



August 13, 2021

Jeanine Townsend, Clerk to the Board
 State Water Resources Control Board
 P.O. Box 100, Sacramento, CA 95812-2000
 Delivered via email to: commentletters@waterboards.ca.gov

Subject: Comments – Restoration Projects Statewide Order

Dear Ms. Townsend:

On behalf of the Floodplain Forward Coalition, we are writing to support the State Water Resources Control Board’s (State Water Board) proposed Order and Programmatic Environmental Impact Report (PEIR), which will help accelerate floodplain reactivation, multi-benefit water management, nature-based solutions, and the implementation of habitat restoration projects throughout the state. Many of us will provide individual comments to the State Water Board, but here we join together to express our appreciation for specifically including **floodplain restoration** in the proposed Order.

We are a diverse coalition of conservation organizations, farmers and other landowners, local governments, water suppliers and academic institutions who care deeply about the future of California and have come together as the Floodplain Forward Coalition to advance a new model for water management and land use as shown in [Reactivating our Floodplains: A New Way Forward](#). We have developed [A Portfolio for Fish and Wildlife](#) that showcases the types of restoration projects we are advancing to reactivate our floodplains in the Sacramento Valley and which would benefit from this proposed Order. We “support the development of expedited and cost-effective permitting mechanisms for common types of restoration and enhancement projects” as called for in the Water Resilience Portfolio ¶13.2.

The process of obtaining an individual permit for a restoration project can be much more time-consuming and expensive compared to permitting under a pre-written General Order that provides programmatic coverage. Having this Order in place will help save time and money and avoid delays for critically needed restoration projects that restore degraded habitats, increase

habitat connectivity, improve water quality, sequester carbon, and increase our resilience to climate change – all of which benefit wildlife, waterways, and people. Having a more efficient process in place is an important incentive to complete more restoration projects in a timely manner, and will make better use of grant funds and agency staff resources. We urge the State Water Board to certify the PEIR and prioritize adoption and active staff use of this Order because projects for climate change adaptation and habitat restoration for imperiled species can't be delayed.

We are all very excited that farmland (primarily ricelands), wildlife refuges, and the bypasses currently designed for flood protection can be managed to work together for dynamic fisheries and wildlife conservation and to mimic the historic floodplain in the Sacramento River Basin, while continuing to provide flood protection for Sacramento, rural communities and lands. Spreading out and slowing down water across this landscape is a nature-based solution that mimics natural floodplain processes and provides multiple benefits year-round by allowing farmers to cultivate rice and other crops for humans during the spring and summer; habitat for birds, reptiles, and other fauna in the fall; and food for migratory birds and juvenile native fish species in the winter. This holistic water management can bring our ecosystem and farmlands to life through the careful interaction of water, sun and land.

Sincerely yours,

Amy Merrill
AMERICAN RIVERS

Meghan Hertel
AUDUBON CALIFORNIA

Tim Johnson
CALIFORNIA RICE COMMISSION

Jacob Katz
CALIFORNIA TROUT

Jeff Volberg
CALIFORNIA WATERFOWL

Kyriakos Tsakopoulos
CONAWAY PRESERVATION GROUP

Jeff McCreary
DUCKS UNLIMITED

Adam Davis
ECOSYSTEM INVESTMENT PARTNERS

Ann Hayden
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Thad Bettner
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Mike Denny
LUNDBERG FAMILY FARMS

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THE NATURE CONSERVANCY

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SACRAMENTO RIVER SETTLEMENT CONTRACTORS

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SUTTER MUTUAL WATER COMPANY

Willie Whittlesey
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cc: SWRCB Members