



Meeting: **Reservoir Committee & Authority Board**  
**Agenda Item 3.2**

**April 18, 2025**

Subject: **Environmental Compliance Program and Manual**

---

**Requested Action:**

Review and comment on the Project's Environmental Compliance Program and Manual.

**Detailed Description/Background:**

Authority staff have been working to prepare an Environmental Compliance Program and associated Manual to efficiently and cost-effectively implement the Project consistent with the requirements in the Project's environmental permits and approvals. The Environmental Compliance Program builds on the Authority's environment stewardship values in its Strategic Plan. The Program provides the framework to ensure that the Project's environmental requirements are fulfilled successfully and that partnerships and good working relationships with natural resources and regulatory agencies, environmental groups, Native American Tribes, and the public are established and maintained throughout the life of the Project. Because the Authority will have multiple construction contractors working on the Project, the Environmental Compliance Program and associated Manual establish a framework for environmental compliance roles, responsibilities and expectations across all of the Project's construction contracts.

There is no Board action required on this item and the report is being provided for information purposes so that the whole Board is aware of the development of this Manual and the approach being taken with construction contractors. There is no presentation planned for this item, however Staff can address any questions and there is opportunity to consider Board input into the Manual, as needed.

The Environmental Compliance Program includes six key components:

- **Standards and Procedures** which are guidelines that ensure consistency and quality across all of the Project's construction contracts. These conditions are envisioned to be incorporated into the large construction contracts involving field work in cultural or biological sensitive areas.
- **Environmental Requirements Tracking System** which is the system the Authority will procure and require all Project construction contractors to

report into for tracking and verification of compliance with all environmental requirements across all of the Project's construction contracts. The Authority is currently planning to use an open-source (no proprietary license required) tracking system called Beacon that is being used by a number of large infrastructure projects in California.

- **Conduct of Authority Assurance Audits** include occasional construction site inspections and document reviews to review that the means, methods, and practices being used to meet environmental requirements are sufficient and credible. These audits will also allow for sharing best practices across the various construction contracts.
- **Environmental Controls** include the preparation and review of contractual documents that flow down implementation of the environmental requirements to prime, subcontractors, and in some situations, vendors. This is an internal element, specific to the EPP team.
- **Capacity Building** includes developing communication strategies, training and education, information transfer, and checklist and guidance memos aimed at improving overall Project understanding and enhancing communication relative to the implementation of the Project's environmental requirements. This is an internal element, specific to the EPP team.
- **Adaptive Management** describes how the Environmental Compliance Program will be periodically reviewed and improved based on lessons learned in implementation. This is an internal element, specific to the EPP team.

It is important to note that the Environmental Compliance Program provides a broad framework for how all of the Project's environmental requirements will be implemented. The Program calls for each construction contractor to prepare an Environmental Compliance Plan early in their contract implementation to detail how the contractor intends to implement the Program and demonstrate compliance with the Project's environmental requirements. This puts it on the contractor to determine the means and methods to implement the environmental requirements based on their specific scope of work.

Staff has prepared a preliminary draft of the Environmental Compliance Program and associated Manual and intends to provide this preliminary draft to those contractors invited to submit a request for proposal on the Reservoir CMAR contract. Staff will continue development of Environmental Compliance Program and associated Manual but does not intend to finalize it until the Reservoir CMAR contractor is under contract and has had the ability to provide input. Staff feel

it is important to receive input from the selected Reservoir CMAR contractor to ensure that the Authority's approach is efficient, effective and implementable from the construction contractor's perspective. Updates and reports on progress will be made to the EPP workgroup as needed.

**Fiscal Impact/Funding Source:**

The Amendment 3 Work Plan includes sufficient budget to cover required resources and activities to progress the Environmental Compliance Program and associated Manual.

**Staff Contact:**

Ali Forsythe

**Primary Service Provider:**

HDR Inc. / CreativEnvironment

**Attachments:**

None