

# North Coast Salmon Project Survey: Assessing Specific Concerns and Opportunities in California Department of Fish and Wildlife Permitting and Grant Funding

California Department of Fish and Wildlife



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## List of Acronyms

CDFW – California Department of Fish and Wildlife  
CESA – California Endangered Species Act  
CGT- Cutting the Green Tape  
ESU – Evolutionarily Significant Unit  
FRGP – Fisheries Restoration Grant Program  
LSA – Lake and Streambed Alteration  
NCSP – North Coast Salmon Project  
NGO – Non-governmental Organization  
PACT – Priority Action Coho Team  
RLC – Restoration Leaders Committee  
RMP – Restoration Management Permit  
SHaRP - Salmonid Habitat Restoration Prioritization  
TWG – Technical Working Group  
USACE – United States Army Corps of Engineers

## Background and Survey Motivation

The North Coast Salmon Project (NCSP) is a California Department of Fish and Wildlife (CDFW) initiative that began in 2019 with the goal of accelerating Coho Salmon recovery by enhancing restoration efforts across the North Coast. The NCSP works closely with non-governmental organization (NGO) partners, specifically with an advisory team including the California Association of Resource Conservation Districts, California Trout, Salmonid Restoration Federation, The Nature Conservancy, and Trout Unlimited. Across the North Coast of California, four watersheds were selected in collaboration with this advisory team that cover both the Southern Oregon Northern California Coast and Central California Coast Evolutionarily Significant Units (ESUs) of Coho Salmon: Lagunitas Creek, the Russian River, the Mendocino Coast (Big-Navarro-Garcia watershed), and the South Fork Eel River. These watersheds were chosen as they are important populations of Coho Salmon that have experienced a diversity of threats, represent different environmental conditions, and have active restoration communities to partner with in ongoing efforts to recover these populations.

One of the objectives of the NCSP is to identify opportunities to improve specific aspects of permitting and granting processes to better support restoration or identify best practices that could be expanded. With this objective in mind the NCSP team designed a survey for stakeholders in the four NCSP focus watersheds. The results from this survey, coupled with recommendations regarding permitting and granting from the Priority Action Coho Team (PACT) 2019 Report, and the Restoration Leaders Committee (RLC), are intended to continue collaborative efforts within CDFW to improve and streamline permitting and granting as part of the broader Cutting the Green Tape (CGT) initiative.

## Survey Methods

The NCSP team developed this survey based on informal stakeholder input within the four focus watersheds, formal review, and current scientific literature regarding survey design. Conversations with stakeholders shaped early drafts of survey questions regarding limiting factors in permitting and granting, and potential remedies to those limiting factors. These early drafts were reviewed by CDFW staff and NGO partners on the NCSP advisory team.

In developing the survey, design principles for question type and format were informed by Menold and Bogner (2016). For Likert scale questions, five categories were offered from 1-5, either corresponding to Not at All Limiting

to Very Limiting, or Not at All Helpful to Very Helpful, depending on the question.

Likert scale data for figures four, five, seven, and eight are visualized in divergent stacked bar charts. Responses categorized as “moderate” for these questions are centered on zero on the x axis, and the length of colored bars for each rating represent the percent of respondents who selected that rating. This style of graph is useful because it can show differences between factors, and trends within a single factor. The overall placement of a bar can show whether an answer skews one way or the other and can be compared to other factors’ overall rating. The sizes of differently colored sections (which represent different answer selections) within a single bar can also draw attention to answers that are polarizing and score high on either end of the spectrum. These findings are not evident when represented in a simple 100% stacked bar chart.

The survey was developed and administered through Microsoft Forms (Forms). This platform collected responses online over a 30-day period and provided built in data summarization and visualization. The data summaries produced by Forms are presented here. QDA-Miner, thematic coding software, was used to analyze qualitative free form responses for questions 7 and 12. Thematic codes were developed by reading through all qualitative responses, defining a set of codes applicable to the text, and then applying different codes to words or phrases while reading through individual responses a second time. This practice is common in analyzing qualitative response data, particularly from interviews or surveys (Gibbs 2007).

The data collected from this survey are compared to recommendations made in the PACT report and from the RLC. PACT consisted of six Technical Working Groups (TWG), one of which focused on Enforcement, Permitting, and Regulations. The PACT recommendations, published in 2019 but crafted collaboratively several years prior, serve as a valuable point of comparison to the current sentiments of restoration professionals. The RLC was comprised of a smaller group of NGO leaders tasked with recommending ways for CDFW to promote species recovery and restoration through regulatory and permitting shifts. This group developed a list of 18 recommendations that overlap with topics discussed in this survey. These recommendations are also useful benchmarks by which to analyze what survey respondents believe to be important actions for CDFW moving forward.

## Results

### Description of Survey Respondents

A total of 49 respondents took part in the NCSP survey. NGO staff made up the greatest number of respondents followed by Resource Conservation District staff (Figure 1). Respondents who selected "Other" for organization included a federally recognized tribe, university staff, a water district, a private wine company, and a "non-profit". Respondents were distributed approximately evenly across the four watersheds listed and 22 respondents said they worked in watersheds other than the ones focused on by NCSP (Figure 2). It is important to note that respondents were able to select more than one watershed in which they performed restoration. The "Other" watersheds in which respondents performed restoration work were the Klamath and Smith rivers, and several Coho Salmon streams south of San Francisco Bay. While this survey was initially intended to focus on NCSP watersheds, during the open period several stakeholders that work outside of our focus area asked to respond to the survey. Their input is included here because permitting and granting issues often occur at a statewide scale.

● State Agency	4
● Federal Agency	2
● County or City Government	1
● Resource Conservation District	8
● Timber Company	1
● Land Trust	1
● Non-Governmental Organization	20
● Environmental Consulting or Engineering Firm	6
● Other	6

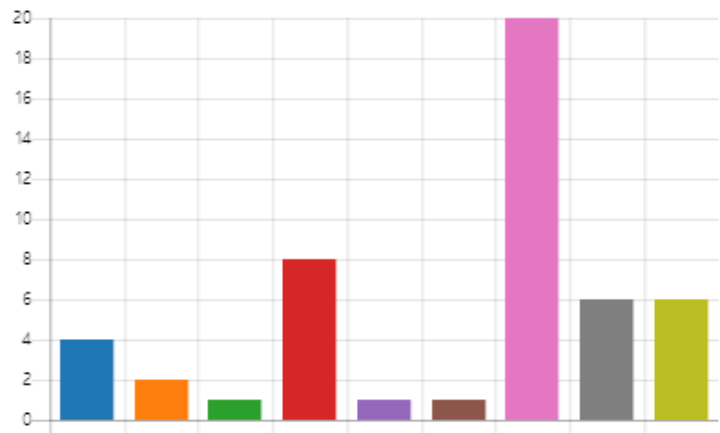


Figure 1. Numbers of respondents from each defined organization type.

● Eel River	16
● Mendocino Coast	13
● Russian River	18
● Lagunitas Creek	12
● Other	22



Figure 2. Numbers of respondents from each of the listed watersheds. Respondents could select more than one watershed.

Respondents work on a diverse set of restoration project types, and most work on multiple project types (Figure 3). A question regarding which of 13 project types (including “Other”) respondents worked on was included for two reasons. First, to see if our survey covered the appropriate breadth of project types, or if our respondents had a particular area of expertise in restoration. Second, the NCSPP team had hoped to parse out responses to see if certain issues were unique to restoration professionals who worked on a certain project type. Unfortunately, with all but one respondent reporting that they worked on more than one project type, and many respondents selecting multiple project types, filtering data to perform this type of analysis was not possible.

● Road Improvement or Decommission	30
● Fish Passage	39
● Outreach and Education	29
● Instream Habitat Restoration	42
● Off Channel Habitat Restoration	39
● Riparian Planting (Including bioengineering)	40
● Flow Enhancement (water conservation/forbearance)	26
● Water Quality and Flow Monitoring	25
● Biological Monitoring	33
● Land Acquisition or Conservation	14
● Wetland or Estuary Restoration	27
● Planning and Design (Standalone project)	27
● Other	6

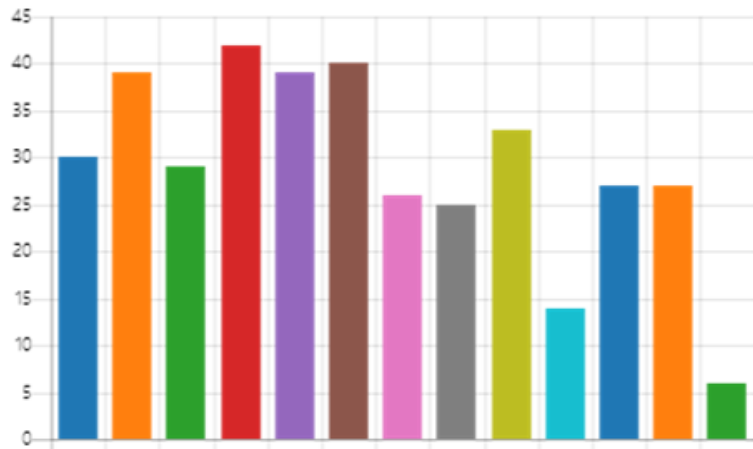
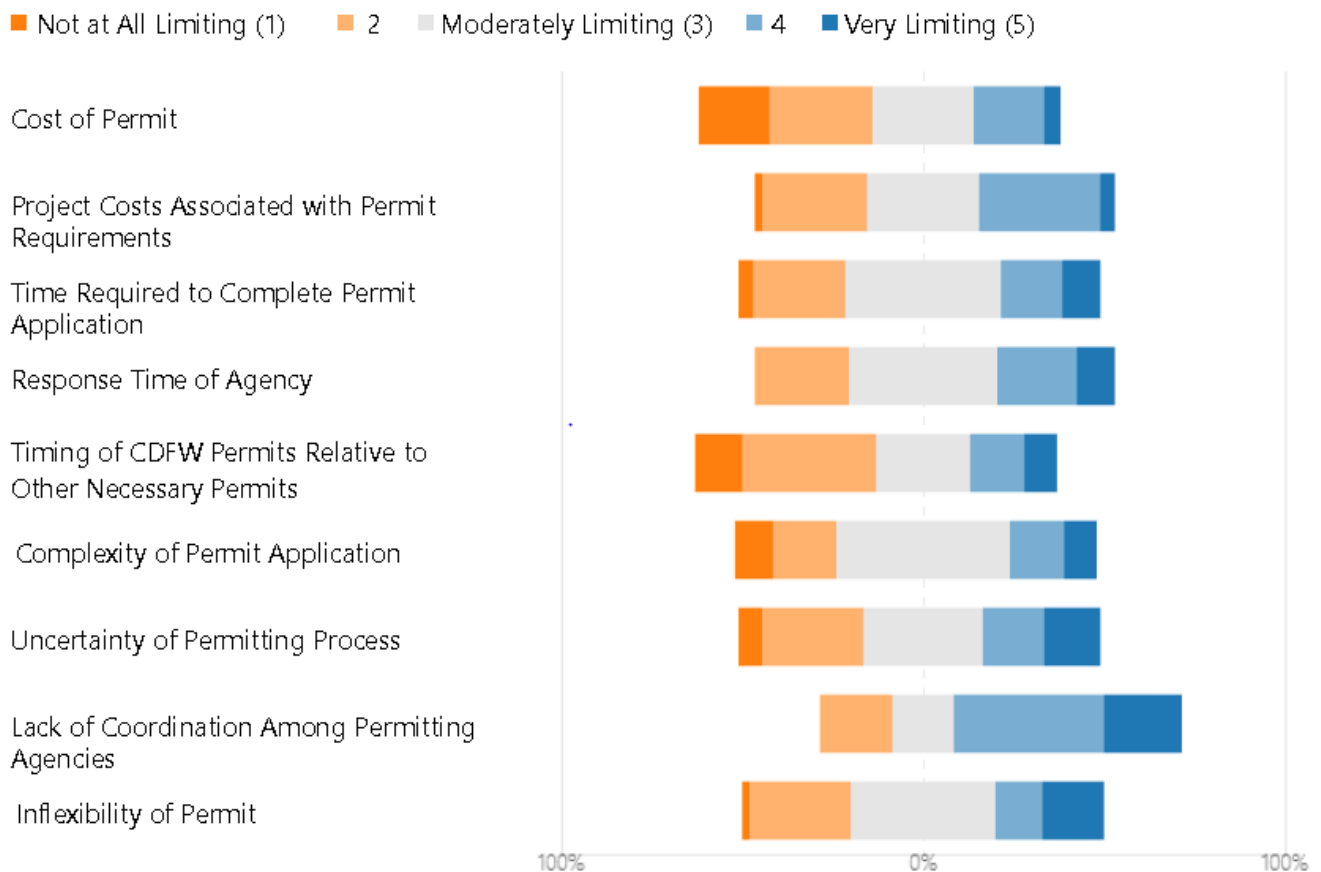


Figure 3. Numbers of respondents who reported working on each type of restoration project.

## Permitting Results

To make recommendations on how CDFW could streamline permitting, the NCSP team asked specifically which aspects of permitting were most limiting. Respondents noted that a lack of coordination among permitting agencies was the greatest limiting factor in their efforts to apply for and implement restoration projects, with 21.7% of respondents saying coordination was “very limiting”—a five on our Likert scale (Figure 4). After coordination, several factors were similarly limiting to respondents. Project cost associated with permit requirements ranked high as a limiting factor, with 33.3% of respondents rating it as a four on the five-point scale. Response time of agency and uncertainty of permitting process were also ranked fairly high, with each having 32.6% of respondents rate them as either a four or five on the Likert scale (Figure 4).



*Figure 4. Response data showing the degree of how limiting different factors are to permit restoration projects.*

After asking about aspects of permitting that limit restoration efforts, the survey presented options that could alleviate the issues respondents have with permitting. Two options were clearly favored by respondents: an



“Umbrella Permit” for multiple projects or a geographic area, and interagency collaboration, with 75% and 67% saying the respective actions would be very helpful (Figure 5).

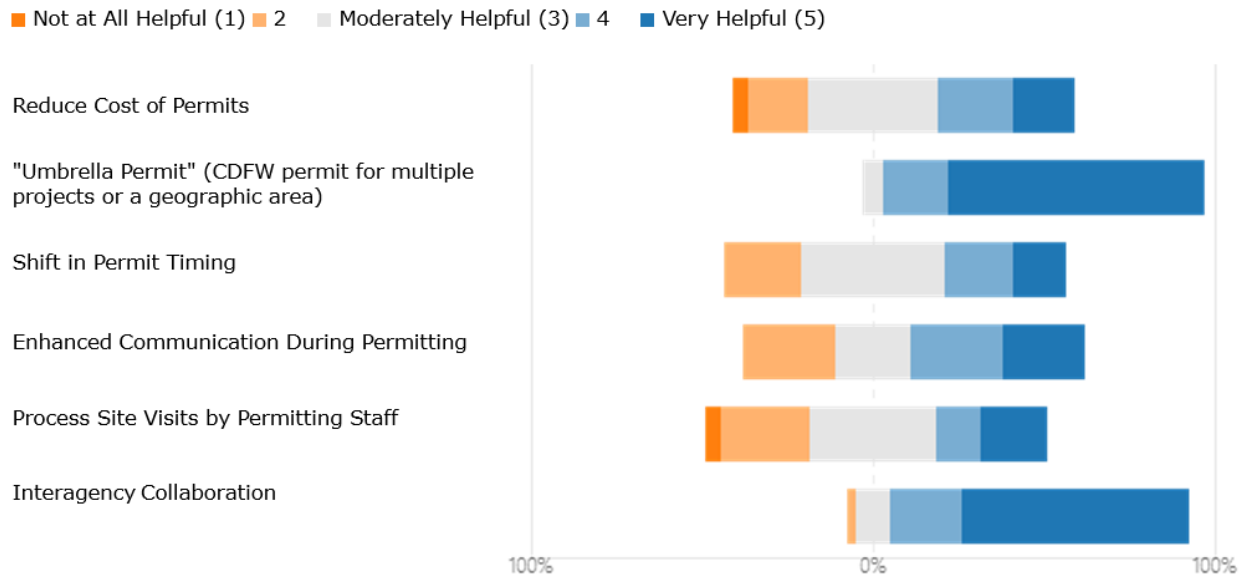


Figure 5. Responses to how helpful different changes in the permitting process would be in promoting restoration while ensuring projects were of high quality.

The qualitative free responses from question seven (see Appendix 1) highlight similar topics to the quantitative responses above. Of the 34 written comments, 29% mentioned collaboration (Table 1). The number of occurrences does not connote positive or negative associations with the thematic code but is a useful indicator of themes that respondents felt warranted further explanation. One respondent summed up the need for collaboration succinctly, “Interagency collaboration is huge and often is what sinks projects. If the permitting process were more cohesive between agencies, a lot could be accomplished”. This respondent also mentioned the need for better collaboration within agencies, and with external stakeholders in general. Another 24% of respondents brought up umbrella or programmatic permits. Several of these comments focused on the benefits of having Fisheries Restoration Grant Program (FRGP) programmatic permits, “programmatic permitting through CDFW is a crucial component to getting restoration work implemented on the ground quickly”.

Table 1. Thematic code, number of occurrences, and percentage for responses to free response question seven (See Appendix 1 for questions).

<b>Thematic Code</b>	<b>Percent of total responses (Occurrences)</b>
Collaboration	29% (10)
Communication	18% (6)
Time	18% (6)
Cost	15% (5)
Programmatic Permits	15% (5)
HREA Permits	12% (4)
Umbrella Permits	9% (3)
LSA Permits	6% (2)
Streamline	6% (2)
SCP	6% (2)

\*A total of 34 respondents answered this question

### Granting Results

This survey suggests that our respondents focus their efforts on three CDFW grant programs, and that the motivation behind grant selection is driven by a few factors. Respondents predominantly applied for grants from the following: Fisheries Restoration Grant Program, Proposition 1, and Proposition 68 (Table 2). Respondents strongly indicated that projects that the grant funds is the highest-ranking motivator in selecting which grant to apply for (Figure 6).

Table 2. Counts of number of respondents that apply for different CDFW administered grants.

Grant	Number of Respondents
Fisheries Restoration Grant Program (FRGP)	40
Proposition 1	36
Proposition 68	30
Steelhead Report Card	8
Wetlands Restoration for Greenhouse Gas Reduction Program	6

\*A total of 43 survey takers responded to this question

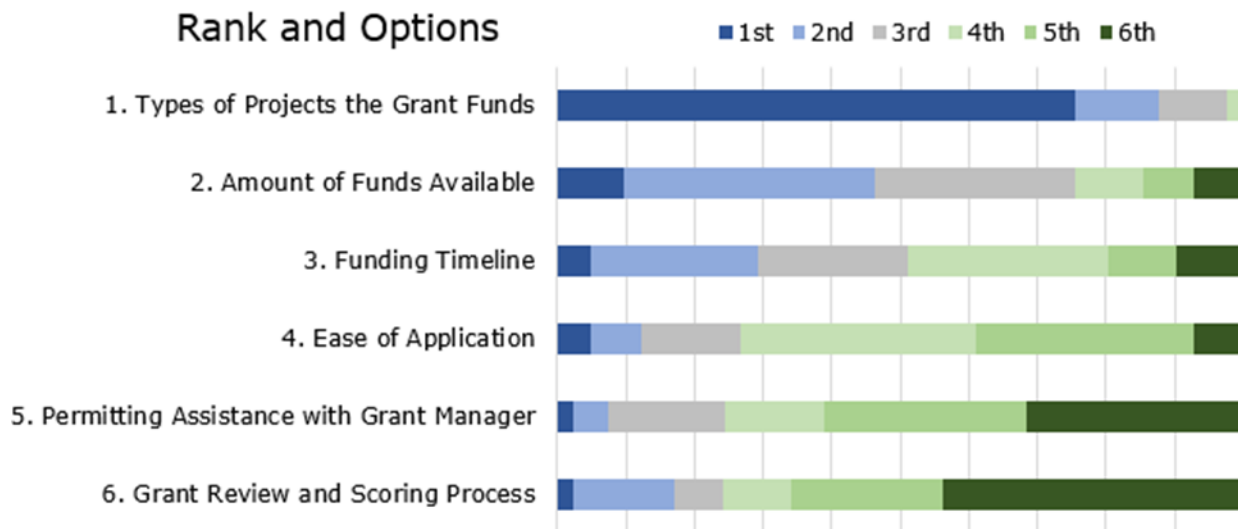


Figure 6. Ranking responses of what factors are most important when deciding which grants to apply for.

When asked about which factors in the CDFW grant process limit their ability to implement restoration, two aspects were clearly the most limiting. “Time and Expense of Planning and Preparing Application” was the most limiting, with 33% and 15% of respondents rating it as a four or five, respectively, on the Likert scale (Figure 7). “Design and Engineering Requirements” also received high levels of responses for being limiting with 20% rating it as a four and another 20% rating it a five. Two other factors, “Amount of Funding” and “Types of Projects Funded” ranked similarly to each other, although were not quite as limiting as the two mentioned above.

Three options were frequently selected as being very helpful in facilitating granting that would lead to effective and efficient restoration outcomes. "Consultation with Department Staff Prior to Submission," "Feedback after Grant Submission," and "Building Adaptive Capacity into a Grant (Facilitating Amendments or Additional Funding Needs)," had between 48% and 76% of respondents rate them as very helpful (Figure 8). While the other three options also had some respondents noting they would be helpful, there is a clear distinction in Figure 8 between the three highest and three lowest responses.

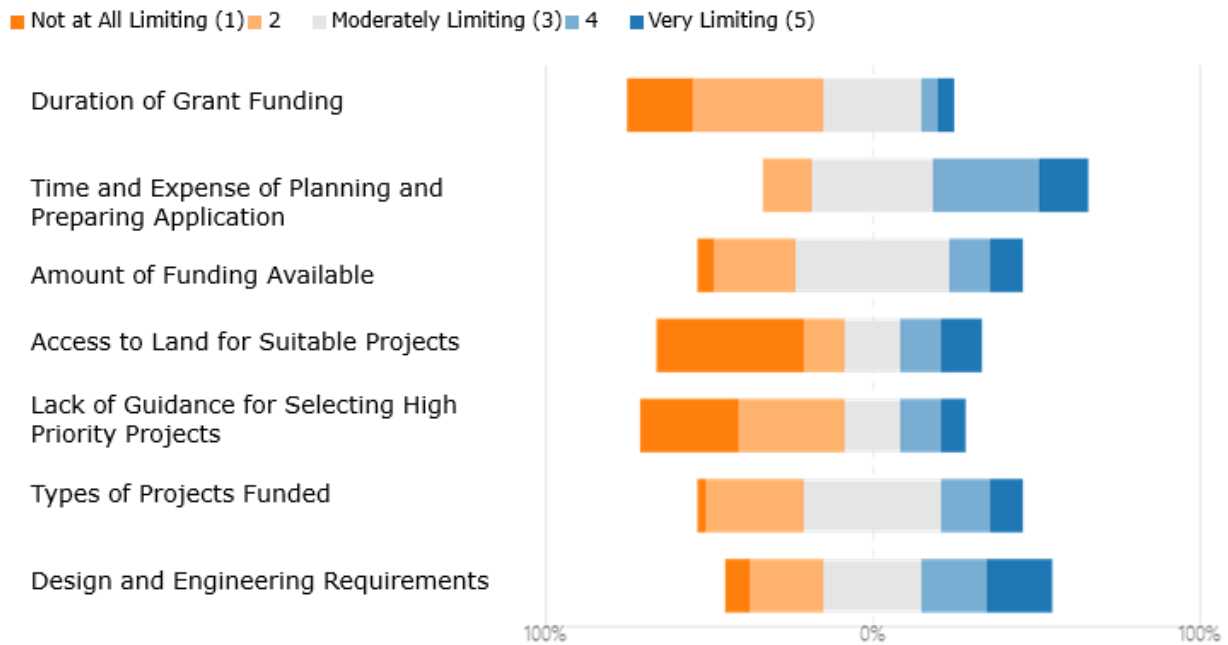
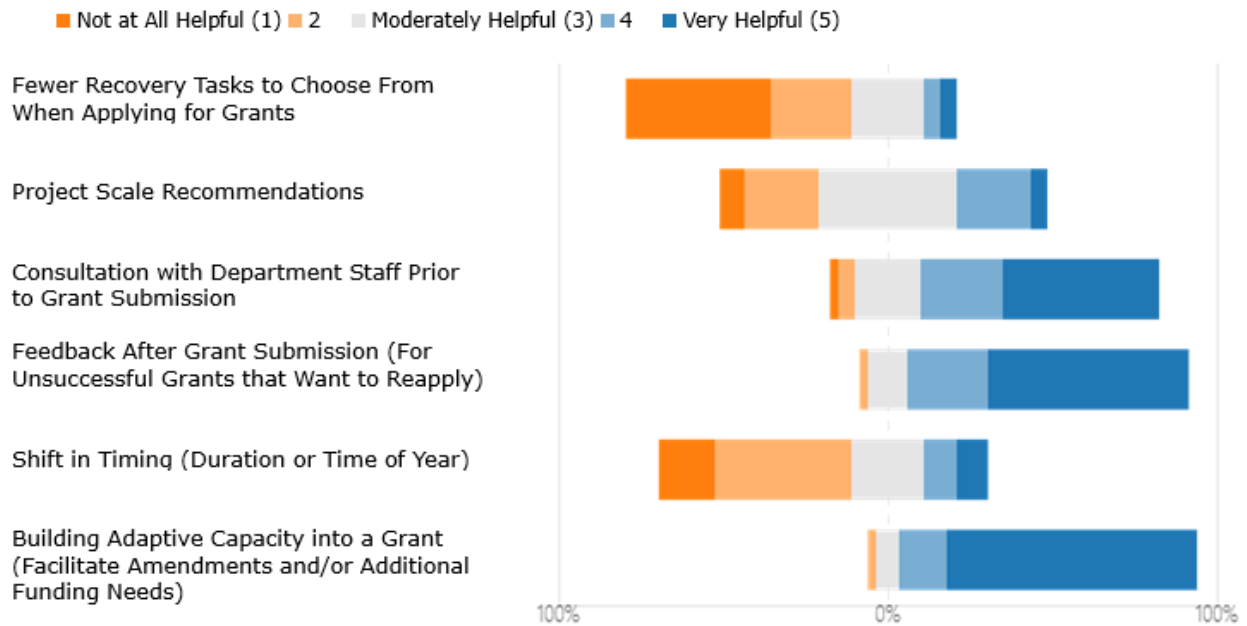


Figure 7. Grant response data showing the degree of how limiting individual factors are for implementing restoration projects.



*Figure 8. Options for CDFW granting process that would be helpful in facilitating effective and efficient restoration goals.*

Qualitative feedback on the granting program also highlighted the need for and benefits of consultation and communication between grantees and CDFW staff. Of the 26 responses in this section, 38% mentioned collaboration or communication with CDFW (Table 3). Some of these responses commended CDFW on the current level of communication: “I do appreciate the field/telephone review as part of the FRGP application review process - I’m sure it is extremely time-intensive for CDFW staff but I think that sort of interaction is rare with state agency funders and I think it leads to better projects and important information sharing.” Others thought more constructive communication was essential for restoration, with one respondent stating, “perhaps the most important thing CDFW could do is to convene stakeholders in good faith (particularly NGOs actively involved in restoration activities) in a serious venue to discuss, acknowledge and then begin to address the challenging, and frequently conflicting directives associated with the grant program as presently administered.”

*Table 3. Thematic code, number of occurrences, and percentage for responses to free response question twelve (See Appendix 1 for questions).*

<b>Thematic Code</b>	<b>Occurrences (percent of total responses)</b>
Time	10 (39%)
Cost	9 (35%)
Flexibility	8 (31%)
Pre-proposal process	7 (27%)
Communication	6 (23%)
Application	4 (15%)
Collaboration	4 (15%)
Adaptive	3 (12%)
Programmatic Permits	2 (8%)
Streamline	2 (8%)

\*There were originally 29 responses to this question, but for analysis, three responses were dropped as they all reported not applying for CDFW grants, and therefore were not applicable to granting questions.

A pre-application consultation or coordination was also something many respondents specifically mentioned that would be helpful. Approximately 27% of respondents brought up the idea of a process by which applicants could discuss goals of a project or proposal solicitation notice (PSN) before submitting a formal application. One respondent wrote, "Having a pre-proposal process for FRGP and Prop 1 funding programs would be much more efficient in getting the project correct. This dialogue could ensure that the materials, techniques, scale, monitoring and budgetary elements work for the fish, the Department and the applicant and will build the best project."

Flexibility in the granting process was also highlighted in the survey. There were several different aspects of the granting process discussed when asking for additional flexibility, but overall, 31% of respondents mentioned flexibility in their written responses. Some called for flexibility in project types funded by a grant. Others wanted more flexibility during the review process, especially regarding disqualification of applications submitted with minor errors. Finally, many respondents asked for additional flexibility in

spending, particularly with how money within a project is shifted between line items and the need to adjust for changes in environmental or construction conditions through the life of a project.

Respondents were asked to rank which factors or documents most influenced the restoration projects they implement. Recovery plans ranked highest, followed by biological or habitat data, and land access and owner interest (Figure 9).

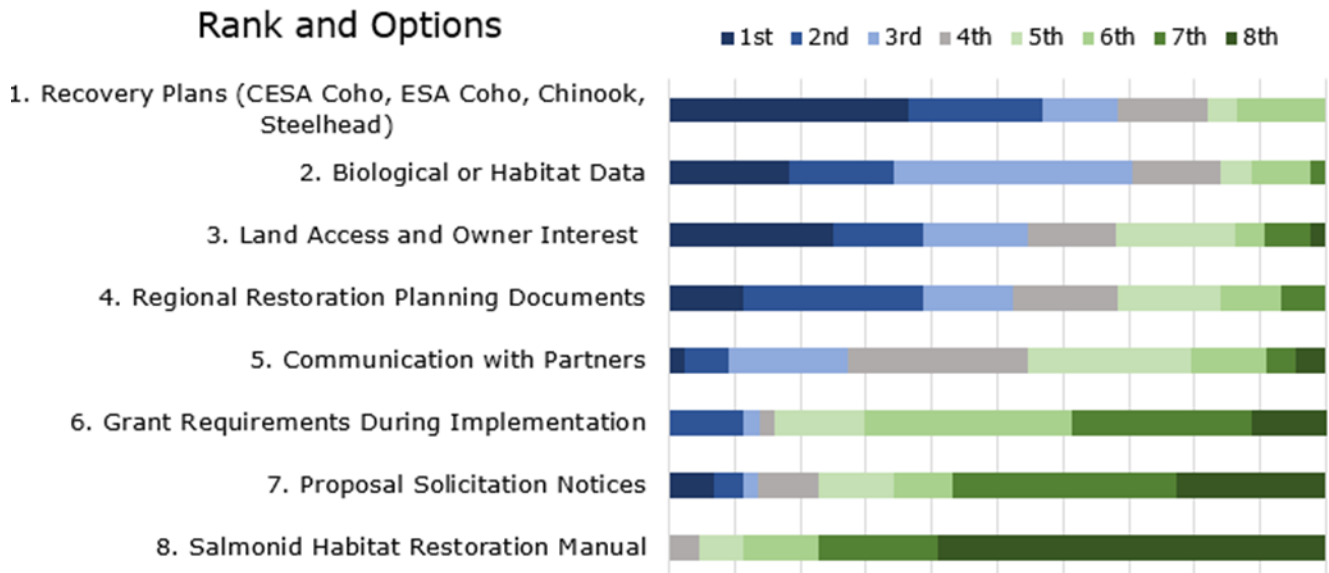


Figure 9. Ranking of the most influential factors or documents in determining the types and locations of restoration projects implemented by respondents.

### Discussion and Recommendations

The results from this survey highlighted and expanded upon many of the themes that NCSP staff have heard anecdotally from restoration partners. Coordination among agencies was the greatest limiting factor for permitting according to respondents. This is a challenge that has been discussed with restoration partners and staff at other agencies. Potential solutions to this included increased coordination with fellow agency staff, and ensuring that communication with partners applying for permits and grants is conducted at an appropriate time, frequency, and manner that ensures all parties understand the conditions of the permits and grants required to perform restoration.

Findings from this survey illustrate that informal communication and feedback from CDFW staff is not only helpful, but could be expanded and formalized to benefit permitting, granting, and restoration. Feedback on unsuccessful grants and increased communication prior to grant submissions

both ranked highly as factors that could improve the granting process. Feedback and communication currently work well in areas where relationships and lines of communication exist informally. These options must be available across the board to build on the success that certain regions have already developed. FRGP is a good example of a program that uses local knowledge and relationships of regional CDFW staff to collaborate on restoration at a regional or often county scale. For grants managed at a larger spatial scale, like Proposition 1 grants, regional CDFW coordinators have been important in developing these lines of communication and ensuring that CDFW staff have the regional expertise to support restorationists. CDFW will explore how these positions could be further supported to ensure all grant programs benefit from open lines of communication.

Other results from the survey warrant a more detailed examination. This discussion is informed by the data communicated in this survey, efforts CDFW is taking to address the topics, and ongoing cases that may provide a road map for paths forward. While this discussion aims to capture shifts CDFW will make in response to this survey, a more comprehensive conversation around the findings of this survey will take place in a collaborative forum with survey respondents, to ensure concerns are being met and the principles of adaptive management are applied.

### Coordination and Communication

Our survey shows that coordination and communication is widely perceived to be the greatest limiting factor and presents the greatest opportunity to facilitate restoration. Respondents signaled quantitatively and qualitatively that a lack of coordination within CDFW and with other permitting agencies is a hindrance to restoring habitat. While some respondents did write that the current levels of coordination with CDFW staff is beneficial to their work, these efforts have not fully addressed the issue. This may be due to the informal nature of this coordination. Where strong lines of communications exist between grant applicants and CDFW staff, this is seen as supporting habitat restoration. But where those lines of communication are not as well developed, grant and permit applicants may hope for a more formalized approach.

This presents an opportunity for increasing communication in ways that this survey highlighted. Pre-proposal review for grants, and feedback on unsuccessful grants both ranked highly as options for increasing restoration work. Some CDFW grants, such as the Wetlands Restoration for Greenhouse Gas Reduction Program, have incorporated a pre-application phase on a trial



basis, with varied results. This phase, whether implemented as an optional or mandatory step in other granting programs, has the potential to ease concerns from grantees that proposals are a resource intensive process without feedback early enough to ensure an application will address the goals of a grant program. A pre-application process could provide early feedback on a more general idea before a complete application is required, to make sure the fundamental components of a grant are sound and will benefit habitat and species it intends to. In terms of feedback for unsuccessful grants, CDFW currently makes available proposal review comment and score sheets to applicants, and discusses unsuccessful applications as requested. CDFW will work to message these options to make sure applicants are aware of these available tools and will discuss in a public forum if there are other specific changes to the debrief process that applicants would find useful in improving future applications.

One of the reasons communication and coordination is challenging is because it is a labor-intensive process that often falls outside of staff's direct workflow, and a single point of contact in CDFW often has to represent multiple facets of CDFW's programs and regions. One way to incorporate coordination into day-to-day operations is through projects that directly facilitate work across programs within CDFW. The CGT initiative supports a more cooperative approach by encompassing multiple disciplines and staff from various roles and regions (permitting, granting, species recovery), and focusing them on a collective effort. Another option is to dedicate additional staff specifically to coordinating aspects of grants, like the current regional coordinators of Proposition 1, FRGP, and Proposition 68 grants who are tasked expressly with facilitating coordination between grantees and CDFW. Coordinator positions have been successful at fostering relationships and communication with grantees. Some of these positions, particularly Proposition 1 coordinators, are responsible for a large area and many applicants or grantees. Additional resources and staffing for these sorts of roles would support coordination within CDFW and communication with external stakeholders. These approaches are some of the ways that CDFW is addressing coordination, with the objective of improved and more cohesive communication that will promote habitat restoration and species recovery.

PACT recommendations from the Permitting, Regulations, and Enforcement TWG also highlighted the importance of coordination and communication during the permitting process. One recommendation stressed the need to communicate formally with agency staff, landowners, and other stakeholders to increase awareness of regulatory process and reduce frustration around what is felt to be an opaque process (PACT 2019). Efforts like the NCSP,

where landowners are asked to participate in restoration prioritization, and efforts like CGT that aim to hold public forums to discuss changes to facilitate restoration, both seek to address this recommendation and improve communication. This is an ongoing goal of these two projects and CDFW.

### Multi-project Permits

One possible pathway to streamline permitting and promote habitat restoration is to permit similar and geographically proximate projects into a single lake and streambed alteration (LSA) agreement or a single California Endangered Species Act (CESA) permit. The goal of multi-project permits would be to increase efficiency by developing a single set of consistent permit conditions for related projects within a planning area. To permit multiple projects under CDFW's existing regulatory authorities, the creation of watershed or subregional restoration planning documents is encouraged. Restoration planning documents would allow CDFW to understand the goals, methods, locations, short-term impacts, and long-term benefits to Coho Salmon and other species associated with the restoration plans. As individual projects reach final design and are implemented, permit sub-approvals could proceed using an expedited approval process.

CDFW recently worked with California Department of Parks and Recreation and the National Park Service to issue a master LSA agreement that covers two separate projects spanning 30 and 15 years, respectively. This longer-term permit covers certain authorized activities, such as large wood placement in streams, which could facilitate practitioner's ability to install instream wood without being solely responsible for an LSA agreement. This permitting approach will make it possible for many projects within the 15 and 30-year time frames to be covered by a single permit, thus, moving restoration towards a watershed scale approach as the cumulative projects will cover a larger geographic area through time and enable restoration to approach the scale needed to see sustained population responses.

Several respondents described a current scattershot approach to restoration with permits for many small and dispersed projects. One respondent explained, "Maintaining and expanding the programmatic permitting is critical to timely and cost-effective permitting... Segmenting projects to comply really isn't viable." This comment encapsulates a couple of challenges in the permitting sphere. Creating new programmatic permitting is a challenging endeavor and sometimes requires legislative action. In the case of endangered species permits, a clear understanding of the scope of projects needed to be covered and the project locations is necessary to determine, in advance of permitting, the potential take on listed species.

While this does not rule out the expansion of programmatic permits, the types, locations, and timing of restoration actions would need to be outlined for a programmatic permit to be created. Additionally, buy-in from agencies other than CDFW would also almost certainly be required.

### Priority Setting and Planning

Another theme this survey highlighted, and one that may help with the time intensive nature of applying for grants and permits, is to develop more specific priorities and support formal restoration planning. The RLC made three recommendations about priority setting, one of which was as follows “CDFW Grant Programs should articulate measurable and science-based Program Goals and Priority Actions; communicate Program Goals and Priority Actions widely amongst external agency partners, NGO restoration partners, and science partners; and revise Program Goals and Priority Actions using a transparent and collaborative process over time.”

The RLC also made recommendations about updating the California Salmonid Stream Habitat Restoration Manual (Flosi et al. 2010) to reflect current restoration techniques. The PSN and the California Salmonid Stream Habitat Restoration Manual ranked as the two lowest factors for what was influential to partners in choosing the types and locations of projects to implement (Figure 9).

One way to incorporate existing priorities would be to require that tasks from watershed documents be cited when applying for grants. Much like FRGP, where NOAA recovery tasks are required in an application, more specific tasks developed collaboratively in watershed plans and prioritization efforts, such as Salmonid Habitat Restoration Prioritization (SHaRP) and PACT, could be added as a requirement. This would only be feasible for watersheds with such plans. Additionally, if refined tasks or priorities like the ones in PACT and SHaRP were required for applications, any effect on grant scoring would only make sense when comparing projects within a watershed. Different watershed plans, and watershed specific priorities, would not necessarily be comparable across watersheds; however, they would still be useful for determining which projects to focus on in a given watershed by basing granting decisions on the most up to date, highest resolution priorities. Such an approach could concentrate efforts on a smaller subset of projects deemed important by both agency staff and stakeholders who participate in watershed planning.

The RLC recommended continuing to fund regional restoration planning and the NCSP analysis report on restoration projects funded for Coho Salmon

further supports this approach. This analysis looked at planning projects in the four focus watersheds and observed that most planning efforts funded through FRGP aided future restoration work and did not result in plans struggling to find funding. This stepwise planning approach provides a clear pathway for restoration and seems to function well through funding at different phases. When done in collaboration with local stakeholders, planning processes are also a good way to increase local approval for restoration and prime a watershed for on the ground restoration projects to come.

### Time and Expense

Time and expense of preparing grant applications was one of the greatest limiting factors to performing restoration according to survey respondents. Through a Lean Six Sigma collaborative review of FRGP, restoration leaders and CDFW staff assessed where efficiencies could be gained in the grant process. One of the results of this review was to reduce the processing times of FRGP grants from 480 days to 240 days (Bonham 2019). Almost no survey respondents mentioned turnaround time of grants as a major limiting factor to restoration. This may signal that changes to the timelines of CDFW grants have been adequate in addressing previous concerns with response time of CDFW staff.

Several qualitative comments focused on other timing aspects related to permitting and granting. Some comments discussed the time-consuming nature of applications. Others mentioned how projects could be more beneficial if they spanned a longer period, or how time passing could require additional flexibility in grant spending. The time intensive nature of these applications contributes to the labor costs, which can be especially limiting to organizations with smaller staff. This diversity of issues relating to the timing of grants necessitates innovative approaches.

Several tools are currently available to address some of the timing issues listed above, but certain limiting factors relating to timing will take significant operational or legislative changes to address. This issue of restoration stakeholders using limited staff resources to craft grant applications remains a major limitation and requires creative solutions. Some of those solutions could come from ideas discussed above, such as a pre-application process that could limit uncertainty early in an application process. Long-term LSA agreements and permitting multiple projects could also cut down on the time needed for staff to move forward on a given project.

Increasing flexibility within a grant program is something CDFW is seeking to address. CDFW recently underwent a process to give grant managers more power to approve limited budget and scope changes without the need for a formal amendment request and signed grant amendment. This will increase flexibility for grantees needing to make budget shifts while maintaining oversight to ensure a project is meeting its stated goals. The RLC recommended a similar action to reduce the need for formal amendments, and CDFW hopes these changes will address the RLC recommendation as well as feedback from this survey. Making changes to the duration of a grant presents a different set of challenges. This sort of shift often requires similar changes in relevant permits and support from agencies other than CDFW. NCSP staff hope to discuss this issue of grant flexibility further with stakeholders to see how critical the issue of duration is, how CDFW could implement flexibility to address this factor, and if flexibility within CDFW alone would be effective without similar efforts from other permitting entities.

Another tool that CDFW is piloting is the new Restoration Management Permit (RMP). The RMP aims to facilitate CESA permitting for restoration projects that need coverage for take of listed species, fully protected species, and non-listed species. While the RMP is in its early phases, CDFW hopes streamlining these permits required for restoration actions will reduce the costs associated with obtaining permits without adding any fees for applicants. CDFW's intent is to pilot the RMP with several projects and expand the effort if it proves effective.

### Cost of Permitting

The costs associated with acquiring permits was something restoration professionals anecdotally discussed with NCSP staff as an issue limiting the ability of restoration professionals to implement projects. Based on the question about limiting factors, the cost of the actual permit was less limiting than the project costs associated with permit requirements (Figure 4). PACT made specific recommendations around non-FRGP large woody debris projects, suggesting that LSA fees associated with these projects may be offset through regulatory changes to fee structure for a select suite of projects or developing funding sources to underwrite the costs (PACT 2019). One survey respondent explicitly expressed that "as a private business owner who does restoration work, LSA agreement fees are a disincentive to performing instream restoration." Regulatory changes are a potential solution but require efforts from parties outside of CDFW.

Another common requirement for restoration permits is a monitoring plan. Although monitoring is necessary for adaptive management and project effectiveness, this line item is often not fundable as part of a project. CDFW is currently evaluating how restoration effectiveness monitoring and biological monitoring can be funded most effectively. Like bundled LSA agreements, bundling monitoring could share costs amongst grants. A thorough look at monitoring data, including the benefits of different monitoring approaches, is another aspect that the NCSP plans to analyze.

Options outside of changes to statutes would require creative solutions. Some of the opportunities discussed above, such as long term LSA agreements with certain covered actions and streamlining of applications that could reduce labor associated costs, could provide options to restoration professionals looking to reduce permitting costs. Bundling projects within a geographic area could also create a situation where costs for things like monitoring and compliance are shared across restoration groups and projects, while benefits of restoration are concentrated in a focal area. This approach would increase restoration efficiency.

## Conclusions and Recommendations

To promote the collaborative nature of the NCSP, the immediate next step of this survey is to share findings and discuss solutions with stakeholders. Staff working on the CGT initiative hosted two public meetings to discuss how CGT is tackling aspects of permitting that will facilitate restoration, and to discuss the upcoming PSN. The NCSP team also aims to publicly present results of this survey, discuss complementary efforts CDFW is currently undertaking, and listen to stakeholders for additional feedback. This step is critical to ensure NCSP staff are understanding needs of the restoration community and doing everything in our power to promote the common goal of habitat restoration and species recovery. The major conclusions from this report that will be discussed with restoration stakeholders are:

1. CDFW commits to developing ways to increase communication and facilitate coordination with stakeholders and other agency staff. Whether this be for granting, permitting, or other aspects of restoration, communication and coordination continually rank highly as areas that need improvement. CDFW will dedicate resources to address these issues through efforts like the NCSP and CGT, as well as seeing how to further support coordinator roles in our granting and permitting processes.
2. Incorporate measures that save time and money during the grant development phase and provided detailed feedback for unsuccessful

grants. A pre-application phase was widely supported by survey respondents. This pre-application consultation approach would provide early feedback on overarching project goals and design to reduce the risk of a project not receiving funding because of a critical flaw that could have been addressed prior to application submission. Educating applicants about the current resources available for grant feedback and adapting the process to better suit applicants would also ensure that future applications are more likely to meet the goals of grant programs.

3. As partners in restoration, practitioners and agency staff will continue to develop new pathways that enhance restoration and creatively use existing tools in a manner that promotes habitat restoration and species recovery. This path will look at how permitting can be streamlined for restoration by acknowledging the need for these projects and the inherent differences between restoration and development that historically have required similar permitting approaches. These options will also include inventive new ways to permit specific restoration activities in a manner that facilitates the sustained restoration work that so many watersheds need, like the long term LSA agreements discussed above, as well as piloting streamlined permit options like the RMP.

NCSP staff understand that the process to streamline and improve granting and permitting is dynamic and ongoing. While certain opportunities to address limiting factors are presented in this document, other solutions for some of the complex issues outlined in the data collected from this survey will take a sustained effort by CDFW. The NCSP will work internally to address the varied concerns of restoration professionals with the appropriate entities within CDFW. This internal collaboration is one of the many components highlighted by respondents as being vital to ensuring restoration is on pace with the challenges that salmonids face. It is a goal of the NCSP to take immediate actions where feasible and make long-term commitments to address the important issues outlined in this survey that warrant sustained efforts.

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## Appendix 1.

### Survey Questions

1. What type of organization do you work for?
2. Which watershed(s) do you perform restoration in? (Select all that apply)
3. What types of restoration projects do you work on? (Select all that apply)
4. Which CDFW permits do you apply for? (Select all that apply)
  - a. Lake and Streambed Alteration (Streambed alteration)
  - b. Lake and Streambed Alteration (Water Diversion)
  - c. Incidental Take Permit
  - d. Scientific Collection Permit
  - e. California Endangered Species Act (CESA) MOU
  - f. Habitat Restoration Enhancement Act (HREA)
5. How limiting are the following aspects of CDFW permitting for your organization in performing restoration? Very limiting means often prevents projects from being applied for, designed, or implemented. Moderately limiting means sometimes preventing projects from being applied for, designed or implemented
  - a. Cost of permit
  - b. Project costs associated with permit requirements
  - c. Time required to complete permit application
  - d. Response time of agency
  - e. Timing of CDFW permits relative to other necessary permits
  - f. Complexity of permit application
  - g. Uncertainty of permitting process
  - h. Lack of coordination among permitting agencies
  - i. Inflexibility of permit
6. Which of the following would minimize specific issues with the current permitting process and promote restoration while ensuring projects are of high quality?
  - a. Reduce cost of permits
  - b. "Umbrella Permit" (CDFW permit for multiple projects or a geographic area)
  - c. Shift in permit timing
  - d. Enhanced communication during permitting process
  - e. Site visits by permitting staff
  - f. Interagency collaboration
7. Is there anything you'd like to elaborate on from your above answers or aspects of the permitting process that work particularly well?
8. What grants do you or your organization apply for? (select all that apply)
  - a. Fisheries Restoration Grant Program (FRGP)

- b. Proposition 1
  - c. Proposition 68
  - d. Steelhead Report Card
  - e. Wetlands Restoration for Greenhouse Gas Reduction Program
9. What are the most important factors for you in selecting which grants to apply for? (Rank from most important to least important 1-7)
- a. Amount of Funds Available
  - b. Funding Timeline
  - c. Ease of Application
  - d. Types of Projects the Grant Funds
  - e. Permitting Assistance Associated with Grant
  - f. Communication with Grant Manager
  - g. Grant Review and Scoring Process
10. Which of the following aspects of the current CDFW grant process are most limiting in your organization's ability to implement restoration projects? Very limiting means often prevents projects from being applied for, designed, or implemented. Moderately limiting means sometimes preventing projects from being applied for, designed, or implemented.
- a. Duration of Funding Availability
  - b. Time and Expense of Planning and Preparing Application
  - c. Amount of Funding Available
  - d. Access to Suitable Project Areas
  - e. Lack of Guidance for Selecting High Priority Projects
  - f. Types of Projects Funded
  - g. Design and engineering Requirements
11. Which of the following would best facilitate a granting process that effectively and efficiently achieves the desired restoration outcomes?
- a. Fewer Recovery Tasks to Choose from or Project Scale Planning Recommendations
  - b. Consultations with Department Staff Prior to Grant Submission
  - c. Feedback After Grant Submission (for unsuccessful grants that want to reapply)
  - d. Shift in Timing (duration or time of year)
  - e. Building Adaptive Capacity into a Grant (facilitate amendments and/or additional funding needs)
12. Is there anything you'd like to elaborate on from the above questions or aspects of the granting process that work particularly well?
13. Which of the following are the most influential in determining the types and locations of restoration projects you implement? (rank from most influential to least influential 1-7)
- a. Recovery Plans (CESA Coho, ESA Coho, Chinook, steelhead)

- b. Biological or Habitat Data
- c. Land Access and Owner Interests
- d. Communication with Partners and Regional Restoration Planning Documents
- e. Grant Requirements During Implementation
- f. Proposal Solicitation Notices
- g. Salmonid Habitat Restoration Manual