

BRRIT

SAN FRANCISCO BAY COORDINATED PERMITTING APPROACH

Policy and Management Committee

Permit and Policy Improvement List Updated July 2025

The Policy and Management Committee (PMC) is part of the coordinated permitting approach agreement, which includes the Bay Restoration Regulatory Integration Team (BRRIT), and whose responsibilities are described in an interagency memorandum of understanding. The PMC is tasked with creating a system to identify and resolve policy issues and conflicts, and to identify a process for elevating issues that require agency policy shifts.

Prioritization will be based on the following criteria:

- **Benefit to review process and overall program:** impact upon the decision-making timeline.
- **Frequency of the issue:** it is a policy issue that comes up over and over.
- **Benefits to regional restoration goals:** Does it result in projects getting in the ground faster and more efficiently?
- **Capacity of BRRIT and PMC:** can be accomplished in the next 3-4 years with projected resources and staffing.

The permit and policy improvement list describes the status of priority issues with a commitment to make progress on and implement at least one initiative annually.

1. Issues that are **being addressed** during the current calendar year (initiatives currently underway, with an anticipated completion date in 2025).
2. Issues that **will be addressed** in the next one to three years (initiatives currently under way, with an anticipated completion date that may extend beyond 2026)
3. Issues and initiatives that **require further development** (no identified initiatives under way, or initial work has begun, but will not be completed until after 2026)
4. **Accomplished**, indicates issues that have been resolved.

The list will be revised annually for items and prioritization. New items will be considered as identified by the PMC, or brought to the PMC by the BRRIT or stakeholders.

POLICY ISSUE: Improving Coordination with Non-Agency Entities	
Date initiated: 2024	Priority: 2025
Agency and/or Legislative Fix? Agency fix	
POC: Keith Lichten, Water Board	Status: Being Addressed
Why is this an issue? Utilities, flood control districts, railroads, and other entities with easements can increase the complexity of project design, and coordination with them may result in delays to project authorization and construction. There is an opportunity to improve the timing and quality of communication to facilitate restoration project design and construction.	
Initiatives: BRRIT member agencies could develop procedures for more efficient and coordinated outreach to benefit permitting process. In the coming year, the BRRIT and PMC will work with PG&E to improve coordination and clarify the specifics of PG&E's engagement on projects. This could be, for example, by identifying a role for them in the pre-application process for affected projects.	
Update 2024 PMC and PG&E representatives identified a lead PG&E contact and the BRRIT is facilitating his coordination of and participation in restoration project design, authorization, and implementation. On the Tiscornia Marsh Restoration and Sea Level Rise Adaptation Project, BRRIT members organized a meeting with PG&E and the applicant to successfully resolve a complicated issue related to proposed levee lowering, which would impact PG&E's ability to access its towers for maintenance.	
Further discussion needed? In the coming year, the BRRIT and PMC will work with PG&E to improve coordination and clarify the specifics of PG&E's engagement on projects. This could be, for example, by identifying a role for them in the pre-application process for affected projects. Identify additional entities, such as flood control districts, where there would be mutual benefit from coordinated outreach and engagement, and collaborate to identify a framework for engagement.	

POLICY ISSUE: Fill for Habitat	
Date initiated: 2022	Priority: 2026
Agency and/or Legislative Fix? Agency fix	
POC: Sahrye Cohen, EPA	Status: Will be addressed
Why is this an issue? Nature-based adaptation measures, such as ecotone levees, horizontal levees, habitat transition zones and artificial oyster reefs, can result in the placement of fill material in aquatic habitat. The placement of fill material may be in conflict with core regulatory language requiring minimal fill. Project proposals may require additional site-specific information to analyze aquatic resource impacts and policy and guidance changes to permit projects with substantial amounts of fill. Identified issues include: • Site-specific information/data needs • Applicability of regional and landscape scale information to specific site designs • Assessing practicability of marsh migration space/fill placement on inboard levee • Monitoring requirements • Whether compensatory mitigation is required • Applicability of artificial reef design and permitting requirements to Bay projects. • Application of the Aquatic Resource Type Conversion Evaluation Framework v.2 to fill for habitat and nature-based solution projects • Risk and uncertainty with adaptation outcomes	
Initiatives: The PMC/BRRIT nature-based solutions subcommittee meets regularly (approximately every 2 months) to discuss resources, identified issues, and complimentary initiatives specific to fill for habitat and nature-based solutions with an emphasis on ecotone and horizontal levees. In 2025 CDFW began development of the California Artificial Reef Program (CARP), expected to be completed by the end of 2026. Continued engagement from CDFW Marine Region will be needed to determine how the guidance in the CARP may impact Bay project permitting.	
Update 2024: In October 2024, EPA and USACE hosted a joint Clean Water Act Regulatory Analysis for Multi-benefit projects workshop for federal CWA staff and managers. This workshop provided technical and regulatory resources, case studies, and discussion on CWA 404 issues and requirements for fill for habitat projects. Additional information needs identified were limited initial site-specific data, level of data needed for affects analysis, beneficial outcomes for ecological resiliency; risk/uncertainty with adaptation outcomes, public access, flood risk. EPA presented an overview of the Aquatic Resource Type Conversion Framework to BCDC on June 9, 2025, and will present and in-depth training September 2025. BCDC is assessing using	

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Date initiated: 2022	Priority: 2026
Agency and/or Legislative Fix? Agency fix	
POC: Sahrye Cohen, EPA	Status: Will be addressed
the Aquatic Resource Type Conversion Framework in regulations as part of a larger amendment of BCDC's regulations. The NBS subcommittee reviewed the Regulatory Pathways for Nature Based Solutions White Paper https://www.sfestuary.org/regulatory-pathways-for-nbs/ and identified items in the draft conceptual workplan that are in alignment with PMC/BRRIT initiatives and will be included in PPIL issues. On June 12, 2024, the Water Board approved the proposed (non-regulatory) <u>Basin Plan Amendment on Climate Change and Aquatic Habitat Protection, Management, and Restoration</u>. The State Water Board approved the amendment on Dec. 18, 2024. The amendment includes language on adapting to rising tides, including referencing the Wetlands Regional Monitoring Program and Adaptation Atlas, and identifying instances where the discharge of fill to waters may be needed and even desirable to adapt to rising tides.	
Updates 2023: EPA met with the Corps to discuss how fill impacts are evaluated under Clean Water Act Section 404. The Water Board adopted a non-regulatory Basin Plan Amendment on Climate Change and Aquatic Habitat Protection, Management, and Restoration to incorporate climate change information in its Basin Plan and provide information on how the Water Board permits dredge or fill activities associated with climate adaptation projects. Artificial Reefs. Representatives of CDFW's Marine Region joined the PMC to work collaboratively with the State Coastal Conservancy, Water Board, and BCDC to identify interim measures to avoid permitting delays until a Statewide Plan is developed. Fill for habitat workgroup meeting to discuss how fill impacts are evaluated for ecotone and horizontal levees.	
Updates 2022: Agency representatives identified for workgroup to discuss how similar impacts can be evaluated under federal regulations.	
Accomplished 2019: BCDC's San Francisco Bay Plan was amended to allow greater amounts of fill for habitat restoration and pilot projects.	

POLICY ISSUE: Fully Protected Species	
Date initiated: 2021	Priority: 2025
Agency and/or Legislative fix? Agency fix and Legislative fix	
POC: Craig Weightman, CDFW	Status: Being addressed
Why is this an issue? For restoration projects CDFW can issue permits to take FPS under a Natural Community Conservation Plan (NCCP), for necessary scientific research, or via development of an internal MOU. CDFW is unable to issue permits to take or possess a fully protected species (FPS) as part of specified mitigation for a project, as defined in Section 21065 of the Public Resources Code. • permitting pathways are unclear for restoration projects when FPS are involved. This is a common complaint amongst the restoration community. • restoration projects may have long- term benefits to special-status species, but project construction and establishment can have the potential to result in significant short-term impacts and under the State Fish and Game Code CDFW may be slow or unable to issue permits for take of FPS.	
Initiatives: • BRRIT assisting applicants by advising avoidance of FPS with conservation measures or in instances where that would not be cost effective or timeline feasible, by identifying mechanisms that CDFW uses to issue permits to take FPS (i.e., a NCCP or MOU). • CDFW will work with restoration projects to ensure recovery efforts for fully protected species are included in the restoration project. • Legislative fixes are being explored outside of BRRIT and PMC to create a more time-effective permitting pathways with more certainty under certain circumstances for restoration projects.	
Updates 2024: Governor Newsom signed the Restoration Management Permit Act (Assembly Bill (AB) 1581) on September 27, 2024, adding <u>Chapter 6.7</u> to the California Fish and Game Code. The Restoration Management Permit can provide fully protected species permitting for a qualifying restoration project that has the primary purpose of restoring native fish, wildlife, plants, or their habitat and that would result in a substantial net benefit to native fish, native wildlife, native plants and the habitat of native fish, native wildlife, or native plants. Importantly, a qualifying restoration project may also have secondary or incidental benefits, including, but not limited to, flood risk reduction, recreation, or groundwater recharge.	
Updates 2023: Under the State of California’s Cutting the Green Tape Initiative to increase the pace and scale of environmental restoration, CDFW has developed several restoration permitting tools under CDFW’s Cutting the Green Tape Program. Such tools include a Restoration Management Permit (RMP) that consolidates “take” authorizations for restoration projects under a single streamlined permit. The RMP can authorize take of CESA-listed as well as state fully protected species. In addition, SB-147 was approved and filed with the State on July 10, 2023, as part of the governor’s California Infrastructure Trailer Bill package. SB-147 authorizes CDFW to issue a	

POLICY ISSUE: Fully Protected Species	
Date initiated: 2021	Priority: 2025
Agency and/or Legislative fix? Agency fix and Legislative fix	
permit under CESA to authorize take of fully protected species for certain types of infrastructure projects with mitigation. Note that the list of project types included in the trailer bill does not include restoration projects. Peggy McNutt to initiate legislative fix. Peggy M. will remain engaged with the PMC to request additional information as needed or to provide updates.	
Updates 2021: Work with restoration projects to ensure recovery efforts for fully protected species are included in the restoration project.	
Further discussion needed? The PMC and EPA will follow up with Resources Legacy Fund to determine the status of their legislative efforts.	

POLICY ISSUE: Develop Guidance for Project Applicants	
Date initiated: 2021	Priority: 2023, ongoing
Agency and/or Legislative Fix? Agency fix	
POC: Jana Affonso, USFWS	Status: Being addressed
Why is this an issue? Restoration projects often have similar issues and, while knowledge may reside in particular project proponents or consultants, many applicants tend to become confused by the numerous information, data, and mapping requirements of federal and state regulatory and wildlife agencies. This issue can result in time-consuming delays.	
Initiatives: There is an opportunity to facilitate project development and permitting by providing FAQs and other guidance, such as typically approved management practices and conservation measures.	
Updates 2024: - NMFS developed and shared a template for information needed for a project to qualify for an expedited letter of concurrence (ELOC) - Has been utilizing condensed biological opinions for qualifying consultations - Is working on additional tools to support project applicants - Updated resources and tools on the BRRIT website for applicants to have access to Nature-Based Solutions Resources - Added guidance on how to submit a complete resume approval request to USFWS or CDFW (resources and tools page) - BCDC's mission-based review was completed. BCDC redesigned their website and rewrote permit application guidance in plain language for it to be easier to understand by the public. Additionally, pages providing guidance on difficult policies are in development, including policies such as public access, climate change, and community engagement.	
Updates 2023: - BCDC Permitting for a Resilient Shoreline. BCDC is working to make improvements to its regulatory program as part of its overall efforts to implement the Bay Adapt Joint Platform. <u>Action 7</u> of the Joint Platform called for refining and accelerating regulatory approvals for resilient shoreline adaptation projects that align with regional goals. The effort includes work to make BCDC permitting faster and more efficient, make the BCDC regulatory program easier to navigate, accelerate effective nature-based adaptation, work together with regulatory partners, and consider the role of BCDC's regulatory program in achieving desired adaptation outcomes. This effort is funded by a grant from the State Coastal Conservancy. - BCDC is also receiving assistance to improve its regulatory program from the CA Department of Finance, through its Mission-Based Review (MBR) process. The goal of	

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Date initiated: 2021	Priority: 2023, ongoing
Agency and/or Legislative Fix? Agency fix	
MBRs is to improve governmental programs through: analyzing the key requirements that drive the program’s core mission; prioritizing limited resources to get the biggest return on investment; streamlining or eliminating functions within the program(s) that are not needed to support the core mission; and analyzing regional approaches to program delivery to eliminate or minimize disparities in staffing, standards, and levels of service. This will be an approximately 6-month process, which started in mid-2023.	
Updates 2022: • More items were added under the Resources and Tools tab on the BRRIT website, including the “Permit application checklist”, “Helpful Links”, and a link to “Box” website for delivering large files to the BRRIT. Some examples of “Helpful Links” include links to regulatory overview websites for each agency, streamlined permitting tools, relevant recovery plans, sea level rise guidance, and the WRMP. • NMFS is developing a checklist for expedited informal consultation that will be available for regional use in SF Bay Area.	
Accomplished 2021: • Created resources and tools for applicants that could include a recommended checklist of items and information needed for a complete application. • Provided a link to the USFWS’s Environmental Conservation Online System (ECOS) to view example Biological Opinions or to construct a Biological Assessment through the Consultation Package Builder. General avoidance and minimization measures can be obtained through these example BiOps. • Reorganized BRRIT website to provide more clarity on the permitting process and how the BRRIT can help. The website now includes tabs for BRRIT Process, BRRIT Projects, BRRIT Eligibility, Resources and Tools, Policy and Management Committee, and FAQs. • Added, under the BRRIT Process tab, a flow chart explaining the pre-application process.	
Further discussion needed? • Guidance documents can be shared publicly as they are available.	

POLICY ISSUE: Short-term impacts of wetland restoration activities vs. long-term benefits of the overall wetland restoration	
Date initiated: 2023	Priority: 2023-2026
Agency or Legislative Fix: Agency fix	
POC: EPA, Sahrye Cohen	Status: Being addressed
Why is this an issue? Agencies necessarily and appropriately require careful analysis and disclosure of construction impacts and even short-term habitat losses that must be weighed against the magnitude, timing, and certainty of long-term benefits. Arguably, however, it is inefficient to treat the short-term impacts from implementing a voluntary restoration project in the same way as a project that would not bring the same significant long-term benefits. This is particularly true for noise- and other short-term disturbance effects (less so for actual habitat changes like excavating a channel through the marsh to connect the slough with a pond interior). This issue has substantial overlap with Fill for Habitat and Nature Based Solutions issue.	
Initiatives: • The USFWS and NMFS’s guidance is to incorporate measures into project descriptions to avoid and minimize short-term impacts as much as possible while recognizing the value of long-term benefits and encouraging proven, demonstrated restoration methods that benefit listed species. • EPA Region 9 developed training materials for multi-benefit restoration projects that provide Clean Water Act 404 specific technical and regulatory resources, regulatory analogues (e.g. USACE Regulatory Guidance letter 18-01), and case studies on fill for habitat and nature-based solutions.	
Update 2024: In October 2024, EPA and USACE hosted a joint Clean Water Act Regulatory Analysis for Multi-benefit projects workshop for federal CWA staff and managers. This workshop provided technical and regulatory resources, case studies, and discussion on CWA 404 issues and requirements for project. Additional information needs identified were limited initial site-specific data, level of data needed for affects analysis, beneficial outcomes for ecological resiliency; risk/uncertainty with adaptation outcomes, public access, flood risk.	
Updates 2021 thru 2023: The USFWS and NMFS worked with applicants in pre-application meetings to front-load avoidance and minimization measures into project descriptions and subsequently incorporated the benefits of restoration into Section 7 consultation documents.	
Further discussion needed?	

POLICY ISSUE: Monitoring	
Date initiated: 2020	Priority: 2026
Agency and/or Legislative Fix? Agency fix	
POC: Keith Lichten, Water Board	Status: Will be addressed
Why is this an issue? Monitoring requirements can be a significant project cost and associated funding can be difficult to obtain, as some grants may not fund or may limit expenditures for monitoring. Regionally relevant monitoring that advances tidal wetland restoration does not fully address site-specific monitoring needs, which can increase the overall monitoring burden for applicants. Scientifically robust and meaningful monitoring is expensive and may be deprioritized when compared to the project proponent's primary goal of enhancing habitat conditions. Monitoring costs are an expense for multi-benefit restoration projects and nature-based solutions that traditional grey infrastructure projects do not have to bear. • Monitoring is challenging to fund, and therefore project proponents can support limiting mandated monitoring requirements to the minimum required for the regulatory agencies to ascertain their regulations are being followed. • Project proponents are typically unable to sustain significant monitoring programs on their own. • Individual projects are not necessarily well positioned to answer broader landscape-scale questions, such as those about specific species and habitats. Those broader questions are better considered through a regional monitoring program or similar arrangement. • Uncertainty associated with climate change and sediment availability exacerbates the challenges of evaluating project success, and site-specific monitoring can be at too small a scale to capture this issue. • This is a Sand in the Gears issue.	
Initiatives: • The Wetlands Regional Monitoring Project (WRMP) will develop a regional-scale monitoring program to evaluate wetland restoration project success and inform science-based decision-making. NMFS is working collaboratively to advance the fish monitoring component of this program. https://www.wrmp.org/ • Adding additional supportive materials to the BRRIT monitoring page that identify common monitoring expectations and provide examples to help project proponents with planning and expectations (e.g., typical revegetation monitoring, maintenance and reporting needs; monitoring that should be included in pilot living shoreline projects).	
Updates 2023: The WRMP FFH Workgroup finished the draft monitoring recommendations and SOPs. The WRMP approved the Site Monitoring Network. Agencies discussed the general information needed from applicants in order to determine if permits are needed for installation of monitoring equipment on a case-by-case basis.	

POLICY ISSUE: Monitoring	
Date initiated: 2020	Priority: 2026
Agency and/or Legislative Fix? Agency fix	
Updates 2022: UC Davis, NMFS, and the Water Board launched the WRMP Fish and Fish Habitat Workgroups (FFH) Workgroup in 2021 to develop fish and fish habitat monitoring recommendations and standard operating procedures (SOPs) for wetlands in the greater SF Bay region. The FFH includes participation from multiple agencies and stakeholders and anticipates completion of initial Draft Recommendations in spring of 2022.	
Updates 2021: SFEP continued to develop an implementation plan that describes funding and governance structure, and a data management plan. SFEP hosted two agency-focused workshops to introduce the WRMP to regional, state, and federal agencies. Additional workshops in 2021 included the restoration practitioner and planning communities.	
Updates 2020 and prior: The San Francisco Estuary Partnership developed a tidal wetland regional monitoring plan for the Bay Area that will help local, regional, state, and federal authorities evaluate the effectiveness of efforts to sustain healthy aquatic habitats and resources. Using an EPA grant and stakeholder input, the plan was completed in April 2020.	
Further discussion needed?	

POLICY ISSUE:	
Siting Public access within multi-benefit habitat restoration projects	
Date initiated: 2023	Priority: 2026
Agency and/or Legislative Fix: Agency fix	
POC: Julie Garren, BCDC	Status: Will be addressed
Why is this an issue? BCDC is the only regulatory resource agency that includes public access requirements in its permits. Other agencies may require minimization of public access to protect habitat value. These potentially conflicting mandates create uncertainty for project applicants in designing a permissible restoration project and can result in project design delays.	
Initiatives: Reduce friction with applicants and agencies over the placement of public access improvements by creating guidelines or best management practices for BCDC to use to minimize impacts to species and habitat.	
Update 2024: BCDC published a new page on their website providing guidance on incorporating public access into projects that is written in plain language to support applicants in developing public access improvements in their projects. Additional pages on meaningful community engagement and environmental justice are in development. BCDC is reaching out to discuss the issue with each agency to determine guiderails around how best to minimize impacts caused by public access.	
Update 2023: The BRRIT has been successfully working among the member agencies and with applicants to reduce potential impacts from public access through appropriate siting, design, and management of public access areas and improvements. Examples include siting trails in appropriate areas to minimize wildlife impacts, using appropriate signage, implementing seasonal trail closures near sensitive areas, using “screening” vegetation to limit noise and visual impacts, and measures to avoid or minimize addition of predator perches when new structures are proposed. Example projects for which these measures will be used (all of which are currently in application or pre-application phase as of 8/9/2023) include: Greenwood Gravel Beach, Tiscornia Marsh Restoration and Sea Level Rise Adaptation Project, Palo Alto Horizontal Levee Pilot Project, and Pacheco Marsh Public Access Improvements Project.	
Further discussion needed?	

POLICY ISSUE: Upland Alternatives to Fill for Habitat	
Date initiated: 2023	Priority: 2026
Agency and/or Legislative Fix: Agency fix	
POC: Keith Lichten, Water Board	Status: Will be developed
Why is this an issue? Do we always have to fill the Bay to create habitat? What are the instances when we want to consider Bay-adjacent uplands as part of that equation, and how? Both federal and state regulations require consideration of upland fill before consideration of bay fill.	
Initiatives: Improve coordination with the Corps/EPA/Water Board on alternatives for 404(b)(1) analysis.	
Update 2024 BCDC has incorporated into its Regional Shoreline Adaptation Planning (RSAP) process goals that include ecosystem health and resilience. The RSAP process recognizes the need to and benefit of protecting, restoring, and enhancing Baylands ecosystems, and prioritizing nature-based solutions where possible. The Water Board, Corps, U.S. EPA, and BCDC expect to coordinate going forward as part of BCDC's RSAP process to ensure that entities developing shoreline adaptation plans are aware of the ecosystem health and resilience goal and the allied expectations as part of Clean Water Act Section 404(b)(1) alternatives analyses and similar expectations under California law and regulation, and are thus able to incorporate those expectations into their climate change planning.	

POLICY ISSUE: General Programmatic Efforts	
Date initiated: 2023	Priority: 2023, ongoing
Agency and/or Legislative Fix? Agency fix	
POC: Jana Affonso, USFWS	Status: Partially accomplished
Why is this an issue? Programmatic approaches to permitting can enable a shorter permitting timeline for certain types of actions, but must be weighed against the time and effort to initially establish the programmatic approach	
Initiatives/Potential Initiatives: • Potential utilization/adoption of State of Washington’s guidelines for pile removal • NMFS and USFWS Programmatic Biological Opinions for restoration projects • Potential RGP for living shoreline projects. • Potential RWP for restoration projects	
Updates 2024 NMFS is working with the NOAA Restoration Center on an update to the Restoration Programmatic Biological Opinion to include San Francisco Bay. NMFS is continuing to work on a programmatic permit for the restoration program. The USFWS Restoration PBO was updated to include additional species, including longfin smelt which occurs in the SF Bay Governor Newsom signed the Restoration Management Permit Act (Assembly Bill (AB) 1581) on September 27, 2024, adding Chapter 6.7 to the Fish and Game Code. AB 1581 consolidates five of the most common CDFW authorizations typically needed for restoration projects into the RMP, which is a single, streamlined permit.	
Updates 2023: Identify projects that are on the BRRIT list and also part of larger statewide efforts (USFWS Restoration PBO, SRGO, CDFW Cutting the Green Tape’s Restoration Management Permit, etc). Evaluate how those state-wide initiatives interact with the BRRIT process in general. NMFS initiated a restoration programmatic permit for SF Bay.	
Accomplished 2022: The USFWS’ Programmatic Biological and Conference Opinion on the California Statewide Programmatic Restoration Effort (Restoration PBO) was completed. State Water Board State-Wide Restoration General Order (SRGO; August 2022)	
Further discussion needed?	

POLICY ISSUE: Lack of collaborative decision-making among agencies	
Date initiated:	Priority: 2023
Agency and/or Legislative Fix: Agency fix	
POC: Luisa Valiela, EPA	Status: Being addressed
Why is this an issue? Applicants tend to find the permitting process for restoration projects extremely confusing when it appears agency requirements are redundant or mutually exclusive to each other. Examples raised: • differing risk tolerances occur between different agencies. • differing level of design needed to acquire a permit. • additional requirements beyond those required by the agency that is primarily responsible for a specific resource. • The Sand in the Gears document touches on this at items 6, 7, and 8.	
Initiatives: BRRIT outreach; information gathering through surveys to applicants; BRRIT internal coordination; using PMC elevation process	
Update 2023: • BRRIT and SFBRA are increasing the frequency of reminders to applicants to complete these surveys and reassessing and updating survey questions to better understand how the BRRIT can help applicants through the permitting process. SFBRA will start obtaining individual feedback from applicants • BRRIT coordination and early feedback on public access and wildlife concerns: Greenwood Gravel Beach, Tiscornia Marsh Restoration and Sea Level Rise Adaptation Project, Palo Alto Horizontal Levee Pilot Project, Lower Walnut Creek Restoration - North Reach Public Access Improvements	
Updates 2020 and 2021: BRRIT outreach; satisfaction surveys; pre-application satisfaction surveys	
Further discussion needed?	

POLICY ISSUE:	
Protecting Single Species in the Context of Larger, Holistic Restoration Goals	
Date initiated: Not yet initiated	Priority: Not yet prioritized
Agency and/or Legislative Fix: Agency fix	
POC: Jana Affonso, USFWS	Status: Will be developed
Why is this an issue? Legal requirements for a single protected species can preclude actions that are deemed beneficial to the larger system by all other agencies. Examples: • Snowy Plover habitat needs can preclude tidal restoration in certain areas, and concerns over fish entrapment can prevent certain types and locations of habitat connectivity. • In an urban estuary, multi-objective projects intended to achieve a balance between a range of habitat improvements for individual special-status species and a wide range of general habitat enhancements over a broad area may require some trade-offs.	
Initiatives:	
Further discussion needed?	

POLICY ISSUE: Wetland Habitat Type Conversion	
Date initiated: 2020	Priority: 2021
Agency and/or Legislative Fix? Agency fix	
POC: Sahrye Cohen, EPA	Status: ACCOMPLISHED 2022
Why is this an issue? To accomplish regional wetland restoration goals, it is necessary to convert one type of wetland habitat to another. For example, currently diked baylands or seasonal wetlands may be converted to tidal baylands. • When wetland-to-wetland conversion occurs in the process of restoring a site, some permitting agencies require compensatory mitigation while other agencies do not. • There are inconsistent approaches as regulators analyze projects and make mitigation decisions. • Regulatory decisions need to be supported by robust technical frameworks to avoid additional project costs, lack of regulatory certainty, conflicting requirements, and project delays. See Fill for Habitat and Nature Based Solutions issue for additional initiatives and updates.	
Initiatives: A multi-agency project to develop a science-based framework for assessing habitat type conversion actions in the SF Bay Region. This framework supports consistent and transparent decision-making using landscape and site-specific information.	
Aquatic Resource Type Conversion Evaluation Framework v.2 finalized and published. http://ftp.sccwrp.org/pub/download/DOCUMENTS/TechnicalReports/1110_ConversionFramework.pdf	

TOPICS FOR FUTURE DISCUSSION
Outreach to tribal communities and environmental justice communities for BRRIT projects
Restoring Watershed to Bay Connection to Improve Sediment Supply to Baylands
Advanced Mitigation for Restoration Projects and Shoreline Planning