

State Water Resources Control Board

Statewide Restoration General Order (SRGO) Programmatic Environmental Impact Report (PEIR)

Frequently Asked Questions (FAQs)

General Information and Recommendations

What is the purpose of this Frequently Asked Questions (FAQs) document?

This document is intended to help project applicants answer common questions about using the SRGO PEIR. The questions and answers have been organized into different categories for ease of reference (e.g., benefits, eligibility, jurisdiction). The answers have been reviewed by agency staff or CEQA practitioners for accuracy. More information on how to qualify for and use the [SRGO PEIR](#) including example project applications and approvals, can be found at [AcceleratingRestoration.org](#). Project proponents are also encouraged to contact the appropriate [Water Board](#) for further information.

What is the SRGO PEIR?

The Statewide Restoration General Order Programmatic Environmental Impact Report ([SRGO PEIR](#)) is an efficient and cost-effective approach to the [California Environmental Quality Act \(CEQA\)](#) compliance because the SRGO PEIR evaluates impacts of project types covered by the SRGO as well as the methods to avoid, minimize, and mitigate these impacts. Actions or supplemental analyses such as completing a memo to file/ findings, addendum, or supplemental EIR could be performed if needed, by doing only supplemental analysis for impacts that are not covered by the PEIR. The *SRGO PEIR can be used along with or independently of the SRGO* (i.e., the PEIR could be utilized to satisfy the CEQA requirement of other CEQA lead agencies) as long as the project meets the SRGO definition of a restoration project and all other applicable assumptions in the SRGO PEIR.

Are other restoration permitting pathways available?

There are also several other restoration permitting pathways available in California, many of which have coordinated requirements. For a summary of those pathways, see our [Essential Guide for Accelerated Restoration Permitting](#).



Frequently Asked Questions (FAQs) - SRGO PEIR Benefits

1. How can the PEIR help me when applying for project funding?

Funders (e.g., State Coastal Conservancy, Wildlife Conservation Board, etc.) typically need to have the required CEQA documentation completed before authorizing a grant for implementation of a restoration project. Using the PEIR is a more efficient way of complying with CEQA than preparing an individual CEQA document and will make for a stronger grant application. The project design and protection measures analyzed in the PEIR also provide guidance on project development and are coordinated with the SRGO and other restoration permitting pathways. This coordination provides greater consistency with other agencies' requirements than individual permitting and CEQA pathways and makes for more efficient and less costly permitting, which means more grant funds can go to on-the-ground work.

Eligibility

2. Can a project use the PEIR if it's not using the SRGO?

Yes, as long as the CEQA lead agency determines that the PEIR or the PEIR along with additional impact analyses is appropriate for the project.

Process

3. If I use the PEIR, will the State or Regional Water Board automatically be the CEQA lead agency for my project?

4. No. Although the State or Regional Water Board may be the [CEQA lead agency](#) for a project, the PEIR does not require them to be. The agency with [the principal responsibility](#) for carrying out or approving a project would be the lead or whichever agency determines they are the lead. Depending upon staffing capacity at each agency involved and the details of the project, it is not always appropriate for the Water Board to be the lead agency.

5. What entity determines whether the PEIR is adequate for my project?

The lead agency and their legal counsel can make that determination.

6. My project is in the Delta Plan area. Do I need a Delta Plan Consistency Certification when using the PEIR?

The CEQA [process](#) triggers the Delta Plan Consistency Certification process. The Sacramento River Basin Restoration Permitting [Roadmap](#) explains how the Consistency Certification process works in the context of other regulatory approvals. Projects that are exempt from CEQA (e.g., projects that use the SERP) often



Sustainable Conservation

still aim for consistency with the Delta Plan by soliciting feedback from interested parties in the Delta even if a formal Consistency Certification is not required.

7. How do I know if my project's impacts are already covered in the PEIR?

The CEQA lead agency will determine if the PEIR is the most appropriate CEQA pathway or if other/additional documentation is more appropriate. Regional Board staff may be able to assist with a checklist.

8. If all my project's impacts are covered in the PEIR, how do I complete CEQA compliance?

The CEQA lead agency can file a CEQA Notice of Determination (NOD) with the [State Clearinghouse](#) (per CEQA Guidelines 15168(c)(2)).

9. If at least one new impact is identified that is not covered in the PEIR, what do I do?

If a new impact is not covered in the SRGO PEIR, additional CEQA actions would be required to disclose and describe this impact and mitigation measures, if needed, to reduce the impact. This can be accomplished by developing a supplemental document such as an addendum or supplemental EIR. The CEQA lead agency will determine the level of additional documentation needed. Overall, using the SRGO PEIR as a baseline analysis will save time and money.

10. What if the lead agency decides to use the PEIR but determines that there are some impacts that aren't clearly covered?

If the impacts are not clearly covered in the PEIR, then disclosure and description is required. The CEQA lead agency could consider doing a hybrid approach of a Memo to File and an Addendum for minor additions per [CEQ Guidelines Section 15164](#) or a supplemental or subsequent CEQA document. CEQA documentation would be submitted to the Water Board and an NOD would be filed with the State Clearinghouse. The type of additional compliance documentation needed will depend upon the significance of the additional impacts analyzed.

11. What types of special reports do I need to have when using the PEIR?

Projects typically include biological and cultural resources surveys. Depending upon the details of the project (e.g., earthmoving, truck trips, etc.), you can also assess whether air quality modeling is needed. Report/survey results will help determine if the proposed project's impacts have been covered under the scope of analysis in the PEIR or whether additional analysis is needed. It is important to make sure that the conclusions you rely on for the proposed project's scope of impacts are accurate. Consult with the lead agency and the approving Water Board to confirm the special reports needed as the reports can also inform monitoring expectations.



12. How do I select the appropriate protection measures from the PEIR for my project?

It will depend upon the project type and activities being proposed. You can use Sustainable Conservation's [protection measures selection tool](#) for the PEIR to select appropriate measures based on your project type and activities. You can then review those measures to see if they are appropriate or need any modifications based on site specific constraints, etc. and then verify selected measures with the approving Water Board, who may recommend/require additional measures.

Note that the protection measures selection tool does not include "mitigation measures" from the PEIR, which are different than protection measures since protection measures are typically done to avoid and minimize impacts during project construction, whereas mitigation measures are additional actions to help offset unavoidable impacts. Pick the measures that apply, rather than explaining why measures do not apply. Explain in your CEQA compliance document (Memo to File, Supplemental, Subsequent, or hybrid approach) and if applicable, SRGO application, that the measures included in the PEIR will be adequate, and the other measures do not apply.