

## California Habitat Conservation Planning Coalition

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September 18th, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Dear Jeanine Townsend:

Thank you for the opportunity to comment on the July 21 2017 draft “Procedures for Discharges of Dredged or Fill Materials to Waters of the State”

We are pleased to see that the Procedures retain the watershed approach and watershed plans, and that the permitting authority may approve the use of HCPs and NCCPs as watershed plans (lines 510-511).

Lines 255-256.

The applicant for an individual order should be able to rely on the overall sequence of actions in a watershed plan that covers the individual project, rather than a sequence for the individual project.

Lines 332-336.

This states that the permitting authority may approve mitigation in a different watershed. The example given is a project affecting more than one watershed. Please add a second example - “if the compensatory mitigation follows the requirements of an approved watershed plan.”

Lines 1017-1020.

It is important to retain this language regarding mitigation, which requires “the protection and maintenance of terrestrial resources, such as non-wetland riparian areas and uplands, when those resources contribute to or improve the overall ecological functioning of aquatic resources in the watershed.”

Lines 1188-1189.

Thank you for adding “Natural Community Conservation Plans”.

Thank you for your consideration of our comments.

Sincerely,

John Hopkins, Ph.D., Director