



NCWA
Northern California Water Association

*To advance the economic, social and environmental sustainability of Northern California
by enhancing and preserving the water rights, supplies and water quality.*

August 12, 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

RE: Comments – Restoration Projects Statewide Order

Dear Ms. Townsend:

The Northern California Water Association received the *Notice of Opportunity for Public Comment and Board Workshop for the Proposed Order for Clean Water Act Section 401 Water Certification and Waste Discharge Requirements for Restoration Projects Statewide*. Thank you for the opportunity to comment.

NCWA is committed to advance the economic, social, and environmental sustainability of the Sacramento Valley by enhancing and preserving its water rights, supplies, and water quality for the rich mosaic of farmlands, refuges and managed wetlands, and meandering rivers that support fisheries and wildlife, and cities and rural communities in the region.

NCWA and our members strongly support the State Water Resources Control Board's (State Water Board) proposed Order and Programmatic Environmental Impact Report (PEIR), which will help to accelerate implementation of greatly needed habitat restoration projects throughout the state. 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.

The current draft Order and associated PEIR provide an environmentally thorough, protective, and robust permitting process that will help applicants better meet state requirements. 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. The drought has given further urgency to addressing this established state priority. We also ask the Board to maintain a clear, implementable, and efficient Order as public comment is considered.

NCWA and our members, working with our conservation organization and state and federal agency partners are implementing collaborative, comprehensive programs to promote [salmon recovery](#) and enhance [Pacific Flyway habitat](#) in the Sacramento Valley. Both of these programs are focused on the implementation of habitat projects. The Sacramento Valley Salmon Recovery Program builds upon a [long history](#) of salmon project implementation in the Sacramento Valley. The program is designed to benefit all four runs on Chinook salmon in the Sacramento Valley and implements projects targeted to provide habitat for all salmon freshwater life-cycle stages in the [upper](#), [middle](#) and [lower](#) reaches of the region's rivers. Projects to benefit the Pacific Flyway include [infrastructure improvements to increase water deliveries](#) to National Wildlife Refuges and State Wildlife Areas and [improvements to privately-managed](#) agricultural lands and wetlands. Both fish and birds are benefiting from efforts to [reactivate floodplains](#) in the Sacramento Valley. These projects occur on both the [wet-side](#) and the [dry-side](#) of the region's levees and includes a [portfolio of projects](#) that will need to secure permits prior to implementation. This proposed Order will be of great benefit to the projects contributing to these programs and many others in the Sacramento Valley and NCWA strongly supports its approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd N. Manley". The signature is fluid and cursive, with a prominent initial "T" and "M".

Todd N. Manley
Director of Government Relations