



Meeting: **Reservoir Committee & Authority Board**
Agenda Item 1.6

February 20, 2026

Subject: **Land Maintenance Standard Operating Procedure (SOP)**

Requested Action:

Reservoir Committee Authority Board consider adopting a Standard Operating Procedure that describes certain Authority owned routine land maintenance activities and associated filing of Notice of Exemption (NOE) under the California Environmental Quality Act.

Detailed Description/Background:

As a responsible public agency landowner, the Sites Project Authority must endeavor to maintain its property. To support this endeavor, requires that the Authority:

- Adopt a Land Maintenance Activities SOP that would apply to routine, small-scale, maintenance-level activities conducted on land owned and/or managed by the Authority.
- Authorize filing with the County a NOE for these activities.

These activities are recurring in nature and are expected to continue throughout construction and operations. The activities fall into four general categories:

- Minor alterations to land such as minor grading to correct drainage or erosion that could impact adjacent properties.
- Stabilization, remediation, or demolition of existing structures.
- Maintenance and stabilization of existing roadways.
- Fuel reduction and vegetation management.

To ensure these activities can occur within the necessary timeframes, staff prepared a SOP to provide clear and consistent direction regarding the environmental review framework and applicable implementation measures. The SOP provides direction on procedures and allowable activities, along with documentation procedures for staff to follow on an activity-by-activity basis. Importantly, the SOP limits activities to previously disturbed or actively managed areas and does not authorize activities that would result in adverse effects to sensitive biological, cultural, or aquatic resources. No Sites Project or Sites Project-related work is authorized by the SOP.

Staff have evaluated the SOP and the categories of activities and determined that the activities in the SOP qualify for one or more categorical exemptions under California Environmental Quality Act (CEQA).

The SOP provides a framework to confirm compliance with CEQA Exemption criteria on an activity-specific basis through required environmental screening and pre-field coordination. This process confirms that each activity:

- Fits within the defined scope of the SOP.
- Meets the criteria for CEQA exemption.
- Incorporates applicable avoidance measures and best practices.

If site conditions change or unanticipated biological, cultural, or environmental resources are encountered, work must stop and the applicability of the exemption must be reassessed prior to resuming activities. Additionally, the SOP defines an audit process with annual report outs to the Board summarizing completed activities.

Approval and adoption of the SOP and associated CEQA exemption will allow the Authority to carry out routine land maintenance activities in a timely manner, while ensuring such activities are implemented within environmentally responsible and legally defensible parameters.

Fiscal Impact/Funding Source:

None.

Staff Contact:

Ali Forsythe, Stephanie Parsons, Kyle Hughes

Primary Service Provider:

HDR

Attachments:

Attachment A: Notice of Exemption / Categorical Exclusion

Attachment B: Land Maintenance Standard Operating Procedure



Sites Project Authority

NOTICE OF CATEGORICAL EXEMPTION

Land Maintenance Activities Standard Operating Procedures (SOP)

Document No. LM-NOE-2026-01 (Draft)

Date: February XX, 2026

1. PROJECT INFORMATION

1.1 Project Title

Sites Project Authority – Land Maintenance Activities Standard Operating Procedures (SOP)

1.2 Lead Agency

Sites Project Authority (Authority)

1.3 Project Location

Various parcels owned or managed by the Authority in Colusa, Glenn, and Yolo County, California.

1.4 Project Description

The Authority will need to conduct routine, small-scale land-maintenance activities, which will be performed in a manner consistent with and as described in its Land Maintenance SOP. Specific activities are described in the SOP and fall into four categories:

1. Minor alterations to land
2. Stabilization, remediation, or demolition of existing structures
3. Maintenance and stabilization of existing roadways
4. Fuel reduction and vegetation management

All activities will occur within existing disturbed or managed areas and avoid sensitive biological and cultural resources. All activities described in the SOP will remain within the limits of the California Environmental Quality Act (CEQA) exemptions. Pre-activity environmental screening and pre-field coordination will confirm the activity is consistent with CEQA exemption, SOP



activity descriptions, and determine which avoidance measures and best practices will be implemented with each planned activity.

2. CEQA – NOTICE OF EXEMPTION

2.1 CEQA Statutory and Categorical Exemptions

The project is exempt from CEQA pursuant to:

- Categorical Exemptions (14 CCR §§15300–15333):
 - §15301 – Existing Facilities
 - §15304 – Minor Alterations to Land
 - §15306 – Information Collection
 - §15307–§15308 – Natural Resource/Environmental Protection
 - §15333 – Small Habitat Restoration Projects
- Statutory Emergency Exemptions (14 CCR §15269; PRC §21080(b)(2), (b)(3) and (b)(4))

2.2 Exemption Criteria and Supporting Rationale

The activities fall within the scope of CEQA categorical exemptions because they involve routine maintenance, minor alterations to land, small-scale restoration, and environmental protection actions with no potential for significant environmental effects. Activities:

- **Will not have a significant effect on the environment**

The SOP activities would not have a significant effect on the environment, meet the CEQA categorical exemptions criteria, and do not require authorization from regulatory agencies (such as compliance with the California Endangered Species Act, Federal Endangered Species Act, Clean Water Act, and similar).

- **Occur within previously disturbed or managed areas**

The SOP activities will occur within previously disturbed areas and previously managed areas and avoid sensitive resources.

- **Will not result in damage to scenic resources, including, but not limited to, historic buildings, rock outcroppings, or similar resources, within a highway designated as an official state scenic highway**

There are no officially designated scenic vistas or highways in Glenn County, Colusa County, and Yolo County. The SOP activities will not result in damage to scenic resources,

including, but not limited to, historic buildings, rock outcroppings, or similar resources, or within a highway designated as an official state scenic highway.

- **Will not be located on a site designated as a hazardous waste facility or hazardous waste property or border zone property**

SOP activities would not be located on or near a property included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The SOP activities will not be located on a site designated as a hazardous waste facility or hazardous waste property or border zone property.

- **Will not cause a substantial adverse change in the significance of a historical resource**

The SOP activities will not cause a substantial adverse change in the significance of a historical resource.

- **Will not create new permanent ground disturbance**

The SOP activities will occur within previously disturbed areas and will not create new permanent ground disturbance.

- **Will not have a significant effect on listed species, proposed species, or designated/proposed critical habitat**

The SOP activities will occur within previously disturbed areas and avoid sensitive resources. Avoidance measures and best practices that avoid impacts on protected and sensitive resources will be employed as a part of planned activities. The SOP activities will not have a significant effect on listed species, proposed species, or designated/proposed critical habitat.

- **Will not have a significant effect on wetlands, streams, cultural resources, and other sensitive habitats, such as elderberry shrubs and trees**

Avoidance measures and best practices that avoid impacts to protected and sensitive resources will be employed as a part of planned activities, which include the installation of exclusionary fencing around the dripline of the trees located adjacent to activity areas, 100 feet from the drip line of all elderberry shrubs, and 100 feet from the edges of wetlands and streams. The SOP activities will not have a significant effect on wetlands, streams, cultural resources, and other sensitive habitats, such as elderberry shrubs and trees.

- **Will not trigger any CEQA exceptions under §15300.2**

Before any activities begin an environmental screening will be conducted to review the description of the proposed activity to ensure it fits within the category of actions described in the CEQA categorical exemptions, and consider the specific circumstances associated with the activity, to rule out any extraordinary circumstances that might give rise to significant environmental effects requiring further analysis and documentation.

The SOP activities will not trigger any CEQA exceptions under CEQA Guidelines §15300.2. The SOP activities will not have an individually or cumulatively significant effect on the environment, nor will they have an individually or cumulatively significant effect on the environment due to unusual circumstances or cumulative impacts.

3. CERTIFICATION

I certify that the proposed activities meet the criteria for exemption under CEQA and that no exceptions or extraordinary circumstances apply.

CEQA Responsible Official

Real Property & Land Management
Manager



Sites Project Authority Land Maintenance Standard Operating Procedures

February 20, 2026

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Appendices

Appendix 1 – Environmental Screening and Documentation Process Flow Diagram

Appendix 2 – Authority Board Approval of Notice of Exemption for Land Maintenance Standard Operating Procedures Activities

Appendix 3 – Audit Checklist

Table 1 **Version History**

Version	Description	Date of Revision	Key Changes From Prior Version
1	Final	2/20/2026	--

1.0 Purpose

This Standard Operating Procedure (SOP) establishes consistent methods for conducting routine land-maintenance activities and ensures activities are performed safely, efficiently, and in compliance with environmental and local regulations.

2.0 Regulatory Basis

2.1 Applicable Policies and Procedures

The land-maintenance activities described in this SOP must be carried out in accordance with the Sites Project Authority's (Authority's) established environmental and real-property requirements. The Local California Environmental Quality Act (CEQA) Guidelines¹ and the Real Property and Land Management Policies and Procedures² provide the governing framework for environmental review and land management decision-making. These documents ensure that all land-management related actions (which include, but are not limited to, maintenance) are implemented lawfully, consistently, and in support of the Authority's long-term stewardship responsibilities.

2.2 Compliance with California Environmental Quality Act

The scope of this SOP involves routine, recurring land-maintenance activities that qualify for CEQA categorical exemptions (14 CCR §§15301, 15304, 15306, 15307, 15308, 15333). It also involves activities that qualify for CEQA statutory exemptions related to emergencies (14 CCR §15269; PRC §21080(b)(2), (b)(3) and (b)(4)).

This SOP is not applicable to activities that would have a significant effect on the environment, do not meet the CEQA categorical exemptions criteria, or require authorizations from regulatory agencies (such as compliance with the California Endangered Species Act, Federal Endangered Species Act, Clean Water Act, and similar).

Activities included by this SOP typically fall under one or more of the following classes of categorical exemptions as defined in the CEQA Statutes and Guidelines, Article 19, Section 15300 to 15333:

- Class 1 – Existing Facilities (14 CCR §15301)
- Class 4 – Minor Alterations to Land (14 CCR §15304)
- Class 6 – Information Collection (14 CCR §15306)

¹ Sites Project Authority (2024). LOCAL CEQA Guidelines.

² Sites Project Authority (2026). Real Property and Land Management Policy.

- Class 7 & 8 – Natural Resource/Environmental Protection (14 CCR §§15307–15308)
- Class 33 – Small Habitat Restoration Projects (14 CCR §15333)
- Statutory Emergency Exemption (14 CCR §15269; PRC §21080(b)(2), (b)(3) and (b)(4))

2.3 Compliance with Existing Regulations

All activities described in this SOP must comply with applicable federal, state, and local laws, regulations, and permits, including but not limited to water quality, air quality, species protection, and cultural resource requirements. Compliance with existing regulations is mandatory, not optional or discretionary. The activities described in this SOP shall not create new impacts beyond what existing regulations already control.

The following are examples of an agreement, statewide general permit, and state legislation that will be complied with during the implementation of maintenance activities:

- Stormwater Construction General Permit (Stormwater and Non-stormwater) (Water Quality Order No. 2022-0057-DWQ/NPDES No. CAS000002 and any amendments thereto)
- California Senate Bill 653: Wildfire prevention: Environmentally Sensitive Vegetation Management

This is not an exhaustive list. It is the responsibility of the Authority Land Manager, Project/Construction Manager, and Environmental Compliance Lead to confirm all applicable federal, state, and local laws, regulations, and permits that govern an activity before, during, and after implementation, as described in Section 5.0, *Pre-Activity Requirements*.

3.0 Scope

As a landowner, the Authority will endeavor to maintain its property in a manner that protects public safety, prevents hazards, and preserves the condition of both its own land and neighboring lands.

This SOP applies to routine, small-scale, or maintenance-level activities conducted on land owned and/or managed by the Authority including:

Minor Alterations to Land

Minor alterations to land include activities that meet the following criteria:

- Ensure safe access
- Deter unauthorized entry
- Mitigate potential liabilities

- Comply with applicable permitting requirements

Activities associated with minor alterations include:

- Minor grading and earthwork to correct uneven terrain, address drainage issues and prevent erosion or runoff that could impact adjacent properties
- Minor temporary use of land having negligible or no permanent effects on the environment, including placement of temporary structures, such as mobile trailers or storage units
- Placement of gravel or similar materials to maintain safe, all-season access for emergency responders, utility providers and authorized personnel
- Repair, replacement or installation of fencing to secure property, prevent trespassing, protect wildlife corridors where required, and comply with local safety or boundary-maintenance regulations

Stabilization, Remediation, or Demolition of Existing Structures

These activities apply to structures meeting one or more of the following criteria:

- Deteriorated condition (e.g., structural failure, roof collapse, compromised framing)
- Fire hazard (e.g., dry fuel accumulation, electrical hazards)
- Public-safety hazard (e.g., unsecured access, risk of collapse, vandalism/attractive nuisance)

Activities associated with stabilization, remediation, or demolition of existing structures include:

- Isolation and disconnection of utilities (power, water, gas/propane, septic)
- Demolition of structures and hauling for lawful disposal or recycling at permitted facilities
- Stabilization and restoration of the former structure footprint to prevent erosion and manage stormwater (e.g., contouring, compaction, erosion-control BMPs, and temporary/permanent coverings) where associated activities are restricted to the footprint of the former structure, previously disturbed sediments, and are restricted to the ground surface and no greater than 6 inches below the ground surface.

Maintenance and Stabilization of Existing Roadways

These activities require specialized maintenance practices to balance operational needs, safety, and environmental protection.

Activities associated with maintenance and stabilization of existing roadways include:

- Blading and smoothing to remove high spots and redistribute materials
- Grading and reshaping repairs the road shape and improves road drainage
- Adding materials to resurface the roadbed or stabilizing gravel with binding agents for dust control and strength

Fuel Reduction and Vegetation Management

These activities support agriculture, ranching, and fire prevention.

Activities associated with vegetation management include:

- Grazing
- Limited mechanical mowing
- Hand trimming or removal of shrubs
- Mechanical removal of dead or dying vegetation

Activities associated with fuel reduction would include:

- Grazing
- The limited removal of vegetation by means of disking within a strategically located strip
- Targeted, site-specific application of herbicides for invasive species control or fire hazard reduction within previously disturbed, non-sensitive ruderal areas, consistent with applicable regulations

3.1 Restrictions and Limitations

Activities described in this SOP must remain within the limits of CEQA exemptions³. Minor maintenance and safety activities will be performed using smaller, compact machines used for small-scale maintenance activities (e.g., backhoe, skid-steer, utility trucks). Improvements are intended to be low-impact, occur within previously disturbed areas and avoid sensitive resources.

The following restrictions may apply to specific activities:

- A health & safety and hazardous-materials screen (asbestos/lead survey, utility locates, spill prevention) may be required prior to stabilization, remediation, or demolition of structures.

³ CEQA Guidelines. CA Governor's Office of Land Use and Climate Innovation, 2026, <https://lci.ca.gov/ceqa/guidelines/>

- Roadway maintenance and stabilization activities may require:
 - Avoiding work during heavy rain or when soils are saturated to prevent erosion
 - Minimizing vegetation removal
 - Use of low-impact equipment; avoiding over-grading
 - Use of clean, imported material that is free of invasive plant species
 - Maintenance of proper crown and drainage to prevent water pooling
 - Restricting work to outside of sensitive wildlife and avian breeding seasons
 - Cleaning and maintaining culverts and ditches without disturbing adjacent habitat
 - Avoiding directing runoff into streams or wetlands by implementing the requirement of the Stormwater Construction General Permit (Section 2.3)
- Mechanical mowing activities require:
 - Compliance with Senate Bill (SB) 653: Wildfire prevention: environmentally sensitive vegetation management (See Section 2.3)
 - Limitation of work to occur outside of days with high fire threat (i.e., red flag days)
 - Maintaining grass height at a minimum of 4-inches, other than along gravel access roads which can be mowed to around 1-inch in height
 - Maintaining immediate access to fire-suppression equipment, which may include an equipment-mounted water tank or a nearby towed water-buffalo tank
- Fuel breaks would not be installed more than twice a year on a given parcel of land and coordinated with the Maxwell Fire Department, as appropriate.
- Vegetation management would take place in spring, summer, and fall, while mechanical treatments would be restricted to periods outside the peak spring and summer blooming seasons for rare species.

4.0 Roles and Responsibilities

Authority Environmental Planning and Permitting Manager

- Conduct a regularly scheduled audit of the administrative record associated with SOP implementation
- Prepare an annual summary report of the audit findings to the Authority Board

Authority Land Manager

- Confirms activity qualifies for CEQA exemption in collaboration with the Project/Construction Manager and Environmental Compliance Lead
- Confirms and implements interested party notifications (as required)

Project/Construction Manager

- Confirms activity qualifies for CEQA exemption in collaboration with the Authority Land Manager and Environmental Compliance Lead
- Determines potentially affected interests and confirms that the Authority Land Manager implements interested party notifications (as required)
- Confirms that project activities, avoidance measures, and best practices are clearly defined in work plans and contract documents, and ensures these requirements are carried through to work orders and enforced during implementation.
- Ensures compliance requirements are fully documented and that all project administrative records are properly maintained

Environmental Compliance Lead

- Assesses activity locations to verify the presence of sensitive natural or cultural resources requiring protection
- Confers with resource experts (e.g. historical, archaeological, cultural or tribal resource experts, wildlife biologist) to confirm assessment of presence of sensitive natural or cultural resources
- Determine necessity for and appropriate level of coordination with Tribal governments
- Determines planned activities are consistent with CEQA exemption criteria
- Determines the timing and applicability of avoidance measures and best practices to minimize impacts throughout all phases of the activity
- Serves as the point-of-contact with resource agencies (as required)
- Ensures compliance requirements are fully implemented and that all appropriate documentation for the administrative record is prepared

Field Crew Lead

- Confirms understanding of the activities, avoidance measures, and best practices as defined in work plans and contract documents, and ensures these requirements are implemented

- Stops work if activities deviate from work plans or conditions change in a way that makes implementation of avoidance measures and best practices infeasible
- Stops work if wildlife enters the work area and notifies the Environmental Compliance Lead (Section 7.0)
- Notifies the Environmental Compliance Lead of incidental wildlife observations

Field Crew

- Performs work in accordance with the work plans
- Reports to Field Crew Lead any environmental sensitivities or unexpected conditions

5.0 Pre-Activity Requirements

Before any activities begin, the Authority Land Manager, Project/Land Manager and the Environmental Compliance Lead together will conduct an environmental screening to:

- Review the description of the proposed activity to ensure it fits within the category of actions described in the CEQA exemptions,
- Consider the specific circumstances associated with the activity, to rule out any extraordinary circumstances⁴ and triggers of CEQA exceptions and statutory emergency exemptions⁵ that might give rise to significant environmental effects requiring further analysis and documentation, and
- Determine which, or if any, SOP avoidance measures and best practices will be implemented with each planned activity.

Where avoidance measures and best practices are required to ensure activities fit within CEQA exemptions, care must be taken to ensure measures and practices are clearly presented where applicable, such as within work plans and contract documents.

Following the environmental screening, the Authority Land Manager, Project/Construction Manager and the Environmental Compliance Lead together will conduct a pre-field coordination to ensure the information gathered during the Environmental Screening is provided to the Field Crew Lead in the appropriate form and pre-activity avoidance measures and best practices are scheduled. The pre-field coordination will serve to ensure that project activities, avoidance measures, and best practices are clearly defined in work plans and contract documents and communicated to all parties involved in implementing the activity.

⁴ Extraordinary circumstances may include, as an example, the presence of a factor, such as a threatened or endangered species or a historic resource, and the impact on that factor.

⁵ CEQA Guidelines §15300.2 (Exceptions to Categorical Exemptions) and CEQA statutory exemptions related to emergencies ((14 CCR §15269; PRC §21080(b)(2), (b)(3) and (b)(4))

The process of conducting the environmental screening through documenting compliance with the SOP is depicted in the Environmental Screening Process diagram, Appendix 1.

6.0 Avoidance Measures and Best Practices

Avoidance measures and best practices that avoid impacts to protected and sensitive resources will be employed as a part of planned activities. The Environmental Screening Checklist and Pre-Field Coordination will identify which of the following measures will be implemented with each planned activity. This is not an exhaustive list, and it is the responsibility of the Authority Land Manager, Project/Construction Manager and Environmental Compliance Lead to confirm if additional or different avoidance measures and best practices should be implemented before, during, and after an activity.

1. **Environmental Awareness Training.** The training would include an overview of the listing status of and the need to avoid affecting biological, cultural and/or historical resources, and avoidance measures and best practice measures that will be implemented as part of the activity. This training would be administered prior to initiating activities.
2. **Community Awareness Training.** The training would include an overview of considerations of surrounding landowners, traffic restrictions or limitations, local requirements and other relevant community considerations.
3. **Installation of Exclusionary Fencing:**
 - a. Around the dripline of the trees located adjacent to activity areas.
 - b. At a minimum setback of 100 feet from the drip line of all elderberry shrubs
 - c. At a minimum setback of 100 feet from the edges of wetlands and streams
4. **Use of toxic or hazardous chemicals** (including herbicides, pesticides, and rodenticides) shall be limited and carefully controlled. Non-chemical or least-toxic alternatives (e.g., mechanical removal, grazing, hand trimming) will be employed where feasible before chemical treatment is considered. Targeted, site-specific application of herbicides may be used for invasive species control, fuel reduction, or to address specific safety concerns, provided such use is conducted in accordance with all applicable federal, state, and local regulations, labeling requirements, buffer restrictions, and avoidance measures identified during environmental screening. Broadcast or aerial application is not permitted under this SOP.
5. **Identify and appropriately demarcate sensitive biological resource areas** (wetlands, elderberry shrubs, trees, nests, bat habitat, sensitive habitat or vegetation) on plans or in the field as no-work areas.

6. **Conduct routine inspections** to ensure compliance with SOP measures during planned activities.
7. **Establish no-work buffers** for sensitive biological resource areas such as nesting birds and roosting bats.
8. **Cover excavations**, steep-walled holes or trenches more than one-foot deep at the close of each working day with plywood boards or similar rigid material.
9. **Maintain a 15-mile per hour speed limit** on unpaved roads.
10. **Clean equipment prior to arrival.** Before bringing equipment from other sites, the contractor(s) must remove all mud, soil, and plant or animal material. Because using water for “cleaning” can still result in water-use impacts non-water cleaning methods (e.g., brushing, scraping, compressed air) should be relied upon unless otherwise approved.
11. **Conduct pre-construction surveys or assessments** to determine presence of nesting birds or roosting bats and implement avoidance measures.
 - a. Nesting surveys prior to any ground-disturbing construction activity during the migratory bird nesting season (February 1 to August 31) and within 500 feet of planned activities. Establish no-work buffer areas around or limit activities near active nests.
 - b. Inspect suitable bat roosting habitat features (e.g., trees, bridges, and other structures) within a minimum of a 500-foot radius adjacent to planned activities. If bat roosting habitat is present, and actions are scheduled during the maternity season (April 15 to August 31) or the hibernation season (October 15 to March 1), the following will occur: 1) conduct pre-construction surveys and 2) develop a Bat Avoidance and Exclusion Plan, if applicable.
12. **Evaluate structures for potential cultural/historic significance** using a qualified architectural historian⁶.

7.0 Stop Work and Adaptive Management

In the event that unexpected conditions arise, work will be stopped and CEQA exemption applicability will be reassessed. Avoidance measures and best practices will be modified as needed to maintain compliance with CEQA exemption criteria and prevent impacts that would trigger additional CEQA review.

⁶ Evaluation methods and criteria will be consistent with the “Secretary of the Interior’s Standards and Guidelines for Evaluation” (Federal Register [FR] Volume 48 pp. 44729–44738) (36 10 CFR Part 63) and completed by staff who meet the qualifications outlined in Stipulation VIII.A., who are qualified in the appropriate disciplines of archaeology, architectural history, or history.

Cultural Materials:

If cultural materials are discovered during work, all work will stop within 100 feet of the find. The find will be protected in place and the Environmental Compliance Lead will be contacted and who will, in turn, coordinate with a cultural resources expert.

Sensitive Wildlife:

If sensitive wildlife species, as identified in the Environmental Awareness Training, are encountered on site, all work will stop, while the animal is allowed to leave the work area on its volition. Work will resume when the animal is safely out of harm's way. If the animal does not leave the work area on its own, the Environmental Compliance Lead will be contacted. Work will be allowed to resume per the direction of the Environmental Compliance Lead. In either scenario, the observation will be reported to the Environmental Compliance Lead.

8.0 Documentation

The Authority Board determined that the SOP activities are exempt from CEQA and approved a Notice of Exemption for the Land Maintenance SOP (Appendix 2). Documenting the basis for each exemption provides the Authority with an administrative record that explains the rationale supporting the CEQA determination. This administrative record, maintained throughout SOP implementation, may also serve to substantiate an activity's eligibility for other state and federal regulatory exemptions or exclusions (e.g., Section 106, Section 7, Section 2081).

The amount of information required to substantiate a CEQA exemption depends on the type of activity. It is presumed that activities that fit within and meet CEQA exemption criteria should not require lengthy documentation. Rather the documentation should be concise:

- Cite the CEQA exemption being used; and
- Show that the determination was made that (1) the activity fits within the category of actions described in the CEQA exemption, and (2) there are no extraordinary circumstances that would preclude the activity from being exempted.

The activities described in this SOP are expected to have little impact and should not require extensive supporting information. The following types of documentation may be required to fully demonstrate activities are compliant with and meet the criteria of the CEQA exemption(s):

- Environmental screening findings
- Documentation of pre-field coordination
- Expertise, experience, and judgment of professional staff as well as outside experts

- The administrative record should document the experts’ credentials and describe how the experts arrive at their conclusions
- High quality, accurate technical and scientific information (e.g. peer-reviewed findings, report, research findings)
- Plans, Drawings, Map(s) and/or Sketches of proposed work locations, including access routes, ingress, egress, staging, laydown, etc.
- Photo documentation of site conditions before, during, and after activity
- Biological and/or cultural survey reports
- Documentation of Trainings:
 - Environmental, Community, Safety, etc.
- Documentation of compliance with and implementation of SOP measures and practices

For activities where the potential for significant environmental effects is uncertain, sufficient information must be gathered to support the application of a CEQA exemption. Activities that fall outside of the CEQA exemption criteria cannot be implemented under this SOP.

8.1 Document Management and Record Retention

The Authority maintains all activity documentation and administrative records in its designated document management system, which serves as the centralized and secure repository for compliance materials. All compliance requirements, supporting documentation, and activity records must be uploaded, organized, and retained to ensure they are fully documented, easily accessible, and properly maintained throughout the activity lifecycle.

Pre-activity documentation must be uploaded at least five (5) business days before the activity begins. **Post-activity documentation** must be uploaded within ten (10) business days following completion.

As of 2026, the Authority’s designated document management system is SharePoint, and all documentation must be uploaded to the Authority’s SharePoint site at the following location: Sites Reservoir SharePoint > Real Estate > 13.0 Land Management > Land Management SOP.

It is the responsibility of the Authority Land Manager, Project/Construction Manager, and Environmental Compliance Lead to know the current document management system and ensure documentation is uploaded to the correct location.

9.0 Assurance Audits

Assurance audits are periodic evaluations conducted to verify that land-maintenance activities performed under this SOP continue to meet CEQA exemption criteria, comply with applicable

regulations, and adhere to the Authority's avoidance measures and best practices. These audits serve as an essential quality-control mechanism, providing an independent check on the adequacy and consistency of SOP implementation.

Audits may include field inspections, desktop reviews of activity documentation, and evaluations of the administrative record maintained in the Authority's designated document management system. As described in Section 8.0 and 8.1, the SOP requires concise but complete documentation of CEQA exemption determinations, pre-field coordination, and implementation of avoidance measures. Assurance audits confirm that this documentation is accurate, complete, and consistent with the requirements of this SOP.

To ensure unbiased performance evaluation, audits will be conducted on a random and unannounced basis. This approach reinforces accountability and supports early identification of deficiencies or emerging issues.

9.1 Environmental Planning and Permitting Manager Record Audits

In addition to field-level assurance audits, the Authority Environmental Planning and Permitting (EPP) Manager will conduct a regularly scheduled audit of the administrative record associated with SOP implementation. This audit will evaluate whether:

- CEQA exemption determinations were properly documented and supported by the environmental screening process (Section 5.0).
- Avoidance measures and best practices identified as being required during screening and pre-field coordination were implemented and documented (Section 6.0).
- Activity documentation was uploaded in accordance with Section 8.1 and is sufficient to support CEQA exemption determinations.
- Work remained within the scope and limitations of the SOP (Section 3.0 and 3.1).

The EPP Manager's record audit provides a program-level assessment of whether internal processes, documentation practices, and compliance workflows are functioning as intended.

9.2 Annual Reporting to the Authority Board

For the first three years following SOP adoption, the EPP Manager will prepare an annual summary report to the Authority Board describing:

- The number and types of activities implemented under the SOP
- The CEQA exemptions applied
- Key findings from assurance audits and record audits
- Any identified deficiencies, corrective actions taken, and process improvements implemented

- Overall performance of the SOP in maintaining compliance and avoiding impacts

Appendix 3, Audit Checklist, may be used as a guide for conducting an audit and preparing the annual audit report to the Board.

This reporting requirement serves two essential purposes:

- **Board Assurance:** It allows the Authority Board to confirm that its CEQA exemption determination is being implemented properly, consistently, and transparently.
- **Program Validation:** It ensures that the internal processes supporting SOP implementation are functioning as planned and identifies opportunities for continuous improvement.

After the initial three-year period, the Authority Board may determine whether annual reporting should continue, be modified, or be incorporated into broader program-level reporting.

9.3 Documentation of Audit Findings

All audit findings, corrective actions, and annual reports will be retained in the Authority's designated document management system as part of the administrative record (Section 8.0 and 8.1). These materials support transparency, and demonstrate ongoing compliance.

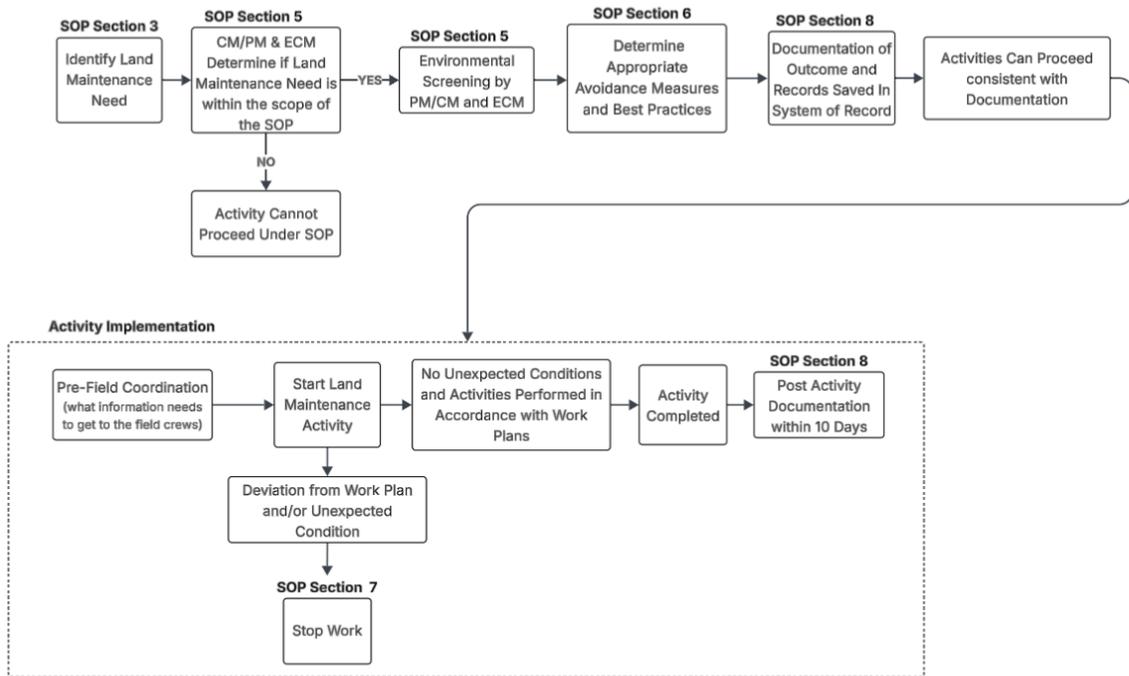
10.0 Change Management

Revisions to this SOP may be made as long as the modifications do not alter the scope, intent, or activities approved under the original NOE. Any proposed change to this SOP must be evaluated by the Authority Environmental Planning and Permitting (EPP) Manager. The EPP Manager is responsible for determining whether the modification remains consistent with the scope of the previously approved NOE and continues to meet the applicable CEQA exemption criteria. If the proposed change exceeds the scope of the original NOE or may affect the applicability of the CEQA exemption, additional environmental review or a new environmental determination and Authority Board approval may be required before the SOP revision can be approved.

All approved SOP revisions or amendments must be documented in the Version History (Table 1), including a clear description of each change and the date it was implemented.

Appendix 1

Environmental Screening and Documentation Process Flow Diagram



Appendix 2

Authority Board Approval of Notice of Exemption for Land Maintenance Standard Operating Procedures Activities

To be provided after Board approval

Appendix 3

Audit Checklist

This checklist supports assurance audits, administrative-record audits by the EPP Manager, and annual reporting to the Authority Board during the first three years of SOP implementation.

A. Activity Identification

Activity title: _____

Date(s) of activity: _____

Responsible Authority staff: _____

Construction/Project Manager: _____

Contractor/Field Crew: _____

B. CEQA Exemption Verification

- CEQA exemption cited
- Documentation demonstrates activity fits within exemption category
- No extraordinary circumstances identified
- No triggers for additional CEQA review
- Activity remains within SOP scope and limitations

C. Programmatic Agreement Compliance

- No ground disturbance beyond allowed limits
- No inadvertent impacts to cultural resources

D. Pre-Activity Documentation

- Environmental Screening completed
- Pre-Field Coordination completed
- Evaluation of required avoidance measures
- Work plans include required avoidance measures and/or best practices
- Pre-activity documentation uploaded on time

E. Implementation Verification

- Avoidance measures and best practices implemented
- Sensitive resource buffers maintained
- Equipment cleaned prior to entry
- Work conducted outside restricted seasons
- Deviations documented
- Stop-work procedures followed

F. Post-Activity Documentation

- Photo documentation complete
- Maps/sketches included
- Survey reports included
- Training documentation included
- SOP measure implementation documented
- Post-activity documentation uploaded on time

G. Administrative Record Audit (EPP Manager)

- CEQA determinations complete and supported
- Avoidance measures properly documented
- Activity remained within SOP scope
- Documentation stored correctly
- Deficiencies identified and corrective actions assigned
- Follow-up verification completed

H. Annual Board Reporting (Years 1–3)

- Activity summary prepared
- CEQA exemptions summarized
- Audit findings summarized
- Deficiencies and corrective actions described
- SOP performance assessed
- Report submitted to Board

I. Audit Findings Summary

- Compliant
- Compliant with minor corrective actions
- Non-compliant

Auditor Name: _____

Title: _____

Signature: _____

Date: _____