

Status of Wisconsin's Wetland Compensatory Mitigation Program (2002-2010)

*Biennial Report from the Wisconsin Department of Natural Resources
to the Wisconsin State Legislature*

Purpose of this Report

The Legislature's wetland mitigation bill of 2000 added to the state's wetland regulatory process the concept of *wetland compensatory mitigation*—restoring, enhancing, or creating wetlands as compensation for permitted adverse impacts to wetlands.

This report provides data on the status and activities of the resulting wetland compensatory mitigation program through December 2010, emphasizing accomplishments and information from the past four years. This is the third status report on the wetland compensatory mitigation program as required by Wisconsin Statute 281.37(5) *Report to legislature. No later than January 31, 2003, and no later than January 31 of each subsequent odd-numbered year, the department shall submit to the legislature under s. 13.172 (2) a report that provides an analysis of the impact of the implementation of this section on wetland resources and on the issuance of permits or other approvals under ss. 59.692, 61.351, 62.231, 87.30, 281.11 to 281.47 or 281.49 to 281.85 or ch. 30, 31, 283, 289, 291, 292, 293, 295, or 299.* The first status report was submitted in 2005 reporting on compensatory mitigation activity from 2002 to 2004 and the second in 2007 reporting on compensatory mitigation activity from 2005 to 2006. The Wisconsin Department of Natural Resources (hereafter 'Department') position of Wetland Mitigation Specialist was vacant from 2008-2010 which is why no status report was submitted in 2009. Key information from this report can also be found on the program's website at: <http://dnr.wi.gov/wetlands/mitigation/currentstatus.html>, where the data is updated quarterly.

History and Introduction

By unanimous vote, both houses of the Legislature passed companion bills AB 859 and SB 447 in May of 2000, granting authority to the Department to consider wetland compensatory mitigation in its wetland permitting decision process. Compensatory mitigation involves wetland restoration, enhancement, or creation to "compensate" for wetland loss either through projects completed by the applicant or through the purchase of credits from pre-approved mitigation banks. On May 10, 2000, Governor Thompson signed into law, 1999 WI Act 147, which created s. 281.37, Wis. Stats.

Following substantial public and Legislative review, rules required by the statute went into effect on February 1, 2002. The new rules involved revisions to NR 103, the state wetland water quality standards, and a new administrative code, NR 350, which sets requirements for mitigation projects.

The January 2001 report of the National Academy of Sciences' National Research Council entitled *Compensating for Wetland Losses under the Clean Water Act* outlined ecological and administrative pitfalls made by other states and the federal government in designing and

implementing their mitigation programs. Mitigation programs can be expensive to run and often result in compensating losses of high-quality, highly-functioning or rare wetland types with degraded, poorly-functioning wetlands. In many other states, wetland compensatory mitigation is a requirement for each wetland permit decision. In contrast, our state decided that mitigation should be a tool to be considered in certain circumstances to improve the regulatory decision-making process. Wisconsin law does not require applicants to replace every acre of wetland that is impacted, nor does it allow any wetland to be destroyed as long as the applicant attempts to replace it elsewhere. Our wetland mitigation law maintains the important steps of avoiding and minimizing wetland impacts where practicable, consistent with federal law. In Wisconsin, compensatory mitigation adds flexibility for the regulated as well as the regulator, especially in cases where a project impacts a small acreage of low quality wetlands. Most mitigation applicants meet their mitigation obligation at mitigation banks.

Recent Accomplishments

☑ Received EPA Grant to improve program

The Department applied for and received a US Environmental Protection Agency (EPA) Wetland Protection State Development Grant to hire a three-year, full-time position to improve and manage the wetland compensatory mitigation program. During the next three years, the Wetland Mitigation Specialist will work to bring consistency and efficiency to the mitigation program for applicants, consultants, Department staff, and collaborators. This position will update the wetland mitigation database and website, conduct site inspections of mitigation projects (both individual sites and bank sites), review mitigation proposals, and process conservation easements and financial assurances. In addition, the position will conduct research on the ecosystem functions unique to natural wetlands and how they compare to the functions provided by restored, enhanced, and created wetlands.

☑ Continued Consultant and Department Staff Training

The Department held a quarterly training session in February of 2007 for Wisconsin DNR Water Management Specialists on wetland compensatory mitigation rules and processes. The Department offered training to consultants and staff on wetland compensatory mitigation at annual Wetland Delineation and Critical Methods classes offered jointly with other agencies through UW-LaCrosse.

Mitigation Proposals Received Since 2002

From February 2002 to December 2010, the Department approved 108 water quality certification applications that included compensatory mitigation; 42 of those applications were submitted from January 2007 to December 2010. Table 1 provides a summary of the categories of proposal applications submitted to the Department since the State rules went into effect in 2002. There are four categories of proposals: 1) approved project-specific mitigations are proposals in which the applicant agrees to compensate for the wetland loss by creating, restoring, or enhancing wetlands either at an immediately adjacent plot of land (on-site) or on a nearby plot of land (off-site), 2) approved bank credit purchase are proposals in which the applicant agrees to purchase credits from an approved wetland mitigation bank to compensate for wetland losses, 3) pending

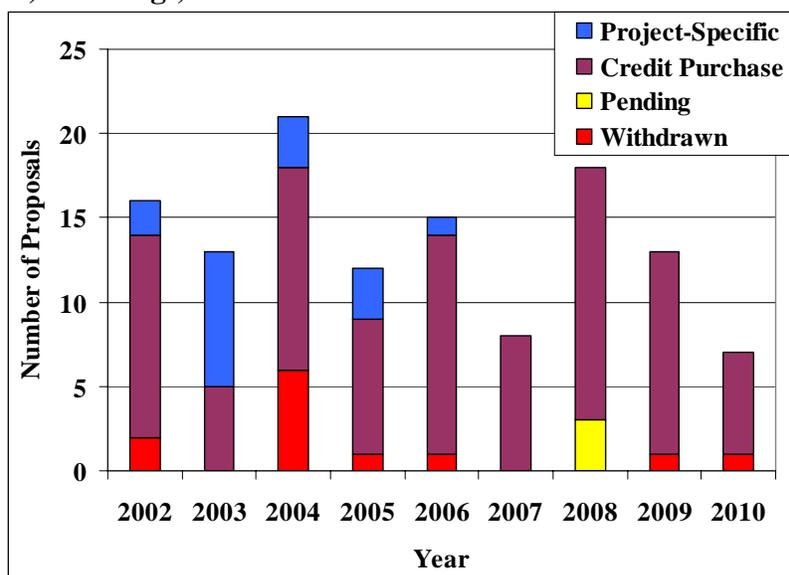
proposals are ones that have been submitted as either project-specific or bank credit purchase but the proposal has not been approved by the Department, and 4) withdrawn proposals are those in which the applicant decided to not proceed with the initially proposed project. Eighty-four percent of approved mitigation proposals resulted in the purchase of bank credits; since 2007, 100% of approved applications have resulted in the purchase of bank credits.

Table 1: Mitigation proposals received from February 2007 to December 2010 and the total number of proposals the program has received since 2002.

Mitigation Proposal Category	Number of Proposals 2002-2006	Number of Proposals 2007-2010	Total Number of Proposals 2002-2010
Approved Project-Specific Mitigation	17	0	17
Approved Bank Credit Purchase	49	42	91
Subtotal	67	41	108
Application Pending	0	3	3
Application Withdrawn	10	2	12
Total	77	46	123

Figure 1 provides information about the number and category of mitigation proposals received each year. Data is broken down by year and by category of project. Credit purchases make up the majority of projects in almost all years. Three projects remain listed as “Pending”; the Department received proposals for each of these pending projects but since then we have not received any documents showing that on-site construction was completed, bank credits were purchased, or that the project sponsors plan to withdraw the proposal.

Figure 1. Number and category of compensatory mitigation proposals from 2002 to 2010. Each year’s data is broken down into four categories of proposals: ‘Project-Specific’, ‘Credit Purchase’, ‘Pending’, and ‘Withdrawn’.



Mitigation Proposals Processing Time (2007 - 2010)

A Department central office Mitigation Specialist conducts the mitigation review, while a regional Water Management Specialist reviews the water quality certification application and alternatives analysis. However, the Mitigation Specialist cannot begin review of the mitigation proposal until the Water Management Specialist makes a preliminary decision that wetland compensatory mitigation can be considered under Chapter NR 103, Wisconsin Administrative Code. What constitutes a complete mitigation plan depends on what mitigation project path is proposed by the applicant. Different plan elements are required for the three mitigation paths of project-specific on-site, project-specific off-site and bank credit purchases. The elements of a complete mitigation application are shown in Table 2.

Table 2: Elements of a complete mitigation application by project path

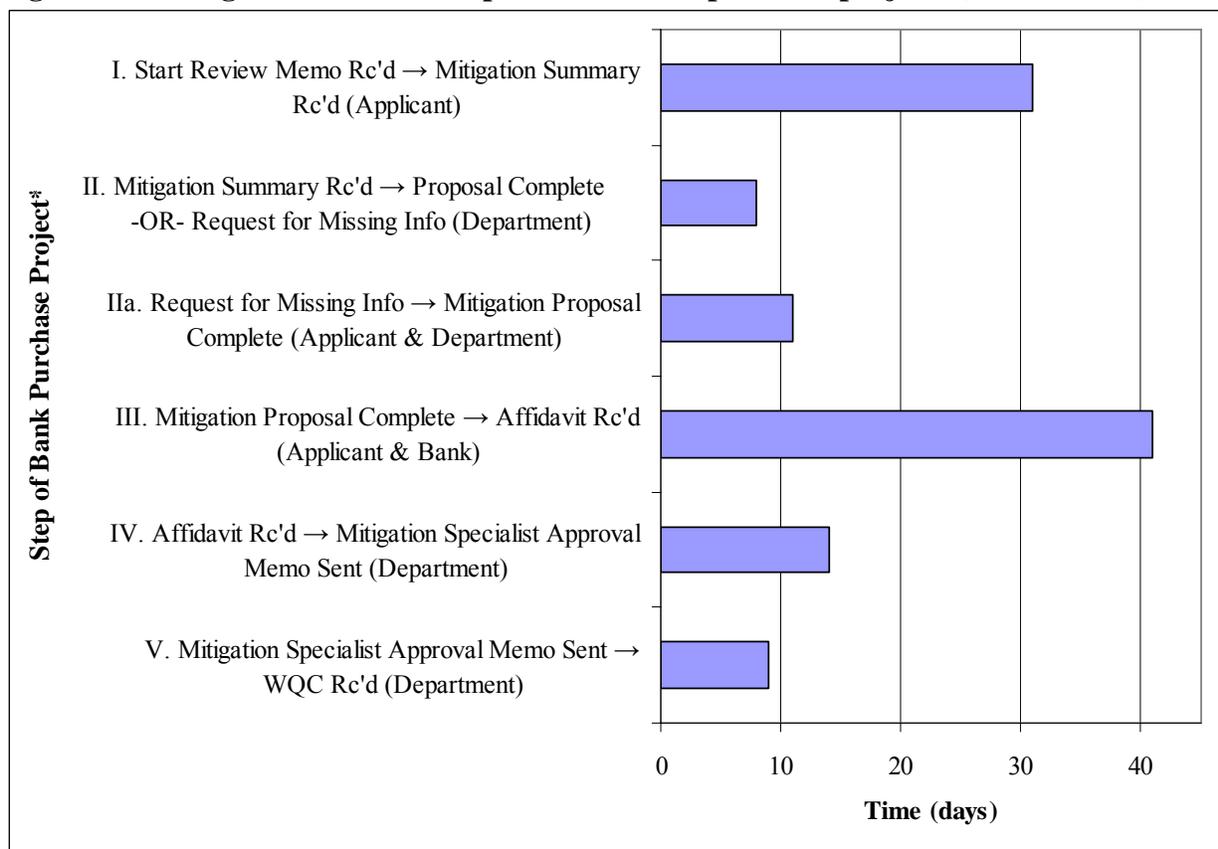
Project-Specific On-site	Project-Specific Off-site	Bank Credit Purchase
1. Mitigation Summary Sheet & Start Review Memo	1. Mitigation Summary Sheet & Start Review Memo	1. Mitigation Summary Sheet & Start Review Memo
2. Compensation Site Plan	2. Documentation of No On-Site Opportunity	2. Documentation of No On-Site Opportunity
3. Conservation Easement	3. Compensation Site Plan	3. Bank Purchase Affidavit
4. Financial Assurance	4. Conservation Easement	
	5. Financial Assurance	

All documentation in the mitigation plan must be of sufficient quality and clarity that it is possible for the Department to prepare a list of specific revisions that must be made for the mitigation application to be approved. The mitigation application can then be approved once the revisions have been made and the finalized legal documents (including a conservation easement and financial assurance, or the affidavit of bank credit purchase) have been received.

Applicants and consultants who are experienced in preparing mitigation proposals and who follow the mitigation guidelines closely are more successful in getting their mitigation proposal approved quickly. When incomplete packages are received the mitigation review process slows greatly. It also slows the process when finalized documents are not submitted promptly.

Since the 2007 Report (based on the program's status for 2005 and 2006), the average overall time it took for a mitigation review process has decreased from 123 days to 100 days. The 2007 Report's time of 123 days is an average of all projects, including on-site and off-site projects which have a longer review time; the current report had no on-site or off-site projects during the reporting time. In addition, the average time of 100 days is skewed by one project that was the result of an enforcement case which lasted longer than all other bank credit purchases.

Figure 2. Average time for each step in bank credit purchase projects (2007 to 2010)



* The arrow (→) indicates the transition time between two important steps. The party listed in the parentheses indicates who was responsible for action during the given time period.

The process for purchasing mitigation bank credits and the average time for each step is shown in Figure 2. A description of each step is provided below.

- I. The first step in the process was to receive the “Start Review Memo” from the Department’s Water Management Specialist and the “Mitigation Summary Sheet” from the applicant. This process requires the applicant to get all the application information and materials to the Water Management Specialist and Mitigation Specialist. Often these documents were not received at the same time and required the Department to request the missing document from the applicant.
- II. Once the “Start Review Memo” and the “Mitigation Summary Sheet” was received by the Mitigation Specialist, a letter was sent to the applicant either: 1) approving that all necessary information was received and indicated that the proposal was approved (proceed to step III, below) or not approved or 2) indicating that missing information be provided before the application could be considered complete (applicant had the extra step of IIa, below).
- IIa. *This step is only required in cases where missing information was requested.* Once the letter requesting missing information was sent, the applicant must provide the Mitigation Specialist with the missing information. When all

information was received, the Mitigation Specialist could determine that the application was approved or not.

When an application was approved, a letter was sent to the applicant notifying them that their proposal was approved and that they must purchase bank credits.

- III. The applicant then purchased bank credits from a pre-approved wetland mitigation bank. Then the bank manager sent a copy of the credit purchase affidavit to the Mitigation Specialist.
- IV. Once the Mitigation Specialist received the affidavit, an approval memo was sent to the Water Management Specialist approving the release of the Water Quality Certification.
- V. The Water Management Specialist then granted the Water Quality Certification to the applicant.

The process of purchasing bank credits relies on efficient communication and response from the Department, the applicant (or a consultant on behalf of the applicant), and the mitigation bank manager. Based on the times outlined in Figure 2, the Department's processing and reviewing time took approximately 32% of the 100 day average, the applicant was responsible for approximately 50% of the time, and the bank manager was responsible for the remaining 18% of the time.

The longest step was waiting for the applicant and the bank to work together to complete the transfer of funds and provide the Department with the credit purchase affidavit. The Department will make the process of credit purchase simpler for the applicant by creating training materials available on the Department website. In addition, the Department will use a new tool created by the Army Corps of Engineers, that tracks credit purchases online decreasing the time between the Department approval of credit purchase and when the affidavit is received.

The second longest step was acquiring the required proposal documents from the applicant. The Department intends to sponsor training for the Water Management Specialists who are the first contact for applicants. This training would provide staff with tools necessary to make clear the initial steps for applicants, so that all materials needed are provided quickly. The Department plans to streamline and clarify the steps taken by the applicant to reduce the overall time to acquire bank credits for mitigation projects.

Permitted Wetland Loss

Table 3 shows a summary of the state-wide loss of wetlands from Department approved and permitted compensatory mitigation proposals. Sixty-three percent of all permitted wetland losses from 2002 to 2010 are compensated through the purchase of mitigation bank credits. All permitted wetland losses in the last four years (2007 to 2010) were compensated through the purchase of mitigation bank credits. On average, the permitted acres lost per proposal is 1.4 acres for project-specific proposals and about one third that for bank credit purchase proposals at 0.5 acres lost per proposal. Of all approved compensatory mitigation projects, 88% involve wetland fills less than one acre.

Table 3: Acres lost by approved applications that included a compensatory mitigation proposal from February 2002 to December 2010. The subset of mitigation data from January 2007 to December of 2010 are shown in parentheses.

Type of Mitigation Approved	Total permitted wetland acres lost		Average acreage loss per proposal		Range of wetland impact acreage	
	'07-'10	'02-'10	'07-'10	'02-'10	'07-'10	'02-'10
Project-specific Proposal	0	23.4	n/a	1.4	n/a	0.07 – 14.3
Bank Credit Proposal	15.5	40.7	0.4	0.5	0.01-1.9	0.01 – 2.9
Total Mitigation Acres	15.5	64.1	0.4	0.6		

Compensation Acreage

Mitigation projects require compensation at ratios of 1.5:1, though the rules allow for 1:1 compensation on a case-by-case basis. From 2002 to 2010, 32% of bank credit purchases were approved with a compensation ratio of less than 1.5:1 and the remaining 68% were approved at a ratio of greater than or equal to 1.5:1. A total of 58.15 credits have been purchased from mitigation banks as a result of the state program between 2002 and 2010. Between 2007 and 2010, 23.12 acre credits were purchased from approved mitigation banks.

Since 2002, there have been a total of 17 project-specific wetland mitigation proposals approved. Ten projects have completed the required monitoring periods and were found to meet all stated project performance standards. The 10 completed projects represent a total of 4.8 acres of filled wetlands. These projects initially proposed restoration, enhancement, and creation of 23.5 acres of wetland and enhancement of 33.7 acres of associated upland buffer communities. At the end of the monitoring process, a total of 20.0 acres of wetlands (and 11.6 acres of upland buffers) were created, restored, or enhanced from these 10 completed projects. Enhanced wetlands made up roughly 16% of the wetlands mitigated through the Department and, therefore, do not represent a gain in wetland acreage but an improvement in function such as plant species diversity, wildlife habitat, water quality enhancement, or flood-water storage.

If the remaining 7 uncompleted project-specific mitigation sites (which represent a total of 18.6 acres of wetlands filled) approved between 2002 and 2010, are successful in producing what the project proposals plan, then a total of 28.9 acres of wetlands would be restored, enhanced, and created and 10.5 acres of upland buffers would be enhanced. Many of the mitigation projects are still in the construction stage or have not completed the monitoring phase of 5 to 10 growing seasons required post-construction. It is difficult to predict what ecological community will result from a wetland restoration or creation; we cannot report final wetland acreages until monitoring periods are completed. Mitigation projects are formally delineated for wetlands at the end of the monitoring period. If the trend holds from the ten completed project-specific sites, restoration, and creations are roughly half as successful as initially proposed, suggesting that project site managers should aim to restore or create at least twice the number of acres that is required by Chapter NR 350, Wisconsin Administrative Code.

Mitigation Banks

By law, when an applicant does not have feasible opportunities for on-site restoration of wetlands (defined by rule as within ½ mile of the wetland loss), that applicant may opt to purchase credits from a pre-authorized bank. Banks are established through a process that is separate from the wetland regulatory decision-making. Bank sponsors can develop bank sites mainly by restoring wetlands and receiving agency approval from the interagency Mitigation Bank Review Team (MBRT is comprised of the Department of Natural Resources, US Army Corps of Engineers, US Environmental Protection Agency, US Natural Resources Conservation Service and US Fish and Wildlife Service) to be in the business as suppliers of mitigation credits. These credits are accrued by completing wetland projects successfully, as defined by mutually agreed upon criteria in the site plan. “Debits” occur when an applicant for a wetland fill permit purchases credits from a bank at a price per acre determined by the bank sponsor. Bank sponsors have included private companies, non-profit organizations and local governments. The remaining two banks, Glacier Ridge and Emerald Park, have not completed the construction phase and, therefore, have not had any credits released by the MBRT.

The Department maintains a registry of approved banks with credits for sale (available at: <http://dnr.wi.gov/wetlands/mitigation/mitigationbanks.html>).

Banks Established Prior to WI Act 147

The US Army Corps of Engineers (ACOE) approved four banks in Wisconsin prior to passage of the 2000 state law. One of these banks is the bank for Wisconsin Department of Transportation that now includes over 30 individual sites across the state. The other three banks only include one site and had all their credits have been released by ACOE.

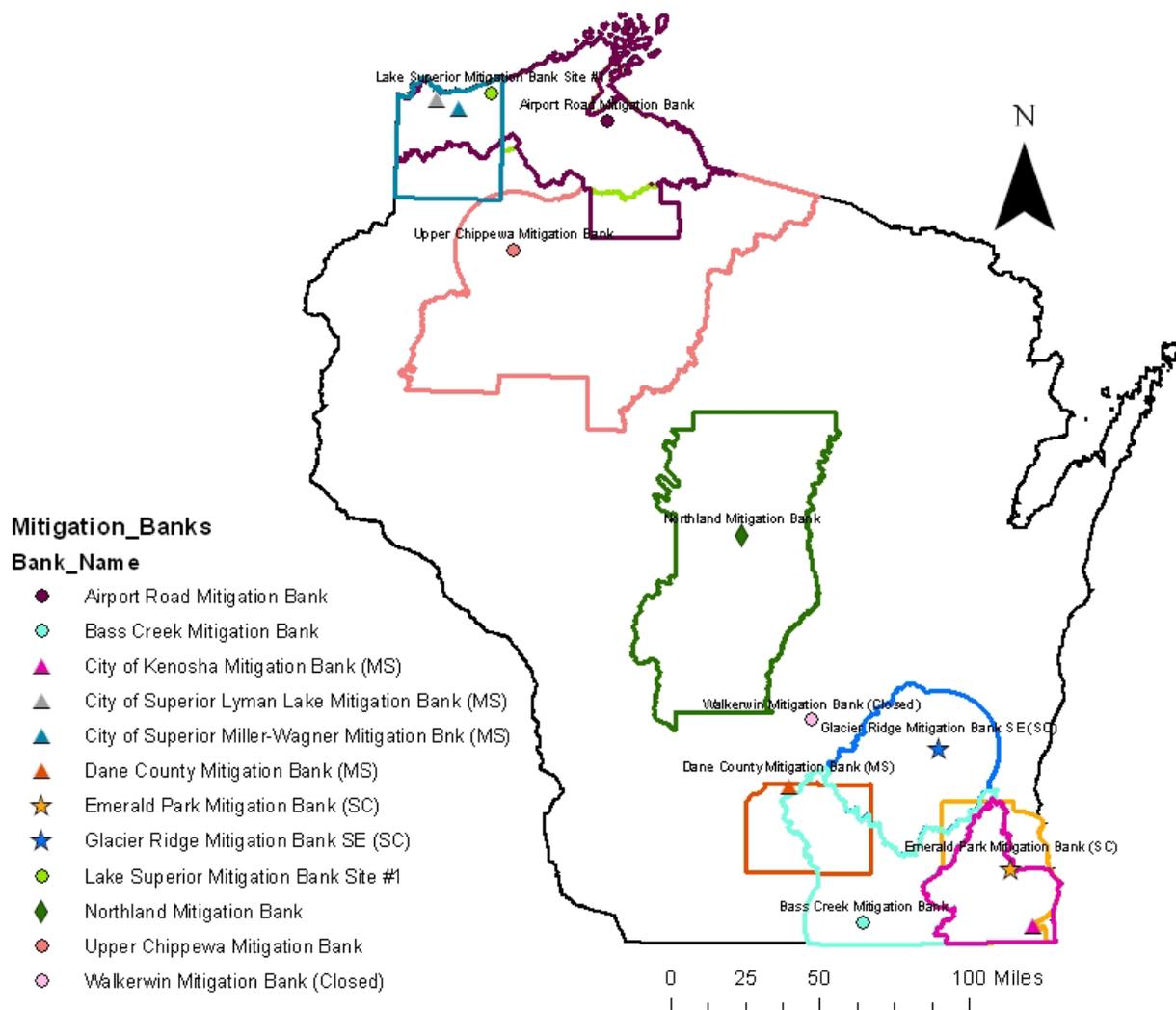
1. A bank site for Dane County, near Lodi, is used only by the county and other municipalities in the county for public projects. By the end of 2010, this bank had 21.65 credits remaining out of the 46.93 credits approved.
2. Walkerwin Bank in Columbia County operated by the Wisconsin Waterfowl Association. This bank has sold out of the 97.75 initially approved credits.
3. Northland Cranberry Bank in Wood County operated by Legacy Bogs, Inc. At the end of 2010, this bank had 84.17 credits remaining out of the 130.15 approved credits.

Chapter NR 350. Wisconsin Administrative Code, recognized that the latter two private banks were operating in good faith before the state rules went into effect and thus were “grandfathered” to allow them to continue to sell credits on a statewide basis. The concept for grandfathering the two pre-existing banks was recommended by the Senate Committee on Environmental Resources. As such, the rules required these grandfathered banks to sign a Memorandum of Understanding (MOU) with the Department that allowed them to sell statewide, but required them to facilitate wetland restoration projects in the Geographic Management Unit (GMU) of their customers, where the wetland loss occurs. Both banks are in compliance with their respective MOUs. All areas of Wisconsin are currently serviced by at least one mitigation bank. Since Walkerwin Bank has sold-out its credits, the Northland Cranberry Bank is the only bank that is still allowed to sell credits state-wide.

Banks Approved After 2002

Banks created after 2002 are allowed to sell credits within the same county as the bank, within 20 miles of the bank site, and anywhere in the major water basin, or GMU of the bank. The Chapter NR 350, Wisconsin Administrative Code, service areas of private and county mitigation banks are depicted in Figure 3. Since February 2002, the Department and the interagency MBRT have approved five banks. Three of these wetland mitigation banks (Upper Chippewa, City of Superior Lyman Lake, and Lake Superior Site #1 Banks) have completed construction of the bank site and have received approval to sell a portion of their credits.

Figure 3. Private and county wetland mitigation banks and their service regions.



*There are two Single-Client (“SC”) banks indicated with a star that only sell credits to one client. There are four Municipality-Specific (“MS”) banks indicated with a triangle that only sell credits within a specific municipality. The remaining banks are General-Use banks, indicated with a circle, which can sell credits to any buyers within the outlined service area (comprised of a 20-mi radius, county of bank, and GMU of bank). Northland Mitigation Bank, indicated with a diamond, is the only bank that can sell credits to buyers outside of the outlined service area.

1. Upper Chippewa located near Hayward (total of 41.5 mitigation credits)
This is a general use bank (credits available for the public). By the end of 2010, the MBRT had released 12.45 credits to the Upper Chippewa bank sponsor, Alf Sivertson, and the bank had sold 11.27 of those credits. This bank has a seven-year monitoring period starting in 2005 and ending in 2011.
2. City of Superior's Lyman Lake Road Mitigation Bank in Douglas County (total of 79.95 estimated mitigation credits)
This is a municipality-specific bank in that it was developed to only sell credits to the City of Superior and/or Douglas County. By December of 2010, 10.633 credits have been made available for the bank sponsor, the City of Superior, and 5.347 credits had been sold.
3. Lake Superior Site #1 in Douglas County (total of 29.14 estimated mitigation credits)
This bank is a general use bank. The bank document was signed and approved by the MBRT in July 2010. Currently, 5.828 credits have been released by the MBRT to the bank sponsor, Alf Sivertson, to sell; no credits have been sold by the end of 2010.
4. Glacier Ridge near Horicon (total of 42.27 estimated mitigation credits)
This is a single client bank (credits only available for the Veolia Environmental Services Company, the bank sponsor) consisting of two sites: a Southeast site (23.88 credits) and a Northeast site (18.39 credits). The bank sponsor has informed the MBRT that construction of the Southeast site was completed in 2006. The MBRT approved the release of 30% of the credits in 2008, but with a warning that the floristic quality of the site was too low and should be improved before more credits would be released. The MBRT also stated that after the fifth year of monitoring, the MBRT would re-assess the number of wetland mitigation credits that the site warrants. As of December 2010, the bank sponsor had not yet begun construction at the Northeast site.
5. Emerald Park near Mukwonago (total of 43 estimated mitigation credits)
This is a general use bank. Construction and planting was completed at this site in 2008 but the as-built report was not received by the Department until March 2010. This bank will have 20% of its credits released when the MBRT receives the finalized financial assurance and conservation easement which by the end of 2010, the Department has not yet received. It has been suggested that this bank be changed from a general use bank to a single client bank with credits only available to Veolia Environmental Services Company; this change has not been made official.

Banks Under Review

The Department is currently reviewing four proposals for new banks.

1. Bass Creek Mitigation Bank in Rock County
This is proposed as a general use mitigation bank. The MRBT received the bank document in June 2010 and has been submitting concerns and requests for revisions since then. The MBRT plans to meet in April 2011 to discuss any remaining issues with the bank document, before it can be approved.
2. Airport Road Mitigation Bank in Ashland County
The bank prospectus for this site was received in 2009. It is proposed as a general use bank. A site visit was performed in November 2009. The MBRT requested a revised prospectus which was under review in December 2010.

3. City of Kenosha Mitigation Bank in Kenosha County

The bank prospectus for this site was received in August 2008. This site is proposed as a municipality-specific bank; the City of Kenosha is the bank sponsor and they plan to sell credits to projects in the City of Kenosha boundaries. The Department sent comments on the Draft plan to the project consultants and as of December 2010 was awaiting an updated plan.

4. City of Superior's Miller-Wagner Creek Mitigation Bank in Douglas County

The site plan for this bank was received in April 2010 and as of December 2010 was still under review by the MRBT. This bank is proposed as a municipality-specific bank that would only sell credits to clients in the City of Superior.

Wetland Compensatory Mitigation Compliance

Approved wetland mitigation banks and project-specific sites all have monitoring periods that last from 5 to 10 years, depending on the project's size and goals. During that period, bank and project sponsors are responsible for implementing their monitoring and maintenance plans and submitting a pre-determined number of monitoring reports to the Department. The monitoring report submitted at the end of the final year in the monitoring period must demonstrate that all of the performance standards (quantitative success criteria determined prior to project implementation) have been met.

Monitoring compliance of mitigation banks and project-specific sites is a must for a well functioning compensatory program. In the mitigation database, staff track when monitoring reports are due and received. Reminder letters are sent to project sponsors when monitoring reports are not received on time. A Department wetland ecologist reviews every monitoring report received for compliance with Chapter NR 350.09, Wisconsin Administrative Code, and completeness according to requirements outlined in individual compensation site plans. Some monitoring reports are missing information and/or are submitted much later than the expected date. When monitoring reports are deficient or late, the Department will send a letter to the project or bank sponsors outlining the issues to be addressed and how to handle future reports.

Site inspections are important to verify accuracy of information found in a monitoring report. Most project-specific sites and bank sites are visited by a Department wetland ecologist every year and all sites are visited at least every other year. While the Department is hopeful that inspecting each mitigation site every year will not be necessary in the long run, inspection results thus far indicate that annual inspections are warranted. During site inspections, Department staff noted many problems with exotic or invasive vegetation colonizing mitigation sites. Only a few mitigation sites were properly implementing maintenance plans to address this problem, and many monitoring reports had understated or inadequately addressed the extent of exotic plant invasions found on-site. Most mitigation sites have performance standards limiting the acceptable amount of invasive or exotic plant species that can be present within the site and early detection and removal of such species is critical for mitigation site success. All sites have at least one invasive species present and most sites are actively attempting to reduce the presence and/or cover of the invasive plant(s). Thus, the Department needs to take an active role in inspecting sites and notifying project sponsors of problems.

All sites in their final monitoring year were visited and evaluated prior to their release from further mitigation, maintenance, and monitoring obligations. All completed site-specific projects and closed bank sites continue to be protected by conservation easements and some continue to be maintained and managed by their project sponsors.

In order to improve site compliance, the mitigation specialist who reviews project proposals in 2011 and 2012 will require maintenance plans and monitoring plans to be developed in greater detail to assure that the project sponsors promptly respond to site problems.

Program Goals for 2011 and 2012

In 2008, the Department applied for and received a USEPA Wetland Protection State Development grant to improve the wetland compensatory mitigation program. This grant will fund a three-year position that started in early 2011; the position will manage the wetland compensatory mitigation program, provide trainings to Department staff and partner organization staff, and continue the study of wetland functions in enhanced, restored, and created wetlands in Wisconsin.

The goals of the compensatory mitigation program for 2011 and 2012 are to:

1. Develop methods to work closely with other state and federal mitigation agencies to increase communication, decrease the overall application time, and provide clearer understanding of mitigation decisions and reporting/tracking processes.
2. Provide guidance and training for Department and partner organization staff on the compensatory mitigation process and how to make program delivery consistent statewide.
3. Compare and standardize functional assessment tools used in site evaluation.
4. Continue to oversee Wisconsin's Wetland Compensatory Mitigation Program, develop methods for making the program delivery more efficient, and provide training and dialog with applicants.

Achievement of these goals will streamline decision-making, increase consistency and transparency for applicants and staff, and improve the quality of future wetland compensatory mitigation projects.