

Environmental Planning and Permitting Work Group

June 5, 2024



Agenda

- 1.1 Environmental Compliance Plan Update
- 2.0 EPP Manager's Report
 - Key Planning and Permitting Activities Report

Environmental Compliance

Ali Forsythe and Stephanie Parsons



Environmental Compliance Program – Upholding our commitments

- Verify and document that the Authority is in compliance with all environmental commitments
- Key elements:
 - Policies and procedures
 - Program structure and process for implementation
 - Review and improvement
- Cradle to grave approach with continuous improvement

What is the Value of a Program?

Shared understanding and agreement about what is required, how it will get done, and how it will be improved

Environmental Compliance Manual provides framework and guides the Program

- Manual accomplishes the following:
 - Establishes roles and responsibilities
 - Guidance for the contractors and construction managers to manage and oversee compliance
 - Establishes standard operating procedures that can evolve with construction
 - Outlines process for improvement
 - Unify and establish clear expectations

Environmental Compliance Program described in the Compliance Manual

All documented broadly in the Environmental Compliance Manual



Guidance Documents (Standards and Procedures)

- Roles and Responsibilities, Expectations for all Parties, Communications
- Non-compliance Triggers and Reporting



Commitment Tracking

- Mitigation Reporting and Documentation
- Agency Review and Auditing



Assurance Audits (Inspections and Monitoring)

- Field Assurances Inspections
- Auditing Procedures



Contract Review Team (Environmental Controls)

- Review of all construction contracts by environmental controls team
- Three phase review - Before, During and After Procurement



Training and Education (Capacity Building)

- Information Transfer, Meetings, and Site Visits
- Checklists and Guidance Memos



Adaptive Management (Resolve and Advance)

- Analysis and Resolution of Non-Compliance
- Improving the Process

Work on the Environmental Compliance Manual is progressing

- • Framework and setting foundation with the team
- • Establish policies and procedures (in progress)
- Create work breakdown structure
 - Establish common language and expectations across all construction contracts
- Establish system(s) for maintaining resources/reports/data
 - Ensure data is available for those that need it
 - Ensure Authority has a well-documented process
- • Develop contract document inserts for construction contracts (in progress – with focus on CMAR contract)

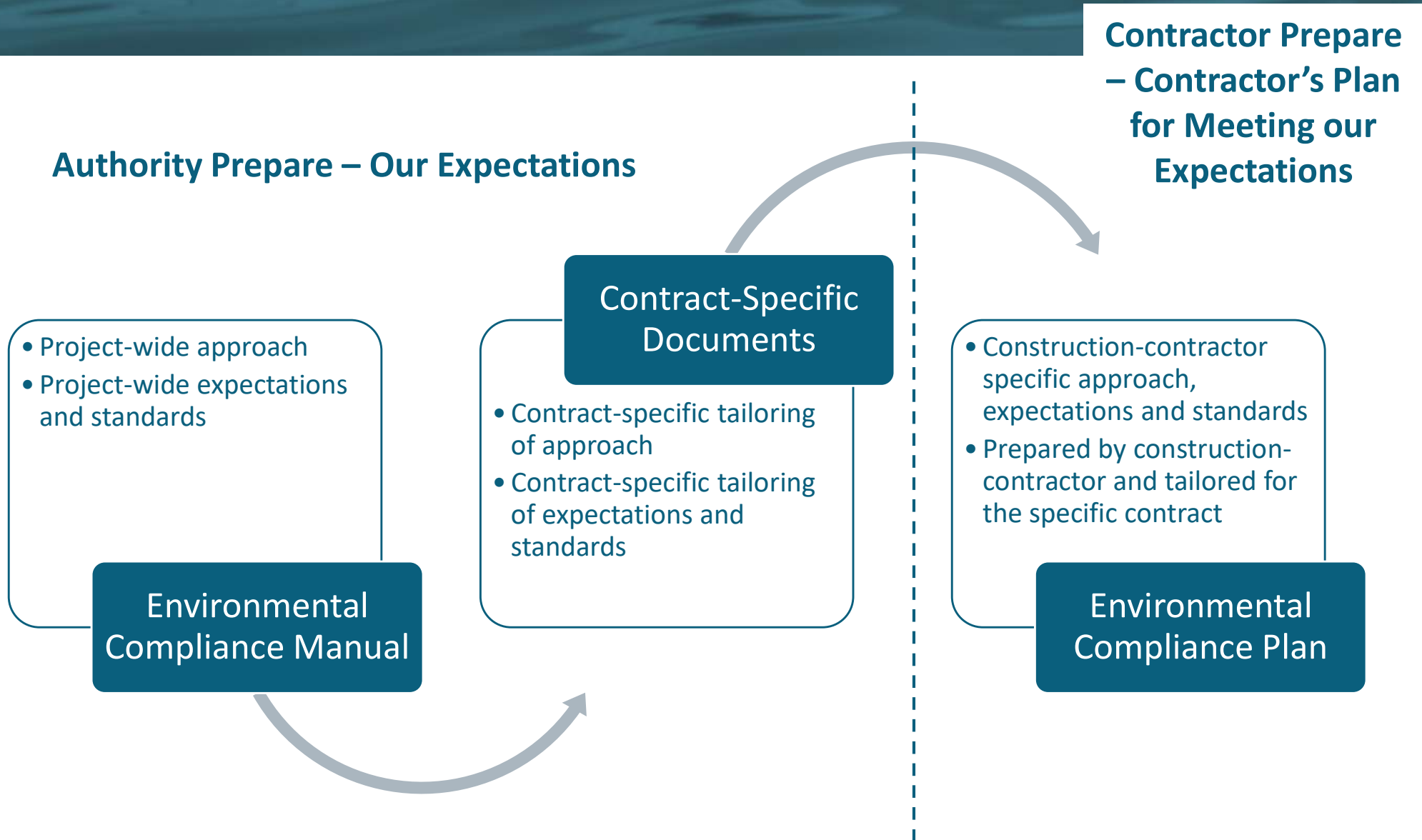
Contract-specific documents tailor the Manual to the specific contract

- Not all sections of the Manual will be applicable to all contracts
- Contractors need a clear understanding of their responsibilities in the request for qualifications/proposals to understand expectations and adequately cost and staff effort
- Contract-specific documents prepared by the Authority to tailor Manual to the specific contract activity

Selected contractor then prepares Environmental Compliance Plan

- Builds from Manual and Contract-Specific Document to:
 - Detail how the Contractor will implement and demonstrate compliance with all applicable environmental requirements
 - Identifies individuals responsible and clear roles and responsibilities
 - Becomes a binding contractual document
 - Authority will use to manage and oversee the Contractor's compliance efforts

How it all fits together



Next Steps

- Continued work on development of the Manual
- Developing approach for the contract-specific documents for the CMAR
 - Working collaboratively with the engineering team
- Development is phased and integrated with construction contracting efforts

Environmental Planning and Permitting Manager Report

Ali Forsythe

Dashboard Update

Deliverable	Finish	Status	Notes, New or Potential Issues
Water Right Application			
• Submit to State Board	May-22	●	Application Submitted May
• Complete Protest Resolution Period	Mar-24	●	
• Receive Water Right Permit	July-25	N/S	Hearing efforts are moving forward
Federal ESA			
• Construction – Biological Opinion	Dec-24	●	
• Operations – Programmatic Biological Opinion	Dec-24	●	
• Operations – Project-level Biological Opinion	Oct-25	N/S	Revised date
State ITPs			
• Receive Construction ITP	Oct-24	●	
• Submit Operations ITP to CDFW	Nov-23	●	
• Receive Operations ITP	Oct-24	●	

N/S = Not Started; **Green** = On track; **Yellow** = Area of Potential Concern; **Red** = Delayed; **Blue** = Completed

Dashboard Update

Deliverable	Finish	Status	Notes, New or Potential Issues
Section 106 – Cultural Resources			
• Final Programmatic Agreement	Oct-24	●	
• Programmatic Historic Properties Management Plan	Dec-24	●	
Clean Water Act 404/401			
• Submit Final Permit Applications	Mar-24	●	
• Receive 404 and 401 Permits	Mar-25	●	Army Corps determined application incomplete based on new guidance; working on next steps
Streambed Alteration Agreement			
• Prepare and Submit Application	Dec-23	●	
• Receive Master Agreement	Oct-24	●	Revised date
Eagle Permit			
• Short-Term and Nest Take Permits	Apr-23	●	
• Long-Term Permit Issued	Dec-24	●	Revised date

N/S = Not Started; Green = On track; Yellow = Area of Potential Concern; Red = Delayed; Blue = Completed

Upcoming Meetings

- Next Work Group Meeting –
August 20, 10 to 11 AM
 - Topics –
 - Master Lake and Streambed Alteration Agreement - Update
- Other upcoming meetings
 - Reservoir Committee and Authority Board
 - Friday, June 21 – 9 AM to 12 PM
 - Engineering and Operations Workgroup
 - Friday, June 28 – Noon to 1:30 PM
 - Wednesday, July 10 – 1:30 to 3:30 PM

Thank you!

