

**Requested Action:**

Reservoir Committee and Authority Board consider approval of administrative changes to the adopted board policies and guidelines as follows:

1. Minor revisions to the Accounting, Accounts Payable Approval, Budget, Procurement & Contract and Records Management Policies to incorporate law changes since prior adoption and/or administrative clarifications that better align the document with how the policy is being implemented.
2. Revisions to Local CEQA Guidelines to better align the guidelines with CEQA compliance implementation under the current governance structure.
3. Revisions to the Delegation of Authority Matrix to better align the document with how delegation is being implemented.

**Detailed Description/Background:**

Authority policy is developed as the need arises for the Board to direct Staff in “what” it intends for Staff to implement within various facets of the Project. Staff implements the policies and determines “how” the business of the agency is accomplished to align with the Board’s policy direction. Authority policy put in place to date mostly revolves around the financial and business functions of the Project. It is good business practice for the Authority to regularly review and confirm that its policies are effectively directing Staff work and reflects the needs of the agency.

The Authority-adopted policies are posted on the Sites Authority website ([Policies](#)) and include:

- Accounting
- Accounts Payable
- Budget
- Debt Management
- Funding Credit and Reimbursement
- Investment
- Procurement and Contract
- Real Property and Land Management
- Records Management (including records retention schedule)
- Storage Principles (listed here for completeness of Board adopted directives, however technically this document is not a policy of the Board and instead serves to guide development of the Benefits and Obligations Contract and Operations Plan)
- Water Infrastructure Finance and Innovation Act Reserve

Local CEQA Guidelines (listed here for completeness of Board adopted directives, however, technically this document is not a policy of the Board and instead serves to guide development of environmental review)

As the project continues to progress, law changes can occur and/or Staff applies its best judgment to interpret meaning behind the policy which can necessitate changes to previously approved policies. Currently, there are 5 policies staff recommends updating (attached) to address issues of this nature. In addition, staff recommends updates to the Local CEQA Guidelines and the Delegation of Authority Matrix, also attached.

Staff is not recommending any additional policies at this time. However, Staff does expect that additional policies will be necessary as the project continues to make progress and continually monitors for the appropriate timing necessary so that Board and Staff stay aligned on project implementation.

Procedures are not Board adopted or even within the purview of the Board but do serve an important purpose of ensuring continuity and quality control in “how” Board policy gets implemented. They are mentioned here only to make sure the Board is fully aware of the infrastructure the Staff has developed and will continue to refine and maintain to ensure the Project delivery meets the Board’s expectations.

**Prior Action:**

May 19, 2023: Investment Policy Approved

**Fiscal Impact/Funding Source:**

Board policy development and maintenance are Project Controls functions, and the FY24/25 Budget includes sufficient funds to support the ongoing need to keep up with policy and procedure documentation.

**Staff Contact:**

Joe Trapasso

**Primary Service Provider:**


Brown and Caldwell

**Attachments:**

Attachment A: Board Policy Documents with suggested changes in redline strikeout.

Attachment B: March 2019 Local CEQA Guidelines with suggested changes in redline strikeout.

Attachment C: Board adopted Delegation of Authority Matrix with suggested changes in redline strikeout.

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	F05
	ADOPTED	7/26/2022
	LAST UPDATED	2/16/2024

## DRAFT SITES PROJECT AUTHORITY ACCOUNTING POLICY

### 1. Purpose:

This Accounting Policy describes the principles, practices, and conventions used by the Sites Project Authority (Authority) in preparing and presenting financial statements. The Authority is a sole purpose entity responsible for the planning, design, and construction of the Sites Reservoir Project. As the project progresses, these accounting policies will be amended.

### 2. Definitions:

**Fiscal Year:** The Authority’s Fiscal Year aligns with the calendar year, beginning on January 1 and ending on December 31 each year.

### 3. Policy:

**Accounting:** The Authority reports its operations using the accrual method of accounting. All accounting is performed in alignment with Generally Accepted Accounting Principles as promulgated by the Governmental Accounting Standards Board (**GASB**), Financial Accounting Standards Board and the Securities and Exchange Commission.

The Authority allocates costs to programs using cost accounting efforts customary for a California public water agency, including reviews of cost acceptability and accuracy.

**Revenues:** The Authority receives revenues via payments and reimbursements under agreements with local, state, and federal agencies. The Authority also receives revenue from interest and grants. The Authority’s revenues are categorized as Authority Revenue and Reservoir Revenue. Revenues are collected as checks, automatic payments through an automated clearing house, and incoming wire transfers.

**Invoicing and Accounts Receivable:** The Authority provides invoices for payment and reimbursement.

- a. The Authority Board Treasurer **and Executive Director** approves all invoices prior to issuance.
- b. An accounts receivable aging summary is generated and is reported to the Authority Board monthly.
- c. Unbilled receivables will be accrued on an annual basis.

**Cash:** The Authority operates on a non-cash basis. Cash in the form of hard currency is neither received nor expended by the Authority.

**Bank Accounts:** The Authority maintains the following bank accounts. In all cases the authorized signatory on the bank accounts includes the Authority Board Treasurer and an additional designated Authority Board member or alternate as approved by the Treasurer.

- a. **Checking Accounts:** Three separate non-interest-bearing checking accounts are maintained and designated as General, State Funds, Federal Funds.
- b. **Savings Accounts:** The Authority has one insured interest-bearing savings account. All interest earned is deposited into this account. The Authority has adopted an Investment Policy to address custodial risk associated with this account.
- c. **Reconciliation:** All bank accounts are reconciled at the conclusion of each month by the Authority authorized accountant.

**Credit Cards:** Credit cards may be used for purchases under \$2,000 per month for office supplies and office operating expenses. The Executive Director has the authority to authorize issuance of credit cards. Use and review of credit card purchases shall conform to the requirements of ~~an internal controls procedure~~ **the Credit Card Use Procedure** approved by the Authority Board Treasurer.

**Assets and Asset Valuation:**

- a. **Fixed Assets:** When a fixed asset is being considered, the Authority will adopt an Asset Management Policy.
- b. **Prepaid Expenses:** Prepaid expenses are amounts paid by the Authority that provide benefit in future periods.
- c. **Capitalization:** The Authority defines capital assets as property, plant, equipment, and infrastructure assets with an initial individual cost of \$5,000 or more and a useful life of three years or more.

**Liabilities:** The Authority's liabilities generally consist of payments for goods and services and liabilities associated with agreement terms related to reimbursements for past project costs.

- a. **Accounts Payable:** All invoices for goods and services are received and processed through an Accounts Payable Policy and Procedures. An accounts payable summary and accounts payable aging summary is provided in monthly reports.
- b. **Leases:** All leases will follow guidance **in general governing regulations** ~~in~~ of GASB.
- c. **Long-Term Liabilities:** ~~When a long-term liability is considered,~~ **Will be consistent with** the Authority's ~~will~~ **adopted a** Debt Management Policy.
- d. **Accrued Liabilities:** A summary of accrued liabilities is prepared on a monthly basis.

**General Ledger:** The General Ledger shall be developed and maintained by the Authority authorized accountant.

**Audit Practices:** An external audit shall be conducted after the conclusion of each fiscal year. The external audit process fulfills all audit requirements, including those specified in funding agreements.

**4. Process:**

All accounting is performed by independent consultants under contract with the Authority and under the oversight of the Authority's Program Operations Manager. The accounting performed by the consultants is in alignment with the respective consultants' accounting procedures and the Authority adopted policies and procedures as stipulated in Authority's contract with the consultants.

**5. Policy Term:**


This Policy will be reviewed as needed and any changes shall occur by way of a resolution adopted by the Authority Board.

**6. Reporting:**

All annual financial reports are provided to the Authority Board for approval.

All annual financial reports are prepared under the direction of the Executive Director and shall be made publicly available on the Authority's website at [www.sitesproject.org](http://www.sitesproject.org).

The Sites Project Authority is a non-profit Joint Powers Authority following Internal Revenue Code subsection 501(c). The Authority's Treasurer files the Special Districts Annual Report and other necessary materials to the California State Controller's Office after Authority approval of the annual financial report.

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	F01
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	LAST UPDATED	2/16/2024

**DRAFT SITES PROJECT AUTHORITY  
ACCOUNTS PAYABLE APPROVAL POLICY**

**1. Purpose:**

To ensure the timely and efficient payment of vendors and service providers as prescribed by the Authority.<sup>1</sup>

**2. Definitions:**

Payment of Claims: The monthly inventory of accounts payable to each consultant and vendor.

**3. Policy:**

Approval of the Payment of Claims **and Warrants to be Drawn for the Payment of Claims** ~~(or Warrant Register)~~ will be documented by the approved minutes of the monthly Authority meetings.

**Rolling Invoice Processing:** When vendor invoices are determined by the Executive Director as being ready for payment following the administrative procedures for approving invoices, the Executive Director and Treasurer have the following authority:<sup>2</sup>

- a. A list of claims will be generated twice a month by the Program Operations Manager and sent via email to the Executive Director and Treasurer for approval to process payment. Both will respond within two business days.
- b. Upon approval, the Authority accountant makes payments using 1 of the 3 payment processes:
  - Printed checks
  - Electronic payments through an Automated Clearing House (ACH)
  - Wired payments ~~for special circumstances~~

**Advanced Payment Approval:** When an urgent need occurs requiring the timely payment of an invoice prior to the next regularly scheduled payment process, the Executive Director is Authorized to approve the following payments:

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<sup>1</sup> Authority refers to Governing Boards.

<sup>2</sup> Where the Executive Director or Board Treasurer is unavailable, their designated backup may provide approval.

- a. Reoccurring expenses such as, but not limited to, rents and utilities: The delegated **authority** not to exceed amount of ~~\$15,000~~ **\$100,000** for each occurrence.
- b. Non-routine payments: The delegated **authority** not to exceed amount of \$500,000 for each occurrence.
- c. The aggregated amount authorized by this policy in a single month for the above categories 3a through 3b is limited to \$550,000 unless otherwise approved in advance by the Authority Board Chair.

#### 4. **Process:**

For each of the ~~above Section 2~~ categories **described in Section 3**, the expense must have been included in the current approved Budget and Work Plan. If not, approval must be received from the Authority Board.

Checks require two signatures: one by an authorized Authority Board member in addition to the Authority's Board Treasurer.

Electronic payments will be requested by the Authority accountant and submitted for bank processing on the next business day.


Each wire payment requires the Authority accountant and Board Treasurer to submit and approve the transaction.

#### 5. **Policy Term:**

This Policy will be reviewed at least every three years and confirmed by way of a resolution adopted at the appropriate Authority Board meeting.

#### 6. **Reporting:**

All payments of claims (both paid and unpaid) will be reported ~~out~~ on a monthly basis to the Budget and Finance Committee as an information item, and approved by the Reservoir Committee and Authority Board.

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	F04
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	LAST UPDATED	2/16/2024

## **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 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.

**Project Agreement:** **The Third Amendment to 2019 Reservoir Project Agreement By and Among Sites Project Authority and the Project Agreement Members Listed Herein Dated as of January 1, 2022.**

**Restricted Contingency:** ~~Funds~~ **A minimum threshold of cash intended sufficient** to cover approximately three months of critical activities to maintain project **progress, and is the minimum fund balance retained by the Authority. Restricted contingency, unlike unrestricted contingency, is not a dedicated budget.**

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

**Work Plan:** **Document developed for a specific phase of the Project that includes scope, budget, and schedule by subject area, project level, and year of the Project Phase.**

### **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.

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

**If the minimum cash threshold, identified as Restricted contingency is reached, may be utilized only following approval by the Reservoir Committee and Authority Board must be notified.**

When it is necessary to utilize unrestricted contingency, the Executive Director has authority to assign unrestricted 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 contingency assignments greater than \$100,000 per occurrence. Unrestricted contingency may be utilized until the budgeted unrestricted contingency amount has been exhausted. Assignment of unrestricted 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 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 contingency will be reported to the Joint Budget and Finance Committee. The Reservoir Committee and the Authority Board will receive a report when unrestricted contingency is assigned. Assignment of restricted contingency 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 contingency assignments,
- Board approval of restricted contingency assignments,
- Notifications of budget transfers and,
- Notifications of unrestricted contingency assignments.

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## 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, **purchase orders** 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.

**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,~~ **including under** ~~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 **eContract** 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~~ **in Contract with** the Professional Service provider or other contracting party considered for a **eContract**. **The Authority shall not enter into any Contract in which a financial interest described above renders a Contract impermissible as a matter of law.**
- **During the pendency of the procurement process provided for in this Policy,** 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. **If a Stakeholder has received any such gratuity, gift, consulting fee, trip or favor during the twelve-month period preceding the commencement of a procurement process, that Stakeholder shall not participate in any stage of the procurement process.**

### **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 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 necessary Professional Services, materials, or combination thereof in any amount of no more \$100,000 per occurrence, **or** 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. **Competitive Sealed Bids:** Publicly solicited and formally advertised procurement method that allows selection based principally on cost, **and if applicable, will result in an award of a Contract to the lowest** ~~(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 **primarily** for **Professional Construction Services, Materials Purchase, or Technical Service 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 **lowest bid** ~~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 Proposals:** Competitive Proposal procurements **are generally a qualifications-based selection process which** 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 qualified**

~~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 **or permitting and oversight** agencies.
  - **Or otherwise, when public policy goals underlying the Competitive Sealed Bid or Competitive Proposal process will not be achieved.**

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 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 **Competitive Sealed**~~Sealed~~ Bid and 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, **or, where feasible, will attempt to acquire authorization from the Reservoir Committee and Authority Board to enter into a contract 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.

	DOCUMENT TYPE	Policy
	DOCUMENT NO.	C05
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	LAST UPDATED	02/16/2024

## 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 ~~7920.000 6250~~ **7920.000 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 ~~§7920.530 6252~~ **§7920.530 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 Public Records Act.

The Sites Project Authority reserves all available exceptions and 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 **required** to make a focused and effective request that reasonably describes an 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

Requesters are invited to research the Records being sought prior to submitting a request, including a detailed review of the Sites Project Authority website, which contains a vast amount of information, resources and Records, and which the Sites Project Authority makes a diligent 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 and for managing the Authority’s Records in compliance with this Policy.

**5. Process**

Records will be retained and discarded in a manner consistent with the attached Records Retention Schedule.

All 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 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 7920.000 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 Program GC Section 122236** ~~2021 California State Records Management Handbook~~. It has been adapted for use by the Sites Project Authority. The timelines below 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.

<b>Records Retention Schedule</b>	
<b>Records</b>	<b>Minimum Retention Period</b>
<b>Organizational Records</b>	
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	4 years
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
<b>Public Records Request</b>	<b>5 years</b>
Other documents not defined	1 year
<b>Accounting Records</b>	
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

Records Retention Schedule	
Records	Minimum Retention Period
Accounts receivable ledger	6 years
Expense records	6 years
All other accounting records (including budgets)	6 years
Invoices/Progress Reports (submitted to Funding entities) <ul style="list-style-type: none"> <li>• California Water Commission Invoices <ul style="list-style-type: none"> <li>○ Progress Reports</li> </ul> </li> <li>• California Water Commission Quarterly Reports</li> <li>• Financial Assistance Agreement Financial Reports <ul style="list-style-type: none"> <li>○ Performance Reports</li> </ul> </li> <li>• USDA Loan Status Reports</li> </ul>	Permanent
Support documents for Invoices submitted to Funding entities <ul style="list-style-type: none"> <li>• Invoice Calculation Spreadsheets</li> <li>• Payment Requests</li> <li>• FAA Invoice Backup</li> </ul>	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
<b>Tax Records</b>	
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
<b>Real Estate Records</b>	
Escrow documents	3 years after close

Records Retention Schedule	
Records	Minimum Retention Period
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
<b>Insurance Records</b>	
Policies	5 years
Claims	5 years
All other Insurance records	5 years
<b>Legal Records</b>	
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
<b>Environmental and Permitting Records</b>	
CEQA Administrative Record <sup>1</sup>	10 years after close of project <sup>2</sup>
Permits and Supporting Documents	10 years after close of project <sup>2</sup>

<sup>1</sup> 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.

<sup>2</sup> 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
Water Right and Supporting Documents	Permanent
<b>Engineering Records</b>	
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 <sup>2</sup>
Meeting minutes	10 years after close of project <sup>2</sup>
Manifests/Waste Disposal	10 years after close of project <sup>2</sup>
Geotechnical samples/cores	10 years after close of project <sup>2</sup> with consideration for permanent long-term storage of limited records
Temporary Project records	10 years after close of project <sup>2</sup>
<b>Technical Project Support Records</b>	
Work Plans and Work Plan Updates	Permanent
Project Schedules	10 years
Final reports	Permanent
Final technical memoranda	Permanent
GIS Data collected in support of technical documents and activities	10 years
Final data collection/analysis/modeling output supporting key deliverables	10 years after close of project <sup>2</sup>
Meeting minutes, including meetings with committees and third parties	5 years after close of project <sup>2</sup>
Proposals in response to Authority solicitations	2 years
Final Cost estimates	10 years after close of project <sup>2</sup>
Correspondence, if formal correspondence, in whatever form, with any third party or government agency including member agencies.	5 years after close of project <sup>2</sup>

<sup>1</sup> 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.

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

CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only									
<b>A. JEPA Agreement, Reservoir Project Agreements, Bylaws</b>									
1	Fourth Amended and Restated Joint Exercise of Powers Agreement		R			R			A
2	JEPA Amendments		R			R		R	A
3	JEPA Admission of a new member		R			R		R	A
4	Calendaring for Board Agenda				R	A			
<b>B. Work Plans, Budget, Grants, Loans and MOUs</b>									
1	Work Plan				R	R	R	A	A
2	Work Plan Budget				R	R	R	A	A
3	<b>Budget Transfers</b>								
a.	Transfers up to \$100,000 between <del>line items</del> subject areas and no increase in approved budget	Yes			R	A	I	I	I
b.	Transfers over \$100,000				R	R	R	A	A
c.	Use of Contingency up to \$100,000	Yes			R	A	I	I	I
d.	Use of contingency over \$100,000				R	R	R	A	A
4	<b>Grants</b>								
a.	Application				R	R	R	A	A
b.	Execution and submittal of grant application				R	A	I	I	I
c.	Execution and management of grant agreements		R		R	A	I	I	I



CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only R = Recommended By P = Pre-Approval/Concurrence									
5	<b>Loans</b>								
	a. Application				R	R	R	A	A
	b. Execution and submittal of loan application				R	A	I	I	I
	c. Execution of loan agreements		R		R	R	R	A	A
	d. Acceptance and management of loan funds				R	A	I	I	I
6	<b>MOUs with Federal, State, Local Govts, Native American, Utilities</b>								
	a. MOU/Agreement Execution		R		R	R		A	A
	b. MOU/Agreement Management and reporting				RA	AI		I	I
<b>C. Environmental Review and Permitting</b>									
1	<b>CA Environmental Quality Act (CEQA) Authority</b>								A
	a. Staff determines if a proposed action requires CEQA compliance document.								
	i. If no then prepare Exemption(s) if needed and CEQA Determination		R	R	R	R		R	A
	ii. If yes and not covered by existing CEQA document, prepare an Initial Study and appropriate CEQA compliance documentation		R	R	R	R		R	A
	b. Board takes lead CEQA agency role				R	R		R	A
	i. Makes and Adopts Findings and Determinations		R		R	R		R	A
	ii. Adopts project and mitigation measures		R		R	R		R	A
2	<b>Permit Applications (water rights, 404, 401, Biological Assessments, etc.) that commit the project to financial or legal/regulatory risk.</b>		R		R	R		R	A
3	<b>Permit Applications that do not commit the project to financial or legal/regulatory risk.</b>		R		R	A		I	I
4	<b>Local Agency permits, land division &amp; GP Amendments that include financial or legal/regulatory risk.</b>		R		R	R		R	A
5	<b>Local Agency permits, land division &amp; GP Amendments that do not include financial or legal/regulatory risk.</b>		R		R	A		I	I

CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only									
<b>D. Administrative</b>									
1	<b>Purchases (supplies, materials &amp; equipment)</b>	Yes							
	a. Up to \$100,000				R	A	I	I	I
	b. Greater than \$100,000				R	R	R	A	A
2	<b>Administrative Procedures that include financial commitments or legal/regulatory risk.</b>		R		R	R	R	A	A
3	<b>Administrative Procedures that do not include financial commitments or legal/regulatory risk.</b>		R		R	A			
4	<b>Agenda Item Submittal</b>								
	a. Recommendation to BOD - Action/Info. & Discuss		R		R	R	R	A	A
	b. Recommendation to BOD - Consent		R		R	R	R	A	A
5	<b>Petty Cash-Request (less than \$50100)The Authority operates on a non-cash call basis. Cash in the form of hard currency is neither received or expended by the Authority.</b>	Yes							
6	<b>Sundries/Procurement Card (\$500)ED has authority to authorize issuance of credit cards. Credit cards may be used for purchases under \$2,000 per month for office supplies and office operating expenses. The cardholder and Program Operations Manager approves the monthly credit card bills.</b>	Yes			A	I	I	i	i
7	<b>Response to Public Records Request</b>	Yes	R		R	A		I	I
8	<b>Liability Insurance Claim Settlements &amp; Workers Comp Claims</b>	Yes							
9	<b>Travel Authorization Out of State</b>	Yes			R	R		A	A
10	<b>Travel Authorization Within State</b>	Yes			A	I			

CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only									
<b>E. Professional Service Contracts</b>									
1	Decision to use outside consultants	Yes			R	A	I	I	I
2	Request for Qualifications	Yes			R	A	I	I	I
3	Request for Proposals	Yes			R	A	I	I	I
4	Sole Source Professional Services up to \$500,000 within approved budget <b>except legal services</b>	Yes	R		R	A	I	I	I
5	Sole Source Professional Services above \$500,000 <b>except legal services</b>	Yes	R		R	R	R	A	A
6	<b>Authority to Negotiate Professional Service Contracts</b>								
a.	Approve Master Service Agreements with terms but no scope or cost <b>except legal services</b>		R		R	A	I	I	I
7	<b>Professional Services Agreement</b>	Yes							
a.	Up to \$500,000 within the approved budget <b>except legal services</b>		R	R	R	A	I	I	I
b.	Up to \$500,000 NOT WITHIN budget with cost offset <b>except legal services</b>		R		R	A	I	I	I
c.	Greater than \$500,000 <b>and all legal services</b>		R		R	R	R	A	A

CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only									
<b>8</b>	<b>Professional Services Amendment including Legal Services</b>	Yes							
	a. Within Contract/Task Order approved amount				R	A	I	I	I
	b. Reallocation of Task Budgets Within Contract/Task Order				R	A	I		
	c. Exceeds Remaining Contract/Task Order Amount				R	R	R	A	A
	d. Adding Task Order to Initiate Litigation				R	R	R	A	A
<b>9</b>	<b>Notice to Proceed</b>								
	a. Professional Services				R	A			
	b. Notices to proceed for existing contracts				A	I			
<b>10</b>	<b>Progress Payments</b>	Yes							
	a. Invoice approval to process payment by Board Treasurer and ED			A	AR	A	I	I	I
	b. Preparation of Payment of Claims				A	I	I		
	c. Check, ACH and Bank Wire Transfer Issuance Authorization by Board Treasurer and ED	Yes			A	A	A		A
	d. Electronic Signatures and Release of Checks, ACHs, and wires. Authority account releases checks and processes ACHs based on Authority Treasurer and ED signed payment of claims document. Bank wire transfers require Authority Treasurer involvement.				R	R			
<b>11</b>	<b>Service Completion (closeouts) and progress reports</b>				A	I	I	I	I
<b>12</b>	<b>Legal Services Agreements</b>				R	R		A	A
	a. Legal Services with General Counsel					R		R	A
	b. Legal Services with Subconsultants		R			R		R	A

CATEGORY / DOCUMENT		Needs a Policy and Procedure	Legal	Designated Staff	Project Agents	Executive Director	Budget and Finance Committee	Reservoir Committee	Authority Board
A = Approval I = Information Only									
13	Significant Schedule Changes (when within sole control of the Project)				R	R	R	A	A
F. Construction Contracts (to be established as project nears construction)									
G. Land Easements and Leases									
1	Temporary Right of Entry (TROE)/Land Access Agreements								
	a. TROE/Land Access Agreement with Landowner		R		R	A		I	I
	b. <del>Check-Request</del> Payment for TROE/Land Access Compensation				R	RA	AI	AI	AI
H. Personnel Issues TBD if Sites has employees									
I. Access to Sites Maxwell and Satellite Project Offices									
1	Electronic Access Cards No electronic cards currently needed	Yes							
	a. Initial Request for Card and Site Access				A				
	b. Replacement of Lost Card				A				
2	Mechanical Keys	Yes							
	a. Initial Request for Key(s) by Agent in charge of the Maxwell Office				A				
	b. Replacement of Lost Key(s) by the Agent in charge of the Maxwell Office				A				



Approved March 2019 – Revised February 16, 2024

# LOCAL CEQA Guidelines

Sites Project Authority

LOCAL GUIDELINES FOR IMPLEMENTING THE CALIFORNIA  
ENVIRONMENTAL QUALITY ACT

Prepared by The Law Offices of Young Wooldridge, LLP

## TABLE OF CONTENTS

Article 1. General Provisions.....	2
§ 1.1    Adoption of Guidelines.....	2
1.1.1    Adoption of State Guidelines .....	2
1.1.2    Purpose of Local Guidelines.....	2
§ 1.2    Decision Making Authority .....	2
1.2.1    Board of Directors.....	2
1.2.2    Delegation to Committees .....	2
§1.3    Definitions.....	3
1.3.1    CEQA.....	3
1.3.2    State Guidelines.....	3
1.3.3    Local Guidelines.....	3
1.3.4    Authority.....	3
1.3.5    Staff .....	3
Article 2. Procedures for CEQA Review.....	3
§ 2.1    Preliminary Review.....	3
2.1.1    Actions Subject to CEQA .....	3
2.1.2    Exemption Review .....	4
2.1.3    Initial Study.....	4
Appendix A: Preliminary CEQA Determination .....	5

## ARTICLE 1. GENERAL PROVISIONS

### § 1.1 ADOPTION OF GUIDELINES

#### 1.1.1 ADOPTION OF STATE GUIDELINES

Pursuant to section 15022(d) of the State Guidelines, the Sites Project Authority herein adopts and incorporates by reference the State Guidelines promulgated for the implementation of the California Environmental Quality Act, codified as Title 14, Chapter 3 of the California Code of Regulations, including any subsequent amendments thereto, subject to the Authority's power to adopt and revise these guidelines at any time in its sole discretion.

#### 1.1.2 PURPOSE OF LOCAL GUIDELINES

These Local Guidelines are adopted pursuant to section 15022(a) of the State Guidelines to provide objectives, criteria, and specific procedures consistent with CEQA and the State Guidelines. These Local Guidelines are expressly intended to be consistent with the requirements of CEQA and the State Guidelines and shall be given a construction that complies with those requirements.

### § 1.2 DECISION MAKING AUTHORITY

#### 1.2.1 BOARD OF DIRECTORS

The Board of Directors is the legislative body of the Sites Project Authority and shall have the final responsibility for the approval of any project, subject to the provisions of the Authority's Bylaws, and for determining whether an Environmental Impact Report, Negative Declaration, Mitigated Negative Declaration, or Notice of Exemption shall be prepared for any project. The Board of Director's determination shall be final and conclusive on all persons, including Responsible Agencies and Trustee Agencies, except as provided in Section 15050(c) of the State CEQA Guidelines.

#### 1.2.2 DELEGATION TO COMMITTEES

The Board of Directors may, in its discretion, delegate its authority to approve a project or class of projects to a standing or ad hoc committee of **the Authority, including the Reservoir Committee**~~its members~~. If it does so, such committee shall determine whether an Environmental Impact Report, Negative Declaration, Mitigated Negative Declaration, or Notice of Exemption shall be prepared for that project or class of projects, **and shall recommend the appropriate course of action to the Board of Directors.** ~~Such determination shall have the same effect as a determination made by the Board of Directors, subject to an appeal to the Board of Directors. Any such appeal must be initiated within 30 days of the determination by~~



~~way of a letter to the Board of Directors.~~

## §1.3 DEFINITIONS

### 1.3.1 CEQA

“CEQA” means the California Environmental Quality Act, codified as Division 13 of the Public Resources Code, as amended from time to time by the legislature.

### 1.3.2 STATE GUIDELINES

“State Guidelines” means the regulations promulgated for the implementation of the California Environmental Quality Act, codified as Title 14, Chapter 3 of the California Code of Regulations, including any subsequent amendments thereto.

### 1.3.3 LOCAL GUIDELINES

“Local Guidelines” means these guidelines, as amended from time to time by the Board of Directors.

### 1.3.4 AUTHORITY

The “Authority” means the Sites Project Authority.

### 1.3.5 STAFF

“Staff” means the Authority personnel and/or independent contractors assigned a given task by the Board of Directors, the ~~General Manager~~ **Executive Director**, or the Environmental Planning and Permitting Manager.

## ARTICLE 2. PROCEDURES FOR CEQA REVIEW

### § 2.1 PRELIMINARY REVIEW

#### 2.1.1 ACTIONS SUBJECT TO CEQA

Before commencing review under CEQA, Staff shall define the proposed activity and determine whether the proposed activity is subject to CEQA review by the Authority. An action is not subject to CEQA review by the Authority if

- a) it does not constitute a “project” subject to CEQA,
- b) it is a ministerial action as defined in the State Guidelines, or
- c) another public agency is involved and is the Lead Agency under CEQA.

If Staff determines the proposed activity is not subject to CEQA review by the Authority, it shall record that determination on the form entitled “Preliminary CEQA Determination” (Appendix A) and submit it to the **Reservoir Committee and** Board of Directors for approval.

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#### 2.1.2 EXEMPTION REVIEW

After determining that a proposed activity is subject to CEQA review by the Authority, Staff shall determine whether any exemption from CEQA applies to the project and whether exceptions exist pursuant to section 15300.2 of the State Guidelines

If Staff determines the proposed activity is exempt, it shall record that determination on the form entitled “Preliminary CEQA Determination” (Appendix A) and submit it to the **Reservoir Committee and** Board of Directors for approval.

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#### 2.1.3 INITIAL STUDY

After determining that a project subject to CEQA review is not exempt from such review, Staff shall perform an Initial Study in compliance with CEQA and present such Initial Study to the **Reservoir Committee and** Board of Directors. Staff may also present its recommendation regarding the form of environmental document to be prepared.

**Preliminary CEQA Determination**

**Sites Project Authority**

1	Proposed Activity	
2	Detailed Description	
3	Location (Preferably, attach a USGS 15' or 7 1/2' topographical map identified by quadrangle name.)	
4	Actions Subject to CEQA	<input type="checkbox"/> The proposed activity is not a “project” subject to CEQA review. <input type="checkbox"/> The proposed activity is a ministerial action not subject to CEQA review. <input type="checkbox"/> Another government agency is involved that constitutes the lead agency under CEQA. Agency: _____
5	Exemption Review	<input type="checkbox"/> The proposed activity is subject to a statutory exemption from CEQA. Exemption: _____ <input type="checkbox"/> The proposed activity is subject to a categorical exemption from CEQA. Exemption: _____ <input type="checkbox"/> The proposed activity is subject to the common sense exemption from CEQA. Comments: _____

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_