



Meeting: **Joint Reservoir Committee & Authority Board** **December 16, 2022**
Agenda Item 2.2

Subject: **Approve Revisions to Policies**

Requested Action:

Approve revisions to the Authority Board adopted Budget Policy, Procurement and Contract Policy and Records Management Policy to conform the policies with subsequent actions and clarifications that have occurred. Conduct an annual review of all of the Authority Board adopted policies and provide direction to Staff related to future consideration of changes.

Detailed Description/Background:

Summary

As the Sites Reservoir Project progresses, developing the business to construct and operate the project remains critical. One key activity in business development is creating and implementing policies and procedures. To date, the Authority has approved 10 policies. It is good practice to occasionally review these documents with the Board. Also, Staff reviewed the policies considering other actions that have been taken since their adoption and is proposing that three of the policies be revised as described below to incorporate and conform to these subsequent actions.

Policy Overview

Policy development was first initiated with the Funding and Credit Reimbursement Policy. Since the approval of this first policy, development has been driven by compliance with audit findings and best practices. Related organizational elements like the Delegation of Authority Matrix adopted by the Authority in 2020 serve to provide greater clarity of the policy direction of the Board.

Most recently, policy development has focused on financial areas. Other recent policies have been driven by best practices, like the Records Management Policy, and upcoming needs of the project, like the Debt Management Policy. Future needs of the project will continue to drive policy development. Provided below is a list of current Authority adopted policies with the items being revised to include an explanation of the changes being incorporated.

Accounting Policy

Accounts Payable Policy

Budget Policy – changing the term reserve to contingency

Debt Management Policy

Funding Credit and Reimbursement Policy

Procurement and Contract Policy – added references to the Board approved

Delegation of Authority Matrix

Real Property and Land Management Policy

Records Management Policy – proposed changes to the retention schedule only to add clarity of documents to be retained
Storage Policy
WIFIA Reserve Policy

As the project progresses, previously approved policies should be reviewed and updated to reflect necessary changes. Attached are markups of the 4 policies staff recommends updates be made.

Procedure Overview

Staff prepare procedures to standardize and establish controls for the implementation of the Board’s policies. Procedures provide additional detail about how policies are complied with by staff on a day-to-day basis. The following procedures have been developed to align with the Board’s policies:

Accounts Payable Invoice Approval	CWC Invoice Review
Accounts Payable Payment	CWC Progress Report
Board Level Approval	CWC Quarterly Report
Budget Approval	GIS Data Procedure
Consultant Budget Reallocation	Monthly Progress Report
Consultant Onboarding	Payment Request
Consultant Staff Annual Rate Change	Records Management
Consultant Scope Change Approval	Response to Public Records Request
Consultant Staff Approval	Schedule Change
Credit Card Use	Task Order Change
CWC Invoice Preparation	Task Order Close

Prior Action:

March 2021: Accounts Payable Approval Policy Approved, July 2021: Budget Policy Approved, October 2021: Procurement and Contract Policy Approved, March 2022: Records Management Policy Approved

Fiscal Impact/Funding Source:

None

Staff Contact:

Joe Trapasso/Hailey Traynham


Primary Service Provider: Brown and Caldwell

Attachments:

Attachment A - Budget Policy Markup

Attachment B - Procurement and Contract Policy Markup

Attachment C - Records Management Policy Markup

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	F04
	ADOPTED	7/21/2021
	LAST UPDATED	12/01/2022

DRAFT SITES PROJECT AUTHORITY BUDGET POLICY

1. Purpose:

The Budget Policy is intended to provide budget approval requirements for the Sites Reservoir Project (Project) in line with governing board expectations. This policy provides necessary flexibility to make budget transfers or assign ~~reserves~~ **contingency** expediently to support expected Project progress while maintaining rigorous accounting controls, ensuring internal and external transparency of operations, and in alignment with the Authority Board (Board) approved limitations set forth in the Delegation of Authority.

2. Definitions:

Accounting method: The Sites Reservoir Project uses the accrual accounting method.

Budget Transfer: A reallocation of unspent subject area budget within the subject area or to another subject area budget within the approved budget.

Fiscal Year: The Sites Reservoir Project’s fiscal year corresponds to the calendar year. Any mention of “annual” refers to the fiscal year.

Restricted ~~Contingency~~ Reserves: Funds intended to cover approximately three months of critical activities to maintain project progress.

Unrestricted ~~Contingency~~ Reserves: Funds intended to cover unanticipated project expenses, including additional scope of work.

3. Policy:

Work Plan: Total expenditures will be estimated by staff and will be approved for a specific period of performance or Work Plan (presumably multi-year efforts) by the Reservoir Committee and Authority Board and be reflected in Project Agreements.

Annual Budget: Annual budgets are based on the estimated fiscal year expenditures and are apportionments of the approved Work Plan. Annual budgets are intended to satisfy the requirements of annual financial audits and will be used for tracking and reporting purposes. Each annual budget will be budgeted and presented at the subject area level and be approved by the Reservoir Committee and Authority Board. Staff will manage project expenditures to the annual budget. The annual budget will include uses and sources of funds.

Source of Funds:

- **Sites Joint Powers Authority Dues:** Separate budgets are established for the Authority Board and Reservoir Committee. The Authority Board budget will be based on revenues from annual Authority Board membership dues.
- **Contributed Project Funds:** The Reservoir Committee budget will be based on revenues from project participation and state and federal funding sources. Project expenses are allocated per subject area consistent with the Sites Project Authority Reservoir Project Agreement.
- **Unused and unaccrued funds:** Any remaining in unrestricted or restricted **contingency** at the end of the fiscal year will be considered as a source of funds for the subsequent budget.

Reserve Contingency Assignment: The Authority will maintain a restricted ~~reserve~~ **contingency** and an unrestricted **contingency** as defined in Section 2.

Restricted **contingency** may be utilized only following approval by the Reservoir Committee and Authority Board.

When it is necessary to utilize unrestricted ~~reserves~~ **contingency**, the Executive Director has authority to assign unrestricted ~~reserves~~ **contingency** of no more than \$100,000 per occurrence to account for unanticipated project expenses, including additional scope of work.

Approval by the Reservoir Committee and Authority Board is required to execute unrestricted ~~reserves~~ **contingency** assignments greater than \$100,000 per occurrence. Unrestricted **contingency** may be utilized until the budgeted unrestricted ~~reserves~~ **contingency** amount has been exhausted. Assignment of unrestricted ~~reserves~~ **contingency** will be reported quarterly in budget updates along with justification for the assignment.

Budget Transfers: The Executive Director has authority to approve budget transfers of no more than \$100,000 per occurrence. Budget transfers will be reported quarterly in budget updates along with justification for the transfer.

Approval of the Reservoir Committee and Authority Board is required to execute budget transfers greater than \$100,000 per occurrence.

4. Process:

Budgets will be developed by staff. Budgets will be approved at the appropriate Board meeting.

If necessary, the Executive Director will initiate a budget transfer or unrestricted ~~reserves~~ **contingency** assignment in accordance with the administrative procedures.

5. Policy Term:


This policy will be reviewed as necessary to support effective implementation of the project.

6. Reporting:

All budget transfers and assignments of unrestricted ~~reserves~~ contingency will be reported to the Joint Budget and Finance Committee. The Reservoir Committee and the Authority Board will receive a report when unrestricted ~~reserves~~ contingency are assigned. Assignment of restricted ~~reserves~~ contingency will **must** be approved by the Reservoir Committee and Authority Board. Quarterly updates comparing actual to estimated expenditures in the approved budget will be reported to the Reservoir Committee and Authority Board.

As provided in Section 3 above, the following will be documented in the approved minutes of the appropriate Reservoir Committee and Authority Board meeting(s):

- Budget approvals,
- Board approval of budget transfers,
- Board approval of unrestricted ~~reserve~~ contingency assignments,
- Board approval of restricted ~~reserve~~ contingency assignments,
- Notifications of budget transfers and,
- Notifications of unrestricted ~~reserve~~ contingency assignments.

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	A02
	ADOPTED	10/27/2021
	LAST UPDATED	12/01/2022

DRAFT SITES PROJECT AUTHORITY PROCUREMENT AND CONTRACT POLICY

1. Purpose:

This Procurement and Contract Policy establishes the Sites Project Authority (“Authority”)’s service procurement and contract standards. These standards align with the values of transparency, accountability, trust, integrity, diversity, and inclusivity and promote the effective procurement of services in a manner that complies with applicable law.

2. Definitions:

Adequate Number: At least two service procurement/proposal submissions.

Administrative Procedures: A separate detailed documentation of processes that is developed, implemented, and revised by staff.

Professional Services: Services performed by a firm or vendor that is selected based on qualifications applicable to the services sought.

Competitive Proposal: Procurement method by which more than one service provider is solicited to submit a proposal, qualifications, or offer to perform services.

Contract: A legally binding agreement to exchange something of value between two or more parties, one of which is the Authority. Contracts can include but are not limited to, any agreement intended to have a binding effect, such as consulting services agreements or task orders.

Contract Negotiation: The process of coming to an agreement on a set of legally binding terms, conditions, rights, obligations, and legal considerations.

Delegation of Authority Matrix: A separate document providing delegations of authority **as approved by the Reservoir Committee and Authority Board.** ~~To parties in a contractual agreement with the Authority.~~

Non-competitive Procurement: Procurement method that results from only one Professional Services provider responding to a Request for Proposals (RFP)

Procurement: The process for requisitioning goods or services for the Authority with an agreed-upon scope, schedule, and deliverables.

Project: The Sites Reservoir Project.

Stakeholder(s): Agents, employees, and Reservoir Committee and Authority Board members currently in a contract with the Sites Project Authority. In certain circumstances, a Stakeholder could include an existing Professional Service provider contracted by the Authority.

3. Policy:

Procurements will be conducted to acquire Professional Services or materials that are deemed necessary by the Authority to implement the Project. The Executive Director is authorized to initiate procurement of Professional Services or materials on behalf of the Authority. Contracts may be awarded by the Authority after evaluating quality, expected life, and other factors deemed necessary to ensure the best outcome for the Project. Funds to support Contract payments will be authorized within the approved Authority budget and not to exceed the Contract authority provided by the Authority Board at the time of Contract award.

Conduct During Procurements:

In addition to the Authority's Conflict of Interest Code and conduct standards applicable to Stakeholders through their designating agencies, Stakeholders shall abide by the standards listed below to promote fair and open competition while a procurement is being conducted:

- No Stakeholder shall participate in the selection, award, or administration of a bid or contract if the individual has a real or apparent conflict of interest as determined by the Authority Board. A conflict of interest would include, but not be limited to, a circumstance in which a Stakeholder, any member of the Stakeholder's family, the Stakeholder's business partner, or an organization that employs or is about to employ any of the parties indicated herein has a financial interest or other personal benefit from the Professional Service provider or other contracting party considered for a contract.
- Stakeholders, shall neither solicit nor accept gratuities, gifts, consulting fees, trips, or favors from a potential Professional Services provider, or from the immediate family or employees of a Professional Services provider, potential Professional Services provider, or bidder, or from any party to a sub-agreement or ancillary Contract entered into pursuant to a Contract.

Procurement Methods and Resulting Contract Types:

- a. **Micro-Purchase:** Micro-purchase enables non-competitive acquisition of Professional Services or materials in which the aggregate dollar amount of a single contract does not exceed \$10,000. The Executive Director may approve and complete ~~any~~ micro-purchases.
- b. **Small Purchase Procedures:** Small purchase procedures provide a simple and informal competitive procurement method for securing Professional Services, materials, or other property that do not cost more than the simplified acquisition threshold of \$250,000. The Executive Director may approve and complete the procurement of ~~any~~ necessary Professional Services, materials, or combination thereof in any amount of no more \$100,000 per occurrence, in aggregate. Purchases of materials, supplies, Professional Services, or equipment over \$100,000 must be approved by the Reservoir Committee and Authority Board. A formal written Contract will be awarded to the

highest value provider as determined by the Executive Director. The Executive Director will determine the type of Contract to be awarded.

- c. **Sealed Bids:** Publicly solicited and formally advertised procurement method that allows selection based principally on cost (i.e., the lowest submitted bid) from a responsive and responsible bidder and, in a Competitive Proposal, is provided in addition to the submitted proposal. These are bids that are publicly solicited for Professional Services or materials. The following are required in a Sealed Bid procurement:
- Bids must be solicited from an adequate number of known suppliers and must provide sufficient response time prior to the established bid opening date.
 - The invitation for bids will include any specifications and pertinent attachments and must adequately define the supplies or services for the bidder to properly respond.
 - All responsive bids will be opened at the time and place described in the invitation for bids.
 - A firm fixed-price Contract award will be made in writing to the highest value qualified, responsive, and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life-cycle costs will be considered in determining which bid is lowest.
 - A low bidder may be rejected due to non-responsiveness or non-responsibility after a notification of and evidence for rejection and an opportunity to present evidence as a rebuttal are provided.
 - Any or all bids may be rejected if the above standards are not satisfied by any bidder.
 - Sealed bids may be provided in addition to a Competitive Proposal.
- d. **Competitive Proposal:** Competitive Proposal procurements may be authorized by the Executive Director. Proposals are solicited by a publicized Request for Proposals (RFP) or request for qualifications (RFQ) that identifies all evaluation factors and their relative importance. The Executive Director may authorize the release of an RFP or RFQ. Proposals must be solicited from an Adequate Number of qualified sources. In the instance there is insufficient competition due to an inadequate number of responses, the Authority may complete a Non-Competitive procurement. Complete responses received from responsible sources by the date and time specified within the RFP or RFQ will be considered to the maximum extent practical. Competitive Proposal procurement may include an interview process. If Contract Negotiation, including price, cannot result in terms acceptable to the Authority, the Authority reserves the right to negotiate acceptable contract terms with next lowest, responsive, responsible bidder. The Authority will rank responsive and responsible proposals based on qualifications best meeting the needs of the Authority as determined by the Authority's Executive Director or designee. Competitive Proposals

may include cost evaluation in the form of a sealed bid. The method for evaluating proposals is further defined in the Administrative Procedure.

- e. **Sole Source Proposal:** The Authority uses this procurement method that solicits a proposal from only one Professional Services provider under the following conditions:
- Unique Professional Services, expertise, specialized knowledge, or proprietary materials are required for which there are no other known providers.
 - Authority declared public emergency exists.
 - Express authorization by funding agencies.

Non-competitive Proposal procurement results in either a fixed price or cost-reimbursement-type contract.

Contracts:

- a. **Contracting Authority:** On behalf of the Authority, the Executive Director may:
- Authorize service Contracts up to the amount specified in the approved Delegation of Authority Matrix for any Professional Services except legal services.
 - Authorize purchase Contracts up to the amount specified in the approved Delegation of Authority Matrix
 - Amend Contracts within the approved Contract budget
 - Conduct Contract negotiations
 - Delegate any of the authorities herein to the Authority agent responsible for management of the applicable Contract.

On behalf of the Authority, the agent responsible for Contract management may authorize notices to proceed for existing contracts.

On behalf of the Authority, the Reservoir Committee and Authority Board, in alignment with each other, may:

- Authorize Professional Services Contracts for legal services
- Authorize Contract amendments that exceed the ~~approved Contract budget~~ **Executive Director authorized amount as stated in the Delegation of Authority Matrix.**

- b. **Contract Negotiations:** A Contract requires among the parties a common understanding of the Contract's terms, conditions, rights, obligations, and legal considerations. Contract Negotiations will be conducted in good faith to reach agreement on Contract terms and conditions. The Executive Director or designee will conduct Contract Negotiations on behalf of the Authority.

Diversity and Inclusion:

The Authority will take the following affirmative steps to ensure local businesses, small businesses, minority businesses, women's business enterprises, disadvantaged veteran business enterprises, and labor surplus area firms are used when possible:

- Placing qualified local businesses, small and minority businesses, women's business enterprises, and disadvantaged veteran business enterprises on solicitation lists whenever they are potential providers,
- When feasible, segmenting tasks or quantities to permit maximum participation by local businesses, small and minority businesses, women's business enterprises, and disadvantaged veteran business enterprises,
- Establishing delivery schedules that encourage participation by local businesses, small and minority businesses, women's business enterprises, and disadvantaged veteran business enterprises,
- Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce
- If subcontracts are allowed, requiring the prime contractor to take the affirmative steps listed above


4. Process:

Procurements will be conducted in accordance with the Administrative Procedures.

5. Reporting:

All Sealed Bid or Competitive Proposal procurements will be publicized by posting to the Authority website, an email notification to firms on solicitation lists, and any other public platforms deemed necessary or appropriate by the Authority.

All procurements authorized and Contracts executed by the Executive Director will be reported in alignment with the approved Delegation of Authority Matrix. The authorization of any Contract, Contract amendment, or justification for Non-competitive Proposal procurement will be documented in the approved minutes of the appropriate Reservoir Committee and Authority Board meeting(s). In the instance of an emergency, the Executive Director will provide immediate notification to the Authority Board and Reservoir Committee and provide a justification at the next Reservoir Committee and Authority Board meeting(s) for any Contract entered into in response to an emergency. Any recourse of a respondent may be presented in the method specified in the RFP/RFQ or at an Authority Board meeting.

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DRAFT SITES PROJECT AUTHORITY RECORDS MANAGEMENT POLICY

1. Purpose

The Records Management Policy establishes management, maintenance and accessibility of records for the Sites Project Authority in compliance with the California Public Records Act. (Public Records Act) (Government Code Section 6250 et Seq).

2. Definitions

Requester: Refers to any individual requesting access to, inspection of, or copies of Sites Project Authority records.

Record: Has the same meaning as “public records” as defined in subdivision (e) of California Government Code Section §6252. Records are any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by the agency regardless of physical form or characteristics.

3. Policy

Records Management

The Sites Project Authority retains records of the agency and effective retention and storage of records, management of records, and information collection practices by establishing and maintaining an active records management program while ensuring compliance with the Public Records Act.

Public Records

The Sites Project Authority provides public access to Sites Project Authority records upon request in compliance with the California Public Records Act.

The Sites Project Authority reserves all available exceptions exemptions from to disclosure of Records as provided under the Public Records Act and decisions of the California Courts interpreting the same.

Consistent with applicable case law interpreting and applying the Public Records Act, new records will not be created to respond to requests.

4. Roles and Responsibilities

Sites Authority Board and Reservoir Committee Members

The Sites Project Authority does not create or maintain records on behalf of any participating agency. Members of the Sites governing boards are subject to compliance with this Records Management Policy.

Contracted Service Providers

Contracted service providers shall perform and maintain appropriate processes and systems to comply with the Public Records Act, the respective executed contract between the service provider and the Sites Project Authority, and this policy by making records generated in performing their work for the Sites Project Authority available as records of the agency upon request by the Authority.

Program Operations Manager

The Program Operations Manager shall be responsible for overseeing the Sites Project Authority's records management activities and assure the Authority remains in full compliance with this policy at all times.

Requester

Requesters are encouraged to make a focused and effective request that reasonably describes and identifiable record or records. The Authority shall make reasonable efforts to assist the requester in making a focused and effective request. A requester is encouraged to include the following information to facilitate a focused response by the Sites Project Authority regarding the requested Records:

- The subject of the record
- A clear, concise, and specific description of the record(s) being requested
- The date(s) of the record(s), or a time period for the request (e.g.: calendar year 2019)
- Full names for the individuals and/or agencies included in the request, including proper spelling
- Any additional information that helps identify the record(s) being requested
- Contact information for response to the request, preferably an email address
- Please make every effort to research the records being requested, prior to submitting a request. There is a vast amount of information, resources, and records available on the Sites Project Website, by utilizing the search tool, or browsing the topics related to the request.

Requesters are encouraged to make every effort to research the records being requested prior to submitting a request, including a detailed review of the Sites Project Authority website, which the Authority makes every effort to maintain.

Records Administrator

Under the supervision of the Program Operations Manager, the Records Administrator will administer an efficient records management procedure and procedure for responding to public records requests to manage the Authority’s records in compliance with this policy.

5. Process

Records will be retained and discarded in alignment with the attached Records Retention Schedule.

All public records requests will be reviewed by the Program Operations Manager, Records Administrator, and Legal Counsel as needed.

6. Reporting

The Reservoir Committee and Authority Board will receive an informational report of **significant** public records requests and notice of completion of responses.

7. Attachments:

Records Retention Schedule

8. Fee Schedule:

Requests for copies of records, for which fees are not otherwise set by law, shall be subject to the following fees:

First page.....	\$1.00
Each additional page.....	\$0.25
Front/Back copying.....	additional \$.10 per page
Copying on paper other than 8.5 x 11.....	actual cost
Color Copies.....	actual cost
Deposit required if estimated copying costs exceed.....	\$25.00

9. References

California Public Records Act ([Government Code Section 6250 et seq.](#))

California Secretary of State

Records Retention Schedule Addendum A

~~The Sites Project Authority Records Retention schedule is based on the Local Government Records Management Guidelines~~

The Sites Project Authority Records Retention schedule is based on the 2021 California State Records Management Handbook and has been adapted for use by the Sites Project Authority. **The below timelines are the minimum retention timelines for the specified documents, but documents may be retained for additional time. The Records Retention Schedule can be modified to provide additional detail concerning more specific documents.**

Records Retention Schedule	
Records	Minimum Retention Period
Organizational Records	
Articles of incorporation	Permanent
Application for exempt status	Permanent
Bylaws	Permanent
Authority Board Adopted Policies and operating procedures	Permanent
Authority Board and Reservoir Committee meeting minutes and materials including Agendas and Staff Reports	Permanent
Form 700	7 years Original/4 years Copies
Workshops, Town Halls, and other significant project meeting materials	5 years
Authority Board and Reservoir Committee Meeting Recordings	1 day after the approval of the respective minutes
Correspondence	7 years
Other documents not defined	1 year
Accounting Records	
Chart of accounts	Permanent
Annual financial statements	Permanent
Annual audit reports	Permanent
General ledger	20 years
Monthly financial statements	6 years
Quarterly financial statements	6 years
Journal entries	6 years
Accounts payable ledger	6 years
Accounts receivable ledger	6 years

Records Retention Schedule	
Records	Minimum Retention Period
Expense records	6 years
Accounting procedures	6 years
All other accounting records (including budgets)	6 years
Invoices/Progress Reports (submitted to Funding entities) <ul style="list-style-type: none"> • California Water Commission Invoices <ul style="list-style-type: none"> ○ Progress Reports • California Water Commission Quarterly Reports • Financial Assistance Agreement Financial Reports <ul style="list-style-type: none"> ○ Performance Reports • USDA Loan Status Reports 	Permanent
Support documents for Invoices submitted to Funding entities <ul style="list-style-type: none"> • Invoice Calculation Spreadsheets • Payment Requests • FAA Invoice Backup 	6 years
All other Invoices	6 Years
Bank statements	3 years
Bank reconciliations	3 years
Checks/Payments Received	6 years
Canceled checks	3 years
Stop payment orders	3 years
Check signature authorizations	3 years
All other bank records	3 years
Tax Records	
Tax returns	Permanent
Form 990 and supporting documentation	Permanent
1099 forms	8 years
All other tax return records	6 years
Supporting documentation for taxes	4 years
Real Estate Records	

Records Retention Schedule	
Records	Minimum Retention Period
Escrow documents	3 years after close
Deeds	Permanent
Option Agreements	5 years after fulfillment or expiration of agreement
First Rights of Refusal Agreement	3 years after fulfillment or expiration of agreement
Purchase/Sale Agreements	Permanent
Leases	3 years after fulfillment or expiration of agreement
All other real estate records	3 years
Insurance Records	
Policies	Permanent 5 years
Claims	5 years
All other Insurance records	5 years
Legal Records	
Contracts and Agreements (including Task Orders and Amendments)	Permanent
All other legal records (that do not fit into a defined category in this table)	10 years
Personal injury records	8 years
All other leases	6 years after termination
Litigation claims	5 years following close of case
Court documents and records	5 years following close of case
Deposition transcripts	5 years following close of case
Discovery materials	5 years following close of case
Environmental and Permitting Records	
CEQA Administrative Record ¹	10 years after close

¹ Public Resources Code Section 21167.6 (e) provides a list of the types of documents that comprise an administrative record, included as Appendix B to the Records Management Procedure. It is the responsibility of the Authority, as lead agency to retain relevant records, many of which may be generated by consultants. If there is a CEQA challenge, legal counsel would ultimately be responsible for the selection of files to be included in the administrative record.

Records Retention Schedule	
Records	Minimum Retention Period
	completion of Authority's formal project² approval decision
Permits and Supporting Documents	10 years after mitigation actions, if any, required in the permit close of project ²
Water Right and Supporting Documents	Permanent
Engineering Records	
Final reports and/or memoranda	Permanent
Final construction contract documents (including plans, specifications, cost estimates, and CAD/BIM files)	Permanent
Construction as-built documentation	Permanent
Records given/sent to any third party or government agency	10 years after close of project ²
Meeting minutes	10 years after close of project ²
Manifests/Waste Disposal	10 years after close of project²
Geotechnical samples/cores	10 years after close of project ² with consideration for permanent long-term storage of limited records
Temporary Project records	10 years after close of project ²
Technical Project Support Records	
Expert opinions	Permanent
Work Plans and Work Plan Updates	Permanent
Project Schedules	10 years
Final reports	Permanent
Final technical and/or administrative memoranda	Permanent
GIS Data collected in support of technical documents and activities	10 years

² ~~Close of Project refers to when all specified project activities have been fully implemented and no further action on the respective project would occur. For example, a construction project would be closed when all construction and mitigation actions were fulfilled.~~

² **The Authority maintains a list of projects on SharePoint including file storage location and close date as applicable.**

Records Retention Schedule	
Records	Minimum Retention Period
Final data collection/analysis/modeling output supporting key deliverables	10 years after close of project ²
Documents given /sent to any third party or government agency	10 years after close of project²
Meeting minutes, including meetings with committees and third parties	10 5 years after close of project ²
Proposals in response to Authority solicitations	2 years
Final Cost estimates	10 years after close of project ²
Correspondence, including emails, letters, text messages, handwritten telephone and meeting notes not further transcribed, written memoranda, to-do lists, report drafts if formal correspondence, in whatever form, with any third party or government agency including member agencies.	5 years after close of project ²

¹ Public Resources Code Section 21167.6 (e) provides a list of the types of documents that comprise an administrative record, included as Appendix B to the Records Management Procedure. It is the responsibility of the Authority, as lead agency to retain relevant records, many of which may be generated by consultants. If there is a CEQA challenge, legal counsel would ultimately be responsible for the selection of files to be included in the administrative record.

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