



ENVIRONMENTAL POLICY  
**INNOVATION**  
CENTER



# What Speeds and Slows Wetland and Stream Restoration

Insights from Research on US Army Corps Mitigation Bank  
Approval Timelines

---

State of the Coast 2023

June 1, 2023

Becca Madsen | [becca@policyinnovation.org](mailto:becca@policyinnovation.org) | 940.231.4359



# Why EPIC Cares about Restoration Permitting Timelines

Projects restoring environmental damage



“Sometimes, fully one-third of public funding for a restoration project goes to planning and permitting...” ([Cutting Green Tape](#))

Projects damaging the environment

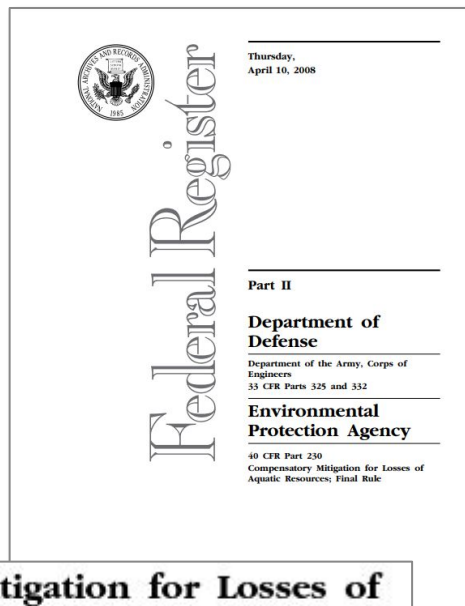


Photo credit: [NPS](#) (L), [DoD](#) (R)

# Quantitative Analysis of Required Timelines



- **225 days**



**Compensatory Mitigation for Losses of  
Aquatic Resources; Final Rule**

DA permits. This initial evaluation letter must be provided to the sponsor **within 30 days** of the end of the public notice comment period.

accompanied by appropriate documentation. The district engineer must notify the sponsor **within 30 days** whether or not a submitted prospectus is complete. A complete prospectus

*And more...*



# Data

&

# Research Questions

## FY14 - FY21 Corps ORM data

- 686 ending records



JAN 17 2025

## Categories

- Mandatory federal processing
- Sponsor processing
- Additional processing

## Is required timeline being met?

- Difference by District?
- Difference by year?



# Main Q: Is required timeline being met?

- No, mean mandatory federal processing time  $\neq$  225 days ( $p < 0.01$ )
- Actual (mean) = 336 days federal processing\*

## Year 1

January						
Su	Mo	Tu	We	Th	Fr	Sa
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

April						
Su	Mo	Tu	We	Th	Fr	Sa
1	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

July						
Su	Mo	Tu	We	Th	Fr	Sa
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

October						
Su	Mo	Tu	We	Th	Fr	Sa
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

February						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

May						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

August						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

November						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

March						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

June						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

September						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

\* Note: Probably underestimated, because 46% of records do not start recording times until the complete prospectus is received.

# Adding in Sponsor and Additional Time

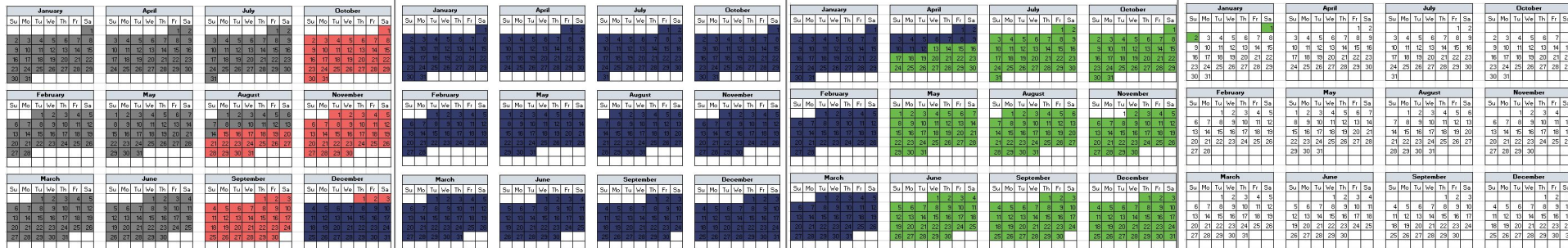
- No, mean mandatory federal processing time  $\neq$  225 days ( $p < 0.01$ )
- Actual (mean) = 336 days federal processing + 495 days sponsor processing + 267 days additional processing = **TOTAL 1,099 days**

Year 1

Year 2

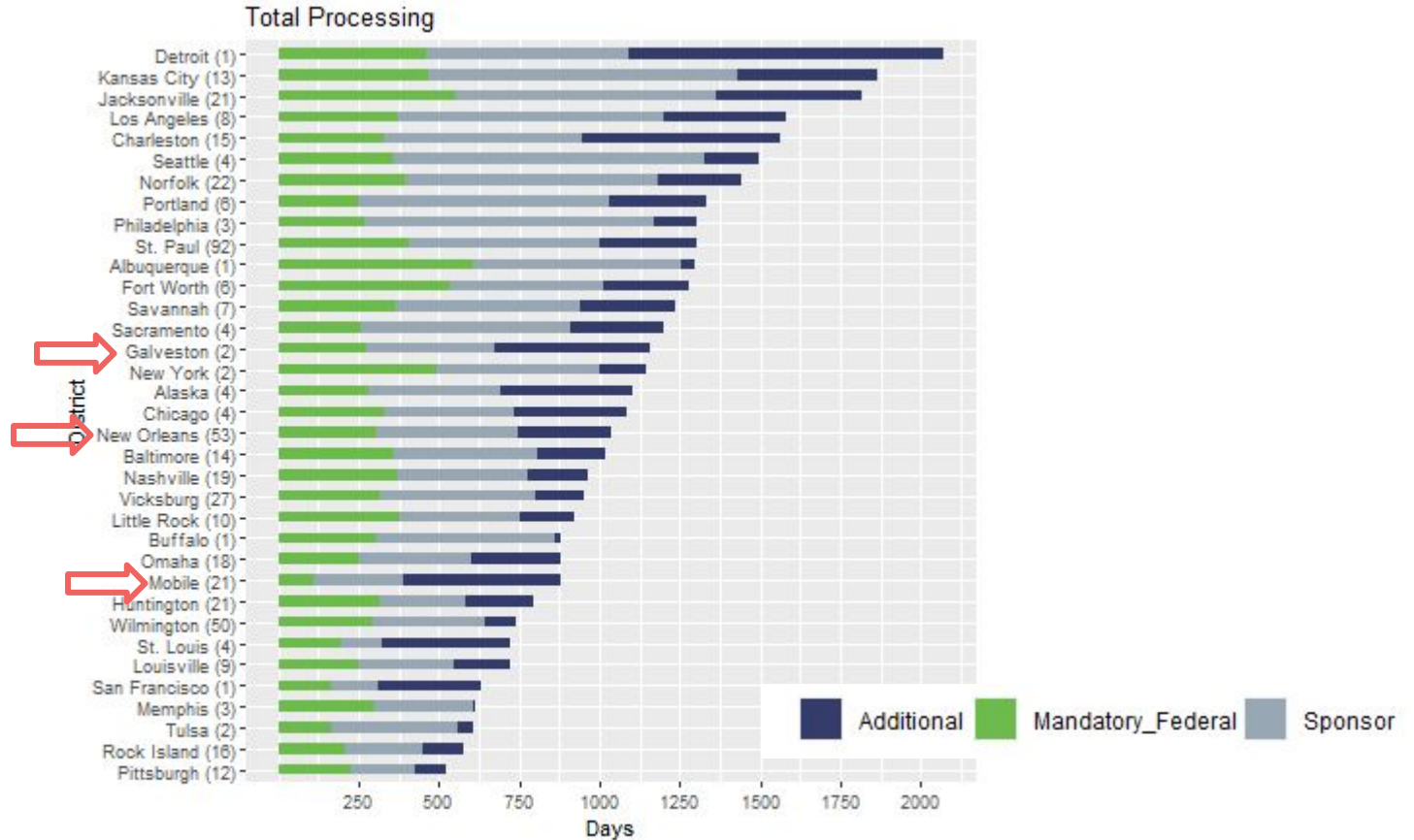
Year 3

Year 4





# Q: Are there Differences by District? A: Yes



# Other National-Level Research Questions



Q: Are Timelines Being Met in Some Years?

A: No (exception: 2014)

Q: Are Timelines Trending Over Time?

A: No



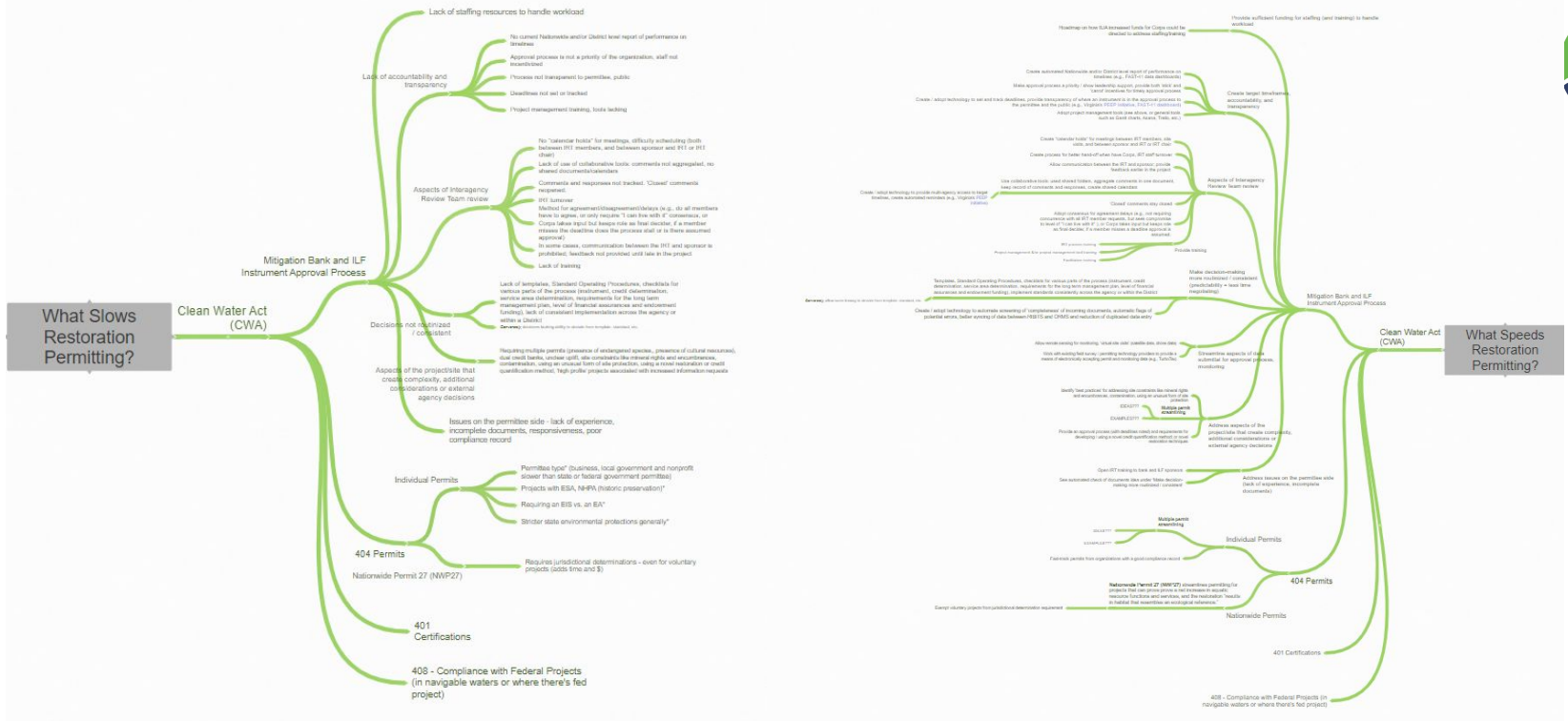


# Take-Aways from Quantitative Analysis

- Using delay codes will help adaptive management
- Transparency - PEEP it!  
(Virginia's Permitting Enhancement and Evaluation Platform)
- Appendix data is a goldmine!



Report link: [bit.ly/mitigationbankresearch](https://bit.ly/mitigationbankresearch)



# Digging In: Mapping out What Speeds and Slows Restoration Permitting



# Insight from Interviews - Top 3 Things...

## Districts are doing great!

1. Standardization and consistency
2. Staff
3. Leadership in project review team (IRT)

Poll





# Insight from Interviews - Top 3 Things...

Poll



**What top things  
could change to  
speed up restoration  
permitting?**



Join at  
**slido.com**  
**#2574 317**



# Insight from Interviews - Top 3 Things...

Poll



Join at  
**slido.com**  
**#2574 317**

## Districts could change

1. Increase staffing / dedicated team
2. Standardization and consistency
3. X analysis paralysis (be decisive!)

# Other EPIC Work

Restoration Permit Streamlining - Policy Tracking [ADD VISUAL

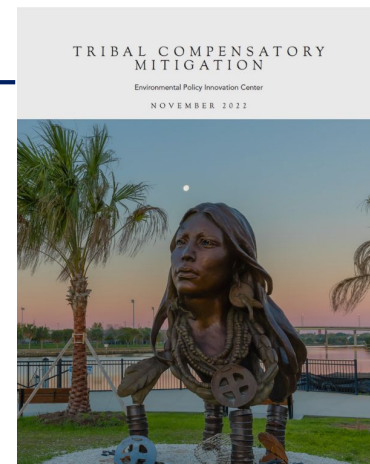
Pay for Success Approaches to Restoration

California Mitigation Bank Approval Timelines

Tribal Compensatory Mitigation

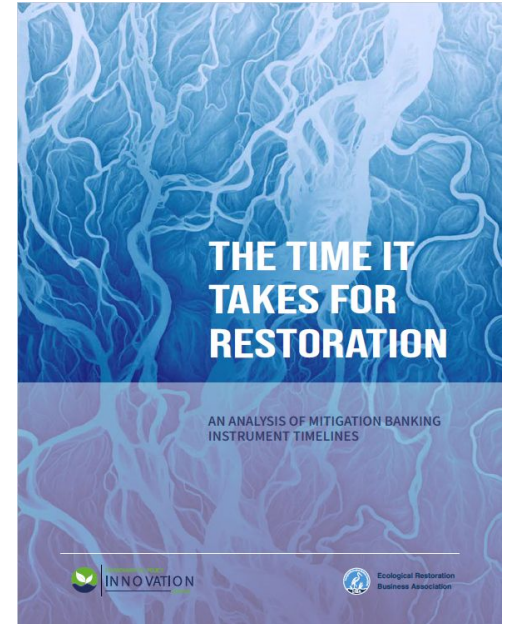
Waters of the United States - Policy Tracking

[policyinnovation.org](http://policyinnovation.org)





## Report Link



# Thank You!

Becca Madsen, [becca@policyinnovation.org](mailto:becca@policyinnovation.org)

[bit.ly/mitigationbankresearch](https://bit.ly/mitigationbankresearch)