever possible. Siting of any necessary new access roads should avoid tree cutting or any economically productive activities as much as possible (e.g. farm areas)</td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td>Erosion/Silt runoff</td>
<td>Contractor</td>
<td></td>
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<td>-------------------------</td>
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</tr>
<tr>
<td></td>
<td>Construction planned for dry season to avoid rainy season difficulties such as: access road construction on water logged soil</td>
<td></td>
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<tr>
<td></td>
<td>Excavated materials to be deposited at a designated site designed and constructed to contain this material with little or no release to environment. No disposal of excavated materials to surface waters (rivers, lakes, ponds etc.) permitted</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Watercourses to be protected from erosion of exposed soil surfaces created during land clearing by the use of silt trapping systems (e.g. bunds, sediment ponds etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interference with local economic activities</td>
<td>Construct during non-farming season. Appropriate compensation paid for any loss or damage to local population</td>
<td>TEIAS Environmental Unit and Contractor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>farmland to be restored after construction</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alteration of surface water drainage patterns</td>
<td>All temporary access roads will be decommissioned upon construction completion</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bunds and sediment ponds constructed to avoid siltation into surface waters</td>
<td></td>
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</tr>
<tr>
<td>Improper disposal of construction debris and wastes</td>
<td>Vegetative debris from land clearing should be recycled or stacked and burned. Non-vegetative debris to be disposed at selected sites properly enclosed to avoid silt runoff. After construction disposal site to be restored</td>
<td>Contractor</td>
<td></td>
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<tr>
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</tr>
<tr>
<td>Impacts to land and water from development of new sources of raw materials</td>
<td>Existing borrow sites and quarries to be used to source aggregates. All suppliers of raw materials required to possess valid operating permits before and for the duration of the time associated with the project</td>
<td>TEIAS Environmental Unit, Contractor</td>
<td></td>
</tr>
<tr>
<td>Worker health and safety</td>
<td>Health and safety plan to be prepared by contractor and submitted to TEIAS Environmental Unit for approval prior to initiating any work activity Contractor to include health and safety training sessions as part of plan</td>
<td>Contractor (Plan Preparation) TEIAS Environmental Unit (Plan Approval)</td>
<td></td>
</tr>
<tr>
<td>Public safety</td>
<td>Work areas presenting danger to the public (particularly children) are to be fenced. Other areas are to include warning signs using danger symbols for universal understanding</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td>Aesthetic impact on local viewscape</td>
<td>Wherever possible, transmission lines are to routed along the toe of slopes where it blends with the background Towers and transmission lines to be positioned so that they avoid blocking the line of sight for points of natural or man made visual interest (scenic vistas, monuments, mosques, etc.)</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td>Dust</td>
<td>Sprinkle/spray area with water. Particularly during hot, dry, and windy conditions</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td>Noise</td>
<td>Construction to take place during normal daytime hours If evening construction required, local affected people will be consulted at least one week in advance of the proposed activity</td>
<td>Contractor</td>
<td></td>
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<tr>
<td>-----------------------------</td>
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</tr>
<tr>
<td>Polychlorinated Biphenyls (PCBs)</td>
<td>It is forbidden to purchase any electric equipment containing PCBs, or to purchase any PCBs for use in any equipment</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td>Operation</td>
<td>Soil, surface and groundwater contamination from oil, lubricant, or fuel spills Operational procedures to be established and implemented for spill prevention and control No PCBs to be used in transformers</td>
<td>Contractor</td>
<td></td>
</tr>
<tr>
<td>Worker health and safety</td>
<td>Health and safety plan to be prepared and implemented. Plan to include safety training and practice drills</td>
<td>TEIAS</td>
<td></td>
</tr>
</tbody>
</table>

* Items indicated to be the responsibility of the contractor shall be specified in the bid documents
## MONITORING PLAN

<table>
<thead>
<tr>
<th>Phase</th>
<th>What parameter is to be monitored?</th>
<th>Where parameter to be monitored?</th>
<th>How is the parameter to be monitored/ type of monitoring equipment?</th>
<th>When is the parameter to be monitored- frequency of measurement or continuous?</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construct</td>
<td>Erosion/Silt runoff</td>
<td>Construction right-of-way</td>
<td>Monitor construction sites to insure mitigation measures are installed</td>
<td>Daily</td>
<td>TEIAS Environmental Unit And Contractor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cleared areas</td>
<td>Examine surface waters (visual)</td>
<td>During or after rainstorm</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Surface waters</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interference with local economic activities</td>
<td>Construction right-of-way</td>
<td>Inspect transmission line construction area and nearby settlements and agriculture</td>
<td>Weekly</td>
<td>TEIAS Environmental Unit And Contractor</td>
<td></td>
</tr>
<tr>
<td>Alteration of surface water drainage patterns</td>
<td>Construction right-of-way</td>
<td>Inspect sediment trap systems and other mitigating measures for proper installation</td>
<td>Weekly</td>
<td>TEIAS Environmental Unit And Contractor</td>
<td></td>
</tr>
<tr>
<td>Improper disposal of construction debris and wastes</td>
<td>Construction right-of-way</td>
<td>Observation of compliance with mitigating measures specified in contract</td>
<td>Continuous</td>
<td>TEIAS Environmental Unit And Contractor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Substation Site Disposal sites</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impacts to land and water from development of new sources of raw materials</td>
<td>At delivery site of raw materials or contractor offices</td>
<td>Review contractor operating license</td>
<td>Before first delivery, and soon after renewal date if construction is still in progress</td>
<td>TEIAS Environmental Unit and contractor</td>
<td></td>
</tr>
<tr>
<td>Worker health and safety</td>
<td>Construction right-of-way</td>
<td>Review health and safety plan</td>
<td>Before start of construction</td>
<td>Monthly</td>
<td>TEIAS Environmental Unit and Contractor</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Observe training or other plan activities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public safety</td>
<td>Construction right-of-way</td>
<td>Observation of compliance with mitigating measures specified in contract (e.g. installation of fences, signs etc.)</td>
<td>Continuous</td>
<td>TEIAS Environmental Unit and Contractor</td>
<td></td>
</tr>
<tr>
<td>Aesthetic impact on local viewscape</td>
<td>Normal observation locations</td>
<td>Visual</td>
<td>During installation of structures</td>
<td></td>
<td>TEIAS Environmental Unit and Contractor</td>
</tr>
<tr>
<td>Dust</td>
<td>Construction right-of-way</td>
<td>Visually</td>
<td>Continuous, but particularly during hot, dry, windy conditions</td>
<td>TEIAS Environmental Unit and Contractor</td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td>---------------------------</td>
<td>----------</td>
<td>----------------------------------------------------------------</td>
<td>------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Access roads</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Wherever construction machinery is being used</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Noise</td>
<td>Population centers nearest to construction sites or where trucks are passing</td>
<td>Observation</td>
<td>Continuous, but particularly if there are complaints from local population</td>
<td>TEIAS Environmental Unit and Contractor</td>
<td></td>
</tr>
<tr>
<td>PCBs</td>
<td>At delivery site of equipment or materials</td>
<td>Review certifications of no PCB content</td>
<td>When equipment or materials are delivered</td>
<td>TEIAS Environmental Unit and Contractor</td>
<td></td>
</tr>
<tr>
<td>Operate</td>
<td>Soil, surface and groundwater contamination from oil, lubricant, or fuel spills</td>
<td>Substation, transformer locations</td>
<td>Inspection of transformer for signs of leaks, inspection of soil area under and near transformer for discoloration</td>
<td>Daily TEIAS Operating Unit</td>
<td></td>
</tr>
<tr>
<td></td>
<td>At worker sites</td>
<td>Review implementation of activities specified in Health and Safety Plan</td>
<td>Every three months</td>
<td>TEIAS</td>
<td></td>
</tr>
</tbody>
</table>

NOTE: Any item identified in the mitigation plan must have a corresponding entry in the monitoring plan. For example, if noise is an issue presented in the mitigating plan, than noise should be an item in the monitoring plan.