



Water Storage Investment Program Quarterly Report

The Quarterly Reporting covered by this template documents applicants' progress toward complying with regulation section 6013 to receive a final WSIP funding hearing with the Commission as well as any changes to the physical quantity and type of public benefit being provided by the project. Applicants must provide an update of the project status for the requirements and milestones listed below. Applicants may deviate from this fill-in format, however, please provide the information requested in this template.

Project Information

Project Name:

Sites Reservoir Project (Project)

Applicant Name:

Sites Project Authority (Sites Authority or Authority)

Date:

January 29, 2025

Reporting Period:

October 1, 2024, through December 31, 2024

Provide a brief project description:

The Proposition 1 (Prop 1) Water Storage Investment Program (WSIP) Early Funding Agreement (Agreement) provides funding for activities related to the completion of environmental documentation and permitting for the Sites Reservoir Project (Project). The Agreement describes three (3) primary tasks that represent the work effort by the Sites Project Authority (Sites Authority or Authority). The Project also involves coordination, cooperation, and work efforts by the U.S. Department of the Interior, Bureau of Reclamation, Interior Region 10 California – Great Basin (Reclamation) and Local Project Participants (Participants). Participants include urban and agricultural water agencies located in the Sacramento Valley, Bay Area, San Joaquin Valley, and Southern California that are participating in the Project. Non-Program cost share for this Agreement is provided by Reclamation and Participants.

The Project continues to advance in parallel with other water management efforts throughout the State. The conditional commitments by the 30 local agencies from across the state in the Project, 22 of whom are investing to receive a direct water supply benefit, combined with the conditional state investment and level of federal interest, has identified that a "right sized" Project (i.e., 1,500,000 acre-feet of storage along with additional facility changes) is more cost-effective and permittable. This "right sized" Project continues to provide long-term annualized water supply benefits for both the local agencies and the State, in accordance with Prop 1 requirements, while also preserving the ability for a federal role. To advance this "right sized" Project, additional technical and environmental studies are being undertaken which will form the basis of the final Prop 1 award:

- Contracts for non-public cost share (ongoing)
- Contracts for administration of public benefits (ongoing)
- Completed Feasibility Studies (complete)
- Final Environmental Documentation (ongoing)
- All required federal, state, and local approvals, certifications, and agreements (ongoing)

Provide a brief description of public benefits:

Through the Water Storage Investment Program, the State of California is investing in the following public benefits for the Sites Project: ecosystem benefits (refuge water supply and Yolo Bypass flows), flood control, and recreation (through construction of recreation areas and a day-use boat ramp).

Current total project cost:

\$3.9B in 2021 \$ (based on the Class 4 cost estimate approved by the Reservoir Committee and Authority Board in June 2021). The cost estimate is being updated in 2025.

General Update and Key Issues

Provide a general update and describe any key issues that occurred during this reporting period. You may attach additional documents or pages if more space is needed:

- The Sites Authority continues to advance the permits, approvals, and agreements necessary for construction and operations in a reasonable timeframe and with Prop 1 requirements.
- The Sites Project Authority certified the Final EIR and approved the Project on November 17, 2023. Subsequently, the Authority was engaged in the successful defense of CEQA litigation (*Friends of the River, et al., v Sites Project Authority, et al*) This was aided through the efforts undertaken to comply with California State Senate Bill 149 (SB 149) and its provisions for streamlining judicial review. On May 31, 2024, the Yolo Superior Court found in favor of the Sites Authority on all counts. On June 14, 2024, Friends of the River, et al., appealed the case. On September 20, 2024, the Third District Court of Appeals found that the Project’s environmental review fully complied with CEQA. Refer to [Attachment A](#) “Supplement for Reporting Period Ending December 31, 2024”.
- CDFW issued the Incidental Take Permit for Construction and Operations in October 2024.
- The Water Right hearing for the new Sites Water Right is proceeding.
- The Authority submitted its Division of Safety of Dams (DSOD) application including payment of non-refundable fee of \$2,890,623. This initiates DSOD reviews, oversight and approval of design and construction of project features.
- Sites Authority is making preparations to transition from planning into detailed design and construction.
- The Authority approved its working budget for 2025.
- The Authority concluded its procurement checklist and the Board authorized proceeding with a competitive process to select a Construction Manager at Risk (CMAR) for the Reservoir and Roads package.
- The Authority maintained its position in the queue for Cluster 15 CAISO interconnection and generations studies and paid associated fees.
- The Authority closed escrow in its acquisition of its first property (~800ac).
- The Authority continues to meet and discuss issues of interest to local County governments and others through its local community working group.
- The Authority extended invitations to Tribes with possible traditional and cultural interests in the Project area to attend Tribal Government Working Group meetings with the Authority. The first meeting is scheduled for January 2025
- External links in this report were taken from the Sites Reservoir Project website at www.sitesproject.org.

Attach latest project schedule. In addition, describe below how the actual schedule is progressing in comparison to the schedule provided in the last reported schedule.

Refer to [Work Plan Schedule and Summary of Changes](#), dated October 18, 2024.

Note any milestones or accomplishments that occurred since submittal of the prior Quarterly Report:

Refer to the [Monthly Status Report](#), as approved by the Board, dated December 20, 2024. Also see above.

Items Required Prior to Scheduling a Final Award Hearing

The following items must be provided prior to scheduling a final award hearing. Please describe the status and include the estimated completion date for the following items. These dates should align with any attached project schedule.

Refer to [Attachment A](#) "Supplement for Reporting Period Ending December 31, 2024".

1. Contracts for non-public benefit cost share:

List all required contracts for non-public benefit cost share, and provide the amount of associated funds, the status and estimated completion date. Please note any issues or concerns that have, will, or could affect the timing of executing contracts for non-public benefit cost share.

TABLE A

Contract Name	Status	Est Completion Date
Sites Reservoir Benefits & Obligations Contract	In Progress.	September 2025 (final contract completed) March 2026 (contract execution by all Participants)
Reclamation Partnership Agreement	In Progress.	October 2025 (final agreement completed)

2. Contracts for administration of public benefits (CAPB):

Provide a status for each applicable administering agency Draft and Final CAPB and estimated completion date for both. The Draft CAPB completion date is when Commission receives the Draft CAPB for a subsequent Commission meeting. The Final CAPB completion date is when it will be executed. Please note any issues or concerns that have, will, or could affect the timing of executing CAPBs or could change the magnitude of the public benefits that could affect cost allocation.

TABLE B

CAPB Admin Agency	Status	Est Completion Date
California Department of Fish and Wildlife (CDFW) (Ecosystem)	In Progress.	June 2025
Department of Water Resources (DWR) (Flood Control and Recreation)	In Progress.	April 2025

3. Completed feasibility studies:

Completion Date: November 2021

4. Complete environmental documentation:

Provide the status and estimated completion date for all required environmental documentation (draft and final) for the project, including all Board resolutions adopting or certifying CEQA environmental documents, CEQA findings, mitigation monitoring and reporting program, Notice of Determination (NOD), and CEQA Addenda, and all NEPA completion documents, including the Record of Decision (ROD). Please note any issues or concerns that have, will, or could affect the timing of providing complete environmental documentation at the state or federal level.

TABLE C

Environmental Document	Status	Est Completion Date
State Document	Complete. The Authority prepared a Draft Environmental Impact Report (EIR) in 2017 and a Revised Draft EIR in 2021. The Final EIR, including responses to public comments, was completed in 2023 with Final EIR Certification, Findings, Mitigation Monitoring and Reporting Program (MMRP), Statement of Overriding Considerations, completed prior to Project approval on November 17, 2023. The Notice of Determination (NOD) was filed on November 20, 2023.	November 2023
Federal Document	Ongoing. Reclamation prepared a Draft Environmental Impact Statement (EIS) in 2017 and a Supplemental EIS in 2021. The Final EIS, including responses to public comments on both the Draft EIS and Supplemental EIS, was completed in 2023. The Final EIS was completed in November 2023. The Record of Decision (ROD) is anticipated to be signed after the Section 106 and ESA consultation is complete.	Final EIS is complete; ROD anticipated mid-2025

5. All required federal, state, and local approvals, certifications, and agreements:

List permits needed for project to begin construction, describe status in acquiring them, and include estimated date to be acquired. Please note any issues or concerns that have, will, or could affect the timing of acquiring all federal, state, and local approvals, certifications, agreements, and permits necessary to begin project construction.

TABLE D

Permit / Approvals	Authorized Approver	Date Submitted	Status ¹
California Endangered Species Act – Incidental Take Permit (ITP) – Construction	CDFW	June 2023	<u>Received October 2024</u>
California Endangered Species Act – Incidental Take Permit (ITP) – Operations	CDFW	October 2023	<u>Received October 2024</u>
Clean Water Act, Section 401 Permit	U.S. Army Corps of Engineers (USACE)	March 1, 2024	<u>Working to Resubmit.</u> Expected Q4 2025
Clean Water Act, Section 404 Permit	USACE	March 1, 2024	<u>Working to Resubmit.</u> Expected Q4 2025
DWR Division of Safety of Dams (DSOD)	DSOD	October 7, 2024	<u>Submitted application and fee.</u> Expected Permittability Finding in Q3 2025 ²

Federal Endangered Species Act – Construction Biological Opinion	USFWS	October 2023	<u>Submitted.</u> Expected Q2 2025
Section 106 of the National Historic Preservation Act – Programmatic Agreement	State Historic Preservation Officer (SHPO)	April 2022	<u>Submitted.</u> Expected Q2 2025
Water Right	State Water Resources Control Board	May 2022	<u>Submitted.</u> Expected Q3 2025

1. Identifies if the item was formally submitted to Permitting Agency and when permit issuance is expected.
2. The 30% design was submitted in October 2024 with an anticipated DSOD permitability finding within Q3 2025. Final permit approval is contingent upon completion and review of final construction documents.

Permitting issues and concerns:

There are no permitting issues to report.

Items Required to Execute a Funding Agreement

Provide an update on the following documents needed to execute a funding agreement for the project and indicate if any significant change has occurred. The Commission may request updated information prior to executing a funding agreement.

- Applicant’s audited financial statements
- Final project costs, schedule, and scope of work
- Evidence of bilateral communications
- Limited waiver of sovereign immunity

<p>• Applicant’s audited financial statements: The Sites Authority had an accounting firm conduct an independent financial audit for Fiscal Year 2023 (which ended on December 31, 2023). The audit report has been submitted to CWC staff. The Sites Authority anticipates having a Fiscal Year 2024 independent audit completed by 3Q 2025.</p>
<p>• Final project costs, schedule, and scope of work: Consistent with the draft feasibility and draft environmental documentation that include a range of project sizes, operations, benefits, and effects, the Sites Authority continues to advance the studies needed to define the “right size project” to build under current conditions. This includes an updated due diligence of the project that prioritizes the creation of:</p> <ol style="list-style-type: none"> 1) Eligible public benefits (as defined in Proposition 1, Section 79753(a)) and consistent with both the Water Commission’s July 2018 determinations and the Authority’s application (i.e., in accordance with the beneficiary pays principle; state’s resource managers would manage the state’s investment, which includes operational decisions that are on an equal footing as agencies managing their investment to create non-Prop 1 water supply reliability benefits; and having the ability to provide these benefits over the project’s service life); 2) Water supply reliability benefits that are not eligible for funding under Prop 1 but are funded by the agencies who have been funding the studies to date. <p>(No Change)</p>
<p>• Evidence of bilateral communications with operators and owners of potentially impacted facilities regarding potential: The Authority, Reclamation andrment of Water Resources DWR continue to maintain effective communication and collaboration. DWR and Reclamation are active in the Authority’s Reservoir Committee. Additionally, the Authority and Reclamation participate in regular Project Integration</p>

meetings, engineering/geotechnical coordination meetings, and environmental coordination meetings. The Authority, Reclamation and DWR are nearing completion of an Operations Agreement to coordinate the operations in a manner protective of State and Federal Project operations.

- **Limited waiver of sovereign immunity:** Not applicable.

Status Update

Provide a status update for the following and indicate if any significant change has occurred. The Commission may request updated information prior to executing a funding agreement.

- Labor Compliance
- Urban Water Management Plans
- Agricultural Water Management Plans
- Groundwater Management or Groundwater Sustainability Plans
- Potential effect of other conditionally eligible projects on the applicant's public benefits

• **Labor Compliance:** No change

• **Urban Water Management Plans:** Not applicable

• **Agricultural Water Management Plans:** Not applicable

• **Groundwater Management or Groundwater Sustainability Plans:** No change

• **Potential effect of other conditionally eligible projects on the applicant's public benefits:** No change

Other Pertinent Information:

1. Sources of Funding

List sources of funding (e.g., Federal, State grants, local partnerships, rate payers, loans...) to move the project to construction and provide the associated amount of funds from that source and a status of obtaining that funding source below:

Pre-Construction Funding Sources	\$ Amount	Status	Est Completion Date
Prop 1 WSIP Early Funding	\$43,769,818	Prop 1 WSIP Early Funding Agreement. Agreement closed out.	05/2024
Bureau of Reclamation	\$6,554,922	Federal Assistance Agreement (FAA1) WIIN Act Funding. Completed. Agreement closed out.	06/2023
Bureau of Reclamation	\$6,900,000	Federal Assistance Agreement (FAA2) WIIN Act Funding. Agreement closed out.	06/2023
Bureau of Reclamation	\$30,000,000	Federal Assistance Agreement (FAA3) WIIN Act Funding. In Progress.	09/2028
Local Participants	\$101,317,076	Total Committed Contribution to the Project	06/2026

2. Early Funding Agreement Status

Provide the status of the Early Funding Agreement (EFA), as applicable, and the percentage of EFA funds expended. If the EFA has been closed, describe how the remaining work needed to move the project to a final award hearing will be financed.

Status	% of EFA funds expended
WSIP Prop 1 Early Funding has been exhausted. The Project Completion Report was approved, and final retention received in May 2024. The WSIP Prop 1 Early Funding Agreement has been closed out.	100%
Remaining work needed to move the project to a final award hearing will be financed through WIIN Act funding and Local Participant funding, unless additional Prop 1 early funding is made available by CWC through the reallocation of funds within the WSIP program or associated with recently voter approved Proposition 4. See table above.	

Attachment A: Supplement for Reporting Period Ending December 31, 2024

1.0 Items Required Prior to Scheduling a Final Award Hearing

1) Contracts for non-public cost share (ongoing)

Based on the following, the estimated completion date is September 2025. [See Table A.](#)

Local Project Participants (Participants): Funding the Project beyond the planning phase and into detailed design, construction, and operation (Phases 3/4/5) will require developing a “Sites Reservoir Benefits & Obligations Contract” (B&O Contract) plus JPA and Bylaw amendments which will serve as the long-term commitment of the Sites Authority to provide each Participant with its capacity interest in the Sites Reservoir water storage system. It will represent what each Participant will need to take to its Board of Directors to secure the necessary authority committing to pay for its capacity interest in the Project. The SPA Board was briefed on the remaining issues to be resolved to reach a substantially completed agreement at its December 20, 2024 Board meeting. Item -03-01 <https://sitesproject.org/meetings/friday-december-20/>

Sites Reservoir Benefits and Obligations Contract:

- Estimated Completion Date (execution by all Participants): September 2025

Reclamation: The Sites Authority is coordinating with Reclamation involving the benefits and obligations for their investment in the Project. These discussions will lead to negotiation of a Reclamation Partnership Agreement between the Sites Authority and Reclamation which will track along a similar timeline to the benefits and obligation contract with Participants.

Signed Cost Share Amendment

- Completion Date: December 16, 2019

Financial Assistance Agreement (FAA1)

Amendment 01

- Completion Date: June 2022

Amendment 02

- Completion Date: June 2023

Financial Assistance Agreement (FAA2)

- Completion Date: June 2023

Financial Assistance Agreement (FAA3)

- Completion Date: June 2026

Reclamation Partnership Agreement

- Estimated Completion Date: October 2025

2) Contracts for administration of public benefits (ongoing)

Based on the following, the estimated completion date is June 2025. [See Table B.](#)

State of California (WSIP): Over the reporting period, the Authority has focused its efforts on continued development of administrative draft Adaptive Management Plans that would be exhibits to the Recreation and Flood Control public benefits contracts. Development of the ecosystem public benefits contract is ongoing.

- Estimated Completion Date: June 2025

3) Completed Feasibility Studies (complete)

Based on the following, the completion date was November 2021.

Coordination efforts between the Authority and Reclamation culminated in the release of the Reclamation Compliant Feasibility Study ([Final Feasibility Report](#)) in December 2020. Completion of this study will allow for continued federal participation in the Project.

After responding to CWC staff and reviewers' comments, the Authority submitted the final WSIP Compliant Feasibility report in November 2021.

Reclamation Compliant Feasibility Study:

- Completion Date: December 2020

WSIP Compliant Feasibility Study:

- Estimated Completion Date: November 2021

4) Final Environmental Documentation (ongoing)

Based on the following, the estimated completion date is mid-2025. [See Table C.](#)

The CEQA documentation for the Project was completed in 2023. The Project environmental documentation commenced in 2017 when the Authority and Reclamation prepared a Draft EIR/EIS for the Project. The Authority, as the CEQA lead agency, issued a Notice of Availability (NOA) of the Draft EIR on August 14, 2017. An NOA of the 2017 Draft EIR/EIS and notice of public meetings was also published in the Federal Register on August 18, 2017. The 2017 Draft EIR/EIS was initially made available for public review from August 14, 2017, to November 13, 2017. This review period was ultimately extended to January 15, 2018, to accommodate additional public review and comments. A total of 137 comment letters and emails were received on the 2017 Draft EIR/EIS, along with comments received at two public hearings held during the public review period.

In early 2019, the Authority and Reclamation began the preparation of a Final EIR/EIS, preparing preliminary response to the comments received on the Draft EIR/EIS. However, in October 2019, the Authority undertook a value planning process in an effort to identify and evaluate additional alternatives that could make the Project more affordable for the Project's participants while also addressing comments received on the 2017 Draft EIR/EIS. In April 2020, the Authority Board accepted the Value Planning Report and its findings. The report focused on three options including reservoir sizes of 1.3 and 1.5 million AF and focused on using existing facilities to the extent

practical for the diversion and release from the reservoir. The Authority also directed staff to analyze the environmental effects of the new alternatives in the report and to recirculate the Draft EIR for public review and comments.

The Authority, as the state lead agency, and Reclamation, as the federal lead agency, prepared a Revised Draft EIR/Supplemental Draft EIS (RDEIR/SDEIS) to address changes to the Project. The Authority and Reclamation prepared a Project Description for the RDEIR/SDEIS and completed several Administrative Drafts of the document, one of which was transmitted to CEQA Responsible Agencies and NEPA Cooperating Agencies for review. The Authority and Reclamation then finalized the public version of the RDEIR/SDEIS and released it in November 2021 for public review. Two public meetings were held in December 2021, and the comment period closed on January 28, 2022. The Authority and Reclamation received 101 comment letters including a single form letter sent by 113 individuals.

The Authority and Reclamation prepared the Final EIR/EIS for the Project which included responses to all comments received on the RDEIR/SDEIS as well as revisions to RDEIR/SDEIS text. In early 2022, the Authority and Reclamation developed an approach to the format and content of the Final EIR/EIS and began preparation of revised text and appendices included in Volumes 1 and 2 of the Final EIR/EIS, as well as the responses to comments which are included in Volume 3. Additional activities included completion of the updated hydrologic modeling for the Final EIR/EIS to account for changes in operations including revised diversion criteria along with additional opportunities for exchanges with Reclamation. The Final EIR/EIS includes equal level of analysis of all alternatives, including Alternative 3, the preferred alternative, which provides for the highest level of Reclamation participation. A few Administrative Drafts of the Final EIR/EIS were prepared, one of which was transmitted to CEQA Responsible Agencies and NEPA Cooperating Agencies for review. The Authority also prepared draft CEQA Findings, a Mitigation Monitoring and Reporting Program (MMRP) and Statement of Overriding Considerations for the Project. Reclamation completed preparation of a draft Record of Decision (ROD) that was submitted with the Final EIR/EIS and briefing package to the Department Review Team in Washington, DC. The Authority and Reclamation also completed public outreach materials and all notices in preparation for the release of the Final EIR/EIS.

The Authority and Reclamation prepared the Final EIR/EIS for the Project, including updated modeling and responses to comments on the RDEIR/SDEIS, and released the Final EIR/EIS on November 2, 2023. On November 17, 2023, the Authority certified the EIR, adopted the CEQA Findings, Statement of Overriding Considerations and MMRP, and approved the Project. A Notice of Determination was prepared and filed with county clerk-recorders and the State Clearinghouse. In 2024, the Authority engaged in the successful defense of CEQA litigation (*Friends of the River, et al., v Sites Project Authority, et al.*) This was aided through the efforts undertaken to comply with California State Senate Bill 149 (SB 149) and its provisions for streamlining judicial review. On May 31, 2024, the Yolo Superior Court found in favor of the Sites Authority on all counts. On June 14, 2024, Friends of the River, et al., appealed the case. On September 20, 2024, the Third District Court of Appeals found that the Project's environmental review fully complied with CEQA. The time limit for petition to the State Supreme Court for review has passed and no petition was filed.

Status: CEQA litigation is complete. The Third District Court of Appeals found that the Project's environmental review fully complied with CEQA. It is anticipated that Reclamation will sign the ROD in mid-2025, after the completion of Section 7 (ESA) and Section 106 compliance is complete.

Draft EIR/EIS

- Completion Date: August 2017

Revised Draft EIR/Supplemental Draft EIS

- Completion Date: November 2021

Final EIR/EIS, Certification, Findings, and NOD

- Completion Date: November 2023

ROD

- Estimated Completion Date: May 2025

5) All required federal, state, and local approvals, certifications, and agreements (ongoing)

Based on the following, the estimated completion date is Quarter 4, 2025. [See Table D.](#)

State:

- **California Endangered Species Act – Incidental Take Permit (ITP) – Construction:** During this period, the Authority’s team and CDFW have continued to hold regularly scheduled meetings to discuss the processing of the Construction ITP application. CDFW issued the Project’s Construction ITP in late October 2024.
- **California Endangered Species Act – Incidental Take Permit (ITP) – Operations:** Over this period, the Authority’s team continued to address CDFW’s information requests and coordinate on data needs. CDFW issued the Operations ITP in late October 2024.
- **DSOD:** During this period, the Authority continued to engage with the DWR’s DSOD to discuss the Project, the permit application process, an initial DSOD permitability finding that provides sufficient assurance to proceed with final Prop 1 award, and supporting information required to permit dam construction which would occur in a phased approach. The Authority filed an application for approval with DSOD and paid associated fees on October 7, 2024.
- **Water Rights Application:** The Authority submitted its water right application to the State Water Resources Control Board (SWRCB) in May 2022. The SWRCB noticed the Authority’s application on June 1, 2023, with protests due on August 31. The Authority received 15 protests on its application (the SWRCB has not indicated that all of these are valid protests but are treating them as such at this time). Two protests were resolved prior to initiating hearing. Over this period, the Authority continued participation in the water right hearing process, provided expert testimony, and completed the case-in-chief portion of the evidentiary hearing. The Authority began preparing additional testimony and exhibits on the Project’s Incidental Take Permits and submitted that to the SWRCB Administrative Hearing Officer (AHO) on December 13, 2024. Lastly, the Authority is continuing to prepare rebuttal testimony for the next phase of the hearing. Under the revised schedule released by the SWRCB on November 22, 2024, the water right hearing process was updated and is anticipated to complete in Q1 2025. Based on the revised schedule, the Sites Authority now anticipates a water right decision in Q3, 2025.

Federal:

- **Clean Water Act, Section 404 and 401 Permits:** This task includes the submittal of the Clean Water Act 404 and 401 permits and working with the agencies to address questions and issue final permits. Over this period, the Authority team continued coordination with the U.S. Army Corps of Engineers (USACE), SWRCB, the U.S. Environmental Protection Agency (EPA), and Central Valley Regional Water Quality Control Board (CVRWQCB). The Authority also continued preparing the 404 and 401 permit applications. The Authority submitted the 404 and 401 application packets to the USACE, CVRWQCB, and SWRCB on March 1, 2024, and is continuing to prepare the associated 404(b)(1) alternatives analysis for the 404 permit which will be submitted in Summer 2024. Under federal regulations, the 404 permit cannot be issued until the Endangered Species Act (ESA) consultation is complete. The ESA process is expected to be complete in Q2 2025 and the 404 and 401 permits are anticipated to be issued by end of 2025.
- **Federal Endangered Species Act Biological Opinions** – Over this period, the Authority continued to meet with the U.S. Fish and Wildlife Service (USFWS) to review and resolve outstanding comments that they provided comments on the Sites Project’s 2023 Construction Biological Assessment (BA) under the Section 7 consultation process. Reclamation and Authority teams also began reviewing draft sections of the Project’s Biological Opinion (BiOp) and meeting with the USFWS to review comments and questions on those draft sections. Reclamation included the Sites Project’s operations as a programmatic action in their Coordinated Long-Term Operation of the Central Valley Project and State Water Project (LTO) reconsultation BA to USFWS and National Marine Fisheries Service (NMFS). The USFWS issued their BiOp for LTO in November 2024 and MNFS issued their BiOp for LTO in December 2024. Both BiOps included programmatic coverage for the Sites Project’s operations. Based on progress to date and an updated schedule issuance of Site’s Construction (USFWS) BiOp is expected to be issued in Quarter 2 of 2025.
- **Section 106 of the National Historic Preservation Act:** Over this period, Reclamation sent the revised Programmatic Agreement to Section 106 consulting parties for review. The Programmatic Agreement is the mechanism Reclamation will utilize to conclude the Section 106 process and outline the processes and procedures for completing a phased process for identifying and assessing Project-related effects to historic properties, and for resolving any adverse effects identified. Authority staff also began drafting plans that would be required under the Programmatic Agreement, including preparing for field work necessary to develop these plans. The Authority team continues to assist Reclamation with Section 106 consultation efforts as needed. The Authority anticipates the Section 106 Programmatic Agreement will be executed in Q2 2025.

Construction Incidental Take Permit	
• Completed Date:	October 2024
Operations Incidental Take Permit	
• Completed Date:	October 2024
DWR Division of Safety of Dams (DSOD) permitability finding	
• Estimated Completion Date:	Quarter 2, 2025
Water Right Application	
• Estimated Completion Date:	Quarter 3, 2025
Section 404 of the Clean Water Act	
• Estimated Completion Date	Quarter 4, 2025
Section 401of the Clean Water Act	
• Estimated Completion Date:	Quarter 4, 2025
Federal Endangered Species Act Biological Opinions	
• Estimated Completion Date:	Quarter 2, 2025
Section 106 Consultation	
• Estimated Completion Date:	Quarter 2, 2025