

# THE TIME IT TAKES FOR RESTORATION

2024 UPDATE

AN UPDATED QUANTITATIVE ANALYSIS OF  
MITIGATION BANK TIMELINES



ENVIRONMENTAL POLICY  
**INNOVATION**  
CENTER

## Note

This report is a complement to two previous reports: a qualitative analysis published in March of 2023, titled [The Time It Takes for Restoration: An Analysis of Mitigation Banking Instrument Timelines](#); and The Time it Takes for Restoration: [A Qualitative Analysis of Factors that Speed and Slow Mitigation Banking Instrument Timelines](#), published in September of 2023.

## About EPIC

The Restoration Economy Center, housed in the national nonprofit Environmental Policy Innovation Center (EPIC), aims to increase the scale and speed of high-quality, equitable restoration outcomes through policy change. The mission of EPIC is to build policies that deliver spectacular improvement in the speed and scale of conservation.

Views expressed here are EPIC's and do not reflect the policy or positions of our funders.

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# The Time it Takes for Restoration 2024 Update

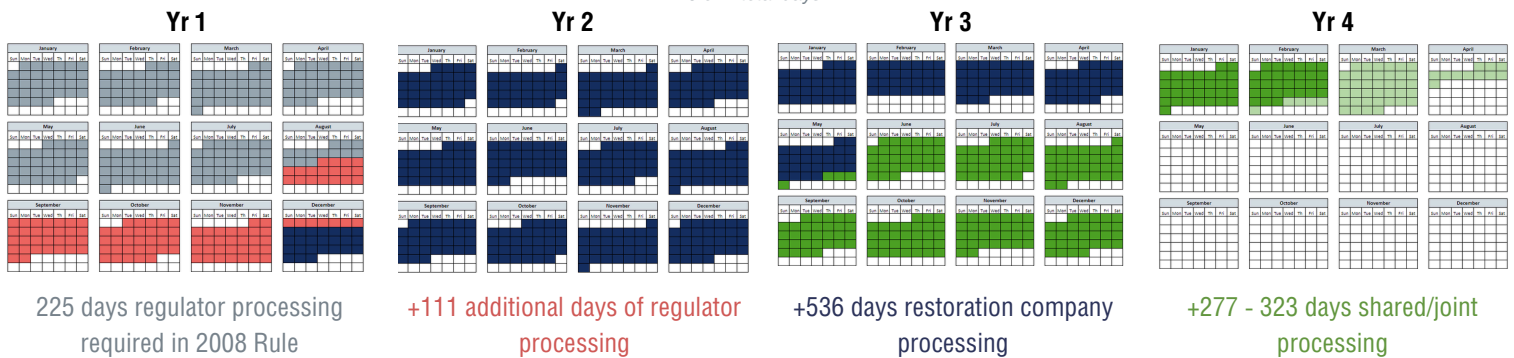
## EXECUTIVE SUMMARY

### BACKGROUND

The 2008 Final Rule on Compensatory Mitigation for Losses of Aquatic Resources (herein 2008 Rule) provides an approval process for mitigation bank instruments (MBIs). The 2008 Rule stipulated that the regulator's side of the approval process (mandatory federal processing) take no more than 225 days. A previous quantitative analysis was published in 2023 based on 500 mitigation banks approved from 2014-2021 (Martin and Madsen, 2023). This 2024 update includes data from an additional 160 banks approved from 2022-2023, and an analysis of mitigation bank credit release timelines based on a dataset of 608 records.

## Total time to permit a wetland or stream mitigation bank - 1149-1195\* days

\*Note: throughout this report, some figures are reported as a range. The higher figure uses a subset of data that \*excludes\* 93 records where 'additional' processing is unrealistically 0 or 1 total days.



### FEDERAL PROCESSING TIME CONTINUES TO EXCEED 225 DAYS

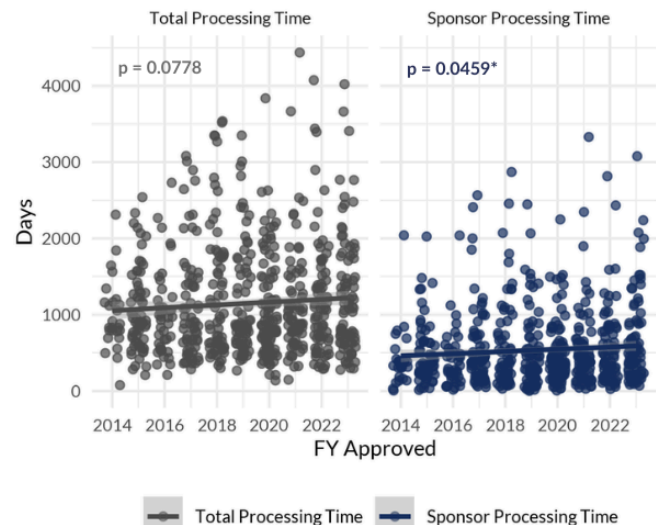
Mandatory federal processing of a mitigation bank instrument takes 336 days on average - 1.5 times longer than required in regulations. There is decrease in average federal processing of 17 days when we isolate the new data from 2022-2023, however this is not a statistically significant trend.

#### Timeline Range to Approve Mitigation Bank Instruments (2014-2023)

Categories of Processing Times	Minimum	Average	Maximum
<b>Mandatory Federal Processing</b> The timeline that the USACE is responsible for, including review of the complete prospectus, complete draft instrument, and complete final instrument.	61	336	1446
<b>Sponsor Processing</b> The timeline that the sponsor is responsible for, including preparation of the prospectus and draft instrument.	2	536	3330
<b>Additional Processing</b> Includes both sponsor time and federal review time with no distinction between the two in the data, including the review of prospectus completeness, and review of draft instrument completeness. In some cases there is no delay, in others there may be considerable back and forth between sponsor and district before the product is complete.	0	227-323*	3428
<b>Total Processing</b> The timeline from start to finish	78	1149-1195*	4437

### SPONSOR, ADDITIONAL, AND TOTAL PROCESSING TIMES ARE INCREASING

Using the full dataset, the national average of total processing is 1,149-1195 days, an increase of 51-97 days from the previous analysis. However, when we isolate just the new data from 2022-2023, there is an increase of 106-220 days of total processing over the previous analysis, and the average sponsor timeline increased by 16% / 98 days. Linear regression analyses found these to be statistically significant trends, adding 18-27 days per year for total processing, and 15-17 days for sponsor processing.



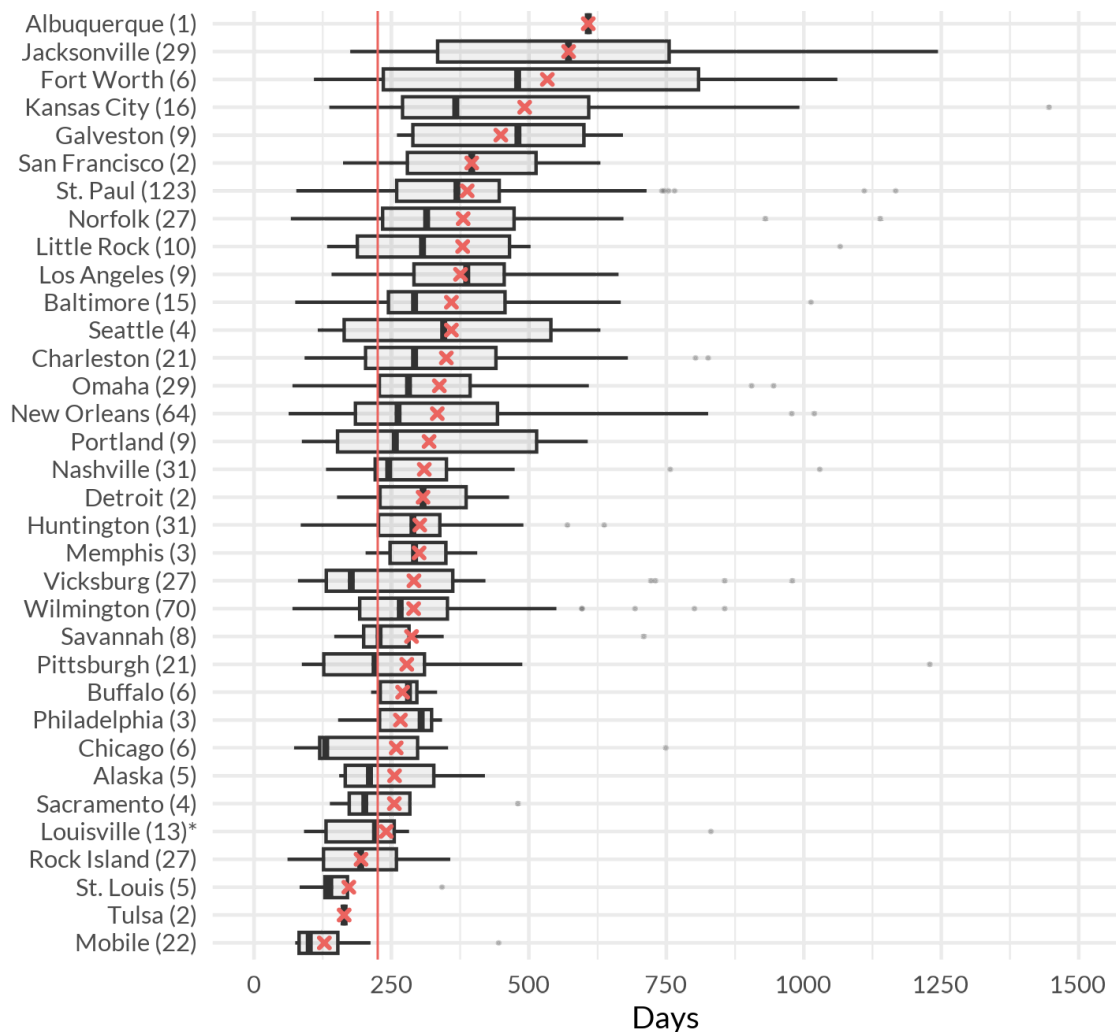


# The Time it Takes for Restoration 2024 Update

## DISTRICT-LEVEL FINDINGS

### Timeline of Federal Mandatory Processing of MBIs by District (2014-2023)

Districts are ordered from shortest average timeline at the bottom to longest timeline at the top. The number in parentheses indicates the number of MBIs approved in the District between fiscal year 2014 - 2023. The red line indicates the 225-day timeline required in the 2008 Rule, and the red x indicates the mean (average) for each District. \*See Louisville District caveat below.



In the updated dataset, eight Districts averaged less than less than 225 days for mandatory federal processing of MBIs (Mobile, Tulsa, St. Louis, Rock Island, Louisville\*, Sacramento, Alaska, and Chicago). The fastest Districts by total processing times were Pittsburgh, Tulsa, Memphis, and Rock Island, Tulsa, and Memphis (these were the same Districts in the fastest quartile in the previous analysis). The Districts with the slowest quartile total processing days (e.g., > 1506 days) were: Norfolk, Seattle, Savannah, Charleston, Detroit, Galveston, Los Angeles, Kansas City, Jacksonville, Kansas City, and San Francisco.

### CAVEATS REGARDING DISTRICT-LEVEL FINDINGS

Although these findings are based on the largest aggregation of data about approval timelines to date, a few caveats are worthy of reflection:

- Multiple Districts have few banks to start, &/or few or no new bank approvals in the new dataset. Readers are encouraged to consider the number of banks indicated in parentheses next to the District name before drawing conclusions about trends.
- Some Districts 'start the clock' later than others. The Louisville District in particular uses a unique 'Letter of Permission' approval process that starts the tracking later than other Districts, resulting in artificially faster timelines in the District.
- Several districts including Sacramento, San Francisco, and Seattle regularly process multiple benefit banks which involve multiple regulatory authorities including 404 CWA, ESA, and Magnuson-Stevens Act. These multiple authority banks are inherently more complicated than single authority banks, but our data makes no indication of whether MBIs are for multiple benefits.

# The Time it Takes for Restoration 2024 Update

## FOR MOST DISTRICTS, IT'S TOO EARLY TO TELL IF TIMELINES ARE TRENDING FASTER OR SLOWER

The graph at right shows the total average timeline in order of longest (top) to shortest timeline, with indication of mandatory federal processing time, additional, and sponsor processing. A handful of Districts had enough of an increase in bank approvals (e.g., 9+ additional banks) to consider a discussion of trends at the District level (below).

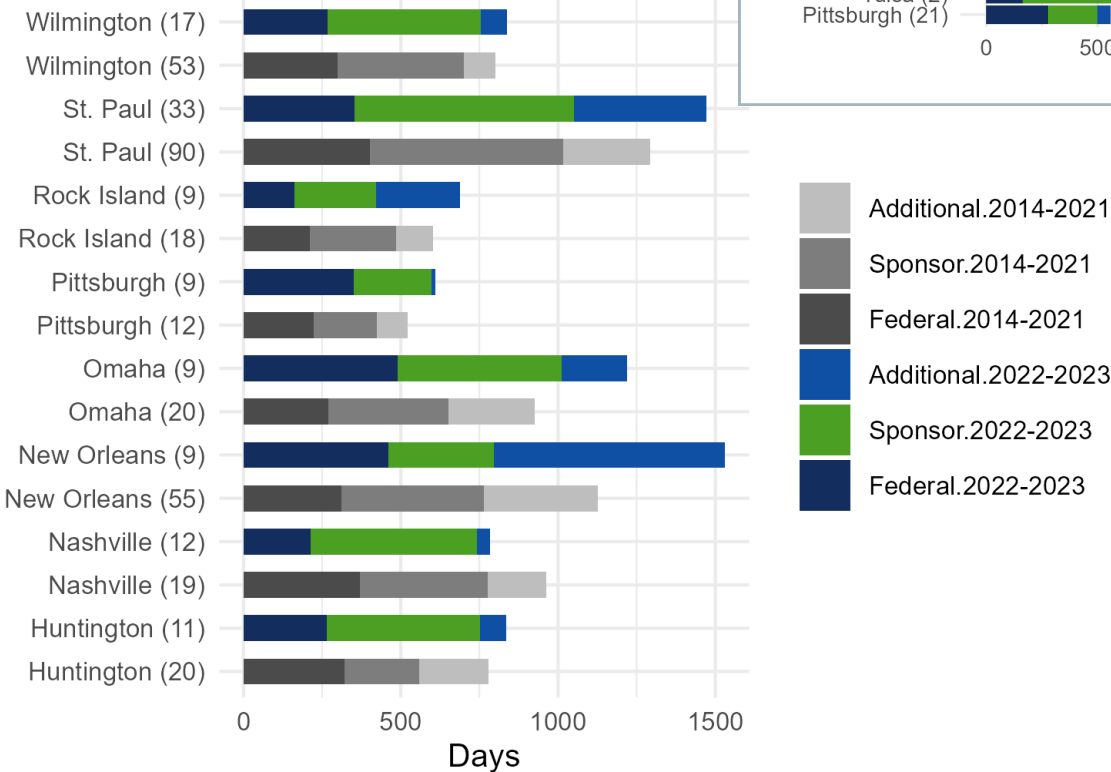
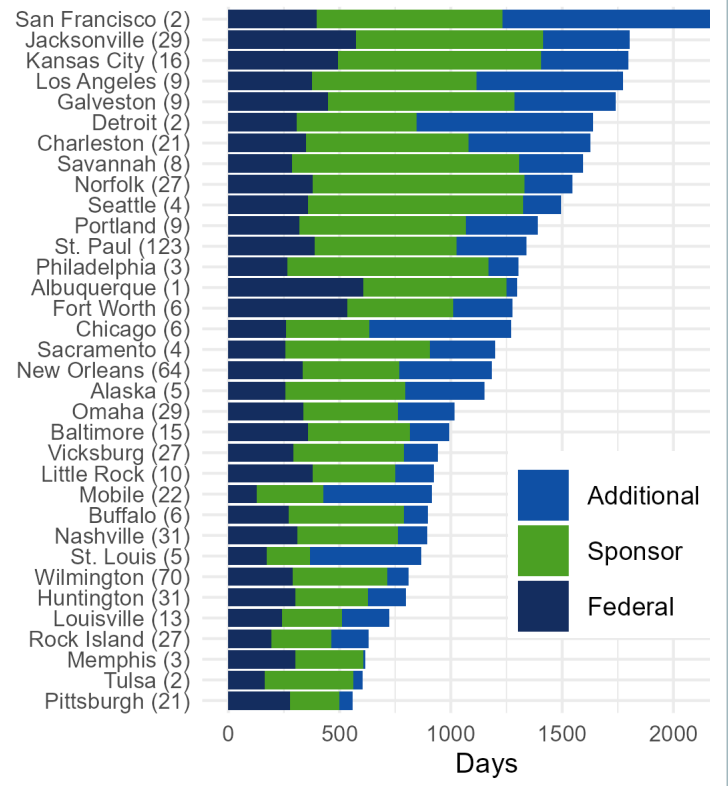
### Previous Total Average Processing Data - Old Data vs. New Data in Districts with Nine or More New Records

Districts that had 9 or more added records are indicated here, as these are more appropriate to review for trends over time. The colored bars in the graph represent only new data (2022-2023), while the gray bars represent the old data (2014-2021). In terms of total processing time, Nashville reduced times by more than 20%; and New Orleans and Omaha increased times by more than 20%.

For federal processing (dark blue), Huntington, Nashville, and Rock Island reduced times by more than 20%; and New Orleans, Omaha, and Pittsburgh have increased federal processing times by more than 20%.

## Total Average Processing Timelines by District - Full Dataset (2014-2023)

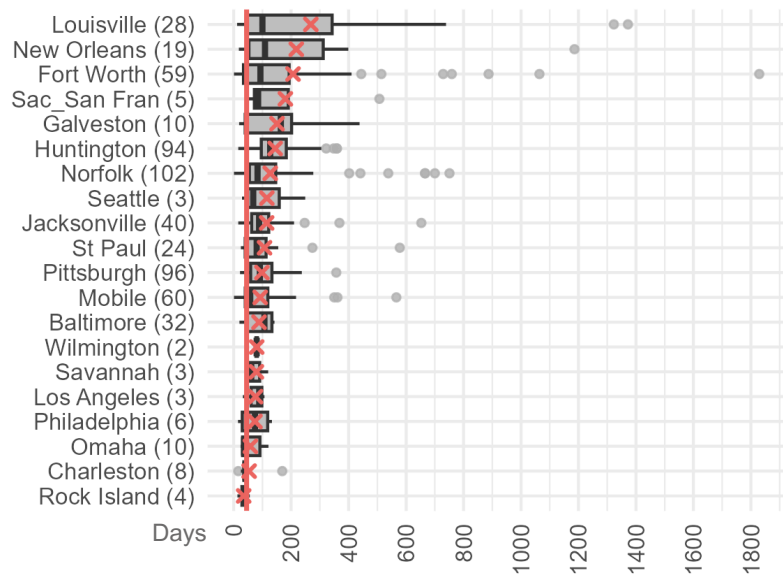
The number in parentheses indicates the number of MBIs approved in the District between fiscal year 2014 - 2023. See Louisville District caveat above.



# The Time it Takes for Restoration 2024 Update

## CREDIT RELEASE TIMELINE ANALYSIS

A mitigation bank cannot sell credits until specific steps are approved by USACE, typically including an initial release, interim releases tied to milestones, and a final release when the site meets ecological standards. However, USACE does not track 'timestamp' data for credit releases or have a performance metric for timely approvals. EPIC compiled the first national dataset of 608 records on credit release request and approval dates, covering 20 Districts. The 2008 Rule sets a 45-day target for reviewing credit release requests, which can be extended for site visits. With the caveat that the data do not indicate site visits, the range of processing times was 1 - 1,829 days, with an average of 92 days. Timeframes varied by District, as seen in the graph at right (the red line marks the 45-day target timeline, "x" indicates the mean, and the number in parentheses shows the number of records per District).



## CHANGES THAT ARE HELPING AND NEXT STEPS

Following the publication of the 2023 quantitative analysis, a [companion report](#) synthesized insights from in-depth interviews with sponsors representing 70 banks in 17 Corps Districts. The report included over 50 recommendations to address bottlenecks. The Corps has already implemented or is moving towards the following **changes that may help speed mitigation bank reviews**:

- **Hiring more staff** with dedicated time for reviews (1).
- **Creating leadership accountability for sticking to deadlines.** We have heard that leadership at multiple levels at USACE are checking in on performance to deadlines on a regular basis.
- **Adopting a Memorandum of Agreement to spread the approval process workload with a state agency** such as the [MOA](#) between the Norfolk District and the Virginia Department of Environmental Quality.
- **Developing technology to speed staff review.** USACE launched a Regulatory Request System ([RRS](#)) in the Spring of 2024. 'E-permitting' could provide 12% time savings per permit (2). MBI/ILF functionality is under development.

Despite these steps, the data show that USACE is still not meeting its 225-day federal processing timeline. We acknowledge that not enough time may have elapsed to identify a change in the data. Regardless, USACE needs to **take additional steps to meet timelines**:

- [Further integrate](#) project management, accountability, and transparent reporting functions into RRS, using Virginia's [Permitting Enhancement and Evaluation Platform](#) as a guide.

- Improve the interagency review team process through consensus decision making, comment tracking, and more.
- **Consider a shift in the performance metric.** Options include changing the metric to reflect only federal processing time, convening a working group to develop guidance on appropriate sponsor response times to create mutual accountability on timeliness, or creating a metric that balances supply and demand of credits. The last option would also **create accountability for credit release timelines**. If impact permits outpace credit supply, credit releases and instrument reviews would be prioritized.

See Section 6 for additional detail on these recommendations.

**Late-breaking news:** In mid-September, leadership from USACE published 1) a memo on "Improving U.S. Army Corps of Engineers Timeline Compliance with the 2008 Compensatory Mitigation Rule," and 2) "Principles of Delivery for Mitigation Bank Decisions" (16 Sept. 2024 ASA Connor [memo](#), 19 Sept. 2024 Chief of Regulatory Moyer [principles document](#)). Multiple recommendations align with those shown here. A summary of this leadership guidance to USACE staff is included in Section 6 of the report.

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7. Appendix 1 - Methodology
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(1) Walker, 2023. Tom Walker, Acting Regulatory Chief, USACE, Presentation at 9/2023 ERBA Policy Conference, Washington DC. (2) Personal communication (anon), 2022.

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# Guide to the Report

The report is organized in the following sections based on the research questions noted below, along with the answers we were able to discover from the data analysis.

**1. Background, Objective and Approach** including data cleaning and management steps

**2. National-Level Findings**

**Research questions:** In the updated data, is federal processing meeting the 225-day requirement in the 2008 Rule nationally? Are approval timelines trending faster or slower over time? Is there any change from the previous analysis)?

**3. District Level Findings**

**Research questions:** Which Districts met the 225-day mandatory federal processing deadline? Which Districts have average federal and total processing timelines in the first and fourth quartiles when considering the addition of new data? At the District level, are federal or total approval timelines trending faster or slower over time? Is there any change from the previous analysis)?

**4. Bank Level Findings**

**Research Questions:** Which individual mitigation banks had average timelines in the first and fourth quartiles? Are there any banks from the new data that were added to the 'top 25' fastest and slowest timelines?

**5. Credit Release Timelines**

**Background on Credit Release Timelines**

**Research Questions:** What is the average timeline of credit releases? Is processing time meeting the 45-day target timeline in the 2008 Rule? Are credit approval timelines trending faster or slower over time?

**6. Changes That Are Helping and Recommendations for Next Steps**

**7. Appendix 1 - Methodology**

Contains additional detail on the methodology of the MBI timeline analysis, including categorization of processing, calculation of time intervals, data cleaning, and an analysis of the effect of removing outliers.

**8. Appendix 2 - Additional Tables and Information**

Includes larger-scale figures, and additional tables including a table of all Districts and processing times, and a table of all mitigation banks and processing times.

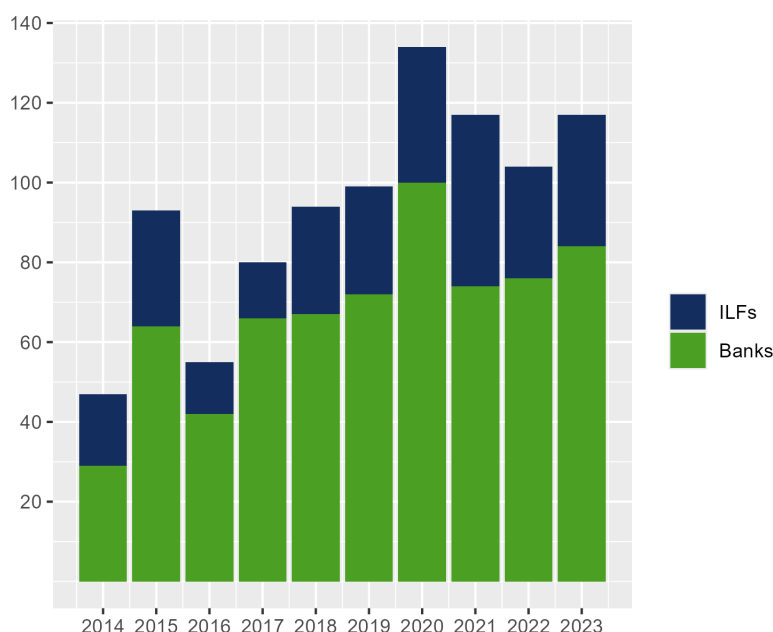
# 1. Background, Objective, and Approach

The 2008 Final Rule on Compensatory Mitigation for Losses of Aquatic Resources (herein 2008 Rule) provides an approval process for mitigation banks and in-lieu fee programs (ILFs).<sup>1</sup> The 2008 Rule stipulated that the regulator's side of the approval process should take no more than 225 days. EPIC conducted quantitative research in 2022 on close to 500 mitigation bank records approved between fiscal years (FY) 2014-2021. The data included 'timestamps' recorded in the US Army Corps of Engineers' (USACE) ORM2 database (Operations and Maintenance Business Information Link Regulatory Module, version 2, generally referred to as ORM). The objective of the past and present research is to determine whether the Corps was meeting the mandatory federal mitigation bank instrument (MBI) approval timeline (nationally, and at the District level) and whether approval timelines have changed since the previous analysis.

This report updates the previous quantitative analysis with new data from FY2022 through February 2023 (we did not have data from the full fiscal year). The dataset includes 157 additional mitigation banks and 61 additional ILF records after data cleaning.

Additionally, the report provides for the first time an analysis of the timeline of mitigation bank credit releases.

Figure 1. Mitigation Banks and ILFs Approved by Fiscal Year (Before Data Cleaning)



<sup>1</sup> EPA and USACE, 2008. Compensatory Mitigation for Losses of Aquatic Resources under CWA Section 404 (Final Rule). [Link](#).

## Data Cleaning and Management

The original dataset consisted of 1,087 starting records (819 banks and 268 ILFs). After data cleaning, the dataset contained 674 banks and 266 ILFs. As with the previous analysis, this research focused on MBIs.

Table 1. Data Records in Previous Report and New Data Records - Before and After Data Cleaning

Fiscal Years of Data	Before data cleaning		After data cleaning	
	Mitigation Banks	ILFs	Mitigation Banks	ILFs
2014-2021	644	213	503	205
2022-2023	175	55	157	61*
Total	819	268	660	266

\*The number of ILFs went up after data cleaning because some ILF records were mis-labeled as banks and were corrected

For each record, time intervals were calculated from the ‘timestamp’ data, and the approval process timeframe was divided into three categories:

1. **Mandatory federal processing** - The timeline that the USACE is responsible for, including review of the complete prospectus, complete draft instrument, and complete final instrument.
2. **Sponsor processing** - The timeline that the sponsor is responsible for, including preparation of the prospectus and draft instrument.
3. **Additional processing** - Includes both sponsor time and federal review time with no distinction between the two in the data, including the review of prospectus completeness, and review of draft instrument completeness. In some cases there is no delay, in others there may be considerable back and forth between sponsor and district before the product is complete.

See Appendix 1 for additional detail on the timeline of instrument approval and time interval calculations.

The following actions were taken to manage and organize the data:

- Records with a begin date prior to 2008 were removed, as these preceded the 2008 Rules that established the timeline for instrument approval (n=26)
- Records marked as “Terminated” were removed (n=15)
- Duplicate records were removed (n=7)
- Records with indications of inaccurate data entry were removed. This included: records with four or more of the same ‘timestamps’ (n=48), and records with four or more blank or “NA” ‘timestamps’ (n=43). Records with inaccurate data entry were also identified after performing the time interval calculations (see below): records with a negative time interval - meaning the begin date was after the end date (n=6), one record with zero mandatory federal processing days (n=1), and one record with zero total sponsor processing days.

- The researchers also found 93 records with zero or one total additional processing days. Many of the summary statistics were run twice - on the dataset with and without the 93 records and results are presented as a range of the two.
- Nineteen records were mis-labeled as mitigation banks, when they were actually ILF projects. This was corrected in the data.
- After calculating the total mandatory federal processing time, outliers below the 1st percentile or above the 99th percentile<sup>2</sup> (identified in R) were removed (n=14 MBIs). These included seven banks with federal processing between 23 - 57 days, and seven banks with federal processing between 1,456 - 3,288 days. Removing outliers resulted in modest decreases to national level findings (e.g., about 20 fewer days of average processing, see Appendix 1, Table 10) and variable changes in District level summary statistics (Appendix 1, Table 11). Of the nine Districts that had outlier records removed, this only resulted in a large change in the average timeline in Savannah, which went from 620 to 287 days, from removing only one record.
- It came to our attention that the Louisville District uses a unique 'Letter of Permission' approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data. We did not remove the District's records from the analysis, but have indicated this note when District statistics are reported.

Several data management steps were also taken, including adding: a textual District Name column in addition to the existing 3-letter District acronym, Calendar Year and Fiscal Year (October 1 - September 30) based on the date of instrument approval. See Appendix 1, Table 9, which summarizes all of the records removed and reason for removing them, broken out by District.

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<sup>2</sup> The researchers also considered dropping outliers at the 5th and 95th percentile - this would remove dozens of records and would be a trade-off between volume of data analyzed (which the researchers thought was more important) and less skewed data.

## 2. National Level Findings

**Caveats regarding national findings.** We note that the data does not include the size of the bank footprint, complexity of the project (including whether the bank is single or multiple benefit), whether site visits were included in the review timelines, or whether the bank was an umbrella bank, which could influence timelines.

**Research Question:** Is federal processing meeting the 225-day requirement in the 2008 Rule nationally?

**Answer:** No, quantitative results show that the average timeline exceeds the 225-day required timeline for mandatory federal processing of MBIs (Table 2). Mandatory federal processing of a mitigation bank instrument takes 1.5 times longer than required in regulations on average. This updated analysis found the same average federal processing time (336 days) as the previous analysis. The Corps processed twenty-five percent of MBIs in under 193 days, and 50% of MBIs were approved in over 282 days. ‘Extra’ processing time (sponsor and additional processing) adds 813-859 days on average to the overall timeline - an extra 27-28.5 months total. Keeping federal processing outliers increases the national averages only by a modest amount--a 4% increase in average federal processing and a 2% increase in average total processing.

Table 2. Timeline Range to Approve Mitigation Bank Instruments (2014-2023 data)

Processing Time	Min	1st Quartile	2nd Quartile (Median)	Average	3rd Quartile	Max
Mandatory Federal	61	193	282	336	416	1446
Sponsor	2	206	380	536	685	3330
Additional*	0*	31	140	277-323*	334	3428
Total	78	634	925	1149-1195*	1506	4437

\*Note that if we run summary statistics on a dataset \*excluding\* the 93 records where ‘additional’ processing is 0 or 1 day, the average additional days increases to 323 (46 additional days, a 57% increase), and the average total processing days increases to 1195 (46 additional days, a 23% increase). See Appendix 1, Table 10 for more detail.

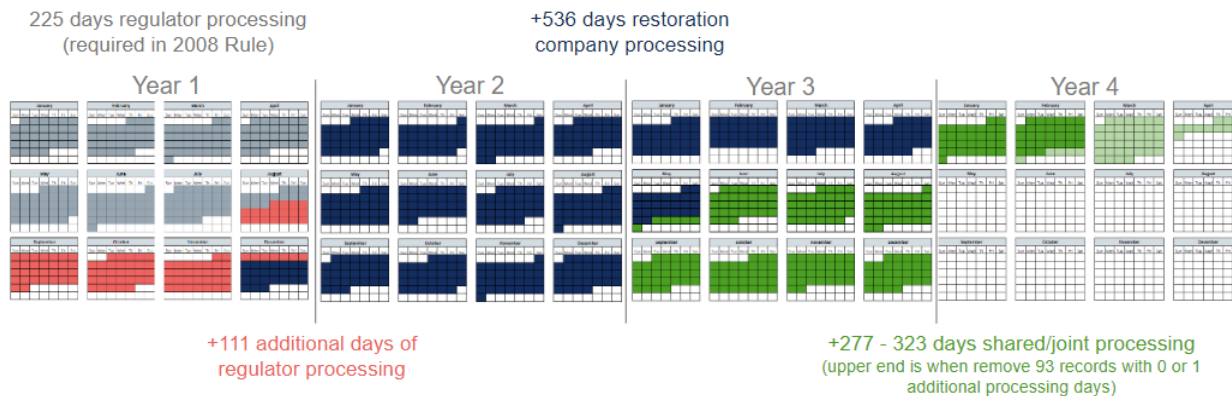
**Research Question:** Are approval timelines trending faster or slower over time? Is there any change from the previous analysis)?

**Answer:** Times are generally trending slower. The national average for the full timeline of the approval process is 1,149-1195 days, **an increase of 51-97 days from the previous analysis** (Figure 2 below, and see Appendix 2, Figure 10 for larger version). Not including outliers at the 1st and 99th percentile, the fastest total time for an MBI approval was 78 days, and the slowest approval was 4,437 days (12 years and 57 days - this is the same slowest record as the previous analysis).



Figure 2. Total Average Time to Approve Mitigation Bank Instruments - 1149-1195\* Days (2014-2023 data)

\*The higher figure uses the average additional days of the dataset \*excluding\* the 93 records where 'additional' processing is 0 or 1 day.



When comparing statistics from the new full dataset (2014-2023) to our previous analysis (2014-2021), changes in average and median timeframes were minor (between -4.2% - +7.9%) with the exception that the average 'additional' timeframe increased by 16% when statistics were run on the dataset that excluded 93 records where additional processing time is 0 or 1 day (Appendix 2, Table 12).

However, when isolating the new data (2022-2023, n=157), the average sponsor timeline increased by 16% / 98 days, the average additional processing time increased by between 9-29% / 26-108 days, and the total average timeline increased by 9-16% / 106-220 days over the earlier data (Table 3). Linear regression analyses found these to be statistically significant trends, adding 18-27 days per year for total processing, and 15-17 days for sponsor processing (see Appendix 2, Table 13. Summary of Linear Regression Models for additional detail).

Table 3. National-Level Change between Average Days from the Previous Dataset (2014-2021) to the New Data (2022-2023)

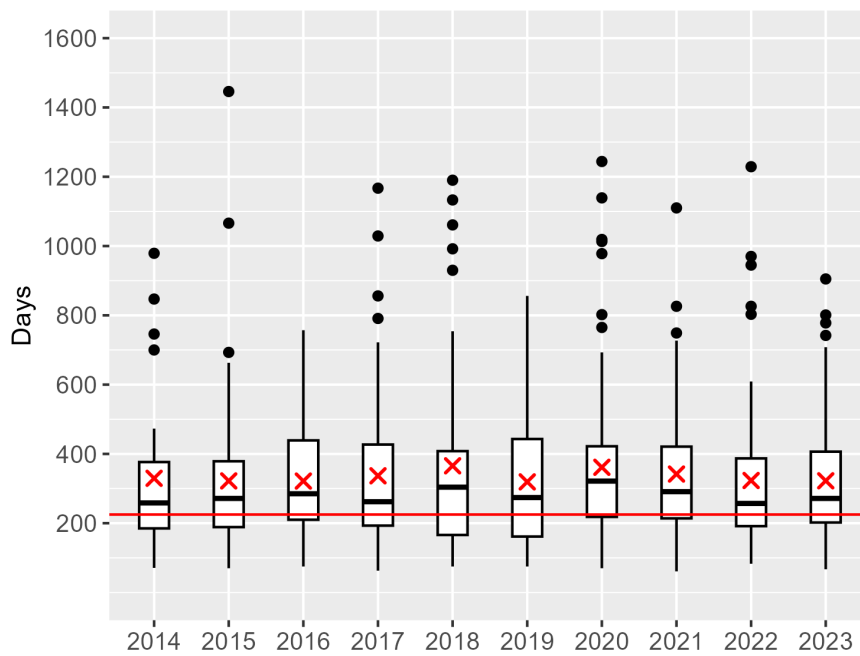
Processing Time	2014-2021 (n=503)	2022-2023 (n=157)	Change in Days	Percent Change
Mandatory Federal	340	323	-17	-5%
Sponsor	513	610	98	16%
Additional*	271	297 - 379	26 - 108	9% - 29%
Total	1124	1230 - 1344	106 - 220	9% - 16%

\*Range includes summary statistics on a dataset \*excluding\* the 93 records where 'additional' processing is 0 or 1 day

When analyzing average federal processing by year, only FY2014 is statistically equivalent to the 225-day timeframe (Figure 3, and Appendix 2, Table 14. Summary of Statistical Tests for additional detail).

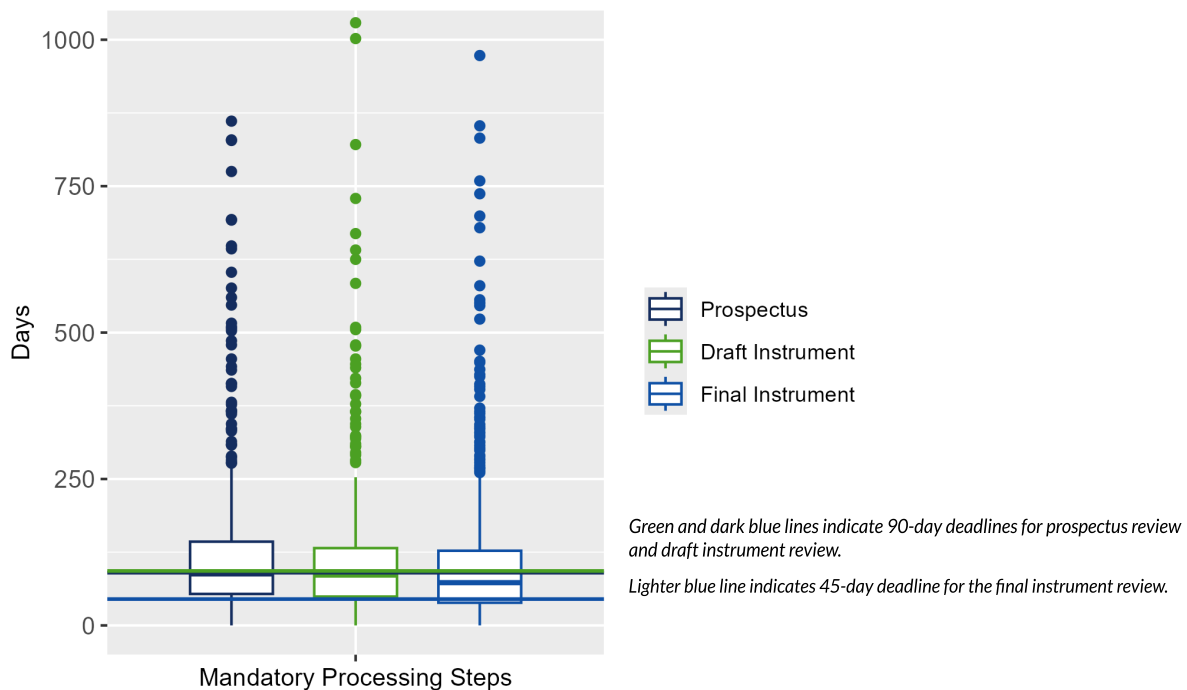
**Figure 3. Timeline of Federal Mandatory Processing of Mitigation Banks by Fiscal Year (2014-2023)**

Note: The red line indicates the 225-day timeline required in the 2008 Rule, dots indicate outliers, and the red x indicates the mean (average).



Of the three steps in mandatory federal processing, the final instrument approval step is the most delayed, taking on average 1.2 - 1.7-2x times longer than the 45 days required in regulations in all fiscal years.

**Figure 4. Range of Processing Time for Prospectus, Draft Instrument, and Final Instrument Processing**



### 3. District Level Findings

**Caveats regarding District findings.** We note that the Louisville District uses a unique ‘Letter of Permission’ approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data; removal of an outlier record in the Savannah District dramatically reduced its federal processing timeline (see Appendix 1, Table 11); and the data does not make a distinction of whether single or multiple benefit banks were approved, which could increase timelines.

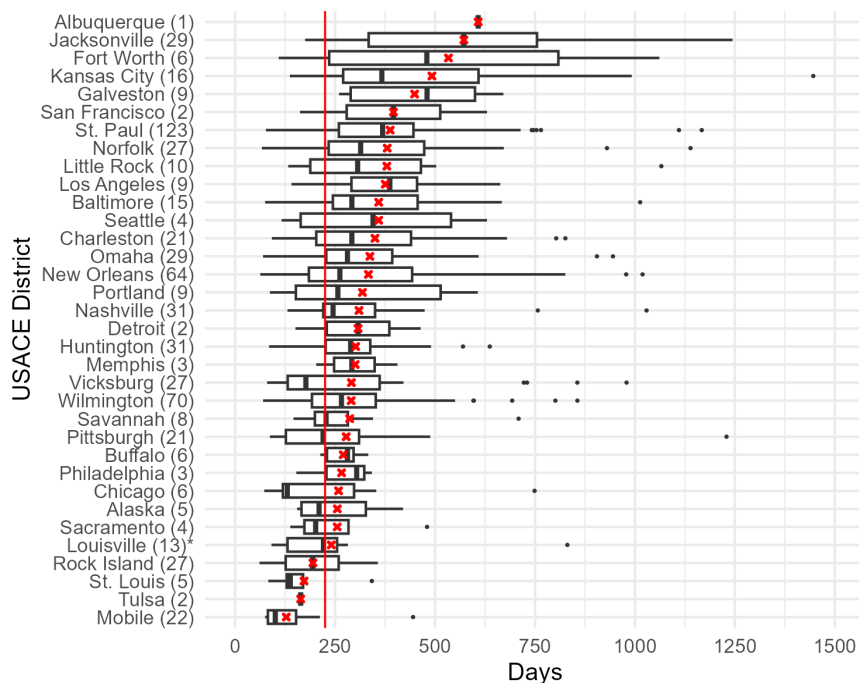
### Mandatory Federal Processing Times in Districts

**Research Questions:** Which Districts met the 225-day mandatory federal processing deadline? Which Districts have average federal processing timelines in the first and fourth quartiles when considering the addition of new data?

**Answer:** In the updated data (Figure 5), four Districts averaged less than 225 days for mandatory federal processing of MBIs (Mobile, Tulsa, St. Louis, Rock Island). The **Districts with the fastest quartile mandatory federal processing days (e.g., < 193 days) were: Mobile, Tulsa, and St. Louis.** The **Districts with the slowest quartile mandatory federal processing days (e.g., > 416 days) were: Galveston, Kansas City, Fort Worth, Jacksonville, and Albuquerque.** See Appendix 2, Table 15 for average timelines for all processing steps, and see Figure 12 for a larger version of the figure below.

Figure 5. Timeline of Federal Mandatory Processing of MBIs by District, Full Dataset (2014-2023)

Districts are ordered from shortest average timeline at the bottom to longest at the top. The number in parentheses indicates the number of MBIs approved in the District between fiscal year 2014 - 2023. The red line indicates the 225-day timeline required in the 2008 Rule, the red x indicates the mean (average) for each District, dots represent outliers. \*Note that the Louisville District uses a unique ‘Letter of Permission’ approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data.



## Changes in Mandatory Federal Processing Times in Districts

**Research Questions:** At the District level, are federal approval timelines trending faster or slower over time? Is there any change from the previous analysis?

When considering changes in mandatory federal timelines in the Districts between the older data (2014-2023) and newer data (2022-2023), it may be difficult to draw insight as many Districts only had a few new records in 2022-2023. Below we show the eight Districts that had 9 or more new records in 2022-2023, with the averages and percent changes between the new and old data (see Appendix 2, Table 16 for a table with all of the Districts). The data indicates that **Huntington, Nashville, and Rock Island have reduced federal processing times by more than 20%**; and **New Orleans, Omaha, and Pittsburgh have increased federal processing times by more than 20%**. Several Districts in Table 4 (and additional Districts in the full Table 16 in Appendix 2) have dramatically decreased the ‘additional’ timeline. USACE continues to hold a performance metric based on total time, despite the 2008 Rule mandating a deadline for federal processing. The data provides a small indication that one consequence of this choice of metric may be ‘stopping the clock’ or withdrawing a bank proposal when the timeline is outside of the regulator’s responsibility.

Table 4. District-Level Change between Average Days from the Previous Dataset (2014-2021) to the New Data (2022-2023), for Districts with 9+ Records in 2022-2023

Orange indicates an increase by 20% or more, green indicates a decrease by 20% or more.

2014-2021					2022-2023					% change in average between new data and old data			
District	Total Federal	Total Additional	Total Sponsor	TOTAL	District	Total Federal	Total Additional	Total Sponsor	TOTAL	Total Federal	Total Additional	Total Sponsor	TOTAL
Huntington (20)	321	220	238	780	Huntington (11)	265	83	487	835	-21%	-165%	51%	7%
Nashville (19)	371	186	405	962	Nashville (12)	213	42	530	785	-74%	-340%	24%	-23%
New Orleans (55)	313	363	451	1126	New Orleans (9)	461	736	334	1531	32%	51%	-35%	26%
Omaha (20)	269	274	382	925	Omaha (9)	489	208	524	1220	45%	-32%	27%	24%
Pittsburgh (12)	223	99	201	522	Pittsburgh (9)	351	12	246	610	37%	-715%	19%	14%
Rock Island (18)	210	116	275	602	Rock Island (9)	163	268	258	689	-29%	57%	-7%	13%
St. Paul (90)	401	276	615	1293	St. Paul (33)	352	420	699	1471	-14%	34%	12%	12%
Wilmington (53)	298	100	403	801	Wilmington (17)	267	83	488	838	-12%	-21%	17%	4%

## Total Processing Times in Districts

**Research Questions:** Which Districts have average total processing timelines in the first and fourth quartiles when considering the addition of new data?

**Answer:** In terms of District level total processing times, in the updated data (Figure 6, left side), the Districts with the fastest quartile total processing days (e.g., < 634 days) were: Pittsburgh, Tulsa, Memphis, and Rock Island (these were the same Districts in the fastest quartile in the previous analysis). The Districts with the slowest quartile total processing days (e.g., > 1506 days) were: Norfolk, Savannah, Charleston, Detroit, Galveston, Los Angeles, Kansas City, Jacksonville, and San Francisco. See Appendix 2, Figure 13 for a larger version of the figure below.

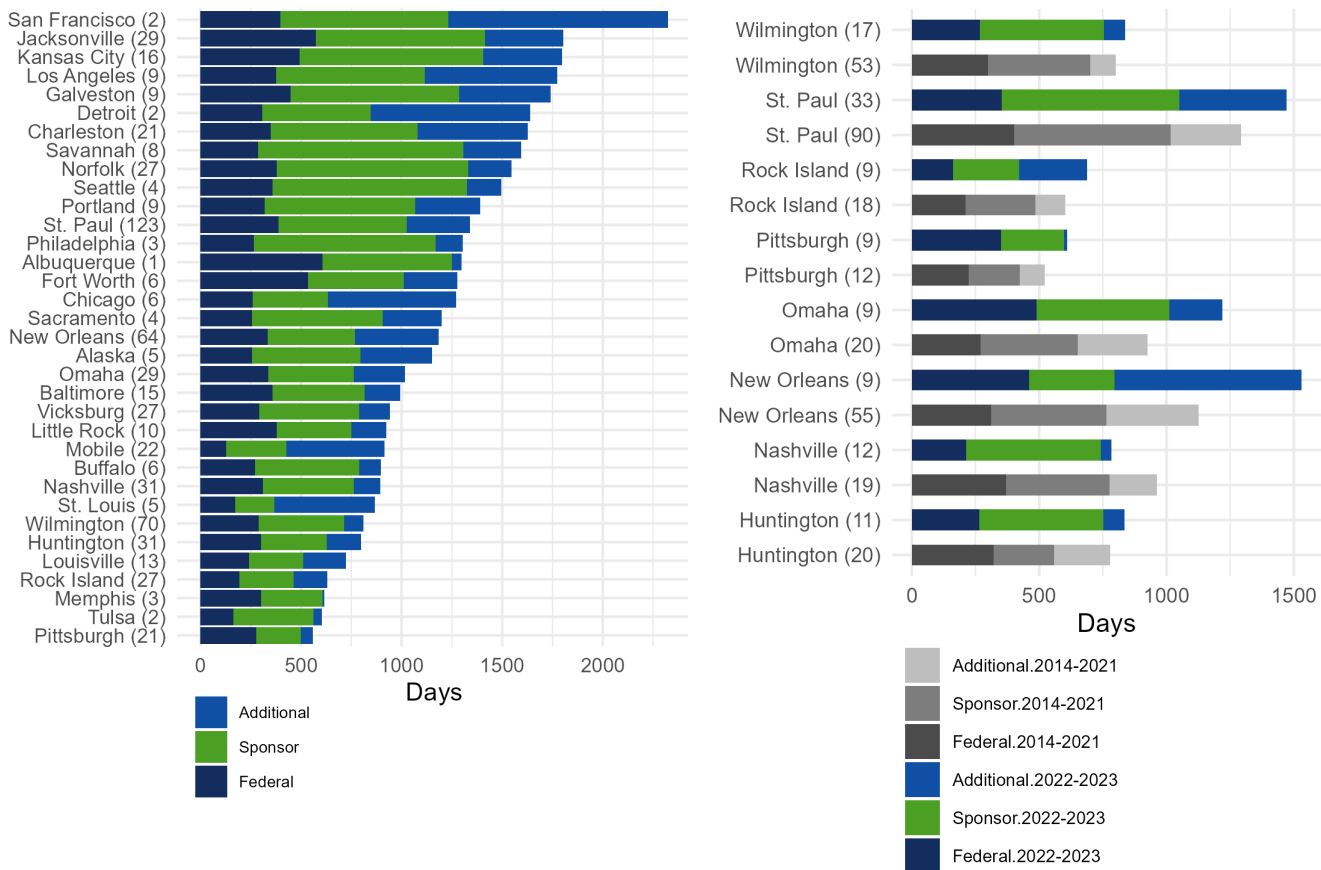
## Changes in Total Processing Times in Districts

**Research Questions:** At the District level, are federal or total approval timelines trending faster or slower over time? Is there any change from the previous analysis?)

**Answer:** When considering the eight Districts that had 9 or more new records in 2022-2023 (Figure 6, right side), total processing time increased in all but two Districts. The data indicates that **Nashville reduced total processing times by more than 20% (and notably had a dramatic -340% decrease in additional time); and New Orleans and Omaha have increased total processing times by more than 20%** (see also Table 4).

Figure 6. Timeline of Total Processing of MBIs by District, Showing Full Dataset (2014-2023) on the Left, and Previous Dataset (2014-2021) and New Data (2022-2023) for Districts with 9+ New Records on the Right

Note that the Louisville District uses a unique 'Letter of Permission' approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data..





## 4. Bank Level Findings

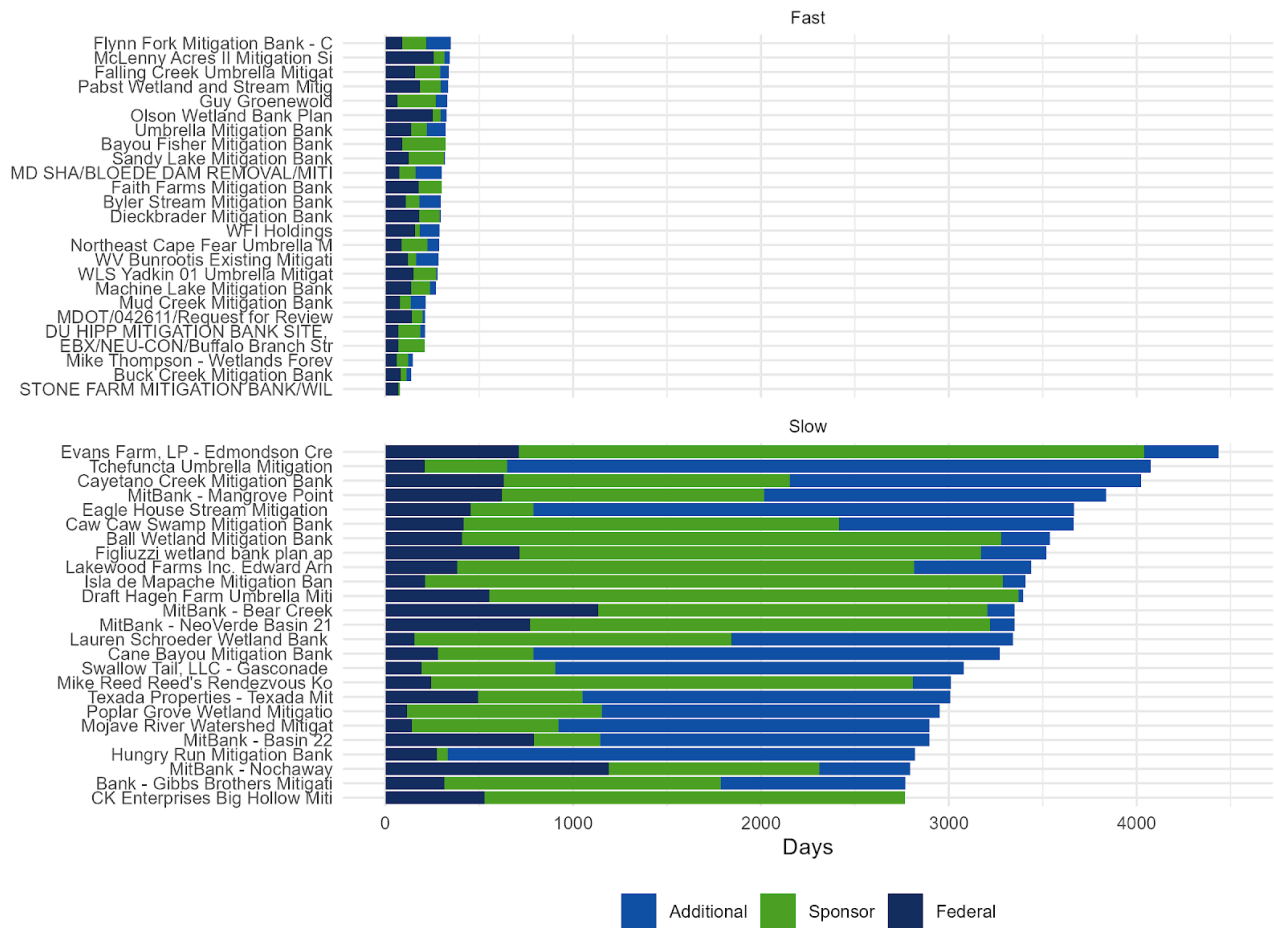
**Research Questions:** Which individual mitigation banks had average timelines in the first and fourth quartiles? Are there any banks from the new data that were added to the ‘top 25’ fastest and slowest timelines?

**Answer:** The national level findings section indicated that the range of total processing time was between 78 - 4437 days—the range is made quite clear in the figure below. The only statistically significant explanatory variable we have in the data for how long approvals take is the year of approval—every year it’s taking longer and longer (on average, nationally).

The fastest quartile of total processing (638 days or less) included 170 banks; 164 banks fell into the slowest quartile of total processing (1506 days or more). A full table of MBIs timelines is included in the Appendix 2, Table 18. That table indicates outliers (that were not considered in the analysis), and an indication of banks in the fastest and slowest quartiles.

Figures 7 below show the top 25 fastest and slowest banks. Note that while mandatory federal processing (indicated in green) may fall within the 225-day deadline, the ‘extra’ Sponsor and Additional timeline can add significant time to the approval process. Many of the slowest banks have a large portion of their processing times in these categories.

Figure 7. Top 25 Fastest and Slowest Bank Approvals by Total Processing Time (2014-2023)



The data from 2022-2023 included the following new entries into the 'top 25' fastest approvals by total processing:

- WLS Yadkin 01 Umbrella Mitigation Bank - Rolling Meadows Site
- WFI Holdings
- Dieckbrader Mitigation Bank
- Byler Stream Mitigation Bank
- Faith Farms Mitigation Bank
- Sandy Lake Mitigation Bank
- Pabst Wetland and Stream Mitigation Bank

The data from 2022-2023 included the following new entries into the 'top 25' slowest approvals by total processing:

- Tchefuncta Umbrella Mitigation Bank
- Cayetano Creek Mitigation Bank
- Caw Caw Swamp Mitigation Bank
- Lakewood Farms Inc. Edward Arnesen Wetland Bank
- Isla de Mapache Mitigation Bank (Raccoon Key)
- Draft Hagen Farm Umbrella Mitigation Bank
- Mojave River Watershed Mitigation Bank on Cronese Lake (T4O, Inc.)
- Bank - Gibbs Brothers Mitigation Bank / MML San Jac Basin/Advanced Ecology/ Walker Co.
- CK Enterprises Big Hollow Mitigation Bank

## 5. Credit Release Timelines

### Background on Credit Release Timelines

A mitigation bank cannot sell credits until certain steps have been met and approved by USACE. These steps are usually: 1) an initial release of “a limited number of credits once the instrument is approved and other appropriate milestones are achieved,” 2) an “interim credit release(s) that are linked to achievement of performance-based milestones (§332.8(o)(8)(i)), and 3) a final credit release” when the site has fully achieved ecological performance standards (2008 Rule). Per the 2008 Rule, the target timeline for reviewing a credit release request is 45 days, but can be extended if site visits are deemed necessary and further delays could occur.

*“The district engineer will provide copies of this documentation to the IRT members for review. IRT members must provide any comments to the district engineer within 15 days of receiving this documentation. However, if the district engineer determines that a site visit is necessary, IRT members must provide any comments to the district engineer within 15 days of the site visit. The district engineer must schedule the site visit so that it occurs as soon as it is practicable, but the site visit may be delayed by seasonal considerations that affect the ability of the district engineer and the IRT to assess whether the applicable credit release milestones have been achieved. After full consideration of any comments received, the district engineer will determine whether the milestones have been achieved and the credits can be released. The district engineer shall make a decision within 30 days of the end of that comment period, and notify the sponsor and the IRT” (2008 Rule).*

Nevertheless, we will consider 45 days as a ‘target’ timeline for credit release processing.

USACE does not collect ‘timestamp’ data for credit releases in its ORM database, nor does it have a performance metric associated with timely approvals. Indeed, mitigation bankers have theorized based on anecdotal evidence that USACE staff de-prioritize credit release processing because it does not have a performance metric or tracking associated with it.

EPIC compiled for the first time a national dataset of 608 records of credit release request (when the sponsor submitted the request) and approval dates spanning 20 Districts from four mitigation bankers and the Virginia Department of Environmental Quality’s (VA DEQ)<sup>3</sup> Permitting Enhancement and Evaluation Platform (PEEP) site.

**Caveat:** We have no indication of whether USACE requested a site visit, which would be a significant factor in timelines.

**Research Questions:** What is the average timeline of credit releases? Is processing time meeting the 45-day target timeline in the 2008 Rule?

**Answer:** The national average credit release approval timeframe is 92 days, 2x longer than the 45-day target timeline in the 2008 Rule, but whether site visits were required is unknown. The very short and very long timelines were confirmed as correct by the data sources. The short timelines may reflect when a later request is reviewed/approved at the same time as a request submitted

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<sup>3</sup> VA DEQ provides publicly transparent information about permits and approvals (including MBI, ILF, and credit release approvals) on its Permitting Enhancement and Evaluation Platform (PEEP) site. Data is made available for the public to [download](#).

earlier. The data providers of the long timelines indicated adaptive management activities and dual agencies reviewing the banks but also indicated there were no extenuating circumstances.

Table 5. National Timeline Range to Process Credit Release Requests

Processing Time	Min	1st Quartile	2nd Quartile (Median)	Average	3rd Quartile	Max
Days	1	50	132	92	142	1829

The data also captured which iteration of request it was (“first” &/or 1, 2, 3, etc.), and the District. We simplified these categories into first, second, middle, or last requests to analyze whether earlier or later requests were faster or slower. An ANOVA test<sup>4</sup> found a significant difference of means in the order of request and timeline (p-value < 0.001), and a multivariate regression model (which tests for the significance of one variable while controlling for the effects of all other variables in the model) found that requests categorized as ‘middle’ and ‘last’ were significantly correlated to days of processing (p-value < 0.001). The average time for first and last requests is much lower than the averages for the second request or ‘middle’ requests (Table 6).

Table 6. Timeline Range to Process Credit Release Requests by Order of Request

Processing Time	Min	1st Quartile	2nd Quartile (Median)	Average	3rd Quartile	Max
First	1	27	63	81	125	700
Second	1	42	105	211	183	1829
Middle	1	64	117	155	175	1186
Last	13	54	59	80	108	300

**Research Question:** Are credit approval timelines trending faster or slower over time?

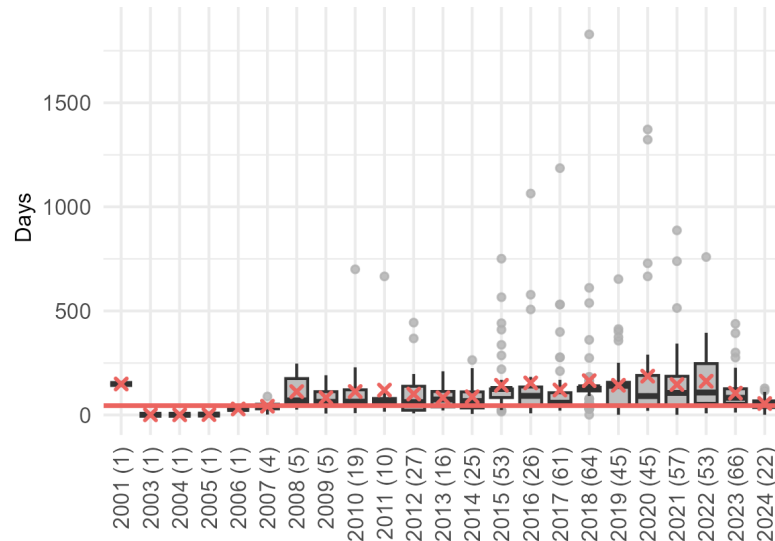
**Answer:** The range of approvals over time is captured in Figure 8 below. Year of request was not statistically correlated to days of processing, from a linear regression analysis.

<sup>4</sup> ANOVA is a statistical test to determine whether there is a significant difference in the means of groups - which in this case is categories of order (first, second, middle, last), and Districts.

**Figure 8. Range of Credit Release Processing Timelines Per Year Applied for**

The red line indicates the 45-day target timeline, the x indicates the mean, dots represent outliers, and the number in parentheses for the District graph indicates the number of records in that District.

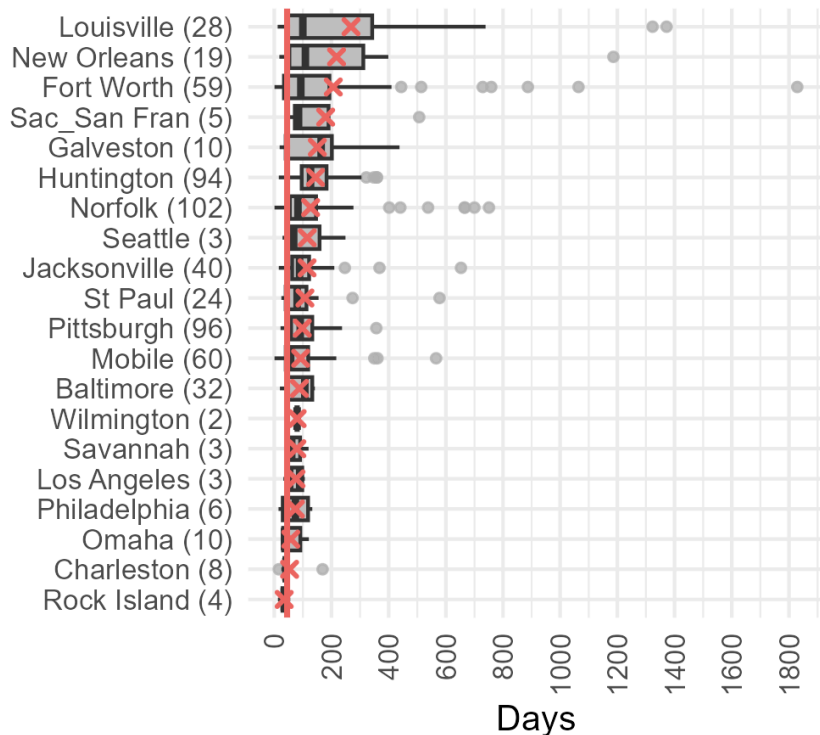
The range of approvals over time is captured here. Year of request was not statistically correlated to days of processing, from a linear regression analysis.



**Figure 9. Range of Credit Release Processing Timelines Per District**

The red line indicates the 45-day target timeline, the x indicates the mean, dots represent outliers beyond the 3rd quartile, and the number in parentheses for the District graph indicates the number of records in that District.

Districts, however, were statistically correlated to days of processing (Figure 9). An ANOVA test found a significant difference of means in the District and timeline ( $p\text{-value} < 0.001$ ). In simple regression models testing a single District's direct relationship with days of processing, Huntington District was significantly correlated with days of processing ( $p\text{-value} < 0.001$ ). However, a multivariate



regression model found that requests in the Louisville District were strongly correlated to days of processing ( $p\text{-value} < 0.001$ ). Requests in New Orleans were also significantly correlated with days of processing ( $p\text{-value} < 0.01$ ), and requests in Fort Worth, Galveston, and Huntington were weakly correlated with processing days ( $p\text{-value} < 0.1$ ). **Rock Island is the one District that is averaging less than 45 days for credit approvals**, although we only have four data points for the District.



Appendix 2, Table 17 provides the summary statistics of credit release timelines by District.

Overall, the 45-day target timeline for credit release processing is not being met. Despite lacking a crucial factor relating to timelines - whether a site visit was scheduled or not - we found statistically significant relationships in the data. Notably, Districts - and whatever staffing levels, processes, priorities, or other factors are at hand - have an influence on how long it takes to process credit requests.

## 6. Changes That Are Helping and Recommendations for Next Steps

This is the second quantitative analysis published on mitigation bank instrument approval timelines obtained from the USACE ORM database. The findings can be used by stakeholders in the MBI approval process to understand what the data is showing about specific Districts or individual banks. Previously, the only information available were opinions like “It’s too slow!,” and stakeholders debated whether this was true or not based on anecdotes rather than data. The results in this report provide proof from data that indeed timelines are slower than mandated in the 2008 Rule (336 days on average vs the 225 days mandated in the Rule)... although there’s still room for arguing about whether the data itself is correct.

This analysis also provides a chance to reflect on what steps have been taken, and whether there is evidence from the data that these steps are helping. In 2023, EPIC published a [companion report](#) that synthesized insights from in-depth informational interviews with 19 bank sponsors representing 70 banks in 17 Corps Districts across the US. The report included a number of recommendations to address bottlenecks in the MBI approval process.

**Late breaking news:** In mid-September, as we went to press, leadership from USACE published 1) a memo on “Improving U.S. Army Corps of Engineers Timeline Compliance with the 2008 Compensatory Mitigation Rule,” and 2) “Principles of Delivery for Mitigation Bank Decisions” (16 Sept. 2024 ASA Connor [memo](#), 19 Sept. 2024 Chief of Regulatory Moyer [principles document](#)). **Recommendations that align with those we had drafted in this report are highlighted in blue.** Additional notes on the memo and principles document are summarized below in Box 1.

- **Hiring more staff &/or ‘Regulators without Borders’ with dedicated time for reviewing mitigation bank and ILF instruments.** USACE Regulatory Division received \$160M in funding from the Infrastructure Investment and Jobs Act, a portion of which was directed to hiring, including over 100 staff in ‘Technical Regional Execution Centers.’<sup>5</sup>
- **Creating leadership accountability for sticking to deadlines.** We have heard that leadership at multiple levels at USACE are checking in on performance to deadlines on a regular basis. Although nationally, federal processing time exceeds 225 days, there are some improvements. When considering the eight Districts that had 9 or more new records in 2022-2023 (Figure 6), the data indicates that Huntington, Nashville, and Rock Island have reduced federal processing times by more than 20%. However, other Districts have increased processing times. **The memo and principles document both emphasize the importance of complying with timelines stipulated in the 2008 rule - both for the instrument review process as well as the credit release review process.**
- **Adopting a Memorandum of Agreement to spread the approval process workload with a state agency** such as the [MOA](#) between the Norfolk District and the Virginia Department of Environmental Quality whereby VA DEQ takes the lead on reviewing credit release requests.
- **Developing technology to speed staff review.** USACE launched a Regulatory Request System ([RRS](#)) in the Spring of 2024. ‘E-permitting’ is estimated to provide 12% time savings per

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<sup>5</sup> Walker, 2023. Tom Walker, Acting Regulatory Chief, USACE, Presentation “Corps Regulatory Program & BIL Investments,” at September 2023 ERBA Policy Conference, Washington DC.

permit.<sup>6</sup> MBI/ILF functionality is under development. USACE recently announced<sup>7</sup> their plan to develop a 'RIBITS 2.0' that would integrate with RRS. However, they noted that this development process would take some time.

Despite these efforts, the data show that USACE is still not meeting its 225-day federal processing timeline for MBIs. The only statistically significant explanatory variable we have in the data for how long MBI approvals take is the year of approval—every year it's taking longer and longer (on average, nationally), and for credit release processing time Districts are a statistically significant predictor in longer timelines. We acknowledge that not enough time may have elapsed to identify a change in the data, and we recommend repeating this quantitative analysis every two years. Regardless, USACE needs to take additional steps to meet timelines:

- **Further integrate project management, accountability, and transparent reporting functions into RRS**, using Virginia's Permitting Enhancement and Evaluation Platform (PEEP) as a guide. For example, automatically create Gantt-style timeframes for the overall timeline as well as intermediate steps, automate reminders of deadlines, add the capability to track indicate 'whose desk' the application is currently on, provide public transparency of all permits and instruments under review, and provide real-time or at minimum annual reports to the public on national and District average federal processing times.
- **Improve the interagency review team (IRT) process.** EPIC provided numerous suggestions in our 2023 report, including:
  - "The Corps should communicate that **agency policy moving forward is to gain consensus** (meaning, "I can live with it") **rather than unanimity from IRT members. If, after working with the IRT, there remains a block to consensus, the Corps PM should exercise the leadership role ('decider' role) that the 2008 Rule clearly assigns to them.**
  - IRT member review should be limited to the boundary of their agency authority and their subject matter expertise.
  - Corps staff could better differentiate "must have" vs. 'like to have" IRT comments on products (draft prospectus, prospectus, draft instrument, etc.) so sponsors know which ones must be addressed to advance the review process.
  - Because late IRT comments threaten the Corps' compliance with regulations, Corps leadership should communicate that **the default position of the IRT Chair should be to not consider IRT comments submitted beyond the deadline.**
  - Corps PMs should track issues identified and resolved so that **comments that are 'closed' stay closed.**
  - The Corps should allow sponsors to submit documents with the IRT directly, rather than submitting documents to the Corps to distribute to the IRT.
  - The Corps should encourage PMs and IRT members to **use the Initial Evaluation Letter to identify potentially unsuitable projects early in the process.**

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<sup>6</sup> Personal communication, anonymous, 2022.

<sup>7</sup> Moyer and Hafer, 2024. Jennifer Moyer, Chief of Regulatory, and Kristen Hafer, Acting Deputy Chief of Regulatory, USACE, Presentation "Regulatory Program and BIL Investments," at September 2024 ERBA Policy Conference, Washington, DC.

- The Corps should provide Corps IRT Chairs with training in how to facilitate a group process efficiently (including the use of modern remote working methods and tools), resolve conflicts, and reach consensus.”
- See additional detail on these recommendations in our 2023 report ([p.26-27](#)).
- **Consider a shift in the performance metric.** USACE’s performance metric related to MBI approvals is 550 days of *total processing time*, which includes sponsor and additional time. We see scant evidence in the data of shifts in the portion of total time from federal processing to ‘sponsor’ or ‘additional’ time. We also have heard anecdotally of staff administratively withdrawing a bank, which effectively ‘stops the clock’ of total processing time. These changes are an unintended consequence of a metric that unfairly ascribes staff the responsibility of keeping ‘total time’ on track, even when it is not their responsibility. Some options USACE could consider include:
  - Changing the performance metric to reflect **ONLY federal processing time**.
  - **Balance supply and demand** in the District (/watershed) by changing the performance metric to have equivalent or greater compensatory mitigation (e.g., credits available) than impacts (e.g., average annual permitting impacts requiring mitigation), with a means to track and report on this goal. This goal/metric would provide accountability to approval timelines by tying the Clean Water Act’s no net loss policy goal with a means to track whether the amount of approved restoration and conservation of wetlands and streams balances impacts. The priority of processing permits to impact aquatic resources would be on par with the priority of processing restoration. This shift would also **create accountability for credit release timelines**. If impact permits are outpacing credit supply, credit releases and other credit-creating work would go to the top of the pile (and vice versa).
  - If the performance metric cannot be changed, a multi-stakeholder working group could be convened to **create mutual accountability** of response times on both sides (the MBI/ILF sponsor as well as USACE staff). The group could develop guidance on appropriate sponsor response times for different categories of requests for changes that usually increases ‘additional’ and ‘sponsor’ time. This is not without precedent. VA DEQ and the Norfolk District did a version of this (internally only) when it came up with mutually-accountable target timeframes in their MOA. The difference would be that MBI sponsors would also have target timeframes for responding to requests.

This quantitative analysis provides valuable insights into the MBI approval process, highlighting both progress and persistent challenges. The steps already taken by USACE, such as increased staffing and technological advancements, are promising steps to improve the approval process. However, the data shows that more attention is needed to meet mandated timelines consistently across all Districts.

Integration of results of quantitative analyses like this one and efforts on the part of both USACE and bankers/ILF program managers may lead to tools and approaches that speed the approval of restoration to meet the nation’s demand, ensuring a sustainable future for our aquatic resources.

### Box 1. Major Themes of the September 2024 USACE [Memo](#) and [Principles Document](#) Regarding Timelines for Mitigation Bank Decisions

As noted above, these two USACE documents were released shortly before this report was finalized in mid-September. A summary of the major themes is provided here.

- **Direction to comply with the 2008 Rule timelines.** The memo and principles document both emphasize the importance of complying with timelines stipulated in the 2008 rule - both for the instrument review process as well as the credit release review process. The ASA memo notes that **a site visit may not be necessary to make a decision on a credit release request** if sufficient information / documentation is provided (e.g., scheduling should not hold up a credit release). The principles memo also pointed out the opportunity to **develop an MOA for more efficient review of credit release requests**. An example is the [MOA](#) between the Norfolk District and the Virginia Department of Environmental Quality whereby VA DEQ takes the lead on reviewing credit release requests. The principles document also **reminds staff of the few valid reasons for extension of timelines** noted in the 2008 Rule. Those reasons are: 1) “taking the time necessary to comply with other applicable laws and policies” (e.g., ESA, the National Historic Preservation Act, conducting government-to-government consultations with tribes); 2) if the sponsor has not submitted information in a timely way, or 3) if the sponsor has not delivered information essential for making a decision on the instrument. The ASA memo also indicates that **USACE headquarters should track causes of delays** (e.g., in their ORM database) and gather feedback from multiple sources to help identify delays and solutions.
- **The Interagency Review Team (IRT) should not hold up the timelines.** Both the memo and principles document emphasize this. The memo reminds staff of **USACE’s leadership role**. Only the signature of the USACE and the instrument sponsor are needed-IRT agency signatures are not required and while staff should strive for consensus (not unanimity), it is not required and should not come in the way of meeting timelines. The principles memo reminds staff that if there is strong disagreement at the stage of final instrument review, there is a dispute resolution process available to IRT members. Likewise, IRT comments and participation in site visits are welcomed, but delays are not tolerated. The memo directs staff to **reduce multiple versions and iterations of draft instruments**, which has become the norm. The principles document goes into more depth, noting that the IRT gets only one review of the draft instrument, and only the comments given will be considered. “The district should disregard any piecemeal comments provided by the IRT member after the 30-day time frame has ended.” Additionally, the principles document doubles down on **‘you only get one bite at the apple’**: whatever sections of the draft instrument have not been commented on will be copied as-is into the final instrument and “the district should not accept additional IRT comments on the completed sections of the draft instrument.”
- **Re-focusing the attention towards ecological performance.** The principles document spends three pages on this interesting paradigm shift, acknowledging the dynamic and uncertain nature of ecosystem restoration. USACE staff are directed to use **credit release review as the “primary risk management tool”** to ensure outcomes. More credits should be released towards the later stages of the project, upon “full achievement of ecological performance standards.” Staff should view the mitigation work plan as a strategy, de-emphasizing the level of detail needed to a **“60% level of design detail.”** This approach allows mitigation bankers flexibility to address the unexpected. **Ecological performance**



**standards should be set as a reasonably achievable range of outcomes**, such as those found in reference wetlands and streams. Overall, the directives shift the focus from perfecting a precise plan, to verifying achievable outcomes. In doing so, it also shifts the risk & level of risk tolerance from USACE staff to mitigation bank sponsors, and should therefore streamline the front end of the restoration review process.

- **Tools and practices to comply with the 2008 Rule timelines.** The ASA memo directed headquarters staff to develop a **national level financial assurances template**, with input from external stakeholders. Both the memo and principles document also directed developments of **templates at the district level for site protection, credit release schedules, and service area determinations; as well as rapid assessment methods to quantify impacts and offsets**. These tools are intended to provide consistency and predictability in the review process. While the memo acknowledged that changes in templates could delay timelines, the memo did not provide direction to “grandfather” a sponsor that was already in the review process, as we previously suggested in our [2023 report](#).
- **Setting expectations on the level of documentation needed at the prospectus stage.** In our [2023 research](#), interviewees noted that some Districts’ requirements for a prospectus were much more detailed than others. The principles document emphasized that only the items listed in the 2008 Rule are required for a prospectus, and “the district should not require additional information... such as a draft mitigation plan or draft mitigation banking instrument.”

The documents represent the clear priority of USACE leadership to speed up the approval process of restoration. EPIC is pleased to see USACE leadership using the findings of our previous research and identifying efficiencies within their purview (indeed, EPIC’s past research was cited in the references of the ASA memo). The recommendations in the USACE documents will doubtless take time to communicate and adopt. Future research can use the findings in this report as a baseline to assess whether internal USACE changes result in a more efficient instrument review process.

## 7. Appendix 1 - Methodology

This research builds on previous analyses by extending the timeframe of analysis to the period of fiscal year 2014-February 2023. For each record, time intervals were calculated from the ‘timestamp’ data, and the approval process timeframe was divided into three categories:

1. **Mandatory federal processing** - The timeline that the USACE is responsible for, including review of the complete prospectus, complete draft instrument, and complete final instrument.
2. **Sponsor processing** - The timeline that the sponsor is responsible for, including preparation of the prospectus and draft instrument.
3. **Additional processing** - Includes both sponsor time and federal review time with no distinction between the two in the data, including the review of prospectus completeness, and review of draft instrument completeness. In some cases there is no delay, in others there may be considerable back and forth between sponsor and district before the product is complete.

The total timeline for mandatory federal review of the complete prospectus to final decision to approve or not approve the instrument is 225 days or less, but the total timeline is broken up into interim steps that also have deadlines. There are other steps that are recorded but not included in the 225-day timeline. In Table 7 we describe these steps, noting the times the ‘clock’ starts and stops based on activities, and whether these steps were categorized as ‘Mandatory federal’ (counted towards the 225-day timeline), ‘Additional’, or ‘Sponsor’ processing.

Table 7. Timeline of Instrument Approval (based on the 2008 Rule, 332.8(d))

Category	Category
<b>Additional processing</b>	Optional Draft Prospectus & Review of Prospectus Completeness A sponsor has the option to submit a draft prospectus and receive comments back from the USACE and IRT within 30 days. The sponsor submits a prospectus to the USACE that provides an overview of the project that is sufficiently detailed to allow the public and the IRT to provide initial comments (see 33 CFR 332.8(d)(2)(i - vii) for the information required in the prospectus). The USACE has 30 days to notify the sponsor whether the prospectus is complete. The USACE may record the time when the optional draft prospectus or prospectus first arrives and the time when the USACE determines that the prospectus is complete, but the time is not counted as mandatory federal processing time. We identified in the ORM data that 21% of the MBI records do not start data entry until receipt of a complete prospectus, so ORM timeline data for this step may not be reliable.
<b>Mandatory federal processing (90 days)</b>	Prospectus The mandatory federal processing ‘clock starts’ when a complete prospectus is received by the USACE. The USACE must provide public notice within 30 days of receipt of the prospectus and allow the comment period to be open for 30 days. After the public comment period closes, the USACE has 15 days to provide any comments to the sponsor and to the IRT. The USACE has 30 days from the end of the comment period to provide an initial evaluation letter to the sponsor informing them whether the proposal has the potential to provide compensatory mitigation and may proceed. If the evaluation concludes the project does not have potential, the sponsor may optionally submit a revised prospectus, at which point this step would repeat. Total mandatory federal timeline for this step: 90 days.
<b>Sponsor processing</b>	Draft Instrument Preparation

Category	Category
	The sponsor receives an initial evaluation letter and prepares a draft instrument to the USACE (see 33 CFR 332.8(d)(6)(ii-iii) for the information required in the draft instrument).
<b>Additional processing</b>	Review of Draft Instrument Completeness After the sponsor submits a draft instrument, the USACE has 30 days to notify the sponsor whether the draft instrument is complete. The USACE records the time when the draft instrument first arrives and the time when the USACE determines that the draft instrument is complete. There could be one or more revision steps where the draft instrument is not deemed complete and sent back to the sponsor but there is no distinction in the data between federal review time and sponsor time.
<b>Mandatory federal processing (90 days)</b>	Draft Instrument The mandatory federal processing clock starts up again when a complete draft instrument is received by the USACE. The USACE and IRT have 30 days to comment, then there may be discussion between the IRT agencies, the USACE, and the sponsor. Within 90 days (inclusive of the comment period), the USACE will indicate to the sponsor whether the draft instrument is acceptable and what changes, if any, are needed.
<b>Sponsor processing</b>	Final Instrument Preparation The time between receipt of USACE / Interagency Review Team (IRT) notification of acceptability & comments about changes needed; and when the USACE determines the final instrument is complete.
<b>Mandatory federal processing (45 days)</b>	Final Instrument The clock starts when the final instrument that has addressed IRT comments is received by the USACE (IRT members also receive the final instrument). Within 30 days, the USACE tells the IRT whether they intend to approve the instrument and the IRT has 15 days after the USACE decision to file an objection. If there is an objection, a dispute resolution process starts (with final decision within a total of ≤150 days from receipt of final instrument) but if there is no objection, the approval is provided within a total of 45 days from receipt of the final instrument.
<b>≤ 225 Days</b>	TOTAL MANDATORY FEDERAL PROCESSING TIME WITHOUT DISPUTE RESOLUTION PROCESS

## Time Interval Calculations

ORM data records ‘timestamps’ for particular activities. As the 225-day timeline in the 2008 Rule applies only to the mandatory federal processing part of the entire approval process, time intervals (number of days) were calculated and categorized as ‘Mandatory federal’, ‘Additional’, or ‘Sponsor’ processing for discrete steps in the process based on ORM data (Table 8). Totals were also calculated overall and for Mandatory federal, Additional, and Sponsor time intervals.

Table 8. Time Interval Categorization and Calculations

Time Interval Categorization Data Calculation	Time Interval Categorization Data Calculation	Time Interval Categorization Data Calculation
Optional draft prospectus & review of prospectus completeness	Additional processing	DATE COMPLETE PROSPECTUS RECEIVED - BEGIN DATE
Prospectus	Mandatory federal processing	DATE EVALUATE LETTER - DATE COMPLETE PROSPECTUS RECEIVED
Draft instrument preparation	Sponsor processing	DATE DRAFT INSTRUMENT RECEIVED - DATE EVALUATE LETTER
Review of draft instrument completeness	Additional processing	DATE COMPLETE INSTRUMENT RECEIVED - DATE DRAFT INSTRUMENT RECEIVED
Draft instrument	Mandatory federal processing	DATE INSTRUMENT COMMENTS RECEIVED - DATE COMPLETE INSTRUMENT RECEIVED
Final instrument preparation	Sponsor processing	DATE IRT RECEIVE FINAL INSTRUMENT - DATE INSTRUMENT COMMENTS RECEIVED
Final instrument	Mandatory federal processing	DATE OF DISTRICT ENGINEER'S FINAL DECISION - DATE IRT RECEIVE FINAL INSTRUMENT

## Data Cleaning and Management

The original dataset consisted of 1,087 starting records (819 banks and 268 ILFs). The following actions were taken to manage and organize the data:

- Records with a begin date prior to 2008 were removed, as these preceded the 2008 Rules that established the timeline for instrument approval (n=26)
- Records marked as “Terminated” were removed (n=15)
- Duplicate records were removed (n=7)
- Records with indications of inaccurate data entry were removed. This included: records with four or more of the same ‘timestamps’ (n=48), and records with four or more blank or “NA” ‘timestamps’ (n=43). Records with inaccurate data entry were also identified after performing the time interval calculations (see below): records with a negative time interval - meaning the begin date was after the end date (n=6), one record with zero mandatory federal processing days (n=1), and one record with zero total sponsor processing days.<sup>8</sup>
- Nineteen records were mis-labeled as mitigation banks, when they were actually ILF projects. This was corrected in the data.

<sup>8</sup> The researchers also found 93 records with zero or one total additional days. Many of the summary statistics were run twice - on the dataset with and without the 93 records with 0-1 total additional days and results are presented as a range of the two.

- After calculating the total mandatory federal processing time, outliers below the 1st percentile or above the 99th percentile<sup>9</sup> (identified in R) were removed (n=14 MBIs). These included seven banks with federal processing between 23 - 57 days, and seven banks with federal processing between 1,456 - 3,288 days. Removing outliers resulted in modest decreases to national level findings (e.g., about 20 fewer days of average processing, see Appendix 1 Table 10) and variable changes in District level summary statistics (Appendix 1 Table 11). Of the nine Districts that had outlier records removed, this only resulted in a large change in the average timeline in Savannah, which went from 620 to 287 days, from removing only one record.
- It came to our attention that the Louisville District uses a unique 'Letter of Permission' approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data. We did not remove the District's records from the analysis, but have indicated this note anywhere District statistics are reported.

Table 9 below summarizes all of the records removed and reason for removing them.

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<sup>9</sup> The researchers also considered dropping outliers at the 5th and 95th percentile - this would remove dozens of records and would be a trade-off between volume of data analyzed (which the researchers thought was more important) and less skewed data.

**Table 9. Records Removed in Data Cleaning**

After the above data cleaning and management steps were taken, a total of 940 records remained (674 banks and 266 ILFs).

District	4 + NAs	4 + of the same date	duplicates identified in manual scan	negative values	outliers	< 2008 Rule	terminated	zero values	Grand Total
Alaska	2			1					3
Baltimore		1			1		1		3
Galveston	2	8							10
Huntington	2								2
Jacksonville	1								1
Kansas City	1	6	1			1			9
Little Rock	1	1			1				3
Los Angeles			1		1				2
Louisville		2							2
Memphis		1		1					2
Mobile	2				2		1		5
Nashville	2	3				1			6
New Orleans	8		2	1	1		1		13
New York							2		2
Norfolk	3	2			2	1			8
Omaha	1	4	1				1		7
Pittsburgh	2	1							3
Rock Island			1						1
Sacramento	1	1		1		1	1		5
San Francisco							1		1
Savannah		2			1	1	2		6
Seattle		1							1
St. Paul	13	3	1	2	4	20	3		46
Tulsa							2		2
Vicksburg	2	7						2	11
Wilmington		5			1	1			7
<b>Grand Total</b>	<b>43</b>	<b>48</b>	<b>7</b>	<b>6</b>	<b>14</b>	<b>26</b>	<b>15</b>	<b>2</b>	<b>161</b>

**Table 10. Average Federal Mandatory Processing Nationally - With and Without Outliers**

Processing Time	Min - with outliers	Min - without outliers	Average - with outliers	Average - without outliers	Max - with outliers	Max - without outliers
<b>Mandatory Federal</b>	23	61	351	336	3288	1446
<b>Sponsor</b>	2	2	537	537	3330	3330
<b>Additional*</b>	0	0	284	277-323*	3428	3428
<b>Total</b>	78	78	1172	1149-1195*	4437	4437

\*Range includes summary statistics on a dataset \*excluding\* the 93 records where 'additional' processing is 0 or 1 day

Table 11. Average Federal Mandatory Processing in Districts - With and Without Outliers

District Name	Average - with outliers	Average - without outliers	Percent change in average
Alaska	256	256	0%
Albuquerque	608	608	0%
Baltimore	432	359	-20%
Buffalo	270	270	0%
Charleston	350	350	0%
Chicago	259	259	0%
Detroit	308	308	0%
Fort Worth	534	534	0%
Galveston	449	449	0%
Huntington	301	301	0%
Jacksonville	572	572	0%
Kansas City	492	492	0%
Little Rock	477	380	-26%
Los Angeles	340	376	9%
Louisville	241	241	0%
Memphis	300	300	0%
Mobile	121	128	5%
Nashville	310	310	0%
New Orleans	329	333	1%
Norfolk	358	380	6%
Omaha	337	337	0%
Philadelphia	266	266	0%
Pittsburgh	278	278	0%
Portland	318	318	0%
Rock Island	195	195	0%
Sacramento	255	255	0%
San Francisco	396	396	0%
Savannah	620	287	-116%
Seattle	359	359	0%
St. Louis	172	172	0%
St. Paul	427	388	-10%
Tulsa	164	164	0%
Vicksburg	291	291	0%
Wilmington	307	290	-6%



## 8. Appendix 2 - Additional Tables and Information

Figure 10. Full Size - Total Average Time to Approve Mitigation Bank Instruments (2014-2023 data)

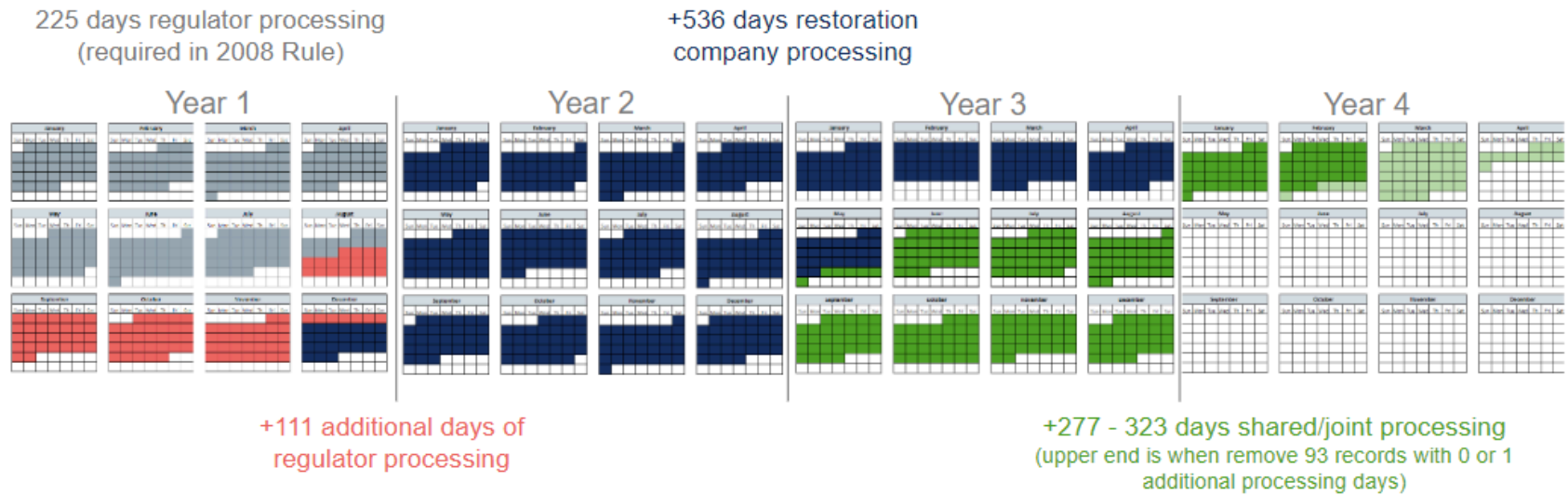


Table 12. Change between Average Days from the Previous Dataset (2014-2021) to the *Full* Current Dataset (2014-2023)

Processing Time	2014-2021 (n=503)	2022-2023 (n=157)	Change in Days	Percent Change
Mandatory Federal	340	336	-4	-1%
Sponsor	513	536	23	4%
Additional*	271	277 - 323	6 - 52	2% - 16%
Total	1124	1149 - 1195	25 - 70	2% - 6%

\*Range includes summary statistics on a dataset \*excluding\* the 93 records where 'additional' processing is 0 or 1 day

Table 13. Summary of Linear Regression Models

Linear model variables	P-value	R2 value	Significant?	Slope - increase in days per fiscal year
Federal processing ~ fiscal year	0.995	NA	No	NA
Sponsor processing ~ fiscal year	0.0275* - 0.0459	0.004532 - 0.006819*	Yes	14.5 - 17.2 days per FY
Additional processing ~ fiscal year	0.510	NA	No	NA
Total processing ~ fiscal year	0.0177* - 0.0777	0.00321 - 0.008161*	Weakly significant - significant*	18.4 - 27.3 days per FY

\*The asterisk indicates the value when the linear regression models were run on the datasets excluding the 93 records where 'additional' processing is 0 or 1 day

Table 14. Summary of Statistical Tests on Federal Processing by Fiscal Year

Year	n=	p-value of Wilcoxon signed rank test of whether the median of the FY is 225	Is the median statistically = 225 days?
2014	26	0.0673961	Yes
2015	62	0.0016906	No
2016*	41	0.0005222	No
2017	65	0.0006702	No
2018	65	0.0001267	No
2019	71	0.0019738	No
2020	100	0	No
2021	73	0.0000061	No
2022	75	0.002312	No
2023	82	0.0000955	No

\*Because 2016 data was normal, a regular 1-sided t-test was performed. The p-value shown is from the t-test.

Figure 11. Timeline of Total Processing of Mitigation Banks by Fiscal Year (2014-2023)

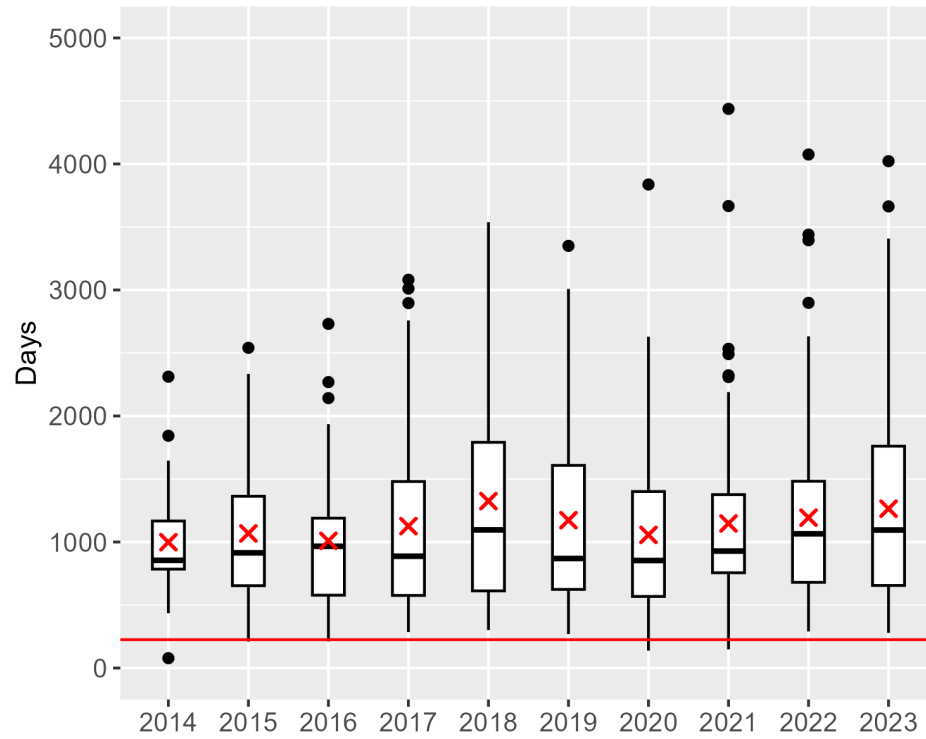
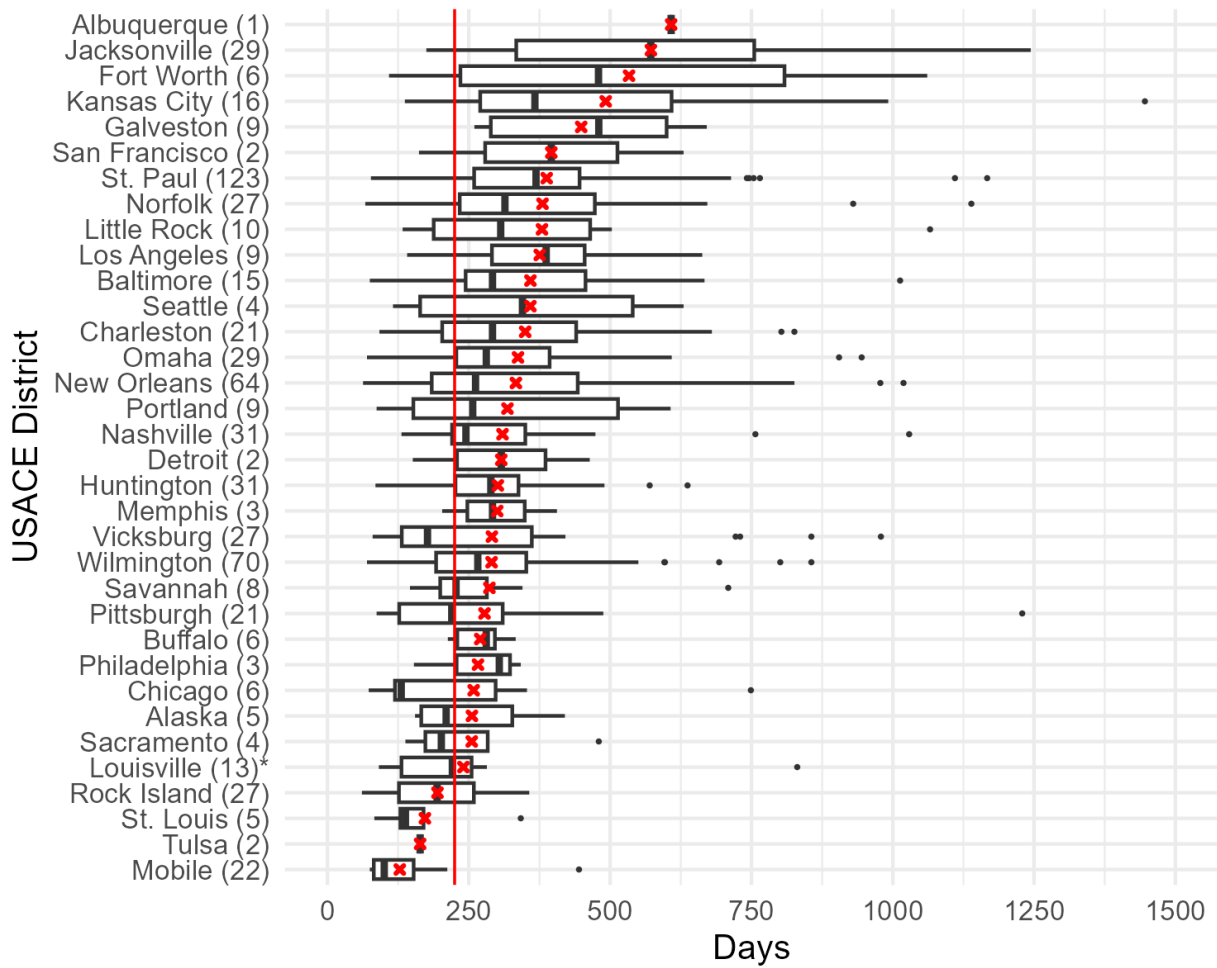


Table 15. Average Timelines by District in Days, Full Dataset (2014-2023) - Ordered Alphabetically

Note: Prospectus, Draft Instrument, and Final Instrument add up to Total Mandatory Federal Processing time.

District (# banks)	Mandatory Federal Processing Steps			Total Federal	Total Additional	Total Sponsor	TOTAL
	Prospectus	Draft Instrument	Final Instrument				
Alaska (5)	83	85	87	256	357	539	1152
Albuquerque (1)	56	29	523	608	48	643	1299
Baltimore (15)	104	115	140	359	177	456	992
Buffalo (6)	93	101	111	270	108	520	898
Charleston (21)	116	80	161	350	549	730	1628
Chicago (6)	43	39	184	259	636	376	1271
Detroit (2)	92	118	98	308	791	539	1638
Fort Worth (6)	143	214	177	534	266	476	1276
Galveston (9)	127	106	228	449	454	838	1741
Huntington (31)	95	90	116	301	172	326	799
Jacksonville (29)	192	235	146	572	389	841	1803
Kansas City (16)	103	171	219	492	392	914	1797
Little Rock (10)	112	125	143	380	173	371	923
Los Angeles (9)	115	164	96	376	659	738	1773
Louisville (13)	50	98	93	241	213	269	723
Memphis (3)	45	146	109	300	7	308	615
Mobile (22)	12	44	76	128	487	301	916
Nashville (31)	117	98	95	310	130	453	893
New Orleans (64)	183	91	59	333	415	434	1183
Norfolk (27)	99	88	194	380	215	951	1547
Omaha (29)	78	89	170	337	254	426	1017
Philadelphia (3)	63	70	133	266	134	904	1304
Pittsburgh (21)	100	105	72	278	62	220	560
Portland (9)	79	60	179	318	321	750	1390
Rock Island (27)	87	65	46	195	167	269	631
Sacramento (4)	114	98	43	255	292	651	1198
San Francisco (2)	147	229	21	396	1094	835	2325
Savannah (8)	80	64	143	287	287	1020	1593
Seattle (4)	47	258	55	359	171	966	1495
St. Louis (5)	26	95	51	172	500	196	868
St. Paul (123)	149	135	104	388	315	638	1340
Tulsa (2)	38	47	79	164	43	397	604
Vicksburg (27)	75	95	121	291	152	498	941
Wilmington (70)	114	106	72	290	96	424	810

Figure 12. Full Size - Timeline of Federal Mandatory Processing of MBIs by District, Full Dataset (2014-2023)



**Table 16. Average Timelines by District in Days, 2014-2021 vs 2022-2023 - Ordered Alphabetically**

*Districts highlighted in orange are those that had 9 or more new records in 2022-2023.*

2014-2021					2022-2023					Percent change in average between old data and new data			
District	Total Federal	Total Additional	Total Sponsor	TOTAL	District	Total Federal	Total Additional	Total Sponsor	TOTAL	Total Federal	Total Additional	Total Sponsor	TOTAL
Alaska (4)	278	412	414	1104	Alaska (1)	166	140	1041	1347	-67%	-194%	60%	18%
Albuquerque (1)	608	48	643	1299	NA	NA	NA	NA	NA	NA	NA	NA	NA
Baltimore (13)	369	176	457	1002	Baltimore (2)	293	184	453	930	-26%	4%	-1%	-8%
Buffalo (2)	291	33	393	716	Buffalo (4)	260	145	583	989	-12%	78%	33%	28%
Charleston (15)	331	612	617	1560	Charleston (6)	398	390	1012	1799	17%	-57%	39%	13%
Chicago (5)	287	591	418	1297	Chicago (1)	116	861	164	1141	-148%	31%	-155%	-14%
Detroit (1)	464	981	625	2070	Detroit (1)	151	601	453	1205	-207%	-63%	-38%	-72%
Fort Worth (6)	534	266	476	1276	NA	NA	NA	NA	NA	NA	NA	NA	NA
Galveston (5)	460	370	505	1335	Galveston (4)	435	558	1256	2248	-6%	34%	60%	41%
Huntington (20)	321	220	238	780	Huntington (11)	265	83	487	835	-21%	-165%	51%	7%
Jacksonville (25)	575	419	864	1859	Jacksonville (4)	554	204	697	1454	-4%	-106%	-24%	-28%
Kansas City (13)	465	431	966	1862	Kansas City (3)	612	220	685	1517	24%	-96%	-41%	-23%
Little Rock (10)	380	173	371	923	NA	NA	NA	NA	NA	NA	NA	NA	NA
Los Angeles (8)	405	495	733	1633	Los Angeles (1)	141	1976	781	2898	-187%	75%	6%	44%
Louisville (9)	247	175	297	720	Louisville (4)	225	298	206	729	-10%	41%	-45%	1%
Memphis (3)	300	7	308	615	NA	NA	NA	NA	NA	NA	NA	NA	NA
Mobile (19)	134	419	284	837	Mobile (3)	90	922	403	1415	-48%	55%	29%	41%
Nashville (19)	371	186	405	962	Nashville (12)	213	42	530	785	-74%	-340%	24%	-23%
New Orleans (55)	313	363	451	1126	New Orleans (9)	461	736	334	1531	32%	51%	-35%	26%
Norfolk (23)	388	249	808	1445	Norfolk (4)	335	20	1779	2134	-16%	-1161%	55%	32%
Omaha (20)	269	274	382	925	Omaha (9)	489	208	524	1220	45%	-32%	27%	24%
Philadelphia (3)	266	134	904	1304	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pittsburgh (12)	223	99	201	522	Pittsburgh (9)	351	12	246	610	37%	-715%	19%	14%

2014-2021					2022-2023					Percent change in average between old data and new data			
District	Total Federal	Total Additional	Total Sponsor	TOTAL	District	Total Federal	Total Additional	Total Sponsor	TOTAL	Total Federal	Total Additional	Total Sponsor	TOTAL
Portland (6)	247	301	782	1330	Portland (3)	462	363	685	1510	47%	17%	-14%	12%
Rock Island (18)	210	116	275	602	Rock Island (9)	163	268	258	689	-29%	57%	-7%	13%
Sacramento (4)	255	292	651	1198	NA	NA	NA	NA	NA	NA	NA	NA	NA
San Francisco (1)	162	318	148	628	San Francisco (1)	630	1870	1522	4022	74%	83%	90%	84%
Savannah (6)	289	328	623	1240	Savannah (2)	278	166	2210	2654	-4%	-97%	72%	53%
Seattle (4)	359	171	966	1495	NA	NA	NA	NA	NA	NA	NA	NA	NA
St. Louis (4)	195	400	128	722	St. Louis (1)	83	899	469	1451	-135%	56%	73%	50%
St. Paul (90)	401	276	615	1293	St. Paul (33)	352	420	699	1471	-14%	34%	12%	12%
Tulsa (2)	164	43	397	604	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vicksburg (24)	313	165	507	985	Vicksburg (3)	113	47	424	584	-177%	-249%	-20%	-69%
Wilmington (53)	298	100	403	801	Wilmington (17)	267	83	488	838	-12%	-21%	17%	4%



Figure 13. Full Size - Timeline of Total Processing of MBIs by District

Note that the Louisville District uses a unique 'Letter of Permission' approval process that starts tracking approval time in ORM later than other Districts, , making timelines in the District appear faster in the data.

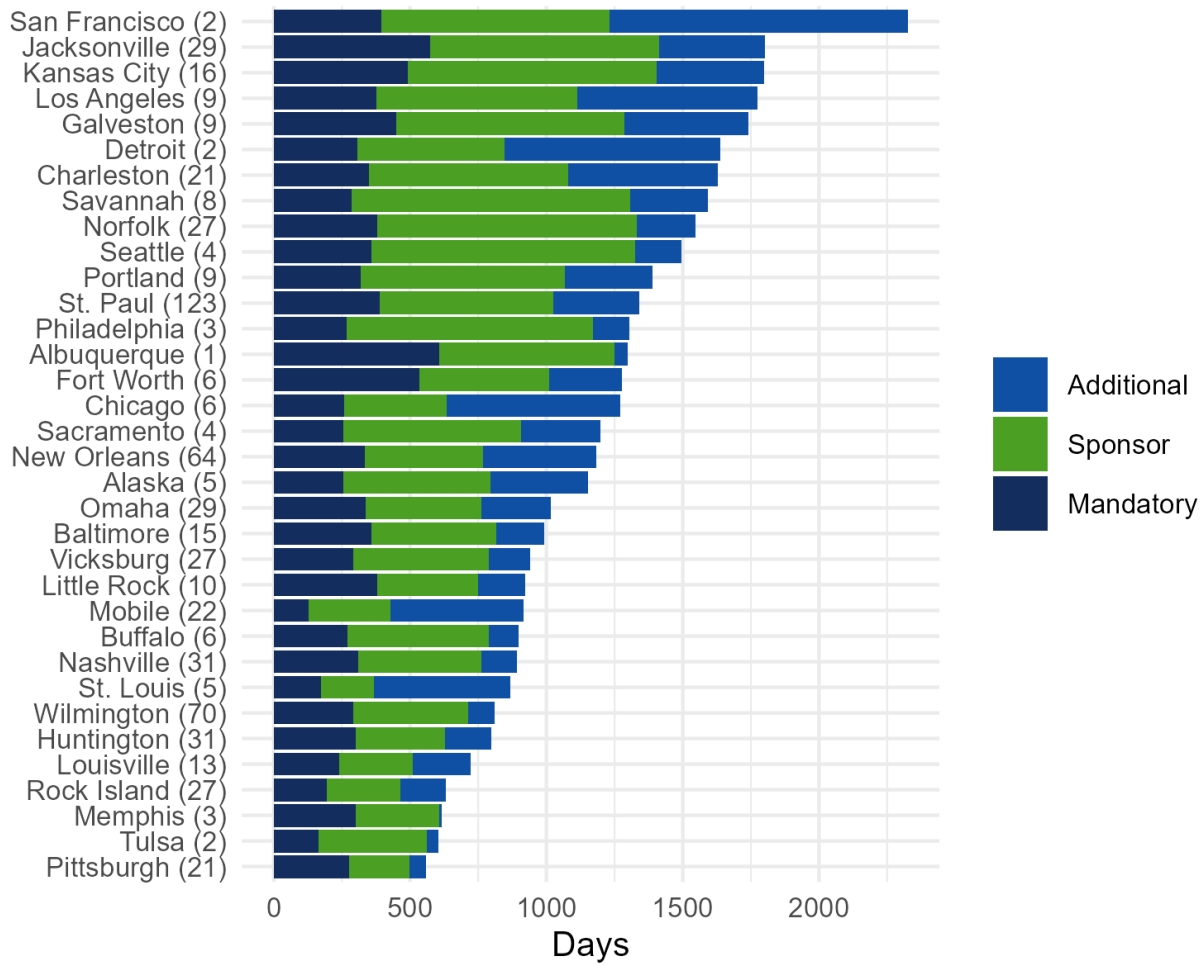


Table 17. Summary Statistics of *Credit Release* Timelines by District, Ordered Alphabetically

District	Min	Q1	Mean	Q3	Max
Baltimore (32)	20	45	88	133	142
Charleston (8)	16	36	54	46	169
Fort Worth (59)	1	34	206	193	1,829
Galveston (10)	19	40	151	202	438
Huntington (94)	16	96	144	183	359
Jacksonville (40)	16	63	115	122	653
Los Angeles (3)	32	61	76	98	107
Louisville (28)	12	43	268	343	1,372
Mobile (60)	1	40	92	119	566
New Orleans (19)	18	53	218	312	1,186
Norfolk (102)	1	55	127	146	751
Omaha (10)	24	31	58	91	121
Philadelphia (6)	15	30	74	118	133
Pittsburgh (96)	22	59	98	133	357
Rock Island (4)	13	29	35	41	56
Sacramento_San Francisco (5)	45	65	177	191	507
Savannah (3)	56	59	79	91	120
Seattle (3)	29	49	115	159	249
St Paul (24)	25	40	107	113	578
Wilmington (2)	75	78	80	83	85
Baltimore (32)	20	45	88	133	142
Charleston (8)	16	36	54	46	169

**Table 18. Bank Timelines – Ordered Alphabetically by Bank Name**

Note: Light green indicates MBIs in the fastest quartile by total processing, light pink indicates MBIs in the slowest quartile; dark green indicates fast outliers, and dark pink indicates slow outliers (these were not included in the analysis but are shown here for reference). The Louisville District uses a unique ‘Letter of Permission’ approval process that starts tracking approval time in ORM later than other Districts, making timelines in the District appear faster in the data.

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Wilmington (70)	130 of Chatham / Box Creek Wildnerness Mitigation Bank	373	20	1022	1415
Rock Island (27)	Afton South Prairie Wetland Mitigation Bank	308	172	332	812
St. Paul (123)	Agassiz Wild Rice, LLC / Agassiz Wild Rice Number 4	185	204	889	1278
Vicksburg (27)	AHTD - Red Chute Mitigation Bank	856	114	1342	2312
Vicksburg (27)	AHTD-Bayou Meto Mitigation Bank	730	17	1475	2222
Vicksburg (27)	AHTD-Upper Saline River Mitigation Bank	722	0	763	1485
Mobile (22)	Alabama River Mitigation Bank	166	587	162	915
Mobile (22)	ALDOT Bucksnot Mitigation Bank	96	557	580	1233
Pittsburgh (21)	AllStar Ecology, LLC, Bear Knob Property, Upshur County, West Virginia	1229	4	742	1975
Portland (9)	Amazon Prairie Mitigation Bank	522	0	619	1141
Norfolk (27)	Amelia Environmental Bank-Amelia	329	121	930	1380
New Orleans (64)	Amite Basin Mitigation Bank - Ewell Tract	145	215	134	494
New Orleans (64)	Amite Basin Umbrella Mitigation Bank - Hunt Tract	145	215	134	494
Sacramento (4)	Antonio Mountain Ranch Conservation and Mitigation Bank	185	691	915	1791
St. Paul (123)	ArcelorMittal Proposed Compensatory Mitigation Site	386	79	514	979
Little Rock (10)	ArDOT-Wiseman Mitigation Bank	503	200	150	853
Mobile (22)	Arlington Plantation Mitigation Bank	93	99	273	465
New Orleans (64)	Ash Slough M B Addendum 1	94	334	18	446
Omaha (29)	Ashland Wetland Mitigation Bank	905	387	637	1929
New Orleans (64)	Avoca Island Mitigation Bank - St. Mary	978	656	403	2037
Norfolk (27)	Bailey Mitigation Bank, Charles City Co	252	184	729	1165
Nashville (31)	Baileyton Stream Mitigation Bank	255	43	452	750
St. Paul (123)	Ball Wetland Mitigation Bank	408	259	2871	3538
Galveston (9)	Bank - Katy Hockley Mitigation Bank /Harris County Flood Control District/Unnamed Waters/Harris County	600	81	636	1317
Galveston (9)	Bank - Gibbs Brothers Mitigation Bank / MML San Jac Basin/Advanced Ecology/ Walker Co.	314	982	1473	2769
Galveston (9)	Bank - Halls Bayou Mitigation Bank/Delta Land Services, LLC/JD/Halls Bayou/Brazoria County	523	0	1215	1738
Galveston (9)	Bank - Houston-Conroe Mitigation Bank / The Earth Partners/Liberty Co.	289	59	712	1060
Galveston (9)	Bank - Seabreeze Mitigation Bank/JD/Spindletop Bayou/Chambers Co.	480	82	582	1144
Galveston (9)	Bank - Tarkington Bayou Mitigation Bank / The Earth Partners/Liberty Co.	260	915	82	1257
Galveston (9)	Bank - West Galveston Bay Mitigation Bank - was: Basford Bayou MB	277	311	1453	2041
Galveston (9)	Bank - West Montgomery Mitigation Bank / Montgomery Co.TX	626	937	881	2444
St. Paul (123)	Bank of Maple Plain - Crow River Wetland Bank	188	787	14	989

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Vicksburg (27)	Banks Family Limited Partnership/100207/Mitigation Bank Wetland Evaluation, Richland Parish, LA	177	120	138	435
Nashville (31)	Banks Pisgah Mitigation Bank, Smithville, DeKalb County, Tennessee	278	79	300	657
St. Paul (123)	Barnes Prairie Mitigation Bank	742	308	1350	2400
New Orleans (64)	Bayou Fisher Mitigation Bank	90	0	231	321
New Orleans (64)	Bayou Maringouin Mitigation Bank	366	251	108	725
New Orleans (64)	Bayou Maringouin Umbrella Bank -Ramah Site	219	72	110	401
New Orleans (64)	Bayou Thornton Mitigation Bank	673	736	673	2082
New Orleans (64)	Bayou Wauksha Mitigation Bank	455	590	187	1232
New Orleans (64)	Beacons Gully Mitigation Bank	472	200	189	861
St. Paul (123)	Beartrap Creek Wetland Mitigation Bank	746	0	387	1133
Huntington (31)	Bearwallow Run Mitigation Bank (also see file 2009-150-LKR)	246	1035	270	1551
Nashville (31)	Beech River Wetland Mitigation Bank TWRA	1029	276	374	1679
Norfolk (27)	Benges Creek Mitigation Bank	1139	171	155	1465
St. Paul (123)	Benz Wetland Bank	400	233	251	884
Vicksburg (27)	Berg Mitigation Bank, LLC/070314/Request for Review of Wetland Delineation Assessment of Berg, Highway 15 and 427 Property, Leake County, Mississippi	135	241	261	637
Vicksburg (27)	Berg Mitigation Banks LLC/051018/Request for a Jurisdictional Determination on the Berg Big Black River Mitigation Bank Site, Webster and Choctaw Counties, Mississippi	397	0	421	818
Huntington (31)	Beverly Mitigation Bank Beaver Creek	289	283	270	842
New Orleans (64)	Big Bend Mitigation Bank	134	100	1133	1367
Charleston (21)	Big Generostee Creek Mitigation Bank	92	52	550	694
Huntington (31)	Big Horse Creek Mitigation Bank (also see file 2009-153-GUY)	379	53	339	771
Huntington (31)	Big Run, LLC - Cranberry Bog Mitigation Bank - Unnamed Tributary to Stump Run - Muskingum County - Ohio	254	7	97	358
Mobile (22)	Big Sandy Mitigation Bank Phase II	75	287	67	429
Nashville (31)	Big Spring Mitigation Bank	443	593	455	1491
New Orleans (64)	Bigwoods Mitigation Bank	421	189	451	1061
Fort Worth (6)	Bill Moore Mitigation Bank	109	686	1064	1859
Detroit (2)	Bjustrom- Openings Wetland Mitigation Bank, Inc.	464	981	625	2070
New Orleans (64)	Black Bayou Mitigation Bank	166	135	247	548
New Orleans (64)	Black Bayou Mitigation Bank Addendum I-Calcasieu Ph	63	64	238	365
Rock Island (27)	Black Hawk Mitigation Bank	296	159	399	854
Wilmington (70)	Blackbird Mitigation Site / EBX-Neuse I, LLC / Benson, Johnston County	242	355	390	987
St. Paul (123)	Blaine, City of / Site 7 Bank	524	356	731	1611
New Orleans (64)	Blouin Mitigation Bank, Raceland 330 LLC, P20180045, Lafourche Parish	304	2	217	523
Huntington (31)	Bluebell Road Mitigation Bank - Guernsey County Ohio	320	219	1398	1937
St. Paul (123)	Bluff Creek Mitigation Bank	369	56	1898	2323
Mobile (22)	Bogue Homa Mitigation Bank	123	302	1536	1961
Mobile (22)	Bogue Homo Mitigation Bank Phase II	108	185	542	835
Nashville (31)	Brady Branch Stream Mitigation Bank, Monterey, Putnam County, Tennessee	193	13	263	469

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	Braun Wetland Bank	412	0	206	618
St. Paul (123)	Brazeau Mitigation Bank	381	42	904	1327
Mobile (22)	Broadview Mitigation Bank- Phase II	108	341	63	512
Los Angeles (9)	Brook Forest Mitigation Bank	530	577	395	1502
St. Paul (123)	Brooks Road Wetland Mitigation Bank	366	525	845	1736
Charleston (21)	Brosnan Forest Coldwater Branch Mitigation Bank	203	90	865	1158
Charleston (21)	Brosnan Forest Wetland Mitigation Bank	440	1368	334	2142
St. Paul (123)	Browns Preserve Mitigation Bank	77	680	816	1573
St. Paul (123)	Bryce DeCook Wetland Bank	602	285	194	1081
Mobile (22)	Buck Creek Mitigation Bank	80	25	33	138
Mobile (22)	Buckatunna Creek Mitigation Bank	98	1180	495	1773
Huntington (31)	Buffalo Creek Preserve, LLC - Buffalo Fork Mitigation Bank - Guernsey County - Ohio	322	439	823	1584
New Orleans (64)	Bull Island Mitigation Bank	253	590	890	1733
Louisville (13)	Bull-Buck Wetland Mitigation Bank	264	98	357	719
New Orleans (64)	Bunches Creek Mitigation Bank Project- Allen Parish	157	103	550	810
Rock Island (27)	Bunker Stream Mitigation Bank	194	0	185	379
St. Paul (123)	Burns, Steve / Burns Wetland Bank	245	332	441	1018
St. Paul (123)	Butterfly Marsh Wetland Bank (Dufresne)	329	201	451	981
Rock Island (27)	Byler Stream Mitigation Bank	109	116	71	296
Rock Island (27)	C&W Hunter Mitigation Bank	357	1	212	570
Nashville (31)	Camp Cove Mitigation Bank, Gallatin, Sumner County, Tennessee	190	24	562	776
Wilmington (70)	Camp Grier Mitigation Bank	177	374	2	553
Louisville (13)	Candace Lee Fink Mitigation Bank	221	448	206	875
New Orleans (64)	Cane Bayou Mitigation Bank	280	2481	509	3270
Wilmington (70)	Cane Creek Umbrella Mitigation Bank - Bethel Branch	209	20	473	702
Wilmington (70)	Cane Creek Umbrella Mitigation Bank - Pine Hill Branch	197	307	401	905
Wilmington (70)	Cane Creek Umbrella Mitigation Bank - South Fork	223	307	178	708
Mobile (22)	Canoe Creek Mitigation Bank	33	205	804	1042
Wilmington (70)	Cape Fear 02 Umbrella Stream Mitigation Bank / Alamance / Rockingham / Caswell / Restoration Systems	215	180	587	982
Wilmington (70)	Cardinal Stream and Wetland Mitigation Site	299	141	293	733
Charleston (21)	Carter Stilley Wetland and Stream Mitigation Bank	292	489	387	1168
Charleston (21)	Caton Creek Mitigation Site	98	293	763	1154
Nashville (31)	Cave Spring Mitigation Bank, near Kingston, Roane County, Tennessee	263	98	470	831
Charleston (21)	Caw Caw Swamp Mitigation Bank	418	1248	1997	3663
San Francisco (2)	Cayetano Creek Mitigation Bank	630	1870	1522	4022
Nashville (31)	CEC - South Mouse Creek Mitigaiton Bank	228	93	373	694
Wilmington (70)	Cedar Grove Golf Course Stream Mitigation Bank	164	0	393	557
New Orleans (64)	Cedar Grove Mitigation Bank	227	224	52	503
St. Paul (123)	Cedarbend East Wetland Bank	439	1	164	604
St. Paul (123)	Cedarbend West Wetland Bank	425	1	178	604

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Nashville (31)	Center Point Mitigation Bank (CPMB), Linden, Perry County, TN	379	156	306	841
St. Paul (123)	Chaska, City of / McKnight Wetland Bank	509	634	348	1491
Wilmington (70)	Chatham Park Umbrella Mitigation Bank	137	76	1481	1694
Pittsburgh (21)	Cherry Ridge Mitigation Bank (Resource Environmental Solutions, Inc.)	301	0	70	371
Norfolk (27)	Chesapeake Bay Mitigation Bank	138	145	537	820
Nashville (31)	Christmas Creek Mitigation Bank, Christiana, Rutherford County, Tennessee	231	0	225	456
New Orleans (64)	Church Branch Mitigation Bank, Livingston Parish	210	14	242	466
St. Paul (123)	Church Farm Wetland Bank - Andy Walser Wetland Delineation	299	709	30	1038
St. Paul (123)	City of Mayer - Wetland Restoration	399	0	1001	1400
Portland (9)	CITY OF SALEM STREAM MITIGATION BANK	514	396	994	1904
St. Paul (123)	City of Superior SAMP II Wetland Mitigation Bank / Moonshine Road	531	31	838	1400
Norfolk (27)	City of Virginia Beach / Pleasure House Point Mitigation Bank - Revision	144	0	2347	2491
St. Paul (123)	CK Enterprises Big Hollow Mitigation Bank	528	0	2238	2766
Portland (9)	Claremont Road Mitigation Bank	191	516	236	943
St. Paul (123)	Clear Lake Bank	308	93	7	408
Huntington (31)	Cline Run Mitigation Bank - Cline Run	216	83	141	440
Huntington (31)	Cloverlick Branch Mitigation Bank	570	389	1522	2481
Charleston (21)	Coldwater Branch Stream Mitigation Bank	249	555	709	1513
Louisville (13)	Coles Creek Mitigation Bank	238	599	134	971
Los Angeles (9)	Colorado Lagoon Mitigation Bank, City of Long Beach	455	634	731	1820
Savannah (8)	Conasauga Bend Mitigation Bank	214	195	386	795
Mobile (22)	Coosa River Mitigation Bank	93	385	159	637
New Orleans (64)	Cow Branch Coastal Mitigation Bank, Delta Land Services LLC, Tangipahoa	226	87	234	547
Seattle (4)	Coweeman River Wetland and Conservation Bank	116	145	771	1032
Little Rock (10)	Crane Creek Mitigation Bank (Stone County)	1456	1211	350	3017
New Orleans (64)	Crooked Branch Mitigation Bank.- East Feliciana	133	190	162	485
Huntington (31)	Crow Run Mitigation Bank - Crow Run	298	183	98	579
Mobile (22)	Cumbest Wetland Mitigation Bank	148	1255	449	1852
St. Paul (123)	Curt Madsen Wetland Bank	253	9	131	393
New Orleans (64)	Cypress Plantation Mitigation Bank	442	385	128	955
Fort Worth (6)	Cypress Slough Mitigation Bank	1061	671	31	1763
Portland (9)	Dairy Creek Mitigation Bank	607	696	188	1491
St. Paul (123)	Dakota Co.-Jordan LRWRP bank site	307	0	132	439
Wilmington (70)	Daniels Creek Mitigation Site/Middle Cape Fear Umbrella Mitigation Bank/Wildlands Engineering/Chris Roessler	283	1	522	806
St. Paul (123)	Dave Jensen / Jensen Wetland Bank	373	209	200	782
St. Paul (123)	Dean Spaeth / Mitigation Bank Carbody Slough	490	1002	504	1996
Tulsa (2)	Deep Fork Mitigation Bank Project, near Chandler, Lincoln County, OK	164	49	467	680
Vicksburg (27)	Deer Creek Road Mitigation/082613/Envirohunt, LLC- Deer Creek Road Mitigation Bank	281	385	1127	1793

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
New Orleans (64)	Delta Land Services - 338 acre Belle Pointe Coastal Mitigation Bank - St. John the Baptist	348	117	158	623
New Orleans (64)	Delta Land Services - Laurel Valley Coastal Mitigation Bank - Lafourche	225	44	285	554
New Orleans (64)	Delta Land Services - Sucre Brut Coastal Mitigation Bank - Lafourche	172	40	452	664
New Orleans (64)	Delta Land Services Ponderosa Ranch of Pointe Coupee Mitigation Bank Phase II	378	53	353	784
New Orleans (64)	Delta Land Services, LLC - Upper Barataria Coastal Mitigation Bank - Assumption	264	43	270	577
Vicksburg (27)	Delta Land Services, LLC/062012/Proposed Little Bayou Pierre Mitigation Bank Prospectus, Claiborne County, Mississippi	378	115	528	1021
Vicksburg (27)	Delta Land Services/072215/ Proposed Crooked Bayou Compensatory Mitigation Site, Red River Parish, Louisiana	172	655	202	1029
St. Paul (123)	Dennis Laboda Flute Reed River Preservation Wetland Bank Delineation	262	253	389	904
Rock Island (27)	Des Moines River Mitigation Bank	127	55	274	456
Alaska (5)	Diamond Willow Mitigation Bank	166	140	1041	1347
Huntington (31)	Dieckbrader Mitigation Bank	180	5	110	295
Wilmington (70)	DM Cape Fear 02 / Dutch Farms Mitigation Site / Guilford County	212	2	287	501
Norfolk (27)	Dog Branch Farm Stream and Wetland Mitigation Bank	463	71	612	1146
Chicago (6)	Donnelley Prairie and Oaks Wetland Mitigation Bank	116	861	164	1141
Omaha (29)	Douglas County Engineer, Mitigation, Douglas County	520	426	990	1936
Mobile (22)	Downey Branch Mitigation Bank	78	381	15	474
Norfolk (27)	Draft Hagen Farm Umbrella Mitigation Bank	554	25	2816	3395
Mobile (22)	Dry Creek Mitigation Bank	75	659	44	778
Norfolk (27)	Dry Fork Mitigation Bank	252	36	529	817
Rock Island (27)	Dry Run Creek Mitigation Bank	131	112	470	713
Omaha (29)	DU HIPPI MITIGATION BANK SITE, Burleigh County	70	23	118	211
Pittsburgh (21)	Duck Creek Mitigation Bank; Nate Ober; Harrison County, West Virginia	224	0	130	354
Nashville (31)	Duck River Stream & Wetland Mitigation Bank	288	0	274	562
Omaha (29)	Ducks Unlimited - Umbrella Mitigation Banking Instrument - Sanborn County Mitigation Site	232	618	300	1150
Omaha (29)	Ducks Unlimited Umbrella Mitigation Bank Program - North Dakota	145	234	464	843
Omaha (29)	Ducks Unlimited, Inc., Mitigation Bank (Turkey Creek), Fillmore County	609	336	778	1723
Little Rock (10)	Dutch Creek Mitigation Bank	1066	143	366	1575
Charleston (21)	Eagle House Stream Mitigation Bank River Road, Flint Hill	455	2877	334	3666
St. Louis (5)	Eberhardt Trust Mitigation Bank	129	154	113	396
Pittsburgh (21)	EBX-EM LLC Horseshoe Hills Mitigation Bank Project in Marion County West Virginia	220	0	278	498
Pittsburgh (21)	EBX-EM, Seven Pines Mitigation Bank, Marion County, West Virginia	127	54	197	378
Wilmington (70)	EBX/NEU-CON/ Buffalo Branch Stream Mitigation/ Johnston County	70	0	140	210
Wilmington (70)	EBX/Neu-Con/Resource Environmental Solutions LLC/Selma Mill Mitigation Site	140	144	292	576
Wilmington (70)	Eco Terra NU01 UMBI - Auctioneer Forest Mitigation Bank / Eco Terra / Grantham, Wayne County	288	0	366	654



District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Huntington (31)	Ecosystem Investment Partners - Umbrella Mitigation Banking Instrument and Tuscarawas Mitigation Bank	308	31	226	565
Huntington (31)	Ecosystem Investment Partners Copperas Fork Stream Mitigation Bank (also see file 2013-374-GUY)	421	280	166	867
New Orleans (64)	Edwina Mitigation Bank	622	404	182	1208
Louisville (13)	EIP III Credit Company - Kentucky Stream and Wetland Mitigation Bank III	255	58	61	374
Pittsburgh (21)	EIP III Credit Company LLC, Brushy Fork UMBI Mitigation Bank, Harrison Co, WV	87	248	201	536
Pittsburgh (21)	EIP III Credit Company, LLC, Proposed UMBI, Upper Ohio Mitigation Bank, Harrison County, Ohio	340	17	130	487
Louisville (13)	EIP Kentucky Stream and Wetland Mitigation Bank UMBI KSWMB I	131	113	236	480
Buffalo (6)	EIP Ohio Umbrella Stream and Wetland Mitigation Bank	280	45	226	551
Louisville (13)	EIP-KSWMB-Big Sandy Mitigation Site	130	53	331	514
Louisville (13)	EIP-KSWMB-Little Sandy MitigationSite	131	53	236	420
Louisville (13)	EIP-KSWMB-Rolling Fork Stream and Wetland Mitigation Bank	282	0	68	350
St. Paul (123)	Elfering Wetland Restoration (Bank)	613	0	1416	2029
Rock Island (27)	Elk Hollow Mitigation Bank	89	1	547	637
St. Paul (123)	Elkton Township Wetland Banking Project	765	1825	39	2629
New Orleans (64)	English Bayou Mitigation Bank	152	133	241	526
St. Paul (123)	Engstrom Crow River Corridor Wetland Bank	333	675	1023	2031
St. Paul (123)	Engstrom Road Wetland Bank [near Diamond Lake]	382	217	235	834
Pittsburgh (21)	Enlow Fork Mitigation Bank, First Pennsylvania Resources, LLC, , West Finley Township, Washington County, Pennsylvania	249	396	742	1387
Kansas City (16)	ESS Green 1, LLC - Blackwater/Lamine Rivers Umbrella Mitigation Bank - Site 1	224	56	468	748
St. Louis (5)	ET Simonds Wetland Mitigation Bank	83	899	469	1451
Savannah (8)	Etowah River Road Mitigation Bank	241	124	800	1165
Kansas City (16)	Evans Farm, LP - Edmondson Creek Mitigation Bank	710	397	3330	4437
Philadelphia (3)	Evergreen Abbot Creek Mitigation Bank CU	342	300	645	1287
Philadelphia (3)	Evergreen Great Bay Mitigation Bank BL	304	63	729	1096
St. Paul (123)	Exsted Mitigation Site sponsored by LRWRP	279	275	1391	1945
Huntington (31)	Faith Farms Mitigation Bank	178	0	123	301
Wilmington (70)	Falling Creek Mitigation Site	192	100	373	665
Wilmington (70)	Falling Creek Umbrella Mitigation Bank - Grantham Branch Mitigation Site - Wayne County	159	44	134	337
St. Paul (123)	Fifield Wetland Mitigation Bank	686	52	312	1050
St. Paul (123)	Figliuzzi wetland bank plan application wild rice paddies	714	349	2457	3520
Pittsburgh (21)	First Pennsylvania Resource (RES) - Laurel Hill Creek Mitigation Bank in Jefferson Township, Somerset Co., PA	184	32	154	370
Pittsburgh (21)	First Pennsylvania Resource (RES) - Robinson Fork Mitigation Bank Phase 2 in West Finley Twp., Washington Co., PA	195	0	153	348
Louisville (13)	Flat Creek Mitigation Bank	140	65	377	582
Wilmington (70)	Flat Rock Mitigation Site / Wildlands Cape Fear 02 UMBI / Wildlands Holdings VI, LLC / Guilford	192	0	362	554
Louisville (13)	Flynn Fork Mitigation Bank - CreekBankers Inc	91	131	126	348

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	Forsman Wetland Bank - Forsman Properties, LLC	316	84	681	1081
Huntington (31)	Foster Run Mitigation Bank, Foster Run	260	0	140	400
Little Rock (10)	Fourche Bayou Mitigation Bank	431	117	126	674
St. Paul (123)	Fox Haven Farms Wetland Bank	207	428	570	1205
Vicksburg (27)	Franks Management Company/120810/Prospectus for Proposed Franks Mitigation Bank, Caddo Parish, Louisiana	979	153	30	1162
Wilmington (70)	French Broad UMB - Carolina Bison Site	856	0	74	930
St. Paul (123)	Fuller Wetland Bank application	400	132	39	571
Pittsburgh (21)	Furnace Run Mitigation Bank	219	7	227	453
St. Paul (123)	Gary Starzinski/Potato Creek Wetland Mitigation Bank WD	450	74	258	782
Nashville (31)	Gleason Creek Stream and Wetland Mitigation Bank	151	7	573	731
Norfolk (27)	Graham and David Bank (Formerly Falling Springs)	52	629	915	1596
Fort Worth (6)	Graham Creek Mitigation Bank	693	0	535	1228
Huntington (31)	Granary Mitigation Bank	181	0	176	357
Sacramento (4)	Grasslands Mitigation Bank	218	123	249	590
Charleston (21)	Great Pee Dee Mitigation Bank	147	625	459	1231
Huntington (31)	Green Camp Mitigation Bank	204	0	885	1089
St. Paul (123)	Grunewald Wetland Bank	754	498	446	1698
St. Paul (123)	Grygelko Rockford Wetland Bank	233	903	228	1364
St. Paul (123)	Guentzel Wetland Bank	286	665	925	1876
Little Rock (10)	Gum Log Creek mitigation bank	133	51	371	555
Rock Island (27)	Guy Groenewold	64	60	204	328
New Orleans (64)	GWM, Inc. - 116.6 acre Glenwood Tract (GWM) Mitigation Bank - Assumption	653	147	585	1385
New Orleans (64)	GWM, Inc. - 256.2 acre Madewood Tract (GWM) Mitigation Bank - Assumption	495	178	1486	2159
New Orleans (64)	GWM, Inc. - 322.5 acre Woodlawn Farm Tract (GWM) Mitigation Bank - Assumption	425	200	1522	2147
Huntington (31)	Hackers Creek Umbrella Mitigation Bank, Hackers Creek	637	172	344	1153
Pittsburgh (21)	Harmony Environmental, LLC. - Development of new Mitigation Banking Instrument and Glade Farms Mitigation Bank	339	237	26	602
Nashville (31)	Harpeth River Mitigation Bank, Eagleville, Rutherford County, Tennessee	256	7	520	783
St. Paul (123)	Hasbargen's Wildwoods Bank	538	849	377	1764
Rock Island (27)	Heineman Mitigation Bank	220	0	304	524
New Orleans (64)	Hickory Branch Umbrella Mitigation Bank, Matrix New World Engineering	185	280	415	880
New Orleans (64)	Hickory Lake Creek Mitigation Bank	218	622	837	1677
Huntington (31)	Hodgson Mitigation Bank	348	0	109	457
Tulsa (2)	Honey Springs Mitigation Bank, McIntosh County, OK	164	37	327	528
Wilmington (70)	Hood Swamp Mitigation Bank / Restoration System, LLC / Wayne County	248	157	219	624
Baltimore (15)	Hop Bottom Creek Mitigation Bank	1013	334	864	2211
Vicksburg (27)	Horseshoe Lake Hunting Club /08242018/ Attala and Madison Counties, Mississippi	120	100	620	840
Pittsburgh (21)	Howdershelt Run Mitigation Bank	488	0	64	552

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	HRM Wetland Bank	492	432	197	1121
Norfolk (27)	Hungry Run Mitigation Bank	276	2488	55	2819
Louisville (13)	Hunt Creek LLC - Hunt Creek Mitigation Bank	177	48	126	351
Little Rock (10)	Illinois River mitigation bank	249	165	230	644
Huntington (31)	Indian Creek Mitigation Bank, Indian Creek	352	14	138	504
Savannah (8)	Isla de Mapache Mitigation Bank (Raccoon Key)	211	119	3078	3408
New Orleans (64)	Jamestown Mitigation Bank	277	680	331	1288
Baltimore (15)	JBA-DoD Umbrella Mitigation Bank Instrument/Mattawoman Creek Mitigation Site	138	182	207	527
New Orleans (64)	JD Conn, The Ratliff Woodlands Property 97mi E/NE of Napoleonville-Assumption	400	1036	124	1560
New Orleans (64)	JD Landry, A 436.9-acre tract along Grand Caillou Rd. near Houma- Terrebonne	183	702	84	969
New Orleans (64)	JD Thibodaux, An 850ac tract located E of LA Hwy 308, in Labadieville-Assumption	270	722	387	1379
Rock Island (27)	Jeff McCorkle	253	193	142	588
Rock Island (27)	JEO	201	34	249	484
St. Paul (123)	Jerry Mueller Property Wetland Bank Feasability Study	526	750	516	1792
New Orleans (64)	Jesuit Bend Mitigation Bank;	445	99	453	997
Rock Island (27)	John Ryan - Land and Water Resources	156	0	311	467
St. Paul (123)	John Welle Laurentian North Wetland Bank Development	211	0	223	434
Rock Island (27)	Johnson County Conservation Board	265	735	196	1196
St. Paul (123)	Johnson Wetland Bank	252	0	378	630
Huntington (31)	Kanawha-Sapsucker Run Mitigation Bank	322	178	65	565
Huntington (31)	Kanawha-Yeager Fork Mitigation Bank	328	214	70	612
Wilmington (70)	KCI Cape Fear 02 UMBI & Black Bull Creek Mitigation Site - KCI Technologies, Inc. - Alamance County	302	72	206	580
Wilmington (70)	KCI Yadkin 01 UMB: Hair Sheep Mitigation Site	360	129	292	781
Seattle (4)	Keller Farm Mitigation Bank	510	164	1076	1750
St. Paul (123)	Kevin Root Wetland Bank	380	380	363	1123
New Orleans (64)	Kilgore Corporation Mitigation Bank; 329.5ac; JMB Partnership / JM Burguières Co - St. Mary	302	447	305	1054
New Orleans (64)	Killian Bayou MB - Livingston	826	397	58	1281
New Orleans (64)	Kimball Ranch Mitigation Bank	167	937	1429	2533
St. Paul (123)	Kingman Wetland Bank	291	221	286	798
St. Paul (123)	KLM Farms Wetland Bank	415	511	175	1101
St. Paul (123)	Kremer/Sonstegard Wetland Bank	659	146	161	966
Louisville (13)	KYTC-Umbrella Mitigation Bank Instrument	236	825	45	1106
New Orleans (64)	L.J.G. Land Company Mitigation Services - Big Darbonne Bayou Mitigation Bank - St. Landry	255	162	1123	1540
Chicago (6)	Lake County Forest Preserve District - Buffalo Creek Wetland Mitigation Bank	130	1545	460	2135
Norfolk (27)	Lake Gaston Mitigation Bank	232	0	1333	1565
St. Paul (123)	Lake Larry Wetland Bank	261	194	213	668
St. Paul (123)	Lake Superior Wetland Bank	324	262	432	1018

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	Lake Superior Wetland Mitigation Bank, Poplar River	324	12	2067	2403
St. Paul (123)	Lakewood Farms Inc. Edward Arnesen Wetland Bank	383	623	2433	3439
Rock Island (27)	Lakota Mitigation Bank	300	127	356	783
Chicago (6)	Land and Lakes Development Company - Mill Creek Wetland Mitigation Bank	131	113	484	728
Huntington (31)	Larkin Hollow Mitigation Bank	280	191	44	515
St. Paul (123)	Larry Jaycox possible mitigation bank	2036	299	738	3073
New Orleans (64)	Laurel Valley Coastal MB Amendment One - Delta Land Services - Lafourche Parish	189	116	355	660
St. Paul (123)	Lauren Schroeder Wetland Bank - BWSR Road Program	154	1501	1688	3343
St. Paul (123)	Legacy Bogs, LLC - Northland Mitigation Bank - Fremont Site	232	222	373	827
St. Paul (123)	Lemke Wetland Bank	425	321	622	1368
New Orleans (64)	Leo Sternfels, Ronnie Foret - 125.77 acre Lucky Hit Mitigation Bank, Plantenville, Spur 70 - Assumption	517	569	1098	2184
Nashville (31)	Lick Creek Mitigation Bank #2	412	0	243	655
Nashville (31)	Lick Creek Wetland Mitigation Bank 1	474	35	169	678
Norfolk (27)	Limestone Mitigation Bank	361	0	2249	2610
Portland (9)	Linnton Water Credits, LLC	392	311	1166	1869
Little Rock (10)	Little Fourche Creek Mitigation Bank - CAUMB LLC	177	468	703	1348
St. Louis (5)	Little Muddy Wetland and Stream Mitigation Bank-Addendum 1	170	140	154	464
Nashville (31)	Little Trammel Creek Stream Mitigation Bank	354	169	598	1121
Nashville (31)	Livingston County Wetland Mitigation Bank	757	802	710	2269
Mobile (22)	Locust Fork Mitigation Bank	445	335	120	900
Nashville (31)	Lodi Stream Mitigation Bank	205	331	327	863
Vicksburg (27)	Loneoak Capital Management, LLC/061714/ Proposed 1,529.20 acre Bashaway Creek Mitigation Bank, Bienville Parish, Louisiana	212	90	235	537
Vicksburg (27)	Loneoak Capital Management, LLC/071814/Proposed Mitigation Bank Prospectus for Little Bodcau Mitigation Bank, Arkansas	220	216	451	887
Galveston (9)	Lost Creek Brake Mitigation Bank	671	715	511	1897
St. Paul (123)	Louisville/Parnell Mitigation Bank/Polk	2944	0	661	3605
Norfolk (27)	Low Ground Mitigation Bank	314	0	304	618
Wilmington (70)	Lower Cape Fear Umbrella Bank - Juniper Tract	102	0	1173	1275
Huntington (31)	Lower Dempsey Mitigation Bank, Lower Dempsey (see file 2013-01071)	490	281	202	973
Norfolk (27)	Lower James Stream Mitigation Bank	210	95	884	1189
Baltimore (15)	LRG UMBI - Tunnel Road Mitigation Bank Site	509	0	276	785
Nashville (31)	Lucky Landing Bank Prospectus; Bradyville, Cannon County, TN	148	149	639	936
Omaha (29)	Lyman-Richey Corporation, Mitigation Bank Development (Gretna Bottom), Sarpy County	443	122	101	666
Norfolk (27)	Mabrey's Meadows Mitigation Bank	483	41	336	860
Sacramento (4)	Machine Lake Mitigation Bank	138	31	100	269
St. Paul (123)	Mader Wetland Bank	508	106	269	883
St. Paul (123)	Maple Grove, City of / Ranchview Wetland Bank	388	399	913	1700
Albuquerque (1)	Maria Lake Mitigation Bank, Walsenberg, Huerfano County, Colorado	608	48	643	1299
New Orleans (64)	Marine Bayou Mitigation Bank - Pointe Coupee	253	1003	308	1564

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	Marquardt Wetland Bank	442	154	493	1089
New Orleans (64)	Marsh Bayou Mitigation Bank	375	46	356	777
Portland (9)	Marys River Mitigation Bank	87	167	659	913
Huntington (31)	Marytown Mitigation Bank, Long Branch (see also file 2013-01071-GUY)	415	281	277	973
St. Paul (123)	Mason Creek Wetland Mitigation Bank	1110	329	446	1885
Rock Island (27)	McCorkle Mitigation Bank	231	35	206	472
St. Paul (123)	McCue, William / Sibley Meadows Wetland Bank	479	181	299	959
Wilmington (70)	McLenny Acres II Mitigation Site / Falling Creek UMBI / Wildlands Engineering / Wayne County	258	30	56	344
Baltimore (15)	MD SHA UMBI/Albaugh Mitigation Site	667	317	1161	2145
Baltimore (15)	MD SHA/BLOEDE DAM REMOVAL/MITIGATION BANK	75	141	85	301
Mobile (22)	MDOT, Buttahatchie Mitigation Bank Phase II, Monroe and Lowndes County, Mississippi	212	0	360	572
Vicksburg (27)	MDOT/042611/Request for Review of Wetland Delineation and Determination Report, Rankin County, Mississippi	140	15	57	212
St. Paul (123)	Meadowbrook Farm Wetland Bank	204	256	251	711
Norfolk (27)	Meadowlawn Mitigation Bank	494	368	1328	2190
Omaha (29)	Mekinock Mitigation Bank Site (formerly associated with North Central Mitigation, LLC, UMBI for North Dakota)	263	93	349	705
St. Louis (5)	Meramec Bluffs Wetland Mitigation Bank	342	1206	159	1707
St. Paul (123)	Michael Murphy Mitigation Bank Proposal (10-018 Greenslade)	415	1077	319	1811
St. Paul (123)	Mike Drummer / Shanahan Site Wetland Bank	277	556	868	1701
St. Paul (123)	Mike Reed Reed's Rendezvous Koochiching county Wetland bank application	243	202	2566	3011
Rock Island (27)	Mike Thompson - Wetlands Forever	61	26	61	148
Wilmington (70)	Milburnie Dam Removal Mitigation Bank	597	48	2001	2646
Charleston (21)	Mill Creek Mitigation Bank	273	78	435	786
Norfolk (27)	Mill Run Mitigation Bank	365	347	122	834
St. Paul (123)	Mille Lacs Meadow North Wetland Bank	590	0	169	759
Los Angeles (9)	Miller Valley Ranch Mitigation Bank	343	931	288	1562
Jacksonville (29)	MitBank - Alafia River	175	904	664	1743
Jacksonville (29)	MitBank - Basin 22	791	1753	352	2896
Jacksonville (29)	MitBank - Bear Creek	1133	144	2073	3350
Jacksonville (29)	MitBank - Big Bullfrog Creek	970	105	857	1932
Jacksonville (29)	MitBank - Boarshead Ranch	285	338	486	1109
Jacksonville (29)	MitBank - Brandy Branch	572	1553	209	2334
Jacksonville (29)	MitBank - Collany	575	25	497	1097
Jacksonville (29)	MitBank - Crooked River (FKA-Conley Tract)	292	25	591	908
Jacksonville (29)	MitBank - Florida Gulf Coast (FKA-Cedar Key)	357	134	441	932
Jacksonville (29)	MitBank - Fox Branch Ranch	182	159	1409	1750
Jacksonville (29)	MitBank - Hilochee	312	60	714	1086
Jacksonville (29)	MitBank - Horse Creek	755	117	1592	2464
Jacksonville (29)	MitBank - Horseshoe Creek	1244	14	595	1853

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Jacksonville (29)	MitBank - Kissimmee Ridge (formerly Lake Wales Ridge)	324	0	543	867
Jacksonville (29)	MitBank - Lake Washington	427	149	791	1367
Jacksonville (29)	MitBank - Manatee	199	331	825	1355
Jacksonville (29)	MitBank - Mangrove Point	621	1821	1395	3837
Jacksonville (29)	MitBank - Mill Creek	802	304	1219	2325
Jacksonville (29)	MitBank - Missing Link	435	78	508	1021
Jacksonville (29)	MitBank - Nature Coast	599	271	173	1043
Jacksonville (29)	MitBank - NeoVerde Basin 21	771	132	2447	3350
Jacksonville (29)	MitBank - Nochaway	1190	485	1121	2796
Jacksonville (29)	MitBank - Old Florida	397	19	218	634
Jacksonville (29)	MitBank - Pigeon Creek	611	301	597	1509
Jacksonville (29)	Mitbank - St. Johns/St. Johns Co	347	1479	585	2411
Jacksonville (29)	MitBank - Tiger Bay	727	77	682	1486
Jacksonville (29)	MitBank - Two Rivers Ranch	467	81	1063	1611
Jacksonville (29)	MitBank - Wiggins Prairie	334	135	907	1376
Jacksonville (29)	MitBank - Withlacoochee (FKA - Boutwell)	700	301	842	1843
Rock Island (27)	Mitchell County Conservation Board	207	941	172	1320
Omaha (29)	Mitigation Bank - Big Thompson Confluence	352	0	446	798
Omaha (29)	Mitigation Bank - Box Elder Creek	525	52	813	1390
Omaha (29)	Mitigation Bank - Front Range Mitigation Bank	298	0	535	833
Omaha (29)	Mitigation Bank - South Platte Mitigation Bank	247	33	539	819
Baltimore (15)	Mitigation Bank - Vargo Site	248	84	424	756
Baltimore (15)	MITIGATION BANK (Commercial) - MAPLE DAM ROAD	305	83	460	848
St. Paul (123)	MN - Anoka - BWSR Woodland Creek	250	213	587	1050
St. Paul (123)	MNDNR / Typhoon WMA Wetland Bank	1555	0	46	1601
New Orleans (64)	Moccasin Mitigation Bank	440	468	897	1805
Wilmington (70)	Mogensen Mitigation/Huff Property/Tar River Headwaters Stream Mitigation Bank	128	166	1218	1512
Los Angeles (9)	Mojave River Watershed Mitigation Bank on Cronese Lake (T4O, Inc.)	141	1976	781	2898
St. Paul (123)	Montgomery Hollywood Twnshp Wetland Bank	57	2418	16	2491
New Orleans (64)	Moss Lake Mitigation Bank	54	164	144	362
St. Paul (123)	MPJWR/Preiner ENRV Wetland Mitigation Bank	332	174	432	938
Mobile (22)	Mud Creek Mitigation Bank	79	81	56	216
Nashville (31)	Mud Creek Stream Mitigation Bank	323	47	290	660
Huntington (31)	Mud Lake Mitigation Bank	237	10	487	734
Little Rock (10)	Muddy Bayou Mitigation Bank	218	247	250	715
Chicago (6)	Muirhead Springs Wetland Mitigation Bank	353	960	277	1590
Mobile (22)	Mulberry Fork Mitigation Bank	55	733	199	987
Savannah (8)	Mulberry Grove Mitigation Bank	146	381	390	917
Nashville (31)	Mule Train Stream & Wetland Mitigation Bank	245	0	1117	1362
Charleston (21)	Murray Hill Mitigation Bank	405	885	560	1850
Rock Island (27)	Nahant Marsh Wetland and Stream Mitigation Bank	97	102	274	473

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Vicksburg (27)	NASA-John C. Stennis Space Center/030619/Proposed Umbrella Wetland Mitigation Bank Prospectus, Hancock County, Mississippi	105	48	343	496
Little Rock (10)	NATGAS - SEECO - Caney Creek Mitigation Bank	476	2	912	1390
Omaha (29)	NDDOT Herda Wetland Mitigation Site; S-17-T154N-R62W; Ramsey County	393	18	419	830
Omaha (29)	NDDOT Trego Wetland Mitigation Site; Sheridan County	393	18	419	830
Omaha (29)	NDDOT; Koenig Wetland Mitigation Bank, Stutsman County	156	20	277	453
Omaha (29)	NE Department of Transportation, Mitigation Bank (District 7; MISC-STWD(1093); CN 71216), Harlan County	281	577	544	1402
Omaha (29)	NE Dept. of Roads Mitigation 75-2(168) Oreapolis Wetland Bank Cass County	213	307	733	1253
Wilmington (70)	NECFUMB Davis Farm Mitigation Site_Cal Miller_LMG_mitigation bank	199	0	1162	1361
Nashville (31)	Neely's Bend Stream Mitigation Bank (NBSMB)	231	221	361	813
Wilmington (70)	Neu-con UMBI - Stone Creek Mitigation Site	243	11	517	771
Wilmington (70)	Neu-con Umbrella Mitigation Bank - Poplar Creek Mitigation Site	312	30	532	874
Wilmington (70)	Neu-Con Umbrella Mitigation Bank / Tull Wooten III Mitigation Site	693	22	455	1170
Wilmington (70)	Neucon Umbrella Mitigation Bank - Bucher Mitigation Site	193	359	590	1142
Wilmington (70)	Neucon Umbrella Mitigation Bank - Hannah Bridge Site	312	15	320	647
Wilmington (70)	Neucon Umbrella Mitigation Bank - Meadow Spring Site	274	371	119	764
Wilmington (70)	Neucon Umbrella Mitigation Bank - Polecat Mitigation Site	237	0	126	363
Wilmington (70)	Neucon Umbrella Mitigation Bank-Uzzle Mitigation Site	596	29	249	874
Norfolk (27)	New Mill Creek Tidal Wetland Mitigation Bank	266	26	112	404
Norfolk (27)	New River Highland Mitigation Bank (VMRC19-2119)	285	119	1267	1671
Rock Island (27)	Nieburh Stream Mitigation Bank	238	371	284	893
San Francisco (2)	North Bay Mitigation Bank (formerly San Antonio Mitigation Bank)	162	318	148	628
Omaha (29)	North Central Mitigation LLC Hatch Wetland Bank Big Sioux River Floodplain Brookings County	171	0	192	363
Omaha (29)	North Central Mitigation LLC Statewide Umbrella Mitigation Bank - Jandl Bank Site - Minnehaha County	325	98	333	756
St. Paul (123)	North Fork Crow River Bank (Burns & McDonnell)	391	319	355	1065
St. Paul (123)	North Shore Federal Credit Union Poplar Ponds Delineation / Wetland Bank Development	406	326	457	1189
Wilmington (70)	Northeast Cape Fear Umbrella Mitigation Bank_Jeat Tract_Cal Miller_Shaw Highway Properties, LLC_LMG	86	60	139	285
St. Paul (123)	Nygren Wetland Bank	216	303	182	701
Portland (9)	ODOT Greenhill Mitigation Bank	152	215	1061	1428
St. Paul (123)	Oehlke, Kenneth / Wetland Bank	576	1211	368	2155
St. Paul (123)	Ogema Wetland Bank	258	0	206	464
Savannah (8)	Old Creek Place Mitigation Bank	165	322	633	1120
St. Paul (123)	Olson Wetland Bank Plan	253	33	41	327
St. Paul (123)	Oneida Mitigation Bank	252	39	632	923
Detroit (2)	Openings Mitigation Bank Phase II	151	601	453	1205
Portland (9)	Oregon Wetlands LLC (South Santiam Bank)	144	199	577	920
Little Rock (10)	Osage Creek Mitigation Bank	178	205	215	598
St. Paul (123)	Oussuamigong Wetland Mitigation Bank	453	589	1590	2632



District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Huntington (31)	Oxbow Mitigation Bank - Louthers Run	289	169	82	540
Baltimore (15)	PA DOT - Statewide Mitigation Banking Umbrella Instrument	138	371	396	905
Rock Island (27)	Pabst Wetland and Stream Mitigation Bank	185	40	110	335
Nashville (31)	Paint Rock Creek Stream & Wetland Mitigation Bank	233	225	638	1096
St. Paul (123)	Palmer, Gary / Wetland Mitigation Bank	434	86	495	1015
Omaha (29)	Papio Missouri River NRD Mitigation Bank at Glacier Creek Douglas County	369	105	513	987
Mobile (22)	Pascagoula River Mitigation Bank	103	101	303	507
Baltimore (15)	Patuxent Mitigation Bank	292	70	513	875
Baltimore (15)	Peige Mitigation Bank/Ecotone	414	199	1091	1704
St. Paul (123)	Pender, Howard/ Wetland Bank	618	1015	272	1905
St. Paul (123)	Peshtigo Brook WDOT Bank Site STH 64 Oco	321	5	100	426
St. Paul (123)	Peshtigo Brook Wetland Mitigation Bank Phase 3	243	0	1362	1605
Los Angeles (9)	Petersen Ranch Mitigation Bank	387	342	607	1336
New Orleans (64)	Petit Bois Mitigation Bank - Addendum I	143	125	257	525
Fort Worth (6)	Phillips Creek Mitigation Bank	266	202	261	729
Savannah (8)	Phinizy Swamp Mitigation Bank (expansion) Phase II by ML South Augusta, LLC	709	210	1335	2254
St. Paul (123)	Pickerel Site #10 Wetland Bank	355	0	817	1172
Norfolk (27)	Piedmont Farms Stream Mit Bank-Buckingham Albemarle	45	805	372	1222
Charleston (21)	Point Farm Salt Marsh Mitigation Bank	680	4	380	1064
St. Paul (123)	Pokegama Lake Mitigation Bank	189	1669	687	2545
New Orleans (64)	Pollard Branch Mitigation Bank	564	212	847	1623
New Orleans (64)	Pontchartrain Basin Umbrella Mitigation Bank, Delta Land Services LLC Weyerhaeuser, Livingston Parish	206	245	162	613
Rock Island (27)	Pony Creek Wetland Mitigation Bank	294	0	202	496
Charleston (21)	Poplar Grove Wetland Mitigation Bank	115	1799	1037	2951
St. Paul (123)	Poppler-Harms Wetland Bank	288	323	660	1271
Los Angeles (9)	Port of Los Angeles Umbrella Mitigation Bank and Harbor BEI	166	737	1800	2703
Seattle (4)	Port of Tacoma Umbrella Bank	630	107	1497	2234
Alaska (5)	Portage Reserve Mitigation Bank	210	202	65	477
Norfolk (27)	Potato Run Stream Mitigation Bank	602	326	894	1822
Nashville (31)	Proposed Roaring Paunch Stream & Wetland Mitigation Bank	427	66	329	822
Baltimore (15)	PSUMBI - Codorus Creek Stream & Wetland Mitigation Bank	499	355	18	872
Baltimore (15)	PSUMBI - East Branch Codorus Creek Mitigation Bank	322	136	200	658
Baltimore (15)	PSUMBI - Upper Susquehanna River Mitigation Bank - Phase II	241	125	362	728
Baltimore (15)	PSUMBI - Upper Susquehanna River Mitigation Bank - Phase II	261	27	83	371
Charleston (21)	PUMBI-Great Swamp Site	372	119	863	1354
Charleston (21)	PUMBI-Savannah Branch Site	340	67	353	760
Norfolk (27)	R.A. Burgess Stream and Wetland Mitigation Bank	930	0	1409	2339
Pittsburgh (21)	Randolph I Mit. Bank - Duplicate of LRH Resource Environmental Solutions (RES) West Virginia Umbrella Agreement - formerly EBX	106	41	335	482
Wilmington (70)	Red Barn Mitigation Bank	300	88	369	757
St. Paul (123)	Refuge at Rush Creek Mitigation Bank	222	630	242	1094

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Wilmington (70)	RES Cape Fear 02 UMB - Walnut Wood Site	320	227	1006	1553
Wilmington (70)	RES Cape Fear 02 UMBI: Cloud and Banner Mitigation Site	255	0	164	419
Wilmington (70)	RES Cape Fear 03 UMBI & Feed and Seed Mitigation Bank - Environmental Banc & Exchange, LLC - Randolph County	281	185	462	928
Wilmington (70)	RES Cape Fear Umbrella Mitigation Bank: Dairyland Mitigation Bank	277	214	139	630
Wilmington (70)	RES Catawba Umbrella Mitigation Bank - Dogtown Site	290	0	795	1085
Wilmington (70)	RES Pasquotank Umbrella Mitigation Bank-White Hat Site	148	670	247	1065
Wilmington (70)	RES Yadkin 01 Stream and Wetland Umbrella Mitigation Bank: Green Mesa Site	1503	118	337	1958
Wilmington (70)	RES Yadkin 01 Stream and Wetland Umbrella Mitigation Bank: Twiman Site	186	55	624	865
Wilmington (70)	RES Yadkin 01 Stream and Wetland Umbrella Mitigation Bank: Gideon Site	185	332	348	865
Wilmington (70)	RES Yadkin 01 Stream and Wetland Umbrella Mitigation Bank: Scout Site	351	23	435	809
Wilmington (70)	RES Yadkin 01 Stream and Wetland Umbrella Mitigation Site: Compass Point Site	352	118	395	865
Wilmington (70)	RES_Dugout Stream and Wetland Mitigation Site_Cape Fear 05 UMBI-mitigation bank-wetland-stream-restoration	429	2	684	1115
Baltimore (15)	RES/MD UMBI & Even Flow MB	264	231	706	1201
Vicksburg (27)	Resource Environmental Solutions, LLC/062015/Proposed Red Chute Bayou Mitigation Bank, Bossier Parish, Louisiana	98	4	822	924
Pittsburgh (21)	Resource Environmental Solutions, Old Oak Mitigation Bank Project, Cheat River and UNT to Little Sandy Creek, Bruceton Mills, Preston County, WV	363	0	85	448
Vicksburg (27)	Resource Environmental Solutions/011411/ Little Eva Mitigation Bank, Natchitoches Parish, Louisiana	345	659	201	1205
St. Paul (123)	RFD II, LLC / Mitigation Bank	415	861	611	1887
St. Paul (123)	Rice Lake Le Sueur Wetland Bank	244	786	383	1413
Philadelphia (3)	Rio Grande Swamp Mitigation Bank CM	153	40	1337	1530
Vicksburg (27)	Rio Rojo LLC/041412/Request for Jurisdictional Determination, Proposed Mitigation Bank, 128.20 Acres, Winn Parish, Louisiana	128	9	692	829
Los Angeles (9)	Riverpark Mitigation Bank	404	184	773	1361
Norfolk (27)	Roanoke River Wetland and Stream Mitigation Bank	449	31	1000	1480
Omaha (29)	Robert L Bundy Family Partnership Wetland Mitigation Bank Sarpy County	303	1398	398	2099
St. Paul (123)	Rochester, City of / Gamehaven (WR-4) Reservoir Wetland Mitigation Bank	513	514	495	1522
Fort Worth (6)	Rockin' K On Chambers Creek Mitigation Bank	225	17	630	872
Charleston (21)	Rocky Creek Mitigation Bank	497	132	1464	2093
New Orleans (64)	Rosedale Mitigation Bank;	260	365	898	1523
Memphis (3)	Rossville Farm Mitigation Bank, Fayette Co., TN	203	21	262	486
Louisville (13)	Salt River Mitigation Bank, Moore Property	831	277	1196	2304
Charleston (21)	Saluda Mitigation Bank	826	0	314	1140
Los Angeles (9)	San Luis Rey Mitigation Bank	291	36	793	1120
Nashville (31)	Sandhill Wetland Mitigation Bank, Eagleville, Rutherford County, TN	236	0	311	547
Huntington (31)	Sandy Creek Mitigation Bank	237	3	216	456
Huntington (31)	Sandy Creek Partners - Little Miami Mitigation Bank	205	167	205	577

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Huntington (31)	Sandy Creek Partners - Upper Scioto Mitigation Bank	187	123	167	477
Pittsburgh (21)	Sandy Lake Mitigation Bank	124	6	188	318
St. Paul (123)	Schmidgall Wetland Mitigation Bank Site	351	316	645	1312
Chicago (6)	School Springs Wetland Mitigation Bank	749	24	776	1549
St. Paul (123)	Schramel Sod Wetland Bank Site - LRWRP	245	171	263	679
St. Paul (123)	Schrupp, Salz, and Wagener / County Road 32 Sod Farm Wetland Bank	428	458	629	1515
St. Paul (123)	Schultz Wetland Mitigation Bank	440	201	419	1060
Vicksburg (27)	Scott Gideon/050715/ NWP 27 Request for Restoration Activities within Panther Creek Mitigation Bank, Madison County, Mississippi	160	9	911	1080
St. Paul (123)	Scott SWCD Helena Road Bank Development	290	28	163	481
Charleston (21)	SCPA- Daniel Island Mitigation Bank	803	261	1282	2346
Omaha (29)	SDDOT - UMBI - Vermillion River Site 1 Wetland Bank - Turner County	156	152	359	667
Omaha (29)	SDDOT UMBI - BCB1 Wetland Mitigation Bank - Cheyenne River GSA	221	264	264	749
Sacramento (4)	Seigler Valley Wetland Mitigation Bank	480	322	1340	2142
Mobile (22)	Selma Dixon Mitigation Bank	154	408	159	721
St. Paul (123)	Serenity Cove Wetland Bank	327	519	234	1080
Nashville (31)	Setters Ridge Stream Mitigation Bank	217	172	390	779
St. Paul (123)	Sheboygan County / Amsterdam Dunes	674	357	1278	2309
Rock Island (27)	Shelby County Conservation Board	126	27	650	803
Pittsburgh (21)	Shrader Hollow Road Mitigation Bank	219	31	135	385
Rock Island (27)	Silver Creek Mitigation Bank	328	17	459	804
Kansas City (16)	Smith Creek Wetland and Stream Mitigation Bank - Swallow Tail, LLC (Terra Technologies)	1446	248	847	2541
Memphis (3)	Smokestack Mitigation Bank	292	0	303	595
Nashville (31)	Smoky Run Mitigation Bank, Roane County, Tennessee	224	69	259	552
St. Paul (123)	Sommer Wetland Bank	170	298	1246	1714
Los Angeles (9)	Soquel Canyon Mitigation Bank	663	516	477	1656
Omaha (29)	South Dakota Department of Transportation Umbrella Wetland Mitigation Agreement	228	1232	186	1646
Omaha (29)	South Dakota Department of Transportation Umbrella Wetland Mitigation Agreement	304	0	597	901
New Orleans (64)	South Fork Coastal Mitigation Bank	557	135	44	736
New Orleans (64)	South Fork II Coastal Mitigation Bank	708	853	149	1710
St. Paul (123)	South Fork Wetland Bank Kanabec	264	7	2041	2312
Huntington (31)	Spanishburg Mitigation Bank Rich Creek (also see file 2009-150-LKR)	85	508	750	1343
St. Paul (123)	Spartan Land Investments, LLC / Kreyer Creek East Wetland Mitigation Bank	245	140	440	825
St. Paul (123)	Spartan Land Investments, LLC/Kreyer Creek West Mitigation Bank	294	104	421	819
New Orleans (64)	Spring Bayou Mitigation Bank	315	246	993	1554
Charleston (21)	Spring Branch (Beidler Forest) Mitigation Bank	180	198	200	578
Baltimore (15)	ST CHARLES WETLAND MITIGATION BANK	1526	302	1440	3268
New Orleans (64)	St. Gabriel Mitigation Bank	244	257	380	881

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
New Orleans (64)	St. Gabriel Wildlife Refuge and Mitigation Bank	490	432	166	1088
St. Paul (123)	Stamer Georgeville Wetland Bank	237	152	834	1223
St. Paul (123)	Stelter Mitigation Bank	317	61	414	792
St. Paul (123)	Steve McNallan Wetland Bank	653	111	1158	1922
Vicksburg (27)	Steve Whitehead, Big Creek Mitigation Bank/061112/Jurisdictional Determination, Columbia County, Arkansas	139	1	388	528
Nashville (31)	Stevens Valley Stream Mitigation Bank - CRC ILF Bank	131	140	1142	1413
St. Paul (123)	Stevensen Wetland Bank	375	141	145	661
St. Paul (123)	Stockholm LGRWRP Wetland Bank	205	13	440	658
St. Paul (123)	Stolp Wetland Bank	348	16	198	562
Wilmington (70)	STONE FARM MITIGATION BANK/WILLIAMSON/Ocean Isle Investment Company/stream/wetland/restoration/enhancement/preservation/mitigation bank	71	0	7	78
Fort Worth (6)	Straus Medina Mitigation Bank	847	22	334	1203
Buffalo (6)	Stream + Wetlands Foundation - Black-Rocky UMBI (Initial Site: Grafton Swamp Wetlands Mitigation Bank (Formerly: Ecological Resource Partners LLC - UMBI and Grafton Swamp Mitigation Bank))	282	1	1602	1885
Buffalo (6)	Stream + Wetlands Foundation Grand River UMBI - First Site: Hemlock Swamp Mitigation Bank	333	315	92	740
St. Paul (123)	Strolberg Wetland Bank	139	37	2025	2201
St. Paul (123)	Sugar River Wetland Bank	216	94	378	688
St. Paul (123)	Sullivan Wetland Bank	412	0	303	715
Kansas City (16)	Sunflower Land Trust, Inc. - Fleming Conservancy Mitigation Bank #1	439	253	2039	2731
Kansas City (16)	Swallow Tail - Blackwater/Lamine Rivers Umbrella Mitigation Bank, Site 2	575	194	1036	1805
Kansas City (16)	Swallow Tail - KS River & MO River Umbrella Mitigation Bank, Site 5	778	97	893	1768
Kansas City (16)	Swallow Tail, LLC - Blackwater/Lamine Rivers Umbrella Mitigation Bank - Site 1	301	0	227	528
Kansas City (16)	Swallow Tail, LLC - Gasconade River Wetland and Stream Mitigation Bank	193	2175	713	3081
Kansas City (16)	Swallow Tail, LLC - Grand/Chariton Rivers Umbrella Mitigation Bank, Site 1	482	370	126	978
Kansas City (16)	Swallow Tail, LLC - Kansas River and Missouri River Umbrella Mitigation Bank, Site 3	344	464	61	869
Kansas City (16)	Swallow Tail, LLC - Kansas River and Missouri River Wetland and Stream Umbrella Mitigation Bank - Site 1	241	0	267	508
Kansas City (16)	Swallow Tail, LLC - Neosho River Wetland Stream Mitigation Bank	137	1074	340	1551
Kansas City (16)	Swallow Tail, LLC - Nishnabotna/Platte Rivers Umbrella Mitigation Bank Instrument, Site 1	992	35	228	1255
Kansas City (16)	Swallow Tail, LLC - Sac River Wetland and Stream Mitigation Bank	386	898	1337	2621
Kansas City (16)	Swallow Tail, LLC - Upper Osage River Wetland and Stream Umbrella Mitigation Bank - Site 1	280	4	294	578
Nashville (31)	Swamp Road Wetland Mitigation Bank (SRWMB) #2	209	179	109	497
St. Paul (123)	Swenson Bank	293	0	568	861
Norfolk (27)	Tail Race Stream and Wetland Mitigation Bank	434	0	491	925
St. Paul (123)	Tallgrass Land Conservation / Kincaid Mitigation Bank	207	224	719	1150

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Alaska (5)	Tanana River Watershed Umbrella Stream and Wetland Mitigation Bank	327	163	389	879
New Orleans (64)	Tchefuncta Umbrella Mitigation Bank	209	3428	438	4075
Seattle (4)	Terrace Mitigation Bank	180	267	518	965
New Orleans (64)	Texada Properties - Texada Mitigation Area II; 124 acre; Harry W. Case, Jr./Cyrus Case - Iberville	495	1958	555	3008
New Orleans (64)	The 159.6ac Beaver Creek Mitigation Bank	247	408	262	917
Buffalo (6)	The Wetland Trust - Inland Salt Marsh Bank	301	20	560	881
Norfolk (27)	Thompson Place Mitigation Bank	119	1011	359	1489
St. Paul (123)	Timberg Creek Wetland Bank	461	252	289	1002
Wilmington (70)	Tobacco Road Mitigation Project / RES Cape Fear 02 UMBI / Environmental Banc & Exchange, LLC / Alamance County	186	0	534	720
St. Paul (123)	Todd Torkelson/Council Creek Mitigation Bank	341	216	387	944
Charleston (21)	Toms Branch Mitigation Bank	213	41	1024	1278
Rock Island (27)	Trails End Mitigation Bank	95	974	380	1449
Alaska (5)	Trillium Mitigation Bank - Prince of Wales Island - 1253 acres	155	1161	712	2028
Vicksburg (27)	Triple S Farms, Incorporated/012312/Big Lake Mitigation Bank Franklin Parish, Louisiana	110	945	99	1154
Mobile (22)	Tuckabum Creek Mitigation Bank	77	1029	133	1239
Wilmington (70)	Turtle Creek Mitigation Bank	293	130	211	634
Wilmington (70)	Twin Burros Mitigation Site / Wildlands Cape Fear 02 UMBI / Wildlands Holdings VI, LLC / Caswell County	201	0	410	611
Charleston (21)	Two Rivers Wetland and Stream Mitigation Bank	248	338	1014	1600
Norfolk (27)	Tye River Mitigation Bank	207	190	800	1197
St. Paul (123)	UCWMB - Nemitz Mitigation Bank	442	0	1853	2295
St. Louis (5)	Umbrella Mitigation Bank	138	99	84	321
New Orleans (64)	Upper Atchafalaya Mitigation Bank - UAS	87	54	835	976
Vicksburg (27)	Upper Coldwater Mitigation Bank/042412/ Upper Coldwater Mitigation Bank, Marshall County, Mississippi	127	1	510	638
Vicksburg (27)	Upper Coldwater Mitigation Bank/042412/ Upper Coldwater Mitigation Bank, Marshall County, Mississippi	281	123	377	781
Savannah (8)	Upper Coosa Mitigation Bank	345	213	1341	1899
Los Angeles (9)	Upper Los Cerritos Wetland Mitigation Bank	23	1040	1660	2723
Wilmington (70)	Upper Rocky Umbrella Mitigation Bank	377	0	849	1226
St. Paul (123)	USFS Superior National Forest Umbrella Mitigation Bank	192	372	111	675
Chicago (6)	V3 Restoration - Gray Willows WMB	73	315	94	482
Kansas City (16)	Vallambrosa Mitigation Bank	3288	512	460	4260
Norfolk (27)	Varina Stream Bank / Sunken Meadow Stream Bank	67	6	2077	2150
New Orleans (64)	Waldheim Mitigation Bank	104	263	94	461
Nashville (31)	Walnut Shade Stream Mitigation Bank Prospectus	245	47	996	1288
Norfolk (27)	Wancopin Creek Stream Restoration Site aka Traveller's Reach Stream Mitigation Bank	672	0	128	800
Savannah (8)	Washington Branch Wetland Mitigation Bank	261	733	194	1188
Pittsburgh (21)	Water and Land Solution, Rocky Run Mitigation Bank Proposal, Claysville, Washington County, PA	88	99	382	569

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
Pittsburgh (21)	Water and Land Solutions Tomlinson Run Mitigation Bank Prospectus Upper Ohio Basin Hancock County WV	310	0	175	485
Pittsburgh (21)	Water and Land Solutions, Little Indian Creek Mitigation Bank, Little Indian Creek, Morgantown, Monongalia County, WV	302	0	166	468
St. Paul (123)	Watertown, City of / 30th Street Trail	421	1027	547	1995
St. Paul (123)	Welle, John and Diana / Otter Creek Wetland Bank	266	374	462	1102
Nashville (31)	West Fork Drakes Creek Stream Mitigation Bank	346	0	270	616
Little Rock (10)	West Fork White River Mitigation Bank	364	129	384	877
Memphis (3)	West TN Wetlands Mit. Bank / EnSafe / Shelby Co., TN	406	0	358	764
Omaha (29)	Western Sand & Gravel Company, Mitigation Bank Development (Benesch 00120489.07), Saunders County	945	118	89	1152
Mobile (22)	Westervelt Mitigation Bank	88	328	214	630
Buffalo (6)	Wetlands Resource Center - Butternut Ridge Wetland Mitigation Bank	213	132	282	627
Buffalo (6)	Wetlands Resource Center - Congress Lake Wetland Mitigation Bank	213	132	357	702
Vicksburg (27)	Weyerhaeuser NR Company/112812/Great Bear Wetland Mitigation Bank Prospectus, Ashley County, Arkansas	196	40	463	699
Rock Island (27)	WFI Holdings	158	105	27	290
Huntington (31)	Whetstone Mitigation Bank	307	1	176	484
Rock Island (27)	White Fox Mitigation Bank	166	100	196	462
Wilmington (70)	White Springs Headwaters Restoration Site	801	0	673	1474
Kansas City (16)	Whitewater River Wetland and Stream Mitigation Bank	348	0	2410	2758
Norfolk (27)	Whitewood Farm	236	7	1886	2129
Wilmington (70)	Wildlands Cape Fear 05 Umbrella Mitigation Bank-Dudley Pond-John Hutton_mitigation bank_stream_wetland	256	14	364	634
Wilmington (70)	Wildlands Cape Fear 06 Umbrella Mitigation Bank / East Mingo Mitigation Site / Wildlands Engineering, Inc. / Benson, Johnston County	223	7	592	822
Wilmington (70)	Wildlands Catawba 01 UMB-Firestone	303	62	327	692
Wilmington (70)	Wildlands Catawba 01 UMBI- Double Rock MitigationSite	372	0	320	692
Wilmington (70)	Wildlands Little Tennessee Umbrella Mitigation Bank (East Buffalo Site)	389	241	144	774
Vicksburg (27)	Wildlife Mississippi/022213/NWP 27 permit request for the mitigation bank, Copiah County, Mississippi	421	0	260	681
Vicksburg (27)	Wildlife Mississippi/101821/ Upper Pearl River Mitigation Bank, Leake County, Mississippi	80	41	264	385
Alaska (5)	William Redmond, Twentymile River, Develop Mitigation Bank	420	121	489	1030
St. Paul (123)	Willow Drive Mitigation Bank	426	92	1072	1590
New Orleans (64)	Willow Lake Wetland Mitigation Bank - 394 ac tractlocated southernly of Hwy 384 & Westerly of Eric Rd	1019	114	372	1505
St. Paul (123)	Winnebago Wetland Mitigation Bank	343	67	627	1037
Wilmington (70)	WLS Catawba 01 UMB- Starker Site	242	65	87	394
Wilmington (70)	WLS Neuse 01 Umbrella Bank - Hollowell Mitigation Site	325	93	262	680
Wilmington (70)	WLS Neuse 02-Scarborough Site	314	52	136	502
Wilmington (70)	WLS Yadkin 01 - Grassy Creek Tributaries Mitigation Site	386	69	293	748
Wilmington (70)	WLS Yadkin 01 Umbrella Mitigation Bank - Rolling Meadows Site	151	8	120	279
Wilmington (70)	WLS Yadkin 01- Toms Creek Mitigation Site	394	21	285	700

District (# banks)	Bank Name	Federal	Additio nal	Spons or	TOTAL
St. Paul (123)	Wolf River Basin Mitigation Bank	473	87	136	696
Mobile (22)	Wolf River Mitigation Bank	161	877	390	1428
Mobile (22)	Wolf Run Mitigation Bank	156	1321	458	1935
St. Paul (123)	Woolan's Park mitigation area	1167	0	463	1630
St. Paul (123)	World Dairy Center Proposed Mitigation Bank Site	384	551	518	1453
Pittsburgh (21)	WV Bunrootis Existing Mitigation Holdings LLC, Kincheloe Stream and Wetland Mitigation Bank, Harrison and Lewis Counties, WV	121	121	42	284
Wilmington (70)	Yadkin 01 Umbrella Mitigation Bank - Brushy Mountain Site	154	4	381	539
Wilmington (70)	Yadkin Valley Umbrella Mitigation Bank: Plantation Bank Mitigation Site	550	14	206	770
Wilmington (70)	Yadkin Valley Umbrella Mitigation Bank: Critcher Brothers Site	411	151	208	770
Wilmington (70)	Yadkin Valley Umbrella Mitigation Bank: Dugger Creek Mitigation Site	382	151	237	770
Wilmington (70)	Yadkin Valley Umbrella Mitigation Bank: White Buffalo Mitigation Site	401	151	218	770
Omaha (29)	Yellowstone Mitigation, LLC (EcoAsset) Lower-Middle Yellowstone Umbrella Bank-Variou s Waterways & Counties	236	242	318	796
Omaha (29)	Yellowstone Mitigation, LLC (EcoAsset) Lower-Middle Yellowstone Umbrella Bank-Variou s Waterways & Counties	236	242	318	796
Omaha (29)	Yellowstone Mitigation, LLC (EcoAsset) Lower-Middle Yellowstone Umbrella Bank-Variou s Waterways & Counties	236	242	318	796
Vicksburg (27)	Yockanookany Mitigation Resources/111615/Yockanookany Mitigation Bank, Attala and Leake Counties, Mississippi	145	0	464	609
Portland (9)	Yoncalla Creek Mitigation Bank	257	393	1249	1899





## ABOUT EPIC

The mission of the Environmental Policy Innovation Center (EPIC) is to build policies that deliver spectacular improvement in the speed and scale of conservation. EPIC focuses on a narrow set of strategies:

- Improving policies that allow private sector funding or stewardship to expand or supplant public or charitable conservation work
- Transforming government policies to focus on what matters—outcomes
- Eliminating the organizational barriers that prevent public agencies from adapting to 21st century solutions

Housed within the EPIC, the Restoration Economy Center envisions a world where environmental restoration outpaces environmental impacts. We champion pathways to achieving greatly scaled environmental restoration outcomes.



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