

Water Storage Investment Program Quarterly Report

The quarterly reporting covered by this template documents an applicant's progress toward complying with [California Code of Regulations, title 23, section 6013\(d\)](#) in preparation for a final WSIP funding hearing with the Commission. This report also documents any changes to the physical quantity and type of public benefit being provided by the project. Commission staff relies on this report to keep the Commission informed of the project's progress, challenges and timeline. It is expected that each Applicant will be forthright and transparent in its reporting.

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. Applicants must ensure this report is consistent with other publicly available project information, such as materials presented to the Applicant's governing body.

Project Information

Project name:

Sites Reservoir Project (Project)

Applicant name:

Sites Project Authority (Sites Authority or Authority)

Date:

July 30, 2026

Reporting period:

April 1, 2026, thru June 30, 2026

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 participating to receive a direct water supply benefit, combined with the conditional state participation and level of federal interest, have resulted in a "right sized" Project (i.e., 1,500,000 acre-feet of storage along with additional facility changes) that is 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 that 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 participating in the following public benefits from the Sites Project: ecosystem benefits (refuge water supply), flood control, and recreation (through construction of 2 recreation areas and a day-use boat ramp). The Authority is also considering applying for emergency water supply public benefits.

Current total project cost:

\$6.2B to \$6.8B in 2025 \$ (this estimated range will be refined prior to seeking investor commitment). The total Project construction cost and benefits estimate is a condition precedent to entering into the investor commitment period.

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 Authority continues to support Reclamation and the U.S. Army Corps of Engineering (USACE) in finalizing NEPA documentation. Reclamation signed their Record of Decision on January 23, 2026. The USACE issued a Record of Decision for the Clean Water Act 404 components of the Project in early April 2026. The Authority continued work on the project-level (step-two) Biological Assessment for operations of the Project.
- The Authority also continued working with Reclamation on its Programmatic Agreement under Section 106 of the National Historic Preservation Act. The Programmatic Agreement was fully executed in January 2026.
- The Authority continued working through the water right hearing process. A draft permit/water right order from the Administrative Hearing Office was received by the Authority on March 20, 2026. On June 26, the Administrative Hearing Office issued notice of a Supplemental Hearing date scheduled for July 24.
- The Authority is coordinating with CDFW on an amendment to the Project's Construction Incidental Take Permit (ITP) for coverage of the state-candidate western burrowing owl.
- The Authority completed draft study plans for Conditions of Approval 8.7.3 and 8.8.2 of the Project's Operations ITP and is now revising these documents per CDFW comments.
- The Authority continued biological and cultural resource surveys and reporting as required by state and federal permits.
- The Authority has begun activities and documentation required to comply with the Programmatic

Agreement (executed to conclude the National Historic Preservation Act Section 106 process) for the first phase of Project work and is coordinating these efforts with the Tribes.

- The Authority created a tribal engagement webpage that presents a high-level, transparent record of selected coordination activities and ongoing opportunities for engagement with Tribes. The Authority is protective of sensitive and confidential information shared during Tribal engagement.
- The Authority continued efforts to coordinate with Tribes with traditional and cultural affiliation with the Project area, including hosting monthly Tribal Government Working Group meetings and individual meetings with Tribes. During this time period, the Authority also continued efforts to re-establish reimbursement agreements with Tribes to compensate Tribes for participating in cultural and biological surveys and monitoring of ground-disturbing activities.
- The Authority continues to coordinate with the USACE and State Water Resources Control Board (SWRCB) on the Project's revised Clean Water Act Section 401 permit application. In May, the SWRCB provided a draft 401 certification for public and Authority review and input.
- The Authority continues to advance development of a Program Baseline Report to include, among other things, updated total project cost and benefits estimate.
- The Partnership Agreement with Reclamation was substantially completed.
- The Sites-DWR-Reclamation Agreement for the Operations of Sites was substantially completed.
- Updates to the Construction Workforce Policy were approved including the adoption of a "template" Project Labor Agreement covering all alternative delivery contracts on the project.
- The CMAR Conveyance procurement was initiated.
- Agreements with DWR for Exchanges and Conveyance were approved by the Authority.
- The Authority maintained its status in Cluster 15 of the CalISO process.
- The 2025 Financial Audit was adopted.
- Contractors were shortlisted for the Terrestrial Compensatory Mitigation Design-Build procurement.
- The Developer Agreement with Yolo County was approved in June 2026 (Colusa County Developer Agreement was completed in October 2025 and Glenn County Developer Agreement was completed in March 2026).
- The draft Contracts for Administration of Public Benefits with CDFW and DWR was presented to the Water Commission and public comments were received.
- Refer to [Attachment A](#) "Supplement for Reporting Period Ending June 30, 2026".
- 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 Progress Reporting](#) dated [June 26, 2026](#).

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

Refer to the Monthly Status Report, submitted to the Board on [April 17, 2026](#), [May 22, 2026](#), and [June 26, 2026](#).

Note any issues, milestones, or accomplishments projected for the next Quarterly Report:

The Authority anticipates completion of two Memorandum of Understandings with Colusa and Glenn County Air Pollution Control Districts to implement the Final EIR/EIS Mitigation Measure AQ-1.2 in Aug/Sept. The Authority anticipates completion of the Clean Water Act (Section 404 and Section 401 permits) and the Bald and Golden Eagle Act permit. The Authority expects the AHO to issue the revised Sites water right draft decision and draft permit on September 3, 2026.

Provide an update on Tribal consultation, and Tribal and community engagement, if any. Please note any ongoing issues with Tribal communities, including differences of opinion or opportunities to work together:

The Authority has been continuing ongoing engagement with Tribes via letter, email, phone calls, document reviews, and virtual and/or in person meetings. The Authority has held and facilitated monthly virtual and/or in-person Tribal Government Working Group meetings for the Project with local Native American Tribes since December 2024. Topics covered during these meetings and during other Tribal outreach have included Project design updates and flexibility for avoiding cultural resources of importance to Native American Tribes, Tribal monitoring during construction and during upcoming cultural resources studies, cultural resources study efforts, biological study efforts, cemetery planning, and other topics of concern or interest to participating Native American Tribes.

The Section 106 process of the National Historic Preservation Act has been concluded through the execution of a Programmatic Agreement (PA) (executed January 2026). Reclamation, USACE, the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, the Cachil DeHe Band of Wintun Indians of the Colusa Indian Community Council, and the Authority have all signed the PA. The PA outlines how historic properties will be considered and addressed during Project implementation and includes provisions for continued consultation with Section 106 consulting parties. The Authority has begun activities and documentation required to comply with the PA for the first phase of Project work and is coordinating these efforts with the Tribes.

Items Required Prior to Scheduling a Final Award Hearing

Provide the date (month/year) that you expect to request a Final Award Hearing from the Commission. Note: the request should be received at least 2 months before the anticipated Final Award Hearing date and after all items required by California Water Code section 79755 are completed:

November 2026

Provide the date (month/year) that you anticipate a Final Award Hearing with the Commission:

December 2026

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 June 30, 2026".

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	\$ Amount	Status	Est Completion Date
Sites Reservoir Benefits & Obligations Contract	66.7% capacity interest	Being Finalized	September 2026 (ready to start investor commitment)
Reclamation Partnership Agreement	16% capacity interest	Being Finalized	Negotiations complete as of June 2026 Pending any final overlapping changes to align with the Final B&O Contract

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

Provide an estimated date when all Draft CAPBs will be complete. The Draft CAPB completion date is when the agreement is ready and available to post for public review at a subsequent Commission meeting:

Ecosystem and Flood/Recreation/Drought Emergency Supplies - May 2026 (Actual)

Provide a status for each applicable administering agency's Draft CAPB. Please note any issues or concerns that have, will, or could affect the timing of the Draft CAPBs:

	Status
Draft CAPB	Ecosystem – In Progress, effect of draft water right permit terms and conditions on overall Project performance including the ecosystem public benefit portion is being evaluated Flood/Recreation/Drought Emergency Supplies – In Progress; no issues or concerns All final draft CAPBs must be complete prior to initiating investor commitment

Provide an estimated date when all Final CAPBs will be complete. The Final CAPB completion date is when it will be executed:

October 2026

Provide a status for each applicable administering agency's Final CAPB. Please note any issues or concerns that have, will, or could affect the timing of executing CAPBs:

	Status
Final CAPB	Comments received on draft CAPBs being considered.

List all public benefits, including quantity of benefit (e.g., acres of habitat, acre-feet of water for pulse flows, etc.):

Table B

Benefits	Description and Quantity of Benefits
Ecosystem	Refuge and wetland Water Supply
Water Quality	Not Applicable
Emergency Response	Drought Emergency Supplies
Flood Risk Reduction	Flood risk reduction to the unincorporated area of Maxwell, Colusa County, CA and specific agricultural lands in Colusa County
Recreation	Two recreational areas (Stone Corral Creek and Peninsula Hills) and one day use boat ramp

Indicate if there are any anticipated changes to the benefit or quantity of the benefit since the original application and whether these changes affect the cost allocation:

Final benefit delivery schedule for ecosystem and drought emergency supplies is dependent on the final water right conditions.

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	Draft: Environmental Impact Report (EIR)	August 2017
	Revised Draft: EIR	November 2021
	Final: EIR	November 2023
	NOD: Certification, Findings and Notice of Determination (NOD)	November 2023
Federal Document	Draft: Environmental Impact Statement	August 2017

	Supplemental Draft: Environmental Impact Statement (EIS)	November 2021
	Final: EIS	November 2023
	ROD: Record of Decision (ROD)	January 2026

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

Approvals / Certifications / Agreements / Permits	Status	Est Date Acquired
California Endangered Species Act – Incidental Take Permit – Construction	Issued	Q4 2024
California Endangered Species Act – Incidental Take Permit – Operations	Issued	Q4 2024
Clean Water Act, Section 401 Permit	Submitted; Revised application submitted September 15, 2025; application deemed complete in October 2025; draft permit issued May 2026	Q3 2026
Clean Water Act, Section 404 Permit	Submitted; Revised application submitted September 15, 2025; application deemed complete in September 2025; ROD issued in April 2026	Q3 2026
DWR Division of Safety of Dams (DSOD)	Under Development	Initial permitability finding issued February 19, 2026
Federal Endangered Species Act – Construction Biological Opinion	Issued	Q2 2025
Federal Endangered Species Act – Operations Biological Opinion	Programmatic Issued Project Biological Assessment Under Development	Q4 2026
Section 106 of the National Historic Preservation Act	Concluded (PA executed in January 2026)	Q1 2026
Water Right Order and Permit	Revised Draft Decision and Permit being prepared	Draft March 20, 2026 Revised Draft September 2026 Final Board approval in November 2026

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.

	Status	Significant Change?
Applicant's audited financial statements	The Sites Authority had an accounting firm conduct an independent financial audit for Fiscal Year 2025 (which ended on December 31, 2025). The audit report is located on the website at sitesproject.org/financial/.https://sitesproject.org/wp-content/uploads/2026/06/Sites-Reservoir-Authority-Annual-Financial-Report-with-Independent-Auditors-Report-Thereon-December-31-2025.pdf	Change
Final project costs, schedule, and scope of work	An updated project cost range was presented to the Sites Authority Board in June 2025 (see item 03-01 https://sitesproject.org/meetings/friday-june-20-reservoir-committee-authority-board-meeting/). Finalizing these costs is dependent upon receipt of the final water right order, and the final agreements with State and Federal agencies.	No Change
Evidence of bilateral communications with operators and owners of potentially impacted facilities regarding potential impacts of the proposed project to their facilities	The Authority, Reclamation and DWR continue to maintain effective communication and collaboration. DWR and Reclamation are active in the Authority's Reservoir Committee. Operators of the TC Canal and GCID Canal continue to be engaged in discussions regarding the use of these facilities for conveyance of Sites Water into and out of the reservoir. There is regular engagement with parties with interests in the Colusa Basin Drain.	No Change
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.

	Status	Significant Change?
Labor Compliance	The Reservoir CMAR, Barnard and various organized labor organizations have executed a project labor agreement (PLA) for this CMAR package. North Coast States Regional Council of Carpenters continue to elect to not sign the Barnard will subcontract all carpenter work to a contractor, Ames Construction, that is signatory with NCSRCC. Ames and NCSRCC signed a Master Labor Agreement which now binds all unions working on the project to comply with the terms of the PLA. The Authority adopted an updated Construction Workforce Policy in June 2026 which requires that the adopted	Change

	Status	Significant Change?
	template PLA be used in all future alternative delivery projects, including the recently initiated procurement for the CMAR Conveyance.	
Urban Water Management Plans	Not applicable	
Agricultural Water Management Plans	Not applicable	
Potential effect of other conditional 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:

Funding Sources	\$ Amount	Status	Est Award Date
Prop 1 WSIP Early Funding Round 2	\$10,948,857	Prop 1 WSIP Early Funding Agreement.	Q4 2026
Prop 1 WSIP Early Funding	\$43,769,818	Prop 1 WSIP Early Funding Agreement.	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. Completed. 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	In Progress.	Q4/2025

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	Percentage of EFA funds expended
WSIP Prop 1 Early Funding Agreement No. 2 has been approved. Invoice No. 1 under EFA No. 2 has been approved and reimbursement payment has been received. Draft invoice No. 2 under EFA No. 2 is currently with CWC staff for review.	66%

Status	Percentage 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 funding becomes available. See table above.	

Attachment A:

Supplement for Reporting Period Ending June 30, 2026

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 December 2026. [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) 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 its capacity interest in the Project.

Sites Reservoir Benefits and Obligations Contract:

- ♦ Estimated Completion Date (execution by all Participants): December 2026

Reclamation: The Sites Authority is coordinating with Reclamation involving the benefits and obligations for their participation in the Project. These discussions resulted in negotiation of a Reclamation Partnership Agreement between the Sites Authority and Reclamation. Negotiations were completed in June 2026 and agreement finalization will track along a similar timeline to the Sites Reservoir Benefits & Obligations Contract with Participants.

Reclamation Partnership Agreement

- ♦ Initiation of Public Negotiations: August 2025
- ♦ Estimated Agreement Executed Date: November 2026

2) Contracts for administration of public benefits (ongoing)

Based on the following, the estimated completion date is October 2026. [See Table B.](#)

State of California (WSIP): Over the reporting period, the Authority has focused its efforts on continued development of administrative draft of the Public Benefits Agreements and attached Adaptive Management Plans.

- ♦ Completion Date (drafts): May 2026 (actual)
- ♦ Estimated Completion Date (final, ready to be executed): September 2026
- ♦ Estimated Agreements Executed Date: October 2026

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:

- o Completion Date: December 2020

WSIP Compliant Feasibility Study:

- o Completion Date: November 2021

4) Final Environmental Documentation (complete)

Based on the following, the completion date was January 2026. [See Table C.](#)

The Authority and Reclamation released the Final Environmental Impact Report / Environmental Impact Statement (EIR/EIS) on November 2, 2023. The Authority certified the Final EIR, adopted CEQA Findings, a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program, and approved the Project on November 17, 2023. The CEQA Notice of Determination (NOD) was filed on November 20, 2023. Reclamation has signed the Record of Decision (ROD) in January 2026.

On December 18, 2023, a coalition of NGOs notified the Authority of their intent to file a petition for Writ of Mandate in Yolo County Superior Court under the provisions of the CEQA, Public Resources Code § 21000 et seq., challenging the Authority's November 17, 2023, certification of the Final EIR, CEQA findings, and approval of the Project. The Authority was successful in defending the CEQA litigation (*Friends of the River, et al., v Sites Project Authority, et al*). 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 focus now is on CEQA compliance during property acquisition and pre-construction activities.

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:

- Completion Date: January 2026

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

Based on the following, the estimated completion date is Q4 2026. [See Table D.](#)

State:

- **California Endangered Species Act – Incidental Take Permit (ITP) – Construction:** Completed in October 2024.
- **California Endangered Species Act – Incidental Take Permit (ITP) – Operations:** Completed in October 2024.
- **DWR Division of Safety of Dams (DSOD):** The Authority received DSOD initial permitability finding in February 2026. During this period, the Authority continued to engage with the DWR’s DSOD to discuss the Project, schedule updates, and approach for phase construction approval.
- **Water Rights Order and Permit:** The Authority submitted its Water Right Application to the SWRCB in May 2022. The SWRCB noticed the Authority’s application on June 1, 2023, with 16 protests received on August 31, 2023. The water right hearing process began in August 2024 and concluded in March 2025. The Sites Authority received a draft water right decision and permit on March 20, 2026. Approx 50 public comment letters were submitted on May 22, 2026. The AHO is conducting an additional hearing day in July and expects to issue a revised draft order and permit on September 3. A 30-day public comment period will ensue and the State Board is expected to consider adopting the water right on November 2 or 3, 2026.

Federal:

- **Clean Water Act, Section 404 and 401 Permits:** Over this period, the Authority team continued coordination with the USACE, SWRCB, the U.S. Environmental Protection Agency (EPA), and Central Valley Regional Water Quality Control Board (CVRWQCB). The Authority submitted the 404 and 401 application packets to the USACE, CVRWQCB, and SWRCB on March 1, 2024. On April 15, 2024, the USACE issued a letter notifying the Authority that the 404-permit application is incomplete and subsequently withdrawn from further review on May 17, 2025. On September 14, 2024, the SWRCB denied the 401-permit application without prejudice because the federal permit application was withdrawn, and the SWRCB no longer had responsibility to act on the request for certification. The USACE identified several items needed as part of the permit application, including but not limited to completed Endangered Species Act Section 7 consultation, final draft of a 404(b)(1) compliance

memorandum, and completed Section 106 consultation, and comprehensive compensatory mitigation plan. The Authority has continued to closely coordinate with the USACE, EPA, and SWRCB on a Project permitting approach that fits with the Project needs and conforms to regulations.

The Project's Construction Biological Opinion was issued on July 16, 2025. Though execution of the Programmatic Agreement to conclude the Section 106 process was not expected until Q1 2026, the USACE authorized the Authority to submit the 404-permit application without the signed Programmatic Agreement. In early 2025, the Authority received confirmation from the USACE that the draft 404(b)(1) compliance memorandum can be considered final. The 404 and 401 permits were resubmitted on September 15, 2025. On September 29, 2025, the USACE deemed the Authority's 404 application complete. On October 24, 2025, the SWRCB notified the Authority that the Project's application for water quality certification is complete.

On April 9, 2026, the USACE issued a Record of Decision for the Sites Project CWA Section 404 permitting efforts. On May 29, 2026, the SWRCB released a draft Section 401 water quality certification for the Project for public review. The Authority reviewed and provided comments to the SWRCB by the June 26, 2026, deadline. The Authority continues to work with both agencies to address questions and provide information as the agencies process the Projects 401 and 404 permits.

- **Federal Endangered Species Act Biological Opinions –**

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). USFWS and NMFS issued their resulting Biological Opinions with the Sites Project included as a programmatic action in late 2024. Over this time period, the Sites Authority, Reclamation, USFWS and NMFS have continued regular meetings to discuss the preparation of the Project's project-level Operations Biological Assessment and resulting Biological Opinion. A draft BA has been prepared by the Authority and is under review by Reclamation. The Project's project-level Operations Biological Opinion is expected in Quarter 4 of 2026.

- **Section 106 of the National Historic Preservation Act:** The Section 106 process of the National Historic Preservation Act has been concluded through the execution of a Programmatic Agreement (PA) (executed January 2026). Reclamation, USACE, the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, the Cachil DeHe Band of Wintun Indians of the Colusa Indian Community Council, and the Authority have all signed the PA. The PA outlines how historic properties will be considered and addressed during Project implementation and includes provisions for continued consultation with Section 106 consulting parties. The Authority has begun activities and documentation required to comply with the PA for the first phase of Project work and is coordinating these

efforts with the Tribes. Authority staff also worked on the development of a number of the plans called for in the EIR/EIS mitigation measures, including the Cemetery Relocation Plan and the Burial Treatment Plan. The Authority team continues to assist Reclamation with Section 106 consultation efforts as needed.

Construction Incidental Take Permit

- Completion Date: October 2024

Operations Incidental Take Permit

- Completion Date: October 2024

DWR Division of Safety of Dams (DSOD) permitability finding

- Completion Date: February 19, 2026

Water Right Order and Permit

- Estimated Completion Date (Final): Quarter 4, 2026

Section 404 of the Clean Water Act

- Estimated Completion Date: Quarter 3, 2026

Section 401 of the Clean Water Act

- Estimated Completion Date: Quarter 3, 2026

Federal Endangered Species Act Construction Biological Opinion

- Completion Date: July 2025

Federal Endangered Species Act Operations Biological Opinion(s)

- Estimated Completion Date: Quarter 4, 2026

Section 106 Consultation

- Completion Date: January 2026