

Table of Recommendations

The table below lists the eight categories of recommendations, detailed actions for each category, and involved agencies or authorities. Agencies with the primary responsibility for implementation are listed in the table. Other interests may also need to be engaged to collaborate on implementation.

Abbreviations: CDFW = California Department of Fish and Wildlife, CNRA = California Natural Resources Agency, Water Boards = State Water Resources Control Board and Regional Water Quality Control Boards, Flood Board = Central Valley Flood Protection Board, Army Corps = U.S. Army Corps of Engineers, DSC = Delta Stewardship Council, DPC=Delta Protection Commission, DCC = Delta Counties Coalition, BCDC = San Francisco Bay Conservation and Development Commission.

Recommendations	Agency/Authority									
	Legislative	CDFW	Water Boards	CNRA	Flood Board	Army Corps	DSC	DPC	DCC	BCDC
1. INCONSISTENT USE AND IMPLEMENTATION OF RESTORATION-SPECIFIC PERMITTING TOOLS										
1.1 Agency leaders actively implement the Secretarial Memo on Institutionalizing Cutting Green Tape Improvements and guide and support staff in the consistent and effective use of restoration-specific permitting tools (e.g., RMP, SRGO, etc.), including for mitigation projects.		X	X	X	X					X
1.2 State leadership prioritize and secure funding for dedicated restoration permitting staff to meet state species recovery and habitat restoration goals.	X			X						
1.3 State agencies develop an agency-wide training program for regional managers and staff at state agencies to support comprehensive and consistent implementation of restoration-specific permitting tools.		X	X		X					X
1.4 All regulatory agency leaders implement an expedited internal decision-making process that enables regional staff to quickly resolve questions and policy issues and avoid permitting delays.		X	X		X		X			X
1.5 San Francisco Bay Restoration Authority in collaboration with BRRIT agencies establish expedited timelines and maximize consistent and effective use of efficient restoration permitting tools for BRRIT-reviewed projects.		X	X			X				X

2. NOT ALL AGENCIES HAVE ADEQUATE RESTORATION-SPECIFIC PATHWAYS										
2.1 Flood Board complete its work with project proponents to update its regulations and processes for restoration projects, consistent with other agencies' efficient restoration permitting pathways. Flood Board provide clear guidance materials to improve understanding and implementation of new regulations and processes.					X	X				
2.2 Flood Board explore delegating the Corps' Section 408 authority to itself for restoration projects seeking an encroachment permit and the additional staff capacity needed to handle delegated authorities.				X	X	X				
2.3 Agencies developing or renewing restoration permitting pathways establish consistent, expedited approval timelines and sufficient staffing to meet expedited timelines.	X				X					X
2.4 BCDC develop an efficient permitting process that covers large-scale restoration projects, consistent with other agencies' restoration permitting authorizations.										X
3. ADDRESSING UNIQUE SPECIES-RELATED PERMITTING CHALLENGES IN THE DELTA										
3.1 CNRA, in collaboration with DSC and Delta Conservancy, convene agencies to resolve conflicts to enable restoration in the Delta, while also protecting special-status species, supporting climate resilience, and maintaining viable agriculture. (The Delta Plan Interagency Implementation Committee Restoration Subcommittee could be a potential existing forum for these convenings.)		X	X	X	X	X	X	X	X	

<i>The effort should identify specific actions to address habitat conversion, mitigation, work windows, monitoring, and other species-related challenges and provide guidance on geographic priority areas for restoration in the Delta. Swainson's hawk and garter snake are priority species to discuss. Include input from CDFW, USFWS, the California Air Resources Board, California Tribes, and local interests (e.g., Delta Protection Commission, Delta Conservancy, Delta Counties Coalition, Delta Stewardship Council, California Department of Water Resources). This planning effort should consider neighboring Habitat Conservation Plans/Natural Community Conservation Plans (HCPs/NCCPs) in San Joaquin, Sacramento, Yolo, Solano, and Contra Costa Counties, and Nature-Based Solutions Climate Targets for the Delta. This effort should include specific actions to address species conflicts and provide guidance on geographic priority areas. CNRA should explore whether this planning effort could be advanced through the development of a Regional Conservation Investment Strategy (RCIS) for DWR's Delta Levees Program.</i>									
4. CHALLENGES FOR PERMITTING AND IMPLEMENTING MITIGATION PROJECTS									
4.1 Agency leaders actively implement the Secretarial Memo on Institutionalizing Cutting Green Tape Improvements and guide and support staff in the consistent and effective use of restoration-specific permitting tools (e.g., RMP, SRGO, etc.), including for mitigation projects. (This recommendation is the same as Recommendation 1.1 under <i>Inconsistent Use and Implementation of Restoration-Specific Permitting Tools</i>)		X	X	X	X				X
4.2 CNRA and CalEPA facilitate state and federal agency coordination to expedite creation of advance mitigation to meet restoration needs in the Delta, either through existing interagency forums or through creation of a new forum.		X	X	X	X	X			

<i>(Existing forums include the Banking Agency Management Team, Project Delivery Team, Interagency Review Teams, and other advance mitigation working groups.)</i>									
4.3 CDFW leadership establish a process for early coordination between Cutting Green Tape and DWR's Delta Levees Special Projects Program staff on the use of efficient permitting tools and to ensure consistent project requirements.		X							
4.4 The California Legislature, Administration, and agency leadership advance alternative funding for Delta levee maintenance and rehabilitation that aligns regulatory requirements with Cutting Green Tape tools and incentivizes nature-based solutions.	X	X		X					
5. HIGH COSTS OF PROJECT IMPLEMENTATION, MONITORING, AND LACK OF SUFFICIENT FUNDING									
5.1 Agency leadership, California Governor, and State Legislature establish stable funding for Delta restoration through the general fund, Greenhouse Gas Reduction Fund, or other sources sufficient to meet the Delta Plan restoration targets.	X						X	X	
5.2 Agencies develop and fund a long-term monitoring program to evaluate Delta health using alternative funding sources, such as a mitigation fund from development activities.		X		X			X	X	X
5.3 CNRA, in coordination with DWR and other Delta agencies, develop a strategy to leverage public funding with private funding for the long-term management and maintenance of restoration sites, including through carbon markets.				X			X	X	X

6. COORDINATION WITH LOCAL INTERESTS AND LAND USE PLANNING										
6.1 Delta Protection Commission update their plan (LURMP) to address climate change adaptation and restoration needs and reduce conflicts that can occur with their land use mandate.								X		
6.2 CDFA facilitate a forum in coordination with Delta agencies and local and agricultural interests to advance agricultural practices that can adapt to climate change and land subsidence (e.g., paludiculture, rice farming, etc.).							X	X	X	
6.3 Local agencies recognize 'carbon farming' as an agricultural land use in future general plan updates.									X	
7. CONDUCT EARLY, OFTEN, AND MEANINGFUL TRIBAL ENGAGEMENT AND CONSULTATION										
7.1 Agency leadership actively implement the Secretarial Memo on Institutionalizing Cutting Green Tape Improvements related to upholding early, often, and meaningful Tribal consultation as outlined in the CNRA Tribal Consultation Policy and the CalEPA Tribal Consultation Policy .	X	X	X	X	X		X			X
8. ANTICIPATED DIFFICULTIES FINDING A FEDERAL NEXUS FOR SECTION 7 OF THE ENDANGERED SPECIES ACT (ESA) COMPLIANCE										
8.1 State funding programs include guidance to project proponents on additional federal nexus options for Section 7 consultation (e.g., federal funding, federal involvement, etc.).		X	X	X						