



Environmental Analysis Program

Pomona College
Biogeochemistry Laboratory

SOP-F004

Site Access and Permits

Standard Operating Procedure

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1. Purpose

This SOP describes the procedures for obtaining site access and research permits for field work conducted by the EA Program. Field research on public or institutional lands almost always requires advance authorization (US Fish and Wildlife Service, 2019). Working without proper permits can

result in fines, confiscation of samples, invalidation of data, and jeopardized relationships with land managers. This document provides an agency-by-agency guide covering the landowners and managers most commonly encountered by EA Program researchers.

2. Scope

- **Applies to:** All EA Program field activities that take place on lands managed by the agencies and institutions listed in this SOP, including class field trips, independent student research, and faculty-led projects
- **Does not apply to:** Laboratory procedures; field work on private land (which requires landowner permission negotiated on a case-by-case basis); marine or offshore research (which may require additional permits from NOAA or the California Coastal Commission)
- **Key principle:** It is the responsibility of the PI (or the supervising faculty member) to determine what permits are required and to obtain all necessary approvals before any field work begins. Students should never assume that their faculty advisor has obtained permits – always confirm.

3. Responsibilities

Role	Responsibility
PI / Faculty	Identify required permits, submit applications, maintain permit files, ensure compliance with all permit conditions
Field Lead	Carry copies of active permits in the field; confirm permit status before each outing
Students	Verify that permits are in place before field work; follow all permit conditions; report any compliance issues to the PI

4. Definitions

- **BFS (Bernard Field Station):** An 86-acre biological reserve of The Claremont Colleges located at 1400 N. Amherst Avenue, Claremont, CA; administered by the BFS Director; all organized access requires an approved Use Request (Robert J. Bernard Biological Field Station, 2024).
- **CESA (California Endangered Species Act):** California state law (Fish and Game Code §2050 et seq.) that protects state-listed threatened and endangered species; take of CESA-listed species requires a separate Memorandum of Understanding from CDFW in addition to a Scientific Collecting Permit (California Department of Fish and Wildlife, 2024).
- **CDFW Scientific Collecting Permit (SCP):** A permit issued by the California Department of Fish and Wildlife authorizing the take or possession of wildlife for scientific, educational, or propagation purposes; required whenever research involves capturing, handling, marking, or collecting wildlife, or when take of sensitive species may occur incidentally (California Department of Fish and Wildlife, 2024).

- **ESA Section 10 permit:** A federal incidental take permit issued by the U.S. Fish and Wildlife Service under Section 10(a)(1)(A) of the Endangered Species Act; required for non-federal activities that involve take of federally listed threatened or endangered species (U.S. Fish and Wildlife Service, 2024).
- **ESA Section 7 consultation:** The formal interagency process under Section 7 of the Endangered Species Act through which a federal agency (e.g., USFS, BLM) consults with USFWS or NMFS to ensure that its authorized activities do not jeopardize listed species or destroy critical habitat.
- **Incidental take:** The unintentional, but not unexpected, harm to a listed species that results from an otherwise lawful activity; must be authorized through a Section 10 permit (private activities) or Section 7 consultation (federal activities).
- **NEPA (National Environmental Policy Act):** Federal law requiring federal agencies to assess the environmental impacts of their proposed actions; complex research proposals on federal lands may trigger NEPA review, substantially extending the permit processing timeline.
- **RAMS (Reserve Application Management System):** The online portal through which researchers and instructors apply for access to University of California Natural Reserve System reserves (University of California Natural Reserve System, 2024).
- **RPRS (Research Permit and Reporting System):** The National Park Service’s online system for submitting research permit applications, reporting annual activities, and communicating with park research coordinators (National Park Service, 2024).
- **Special Use Permit (SUP):** A general-purpose permit issued by federal land management agencies (BLM, USFS) authorizing a specific research project or activity on public lands; may take 60–120 days or more to process (Bureau of Land Management, 2024; USDA Forest Service, San Bernardino National Forest, 2024).
- **Take:** Under California Fish and Game Code §86, to hunt, pursue, catch, capture, or kill, or attempt to do so; under the federal ESA, to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to do so.
- **UC Natural Reserve System (UCNRS):** A network of 41+ reserves managed by the University of California for research, teaching, and public service; access requires an approved RAMS application (University of California Natural Reserve System, 2024).

5. General Principles

5.1. Planning Timeline

Permit processing times vary widely. Submit applications at least 60–90 days before the planned start of field work. Some agencies (particularly federal ones involving NEPA review or listed species) may require 6 months or more. Always confirm the current timeline with the specific office.

Agency / Institution	Typical Lead Time
Bernard Field Station	1–2 weeks
California State Parks	60–90 days
UC Natural Reserve System	2–4 weeks
CDFW (General Use SCP)	60–90 days
CDFW (Specific Use SCP)	3–6 months

Agency / Institution	Typical Lead Time
USFWS (Section 10)	3–12 months
BLM	60–120 days
National Park Service	60–120 days
USDA Forest Service	60–120 days

5.2. Permits You May Need Simultaneously

A single field project can require permits from multiple agencies. For example, sampling macroinvertebrates in a stream within a National Forest may require a USFS Special Use Permit, a CDFW Scientific Collecting Permit, and (if listed species are present) a USFWS Section 10 permit. The land management agency will typically not finalize its own permit until copies of all other required permits are submitted.

5.3. Permit Files

The PI must maintain a digital folder (in the EA Program Google Drive or GitHub repository) containing:

- Copies of all active permits (signed, final versions)
- Copies of all applications submitted
- Copies of annual reports and compliance documents submitted to agencies
- Expiration dates and renewal deadlines

Field leads must carry printed or digital copies of relevant permits during every field outing.

5.4. Insurance and Liability

Several agencies require proof of liability insurance as a condition of permit issuance. Pomona College maintains institutional liability coverage; contact the Office of Risk Management to obtain a Certificate of Insurance naming the specific agency as an additional insured party.

6. Agency-Specific Procedures

6.1. Robert J. Bernard Biological Field Station (BFS)

The BFS is an 86-acre facility of The Claremont Colleges located at 1400 N. Amherst Avenue, Claremont, CA. Access requires advance approval from the BFS Director (Robert J. Bernard Biological Field Station, 2024).

When a permit is needed: All research projects, class field trips, and organized activities on the BFS require a Use Request, even for Claremont Colleges faculty and students. Casual, unaccompanied pedestrian access also requires prior authorization.

How to apply:

1. Contact the BFS Director (Dr. Wallace M. Meyer III, wallace.meyer@pomona.edu, 909-621-8577) to discuss the proposed project
2. Complete the online “Apply to Use” form at <https://bfs.sites.pomona.edu/using-the-bfs/>
3. Allow 1–2 weeks for approval; more complex projects may require additional review

Website: <https://bfs.sites.pomona.edu/using-the-bfs/>

6.2. California Department of Fish and Wildlife (CDFW)

CDFW issues Scientific Collecting Permits (SCPs) for the take or possession of wildlife (mammals, birds, reptiles, amphibians, fish, certain plants, and invertebrates) for scientific, educational, and propagation purposes (California Department of Fish and Wildlife, 2024).

When a permit is needed: Any time your research involves capturing, handling, marking, or collecting wildlife – or when there is potential for incidental take of sensitive species.

Permit types:

- **General Use SCP** – for more common species, non-invasive methods, and areas outside Marine Protected Areas
- **Specific Use SCP** – for focused studies involving prohibited wildlife, more invasive methods, or sensitive locations including MPAs

How to apply:

1. Review the SCP regulations (Title 14, Section 650, CCR) and Standard Conditions at <https://wildlife.ca.gov/Licensing/Scientific-Collecting>
2. Apply online through the Scientific Collecting Permit Portal (SCPP)
3. Pay the required permit fee before issuance

CESA-listed species: Requires a separate CESA Memorandum of Understanding from CDFW in addition to the SCP.

Reporting: Each permit holder must submit a Mandatory Wildlife Report (form DFW 1379a) annually.

Website: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

6.3. California Department of Parks and Recreation (State Parks)

When a permit is needed: Any scientific research, data collection, specimen collection, or installation of monitoring equipment in California State Park System lands requires written authorization (California Department of Parks and Recreation, 2024).

How to apply:

1. Download and complete form DPR 65 from https://www.parks.ca.gov/?page_id=21557
2. Prepare a full study proposal following the Study Proposal Guidelines for Research in California State Parks
3. Submit the application, study proposal, proof of insurance, and copies of any other required permits (CDFW, USFWS, etc.) to the appropriate State Parks district office; for multi-district projects, submit to the Natural Resources Division in Sacramento at nrd.research@parks.ca.gov
4. Allow 60–90 days for processing

Reporting: A summary report of activities and findings must be submitted to State Parks; renewal is contingent on receipt of this report.

Website: https://www.parks.ca.gov/?page_id=21557

6.4. University of California Natural Reserve System (UCNRS)

The UCNRS manages 41+ reserves across California for research, teaching, and public service (University of California Natural Reserve System, 2024).

When a permit is needed: All research projects and class visits require an approved application through the Reserve Application Management System (RAMS).

How to apply:

1. Contact the reserve director(s) to discuss project requirements
2. Review the NRS Use Guidelines at <https://ucnrs.org/reserve-research-guidelines/>
3. Submit a research application through RAMS at <https://rams.ucnrs.org>
4. Once approved, submit a Reservation for each planned visit through RAMS

Special conditions:

- IACUC approval required if the project involves vertebrate animals
- Additional agency permits (CDFW, USFWS) may be required
- All equipment must be removed and sites restored at project conclusion

Website: <https://ucnrs.org/>

6.5. U.S. Fish and Wildlife Service (USFWS)

USFWS administers permits for activities involving species listed under the federal Endangered Species Act (ESA), migratory birds (Migratory Bird Treaty Act), and wildlife on National Wildlife Refuges (U.S. Fish and Wildlife Service, 2024).

When a permit is needed:

- Take of federally listed threatened or endangered species requires a Section 10(a)(1)(A) recovery permit
- Research involving migratory birds requires a federal Bird Banding Permit and/or Scientific Collecting Permit
- Research on National Wildlife Refuge lands requires a Special Use Permit from the refuge manager

How to apply:

1. For ESA-listed species: submit form 3-200-55 through the USFWS Endangered Species permits portal
2. For migratory birds: apply through the USFWS Bird Banding Laboratory or the federal permits portal
3. For refuge access: contact the specific refuge manager

Key considerations: Section 10 applications are subject to a 30-day Federal Register public comment period; processing times are 3–12 months. Annual reports are required for all active permits.

Website: <https://www.fws.gov/service/apply-permit>

6.6. Bureau of Land Management (BLM)

BLM manages extensive public lands in California, including desert, grassland, and mountain areas where EA Program research may occur (Bureau of Land Management, 2024).

When a permit is needed: Any organized research activity on BLM-managed lands, including specimen collection, installation of monitoring equipment, and systematic surveys.

How to apply:

1. Contact the nearest BLM Field Office at <https://www.blm.gov/office/directory>
2. BLM staff will determine whether a Special Recreation Permit, research authorization, or another approval type is needed
3. Submit required application materials (maps, project description, copies of other agency permits)
4. Allow 60–120 days; complex NEPA projects may take longer

Website: <https://www.blm.gov/learn/science-in-the-blm/conducting-science>

6.7. National Park Service (NPS)

NPS requires a Scientific Research and Collecting Permit for most scientific activities in any unit of the National Park System (National Park Service, 2024).

When a permit is needed: Any study in the natural or social sciences within a national park, monument, seashore, or other NPS unit.

How to apply:

1. Create an investigator account in the Research Permit and Reporting System (RPRS) at <https://irma.nps.gov/rprs/>
2. Locate the park profile in RPRS and contact the research coordinator for park-specific conditions
3. Submit the application through RPRS; allow 60–120 days
4. Annual reports are submitted through RPRS

Website: <https://www.nps.gov/subjects/science/research-and-collecting-permit-overview.htm>

6.8. USDA Forest Service (USFS)

USFS manages National Forest System (NFS) lands through local Ranger District offices (USDA Forest Service, San Bernardino National Forest, 2024).

When a permit is needed: Any organized research activity on NFS lands, including specimen collection, installation of monitoring equipment, and systematic surveys.

How to apply:

1. Contact the Ranger District office for the relevant National Forest (for Southern California: San Bernardino, Angeles, Cleveland, or Los Padres)
2. Download and complete a Research Special-Use Operating Plan/Itinerary from the forest's website and submit it to the district permit coordinator
3. Forest staff will determine whether a full Special Use Permit or a Research Permit Waiver is appropriate
4. Allow 60–120 days; projects requiring NEPA analysis may take longer

Special conditions:

- Projects involving wildlife or threatened/endangered plants may require additional CDFW and/or USFWS authorization
- A summary of findings must be provided to the Forest Service upon completion

Website: <https://www.fs.usda.gov/>

7. Permit Decision Flowchart

Use the following steps to determine what permits you need:

1. **Identify the land manager.** Who owns or manages the land where you will work?
2. **Obtain the land access permit** from the land manager (Sections 5.1–5.8 above).
3. **Will you handle, capture, collect, or disturb wildlife?** If yes, you likely need a CDFW Scientific Collecting Permit (§5.2).
4. **Are any federally listed species present, or could they be incidentally encountered?** If yes, you likely need a USFWS Section 10 permit or ESA Section 7 consultation (§5.5).
5. **Are any state-listed species (CESA) present?** If yes, you need a CESA MOU from CDFW in addition to the SCP (§5.2).
6. **Does the land manager require other agency permits before issuing its own?** If yes, obtain those permits first and submit copies with your land access application.

 When in doubt, ask

If you are unsure whether a permit is required, contact the agency before beginning field work. It is always better to ask in advance than to be stopped in the field or have your data and specimens invalidated.

8. References

- California Department of Fish and Wildlife (2024)
- California Department of Parks and Recreation (2024)
- Robert J. Bernard Biological Field Station (2024)
- University of California Natural Reserve System (2024)
- U.S. Fish and Wildlife Service (2024)
- Bureau of Land Management (2024)
- National Park Service (2024)
- USDA Forest Service, San Bernardino National Forest (2024)
- US Fish and Wildlife Service (2019)

Bureau of Land Management. (2024). *Conducting science on BLM lands*. <https://www.blm.gov/learn/science-in-the-blm/conducting-science>

California Department of Fish and Wildlife. (2024). *Scientific collecting permits*. <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

California Department of Parks and Recreation. (2024). *Scientific research and collecting on state park system lands*. https://www.parks.ca.gov/?page_id=21557

National Park Service. (2024). *Research and collecting permit overview*. <https://www.nps.gov/subjects/science/research-and-collecting-permit-overview.htm>

Robert J. Bernard Biological Field Station. (2024). *Rules for use and apply to use*. <https://bfs.sites.pomona.edu/using-the-bfs/>

University of California Natural Reserve System. (2024). *Reserve research guidelines*. <https://ucnrs.org/reserve-research-guidelines/>

U.S. Fish and Wildlife Service. (2024). *Endangered species act section 10: Incidental take permits*. <https://www.fws.gov/service/apply-permit>

US Fish and Wildlife Service. (2019). *Quality assurance project plan for eDNA monitoring of bighead and silver carps*. USFWS, Midwest Fisheries Center. <https://www.fws.gov/project/environmental-dna-edna>

USDA Forest Service, San Bernardino National Forest. (2024). *Research and collection permits*. <https://www.fs.usda.gov/r05/sanbernardino/permits/research-and-collection-permits>

9. Related SOPs

SOP	Title	Relationship
F001	Field Safety	Required reading before any field work
F002	Field Equipment Checklist	Carry permit copies in field kit
F007	Field Decontamination	Required by many agency permits
F610	Macroinvertebrate Sampling	Typically requires CDFW SCP
F700	eDNA Field Sampling	May require CDFW SCP for target taxa

10. Training Record

Before leading field work on any permitted site, personnel must:

1. Read this SOP in full
2. Identify all permits required for their specific project and site
3. Confirm with the PI that all permits are active and in hand
4. Know where to find copies of active permits (digital and/or printed)
5. Understand the reporting requirements for each active permit
6. Be signed off by the PI or designated field lead