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of Engineers®**  
St. Paul District



# SPECIAL PUBLIC NOTICE

ISSUED: May 7, 2026

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## ANNOUNCEMENT OF RELEASE OF THE AFTER-ACTION REPORT FOR THE 2025 BANKING LISTENING SESSIONS

The U.S. Army Corps of Engineers St. Paul District Regulatory Division (USACE), U.S. Environmental Protection Agency (EPA), and Wisconsin Department of Natural Resources (Wisconsin DNR) are announcing the release of the After-Action Report for the 2025 Banking Listening Sessions held on September 3, 2025 (Wisconsin) and September 17, 2025 (Minnesota). The agencies have developed an After-Action Report as one combined document for both states.

This document provides an overview of the federal mitigation program, describes the participant feedback received, agency evaluation of the feedback, and specific joint-agency actions to address feedback.

The agencies will prioritize completing short-term actions within the next year and long-term actions will require at least a year or more to complete. Please note we will be soliciting volunteers for several upcoming webinars to share success stories and case studies. If you are interested, please e-mail [leslie.e.day@usace.army.mil](mailto:leslie.e.day@usace.army.mil) and [eric.m.norton@usace.army.mil](mailto:eric.m.norton@usace.army.mil).



**US Army Corps  
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St. Paul District



## 2025 Banking Listening Sessions Report



U.S. Army Corps of Engineers, Wisconsin Department of Natural Resources, and U.S. EPA  
Date: April 2026

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## Executive Summary

In September 2025, the U.S. Army Corps of Engineers (USACE), Wisconsin Department of Natural Resources (WDNR), and U.S. Environmental Protection Agency (EPA) hosted two listening sessions intended for mitigation bank sponsors, consultants, and other mitigation professionals. The sessions were aimed at soliciting feedback and discussing the current state and federal mitigation bank processes, with a specific focus on ways to improve consistency and efficiency of the programs in Minnesota and Wisconsin. The Wisconsin session was held on September 3, 2025, in Weston, Wisconsin, and the Minnesota Session was held on September 17, 2025, in St. Paul, Minnesota.

USACE sent a planning survey to sponsors, consultants, and other stakeholders in March 2025. To focus and facilitate participant feedback on the state of banking in Minnesota and Wisconsin, the agencies identified four broad categories for discussion: communication, agency review comments, agency guidance, and the general banking process. The agencies asked participants to come to the sessions with their top three impactful ideas for improving the banking programs in each state.

At each session, the agencies provided a brief introduction and shared ground rules to guide the discussion. The agencies presented an overview of wetland and stream mitigation banking in each state, including the purpose of mitigation banking, a summary of mitigation banking activity, clarification on what aspects of the mitigation program can and cannot be changed, and an update on short- and long-term actions completed since the 2019 listening sessions. The agencies then outlined the four categories for discussion and solicited feedback from participants on each of the four categories.

The agencies facilitated discussion with the participants and documented all comments and suggestions. Following discussion with the participants, the agencies organized comments into similarly themed groups under each category and invited participants to vote for the items of greatest importance to them. Following this voting exercise, the agencies provided preliminary feedback on each item receiving a vote in terms of agency priority and timelines. At the end of each session, the agencies committed to developing a report summarizing session results and agency recommendations, as well as providing periodic updates on action items. A summary table of the proposed joint agency actions is found in Appendix A.

## Introduction

Mitigation banking in Wisconsin and Minnesota is regulated and overseen at both the state and federal level. In Wisconsin, Chapter NR 350 of Administrative Code and 281.36 of Wisconsin State Statutes govern compensatory mitigation requirements and approval of compensation sites by the Wisconsin Department of Natural Resources (WDNR). In Minnesota, the Wetland Conservation Act (WCA) is the primary law that governs the establishment and operation of the Minnesota Wetland Bank which serves as a source of replacement (mitigation) for wetland impacts authorized under WCA. Rules to implement WCA are developed by the Board of Water and Soil Resources (BWSR) with input from other state agencies and the public. At the federal level, the Clean Water Act (CWA) and 33 CFR 332, also known as the Federal Mitigation Rule (FMR), provide the framework for the review, approval, and operation of mitigation banks, which are a preferred source of compensatory mitigation for unavoidable impacts to wetlands authorized by CWA Section 404 permits. The federal program is administered by USACE. To ensure consistent state and federal site approvals, the Inter-Agency Review Team (IRT) consists of USACE (IRT Chair), BWSR, MDNR, and the EPA in Minnesota and USACE (IRT Chair), WDNR, and the EPA in Wisconsin.

The WDNR and BWSR, in conjunction with USACE, developed state-specific guidance to stakeholders on compensatory mitigation requirements and to outline the role of the state in the federal bank review process. Since 2008, the federal program has undergone changes that have significantly improved all aspects of mitigation under the FMR. In Wisconsin and Minnesota, USACE now has standard procedures, review processes in place to improve consistency in decisions and implementation, and a federal database for tracking the progress of pending and approved banks and transaction activity. The current regulatory framework for mitigation banking in Wisconsin and Minnesota can be complex. There has been measurable progress in bringing the state and federal programs together to simplify and clarify the processes for the benefit of the public, yet there continue to be areas where differences and complexities can lead to uncertainty for bank sponsors or others involved with wetland mitigation banking. The agencies agreed that soliciting input from bank sponsors, consultants, and other stakeholders would provide beneficial feedback on how to further improve mitigation banking in their respective states with the ultimate goal of maintaining a healthy and active mitigation banking program.

## Purpose

USACE, EPA, WDNR, and MNDNR developed the 2025 Bank Listening Sessions as a continuation from the 2019 Bank Listening Sessions. USACE provided a status update of the programmatic changes since the 2019 sessions and then opened discussion aimed at identifying and prioritizing agency actions for improving the mitigation bank programs in Minnesota and Wisconsin, with the following specific goals:

- Increase agency awareness of challenges faced by mitigation bank stakeholders
- Gather stakeholder feedback to identify areas of the mitigation bank program where aspects of the mitigation bank program are not consistent or efficient and where additional guidance or clearer communication with stakeholders is needed
- Solicit stakeholder input into which action items and issues should be prioritized by the agencies for resolution to amplify program improvements
- Identify stakeholder training needs

## Listening Session Framework

### Advance Work

The goal of the listening sessions was to update stakeholders on program evolution since the 2019 sessions and to gather feedback from stakeholders regarding what is working and what could work better. USACE sent a planning survey (Microsoft Forms) out to sponsors, consultants, and other stakeholders in March 2025 to collect information for a future meeting, including whether to hold a virtual or in-person meeting, host separate sessions for each state, what time of year to host, and whether any additional topics should be added.

USACE received 42 responses to the planning survey (Appendix B). Twenty-one people requested an in-person and virtual meeting format, eighteen requested virtual only, and three requested in-person only. Regarding separate state sessions or a combined Minnesota and Wisconsin session, twenty-six people requested separate sessions for each state and six people requested a combined session for both states. Twenty people requested that the meeting take place in the late summer (August) and twenty-one people requested that the meeting take place in fall (September or October).

The Wisconsin session was held on September 3, 2025, at the Fairfield Inn (7100 Stone Ridge Drive, Weston, Wisconsin). The Minnesota Session was held on September 17, 2025, at the First National Bank Building (332 Minnesota Street, St. Paul, Minnesota).

Approximately four weeks prior to the listening sessions, the agencies provided an agenda to participants, along with the informational flyer (Appendix C) describing the meeting location and directions, and a virtual link to access the listening session on-line.

## Meeting Flow

Prior to the meeting, the agencies developed a leader agenda to ensure all agency staff were prepared and agreed on the ground rules and flow of the session. The agencies agreed that the intention was to update attendees on the status of the 2019 Listening Session short- and long-term actions and then dedicate time to a facilitated and respectful discussion by banking community participants.

Attendees wrote their top ideas on sticky notes under the main themes identified by the agencies. The exercise included ideas from participants in the room and on-line to capture ideas from all participants. Agency staff then discussed each idea with the group, asked for clarification or elaboration, and grouped ideas as needed. Participants then used up to three votes each to indicate support of specific topics or comments.

The agencies provided additional feedback to attendees at the end of each session to give perspective on which items would be short (less than 1 year) or long term (greater than 1 year) actions. Agency staff clarified that, while they did not commit to completing specific actions, they would present a report with recommendations to agency leadership for approval. At the end of the sessions, agency staff stayed to discuss programmatic or project-specific questions from participants. The detailed leader agenda is included below; the participant agenda is included as Appendix D.

## Detailed Agenda

- i. **Introduction**
  - a. Introductions of Agency Staff and Attendees (Name, organization (if applicable), brief overview of banking world experience)
  - b. Ground rules, cover the agenda, meeting logistics
  - c. What we want to accomplish
- ii. **Mitigation Context and Status update on Action Items from 2019**
  - a. Overview of Wetland Mitigation
  - b. Overview of Stream Mitigation
  - c. Review of completed short- and long-term actions since 2019
  - d. Timeline Improvements
  - e. What's up next (new legislation, rule making process, etc.)
- iii. **Introduce main topics**
  - a. Guidance
  - b. Communication
  - c. Agency comments
  - d. General banking process
- iv. **Posting of attendee's ideas by topic**
- v. **Group review of ideas**
  - a. Ask for clarification, group as appropriate, and edit or give immediate feedback as needed
- vi. **Voting**
  - a. Everyone gets three dots to place as they see appropriate
- vii. **Attendee Lunch Break/Agency review**
  - a. Agencies discuss grouping of results and initial perspectives
- viii. **Review agency priorities**
  - a. Short-term (< 1 year) or Long-term (> 1 year)
- ix. **Open Discussion**
  - a. Review of main ideas
  - b. What's going well
  - c. Request for trainings / outreach
- x. **Review of Due-outs**
  - a. Joint summary report – Spring 2026
  - b. Schedule with leadership
  - c. Remaining Questions

## Meeting Attendance

### Wisconsin Session

Fifty-five participants representing bank sponsors, consulting firms, and wetland and stream professionals attended this meeting. Two participants attended in person, while the rest participated on-line through Zoom. Zoom participants used the chat feature to share their ideas and to cast their votes. Agency staff grouped all ideas and then shared them in the chat feature for virtual attendees to vote.

### Minnesota Session

Forty-two participants representing bank sponsors, consulting firms, and wetland and stream professionals attended this meeting. Eight participants attended in person while the rest participated on-line through Microsoft Teams. Microsoft Teams participants used Canva to post their ideas and cast their votes. Agency staff added the in-person attendee's ideas to the Canva board prior to voting so that all ideas were grouped and accounted for.

## Summary of Participant Feedback

Below is an agency staff summary of the feedback which received votes of support from participants. Feedback is separated by session and then listed in descending order of votes. Complete notes from the listening sessions are included as Appendix E.

### Wisconsin Session (Weston, WI, September 3, 2025)

#### **MBI Completeness (16 Votes)**

Participants requested clarity on completeness requirements for each review phase (i.e. “perfect package” for Final MBI and level of information required in compensation site plans).

#### **Information Sharing (12 Votes)**

Participants requested the IRT share feedback from lessons learned on other banks, such as highlighting successes in webinars or newsletters.

Participants also noted that the Mitigation Newsletters contain many important topics and requested an easier way to access this information.

### **Improve Communication (10 Votes)**

Participants noted confusion on whether they need to address all IRT comments or just focus on the USACE consolidated comments in end-of-phase letters. They also expressed confusion on understanding when actions identified in end-of-phase letters are required by the IRT and when they are just recommended.

### **Stream Mitigation & Restoration (6 Votes)**

Participants requested a webinar on stream credits and restoration including more communication on stream mitigation needs to sponsors and the potential for dam removal to qualify for a mitigation bank.

### **Buffers (3 Votes)**

Participants requested that sponsors be allowed to propose and justify buffer widths based on site conditions.

### **MBI Modification Procedure (3 Votes)**

Participants requested more information on timelines and steps to modify an MBI after a site is built such as additional earthwork, revised credit release schedules, or ownership transfers.

### **Preservation (2 Votes)**

Participants requested updated guidance for preservation crediting in Wisconsin and more specific guidance on threats.

### **Credit Release Schedule Flexibility (1 vote)**

Participants requested flexibility in credit release schedules to allow Interim Vegetation Performance Standards to be independent of hydrology restoration success and credit release.

### **Comments Receiving No Votes**

Participants noted that Regulatory In-Lieu Fee and Bank Information Tracking System (RIBITS) entries have improved, but there are still some errors, and noted that it can be hard to find banks and USACE project numbers for annual reporting. Participants made additional comments that they appreciate flexibility and requested guidance on permittee-responsible mitigation (PRM) sites that could be expanded in the future for potential mitigation banks. Finally, participants noted that they appreciated acknowledgement emails.

## Minnesota Session (St. Paul, MN - September 17, 2025)

### **Performance Standards (21 Votes)**

Participants noted a desire for updated procedures and training on performance standards. Comments on this topic included requests to review bank performance after monitoring, review reference wetlands and historical data to support achievable performance standards, regionalizing performance standards, and requesting consideration of function-based performance standards.

### **Local Needs for Mitigation (7 Votes)**

Participants noted that the mitigation hierarchy at the federal level and statute change at the state level results in limiting the development of mitigation sites in urban areas that have large wetland losses and suggested that PRM may be ecologically preferable to bank credits located farther from the impact area.

### **IRT Coordination (7 Votes)**

Participants noted that end of phase letters sometimes lack clarity on which IRT comments need to be addressed and the fact that some IRT comments contradict each other creating confusion for the sponsors on how to resolve issues.

### **Improve Communication (6 Votes)**

Participants noted some issues in communication including confusion on whether applicants are responsible for managing vegetation outside the easement, comments that may not be easily resolved, a desire to resolve a lack of information before the end of phase and requesting more communication directly with sponsors during review process. Participants also noted that overall timeliness and consistent communication has improved.

### **Lateral Effect (4 Votes)**

Participants requested guidance for when to use the NRCS Lateral Effect Tool or BWSR Setback Tables for determining the lateral effect from functioning ditches and tile systems for mitigation projects.

### **Engineering (4 Votes)**

Participants requested training in engineering design, modeling, and resources for successful restoration plans.

### **Deep Marsh and Shallow Open Water Restoration (2 votes)**

Participants requested flexibility for allowing deep marsh and shallow open water restorations when those communities are the historical natural condition. Participants also requested guidance on performance standards for these communities.

### **Credit Potential (2 Votes)**

Participants commented that BWSR and USACE are limiting credits based on arbitrary and pre-conceived notions of what is possible on a site. Participants argued that potential crediting should be based on the difference between pre-restoration baseline conditions and post-restoration performance. Maximum potential credit should not be limited administratively by the agencies but rather based on actions eligible for credit by rule and restoration performance.

### **Monitoring (1 Vote)**

Participants requested training on calculating data to determine if vegetation performance standards (PS) are met during monitoring.

### **Hydrogeomorphic (HGM) Transition (1 Vote)**

Participants asked if USACE would follow the State's transition to HGM classes for identifying wetland communities.

### **USACE Mitigation Contacts (1 vote)**

Participants requested a list of USACE mitigation contacts.

### **Anoka Sandplain Restoration (1 vote)**

Participants noted that Minnesota's Anoka Sandplain seems to need its own unique approach to address the loss of rare plant species and to encourage banks restoring these communities or the preservation of areas with these species and unique plant communities.

### **Water Control Structures and Financial Assurances (1 vote)**

Participants requested flexibility to allow water control structures to manage water levels without major financial assurances or long-term funding.

### **Site Visits Early in Process (1 vote)**

Participants requested that the agencies consider a site visit with the sponsor early in the bank application process with sponsors, specifically following or at the prospectus stage.

## Comments Receiving No Votes

There were several comments that did not receive any votes. These comments included a request for guidance on specific plantings for pollinators, long-term management requirements, consistency in application of preservation guidance, requesting feedback if public/private partnerships are advantageous or valuable, request for guidance on buffers (incompatible adjacent land uses or invasive species immediately off-site, etc.), and a request for clarity on crediting for extended restorations and partially drained, non-cropped areas. They also included a request to clarify how State and USACE requirements will align following upcoming state rulemaking, a request for access to training resources, and a request that USACE guide applicants on communication with BWSR and LGUs.

## Joint Agency Recommendations

After the listening sessions, agency staff evaluated participant feedback from both sessions and developed a crosswalk table for each state (Appendix A) to show short term, long term, and ongoing actions in response to the topics that received votes. The agencies assigned the highest priority to actions that were most popular to participants. The Minnesota and Wisconsin actions are grouped into four categories and summarized below. The four Wisconsin topics receiving the most votes were: MBI Completeness Requirements, Information Sharing, Improving Communication, and Stream Mitigation and Restoration. The four Minnesota topics receiving the most votes were: Performance Standards, Local Needs for Mitigation, IRT Coordination, and Improving Communication.

## Wisconsin

### MBI Completeness

- Participants requested guidance on what agencies consider a complete Final MBI submittal, more clarity on completeness requirements for each review phase, and less detail required in certain areas of compensation site plans (also referred to as mitigation plans). USACE has completeness checklists for Prospectus and Draft MBIs. The agencies will develop an outreach event (webinar) that will provide an overview of existing checklists and address each of the main participant comments above.

### Information Sharing

- Participants requested the IRT share feedback from lessons learned on other banks, such as highlighting successes in webinars or newsletters. The agencies will develop an outreach event soliciting success stories and lessons learned from

sponsors, consultants, and wetland and stream professionals in a webinar or future newsletter topic.

- Participants noted that the newsletters contain many important topics and requested an easier way to access this information. USACE will develop an index table of past Newsletters on our public website that identify topics covered in each one.

#### Improve Communication

- Participants noted confusion on whether they need to address all IRT comments or just focus on USACE consolidated comments in end of phase letters. They also identified confusion on when an action is required versus recommended. USACE will commit to internal consistency in identifying all comments that need to be addressed in end of phase letters and including IRT letters for reference by the sponsors and their agents.
- The agencies also recognize a need to clarify language on recommendations versus requirements including the need to eliminate the phrase “strongly recommended” from letters. This is typically used for additional wells or vegetations points in monitoring plans. Instead, agency letters will use “required” for comments that must be addressed for the next submitted to be complete or recommended” for true suggestions and will clearly outline the risk to sponsors associated with not incorporating an agency recommendation.

#### Stream Mitigation and Restoration

- USACE is already in the process of updating our Stream Mitigation Procedures (Version 2.0) and anticipates releasing this in 2026. The agencies will provide an outreach event (webinar) explaining updates to the Stream Mitigation procedures (Version 2.0) prior to issuance. The agencies intend to gather case studies from other districts and to develop a panel comprised of Minnesota DNR staff to present St. Paul District-specific case studies from recent stream restoration projects to address participant comments.
- Agencies will continue using the Mitigation Newsletter to highlight innovative mitigation techniques, communicate program updates, including joint agency initiatives described above, and notify the mitigation banking community of upcoming outreach events. In addition, agencies anticipate future listening

sessions occurring every 3-5 years. This is subject to change based on need and/or state and federal program or policy changes.

## Minnesota

### Performance Standards (PS)

- Currently, hydrology (Version 6.0 - March 20, 2019) and vegetation (Version 1.0 - May 2024) PS procedures are issued for public use. Based on feedback received at the listening session, the agencies will engage the PIRT to evaluate monitoring data on approved banks and reference sites, which may include banks that recently entered long-term management. This information could be used to determine if updates to our current PS procedures are warranted.

### Local Needs for Mitigation

- Participants disagreed with current preference hierarchy at the State and Federal level. Participants indicated that local mitigation would help replace wetland functions in urban areas where large development has resulted in wetland loss, requested the agencies consider any form of mitigation when it is ecologically preferable, and requested agencies evaluate whether current and past mitigation decisions are resulting in no net loss of wetland functions within watersheds. The agencies will develop a public outreach event (likely a roundtable discussion with sponsors, consultants, and other wetland and stream professionals) to explain how the agencies evaluate mitigation decisions and convey what we can change and what aspects of our program we cannot change regarding preference hierarchy.

### IRT Coordination

- Participants indicated that agency comments should not conflict or contradict each other in the State and Federal bank review process and requested clarity in agency comments and bringing issues to a close with one voice. USACE will update their internal processes and procedures to commit to consistent and effective IRT coordination prior to distributing end of phase comment letters to avoid conflicting comments, provide closure on proposals with no potential, and improve communication with State partners.

### Improving Communication

- Participants indicated that the agencies provide similar comments on every mitigation proposal even when they are not applicable on every site, and they requested that 1) agency comments be tied to specific requirements and

procedures that can be reasonably resolved, 2) USACE and IRT should seek clarification on proposals where there may be a lack of information prior to sending comment letter, and 3) requests for agency comments should be more clear when edits or additional information is requested. The agencies are committed to more IRT coordination after comments are submitted to ensure clear, consistent communication occurs within each review phase between USACE, IRT, sponsors, and consultants.

#### Completed Joint Agency Actions

- The agencies hosted a 2-day Wetland Banking & Monitoring for Consultants webinar in November 2025 to address monitoring feedback from the listening sessions.

## Lessons Learned

The listening sessions generated meaningful stakeholder feedback. The agencies will follow this model and apply lessons learned to future sessions.

- Identify a facilitator in advance to keep sessions on time and ensure all participants have an opportunity to express their views. Participation was productive and professional. When discussions strayed from the topic, the facilitator was able to effectively redirect the discussion.
- Future organizers should continue the practice of communicating expectations and soliciting questions in advance to increase participant preparation and ensure that the discussions are focused with ample time for discussing and voting on topics, providing agency feedback, and answering questions. Future organizers should use a Google Sheet or polling site to solicit questions in advance of sessions.
- Lunch time was built into the sessions; the agencies should consider also offering refreshments or notifying participants that they may wish to bring their own refreshments. Future organizers should also ensure venues are located near restaurant options. If none are available, consider starting early and finishing by lunchtime or ask participants to eat before attending an afternoon session.
- Future organizers should continue the practice of outlining formal ground rules at the beginning of the session and including them in the participant agenda. A major achievement of the format and facilitation of these sessions was ensuring engagement and constructive feedback from all participants throughout the session. It ensured that all participants were heard and understood, and it reduced the risk of feedback being dominated by particular parties or around specific projects.

- The agencies notified participants that they could participate via an on-line option (Teams for MN and Zoom for WI) if they preferred to attend virtually. Future sessions should also include a virtual option (Zoom, Teams, or Webex), although the agencies believe that in-person participation is more effective and strongly encouraged. Organizers should consider going solely in-person or virtual for future sessions as a hybrid style made it more difficult for participants to engage with each other and agency staff.
- Virtual meetings should include a virtual whiteboard. The agencies used a free one (Canva) for the MN session and it was very effective and user-friendly.
- Have attendees comment their name and the names of others attending the meeting when taking attendance at virtual meetings.
- If the St. Paul District Office is used for a session, organizers should ensure that advance work is completed early, including reserving a training room, notifying the Security Office, and validating audio/visual equipment. Solicit volunteers to make/hang signs at entrances and direct participants to the venue.
- Complete a test run of audio and visual equipment prior to listening session and have a sign-in sheet for in-person attendees and have virtual attendees type their name in the chat to record attendance.
- Future organizers should continue to document lessons learned; the lessons from the 2019 sessions were extremely helpful in the success of the 2025 sessions.

## Appendices

Appendix A - Crosswalk Table for Joint Agency Recommendations

Appendix B - Survey Soliciting Interest in Participating in Listening Session

Appendix C - Informational Flyer

Appendix D - Participant Agenda

Appendix E - Meeting Notes

## Appendix A

### Crosswalk Table for Joint Agency Recommendations

2025 Banking Listening Session - Joint Agency Actions						
State	Participant Comments	Votes	Joint Agency Action	Lead Agency	Priority	Timeframe
MINNESOTA	Performance Standards	21	Coordinate with PIRT on potential PS Procedure Update	Corps/PIRT	High	Long-term
	Local Needs for Mitigation	7	Develop Outreach Event - Roundtable with Stakeholders	Corps w/Public Volunteers	High	Short-term
	IRT Coordination	7	Improve consistency with IRT Comments	Corps/IRT	High	Short-term / On-going
	Improve Communication	6	Update Internal Procedures to Improve communication w/IRT and Sponsors	Corps/IRT	High	Short-term
	Lateral Effect	4	Develop External Training	Corps/BWSR	Medium	Short-term
			Collaborate w/PIRT to Update MN Mitigation Guidelines	Corps/PIRT	Medium	Long-term
	Engineering	4	Develop External Training	Corps/BWSR	Medium	Short-term
	Deep Marsh and Open Water Restoration	2	Address in Newsletter	Corps	Low	Short-term
			Collaborate w/PIRT - Potential Update to MN Guidelines or Vegetation PS Procedures	Corps/PIRT	Low	Long-term
	Credit Potential	2	Address in Newsletter	Corps/BWSR	Low	Long-term
	Monitoring	1	Address in Newsletter / Develop External Training	Corps/BWSR	Low	Long-term / Recurring
	HGM	1	Address in Newsletter	Corps/BWSR	Low	Long-term
	Corps Mitigation Contacts	1	Address in Newsletter	Corps	Low	Short-term
	Anoka Sandplain Restoration	1	Address in Newsletter	Corps	Low	Long-term
	Water Control Structures and FAs	1	Address in Newsletter	Corps/PIRT	Medium	Long-term
Site Visits	1	Ensure Site Visits are Completed at Draft Prospectus or Prospectus	Corps/IRT	High	On-going	
<b>Total Votes</b>		<b>59</b>				

WISCONSIN	MBI Completeness	16	Develop External Training	Corps	High	Long-term
	Information Sharing	12	Develop Outreach Event - Success Stories	Corps	High	Short-term
			Develop Mitigation Newsletter Index Table		High	Long-term
	Improve Communication	10	Improve Internal Consistency on Comment Letters	Corps	High	Short-term
	Stream Mitigation and Restoration	6	Develop External Training	Corps	High	Short-term
	Buffers	3	Develop Outreach Event - Flexibility in Guidelines	Corps/WDNR	High	Long-term
	MBI Modification Procedures	3	Develop Outreach Event	Corps	Low	Long-term
	Preservation	2	Develop Preservation Procedures for WI	Corps/PIRT	Low	Long-term
	Credit Release Schedule Flexibility	1	Coordinate with PIRT	Corps/PIRT	High	Long-term
	<b>Total Votes</b>		<b>53</b>			

## Appendix B

### Survey Soliciting Interest in Listening Session

# Wetland Banking Listening Sessions Survey

We hosted the 2019 listening sessions in-person at select locations in both Minnesota and Wisconsin with a virtual option for attendees. The listening sessions provided valuable feedback to our agency on how to improve our mitigation program and we are in the process of planning another listening session(s) in 2025! In order to obtain maximum attendance this year, we are soliciting feedback on the following items. **Please provide your votes no later than April 4, 2025.** We will track all responses received and notify you of the results with a flyer that includes details on the type of meeting, location(s), and

1. Would you prefer an in-person or virtual meeting (Teams, Webex, or Zoom) or both?

- In-Person Only
- Virtual Only
- In-Person AND Virtual

2. If you selected in-person, would you prefer a separate session in each state or one session for both states in either MN or WI (may require longer travel)?

- Separate session for each state
- Combined session for both states

3. What time of year do you prefer?

- Late Summer (August)
- Fall (September or October)

4. We presented four main topics at the 2019 Banking Listening Sessions and intend to use these again. These topics were: Guidance, Communication, Agency Comments, and General Banking Process. Please submit any other topics you would like us to consider adding for the 2025 Banking Listening Session(s).

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This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

Appendix C  
Informational Flyer

## 2025 Banking Listening Session

### WI Listening Session

Time/Date: September 3, 2025 / 11:00 am – 3:00 pm

Location: Fairfield Inn – 7100 Stone Ridge Drive, Weston, Wisconsin 54476

Meeting Type: In-person and Virtual

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**ALL PARTICIPANTS SHOULD COME PREPARED TO SHARE:**

*Your top three impactful ideas to improve banking in Wisconsin*

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### **REMINDER:**

This is not a training session on the mitigation banking process. The agencies are interested in obtaining feedback on the mitigation program in WI and how it can be improved. Listening sessions will not cover specific project or staff-related topics or issues.

Respect for all ideas and participants is expected.

### **TOPICS WE WILL COVER:**

**GUIDANCE** Do you know where to find banking guidance on both agency's websites? Are guidance and standards clear? Are there topics for which additional or updated guidance is needed?

**COMMUNICATION** Do you know who to contact with questions? Would you prefer more agency outreach, if so, on what topics? Would training on the banking process be helpful, if so, what topics?

**AGENCY COMMENTS** Are agency comments clear, useful and implementable? Does it appear that the agencies have attempted to coordinate comments?

**GENERAL BANKING PROCESS** What is / is not working in the banking process? Any ideas how to improve banking reviews (keeping in mind constraints imposed by Federal/State laws)?

Listening Sessions developed and hosted by: St. Paul District Army Corps Regulatory Division, Wisconsin Department of Natural Resources, and U.S. Environmental Protection Agency

# 2025 Minnesota Banking Listening Session

## MN Listening Session

Date/Time: September 17, 2025 / 11:00 am – 3:00 pm

Location: Skyway Level West Wing Training Room – First National Bank Building, 332 Minnesota Street, St. Paul, MN 55101

Meeting Type: In-person and Virtual

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### ALL PARTICIPANTS SHOULD COME PREPARED TO SHARE:

*Your top three impactful ideas to improve banking in Minnesota*

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### REMINDER:

This is not a training session on the mitigation banking process. The agencies are interested in obtaining feedback on the mitigation program in MN and how it can be improved. Listening sessions will not cover specific project or staff-related topics or issues.

Respect for all ideas and participants is expected.

### TOPICS WE WILL COVER:

**GUIDANCE** Do you know where to find banking guidance on both agency's websites? Are guidance and standards clear? Are there topics for which additional or updated guidance is needed?

**COMMUNICATION** Do you know who to contact with questions? Would you prefer more agency outreach, if so, on what topics? Would training on the banking process be helpful, if so, what topics?

**AGENCY COMMENTS** Are agency comments clear, useful and implementable? Does it appear that the agencies have attempted to coordinate comments?

**GENERAL BANKING PROCESS** What is / is not working in the banking process? Any ideas how to improve banking reviews (keeping in mind constraints imposed by Federal/State laws)?

Listening Session developed and hosted by: St. Paul District Army Corps Regulatory Division,  
Board of Water & Soil Resources, Minnesota Department of Natural Resources, and U.S.  
Environmental Protection Agency

Appendix D  
Participant Agenda



US Army Corps  
of Engineers®

# 2025 Wisconsin Banking Listening Session

WEDNESDAY  
SEPTEMBER

3

11 AM - 3 PM

## Meeting Agenda

### 2025 Wisconsin Banking Listening Session

Wednesday, September 3, 2025 from 11 AM to 3 PM

Get an overview from the U.S. Army Corps of Engineers Regulatory Program on the current state of banking in Wisconsin, assess progress on the 2019 short- and long-term action items, and collaboratively identify priorities for future action.

Time	Session
10:30-11:00 AM	Registration
11:00-11:10 AM	Welcome and Introduction
11:10-11:30 AM	Overview of Banking in Wisconsin & Status of 2019 Short and Long-term Actions Met
11:30 AM-12:30 PM	Introduce Main Topics, Post Top Ideas, and Voting Exercise
12:30-1:30 PM	Lunch Break
1:30-2:00 PM	Agency Feedback on Voting Exercise
2:00-2:45 PM	Open Discussion on Banking Topics
2:45-3:00 PM	Review of Agency Due-outs and Final Questions



US Army Corps  
of Engineers®

# 2025 Minnesota Banking Listening Session

Wednesday  
**SEPTEMBER**  
**17**  
11 AM – 3 PM

## Meeting Agenda

### 2025 Minnesota Banking Listening Session

Wednesday, September 17, 2025 from 11 AM to 3 PM

Get an overview from the U.S. Army Corps of Engineers Regulatory Program on the current state of banking in Minnesota, assess progress on the 2019 short- and long-term action items, and collaboratively identify priorities for future action.

<b>Time</b>	<b>Session</b>
<i>10:30–11:00 AM</i>	<i>Registration</i>
<b>11:00–11:10 AM</b>	<b>Welcome and Introduction</b>
<b>11:10–11:30 AM</b>	<b>Overview of Banking in Minnesota &amp; Status of 2019 Short and Long-term Actions Met</b>
<b>11:30 AM–12:30 PM</b>	<b>Introduce Main Topics, Post Top Ideas, and Voting Exercise</b>
<i>12:30–1:30 PM</i>	<i>Lunch Break</i>
<b>1:30–2:00 PM</b>	<b>Agency Feedback on Voting Exercise</b>
<b>2:00–2:45 PM</b>	<b>Open Discussion on Banking Topics</b>
<b>2:45–3:00 PM</b>	<b>Review of Agency Due-outs and Final Questions</b>

Appendix E  
Meeting Notes

## WI Bank Listening Session, Wednesday, September 3, 2025 11AM-3PM

- Introductions:
  - Eric - USACE, Mitigation PM
  - Chelsey Lundeen - WI DNR, IRT Member
  - Leslie Day - USACE, St. Paul Mitigation Coordinator
  - April Marcangeli - USACE, Regulatory Ecologist
  - Nichole Deweese - EPA, IRT Member
- Goals and Objectives:
  - Keep improving mitigation program
  - Identify knowledge gaps or needs from sponsors/agents
  - Streamline process and make more efficient through two-way communication
- Overview of Wetland Mitigation - Chelsey
- Overview of Stream Mitigation - April
- Completed Actions (2019 Listening Sessions) - Leslie/Eric
- Agency Updates:
  - Wi DNR (Chelsey): NR350 updates, fee for draft mitigation bank instruments, required to ask permittees to purchase from BSA in-kind
  - Corps (Leslie): MN and WI stream mitigation procedure updates, veg performance procedures, site selection criteria checklist (help identify fatal flaws earlier on), as-built checklist, Regulatory Request System (RRS)

### White Board Comments

- Guidance:
  1. Webinars are helpful, can we have one on stream credits and restoration stream study (4 votes; Short-Term)
  2. Updated guidance for preservation crediting in WI, more specific guidance on threats (2 votes; long term)
  3. Appreciate flexibility and looking forward to using updated procedures
  4. Guidance on PRM sites that could then be expanded in the future for banking potential
  5. WI's new guidelines indicate that a "perfect package" is required to proceed as it relates to MBI. Is there an example or clear guidance available on what the agencies consider a "perfect package"? Communicating requirements (5 votes; Long-Term)

- Communication:

6. (1) Sharing feedback from lessons learned on other banks, highlighting successes in webinars or newsletters (6 votes, short-term)
7. (2) Appreciate acknowledgement emails pot
8. (3) More clarity on requirements for completeness for different phases of process (8 votes; short-term, webinars?)
9. (4) More evaluation of projects for stream impacts and more communication about stream mitigation needs to project sponsors. (1 vote, procedures will be updated hopefully within the next year but working on providing more communication on this item)
10. (5) Are all of the important topics/articles explained in quarterly newsletters now in a more formal guidance document? If not, recommendation would be to condense down those items into existing guidance docs (or new formal guidance) to make it easier for sponsors to ensure the current expectations are being met. It can be tedious to use those as a reference given the number of them that exist and no sort of index for topics within. (6 votes, long-term)
11. (6) Newsletters and webinars are helpful but consider not having them if there is no new info to share

- Agency Comments:

12. (1) Appreciate suggestions of requirements vs recommendations in agency comments, if something is strongly recommended why not make it required? (4 votes; short term)
13. (2) Do we need to address all IRT comments or just focus on the USACE consolidated comments? Combined comments. (6 votes, long term, letter clarity)

- General Banking Process:

14. (1) Timeline/steps to modify MBI after site is built (ex. additional earthwork, change credit release schedule, transfer ownership, etc.). (3 votes, long-term)
15. (2) Less detail in certain sections to decrease time in CSPs - Parts of document that were sufficiently covered by the prospectus (site selection, need, baseline info, etc.). If those elements are unchanged, they are being said again in the CSP and usually with more detail. Writers feel like since it's the CSP it has to have more detail than what was said in the prospectus. (3 votes; long-term)

16. (3) RIBITS entries have improved but there are still some errors, spot checking, RIBITS being down (how do we communicate that), can be hard to find banks and RIBITS numbers for annual reporting (short-term)

17. (4) Flexibility in credit release schedules (more flexibility or good as is)

18. (5) Do not make interim veg standards contingent on hydrology success and release (1 vote, need more info on this comment to determine follow up action)

19. (6) Allow bank sponsor to propose and justify buffer widths based on site conditions (6 votes; short term)

20. (7) Is dam removal an option for banks (1 vote; long-term)

- Questions:

- How consistent are these guidelines across different states (ex. Work in Illinois)?
  - Corps is broken down by Districts that have some of their own tools and procedures. St. Paul district tools may not always be applied to other districts. There is a better consistency within Minnesota and Wisconsin. Working toward consistency with both states.

- Open Forum:

1. I greatly appreciate the willingness of the IRT team to help constructively work through questions and challenges as we work through project proposals and implementation. It's such a time saver to be able to ask for feedback and get meaningful help
2. WisDOT seconds the sentiment expressed above. We appreciate the responsiveness to emailed questions and requests for meetings on bank projects. Thank you for hosting this listening session again!

## **Introduction and Welcome**

### **Overview of Banking in Minnesota & Status of 2019 Short and Long-term Actions Met**

Marissa: **Overview of federal and state review process**

Ben Carlson: **Overview of LGRWRP program**

April: **Overview of Stream Mitigation in District**

Leslie: **Completed actions since 2019 listening session**

- We had a lot of things to work on as a result of the sessions
- Timelines were a top priority
- Feedback on delegation, working to improve times lines through internal operation
- Immediately worked on delegation for FMBI
- Templates: Develop MBIs to be more consistent to be easier to use
- Worked to centralize the review for banks in TSB
  - Easier to be quicker on our reviews
- Develop tools for applicants to streamline submissions
- Develop stream procedures to identify when stream mitigation would be needed
- Improved consistency on vegetation performance standards
- Communication: we needed to have more routine communication, before submission, with letter or shortly thereafter, and communication improved more broadly through mitigation newsletters
  - Newsletters identify areas of inconsistency in Corps review or in mitigation sites
  - Issue of credits being tied to vegetation while lift is largely provided by hydrology improvements. Corps worked to refine credit release schedule to match this
- Improvements on RIBITS data entry
- Preference hierarchy
  - Webinar hosted in 2020 to talk about how Corps views this hierarchy
- Long-term management needs additional outreach
  - Corps released guidance document jointly with BWSR
  - Folks looking for guidance on demonstrable threat and when we might consider preservation
  - Good improvements in review timelines for draft prospectus, prospectus

## 2025 MN Banking Listening Session Notes

- DMBI: 90-day review timeline. 2019-2020 average was 120 days
  - 2024: Under 90 days
- Final MBI Approval
  - Looking for feedback on how to improve this still
  - 2019: over 100 days
  - 2024: 55 - better but not meeting 45-day target

### Agency updates

- Corps does not have control over legislation and rulemaking nationally
  - Stream Mitigation Procedures
  - Veg Performance Standards Procedures
  - Checklists to guide applicants: prospectus and as-built
  - RSS - reg request system: national database to submit requests to Corps. In our district, we use this for PNs and JDs. We have not ruled out applications, targeting those potentially not needing state review. Stay tuned
- Question: Is timeline limited by staffing?
    - Leslie: staffing is likely not the issue, but there may be ways to tweak submission to make them easier to review and approve

### Marissa: Updates to Minnesota Mitigation Guidelines

- We are in agency coordination with programmatic IRT
- Anticipate draft PN available May of 2026
- Talk to Marissa about changes you see as needed
- Main difference: section for sponsors and separate section for permittees

### Whiteboard Comments

#### Guidance (yellow)

- NRCS LE Tool Vs. 2012 BWSR Setback Tables for determining ditch/tile setbacks, guidance for each tool and when to use which
- Guidance on planting for pollinators
- Consider ways to deal with lateral effect or back-end credit adjustments based on monitoring guidance
  - [4 votes]
- With information coming out about reed canary grass being potentially native, and prevalence of cattails across banks and the state, is there any consideration to modify vegetation performance standards?

## 2025 MN Banking Listening Session Notes

- If local gov partners are struggling to meet performance standards on BWSR partner banks with decades of experience, are the performance standards unrealistic for private landowners/consultants with large up-front financial investment
- How do banks perform after monitoring? Review old banks to modify or revise procedures as needed
- Review hydrology PS against reference/historical data to verify standards
- Regionalize PS - especially vegetation
  - [13 votes]
- Long-term maintenance requirements
- Consistency in application of preservation guidance
- Value/perception/advantage of public-private partnerships - understanding if projects are valued differently based on roles
- Guidance on internal buffers at easement edges when adjacent properties dominated by aggressive invasives
- An online class on how to calculate vegetation performance standards would be beneficial - during monitoring
  - [1 vote]
- Clarity on crediting for extended restoration sites and partially drained, non-cropped areas - potentially use CFC impairment tables to assess level of degradation
- Flexibility on allowing deep marsh / shallow open water restorations when that is the natural condition guidance on PS for those communities
  - [2 votes]
- Consider training/guidance specific to engineering design/modeling or resources for successful designs
  - [4 votes]

### Communication (green)

- Clear communication of no potential - don't give sponsors glimmer of hope to keep pursuing

## 2025 MN Banking Listening Session Notes

- Overall timeliness and quality of consistent communication have been improved
  - [1 vote]
- Transition to HGM with state, how will this affect crediting?
  - [one vote]
- Clarity on how revised state mitigation requirements & USACE requirements will align - For example specific service area guidance
- ACOE guidance to applicants that they must communicate with local LGU under BWSR application process
- More/better communication with bank sponsors during review process
  - [one vote]
- Where are the training resources available?
- Is there any kind of document outlining who at the Corps to reach out to about specific things? Maybe a list of subject experts?
  - [one vote]

### Agency Comments (Blue)

- Similar comments on every application even though they may not be applicable on every site.
- Ensure agency comments are tied to specific requirements/guidance that can reasonably be resolved
- Agency comments that seek clarification of info should be addressed during the agency review, not included as comments in letter
- Nearly every application I submit there is a comment about vegetation on adjacent properties, do the regulatory agencies expect us to do vegetation management on properties outside of the project
  - [5 votes]
- Agency comments should not be contradicted by other IRT members; more IRT coordination and communication required to prevent this (prior to providing comments)
- Identify which IRT comments need to be addressed by sponsors
- Provide greater detail/clarity when requesting edits to a submittal. Sometimes best to simply tell us what you want.
  - [6 votes]

- IRT management: bringing issues to a close and with one voice.
  - [one vote]
- State review seems to be lagging behind federal. Just saying...
- Ensure increased consistency among comments. We have seen some variation on different projects.
- Comments that only specify what is wrong or lacking with an aspect of an application are not helpful. Comments that proactively provide potential solutions to the application shortfalls are more conducive to expediting the banking application and design process.
- 

### General Banking Process (Orange)

- I'd like to try to urge proposers to consider any adjacent high biodiversity sites and seed or plant plugs accordingly. I think I'm seeing peatland sites restored with the same technique and seed mix as regular non-peat soils.
- I am surprised to see nearly every proposal having adjacent land owner issues - proposals coming in with plans that show hydro impacts to neighbors. This clearly slows things down. Is this just the norm or is there anything to be done? I wonder if we have any other easement programs in MN at BWSR that could be offered to adjacent landowners where hydrologic impacts are rare, but the buffer might extend to a neighbor.
- 
- Vegetation performance standards are too high, other factors such as flood storage, water quality/clarity, etc. should be considered.
  - [8 votes]
- 
- Overall, I'd like to see more of a recognition of the climate value of peatlands - particularly with preservation.
- MN Anoka Sandplain area seems to need its own unique approach. We are continually losing so many rare plant species there and I don't think we're encouraging banks or preservation of areas with these species and unique plant communities
  - [one vote]

## 2025 MN Banking Listening Session Notes

- Flexibility on allowing water control structures to manage water levels without major financial assurances needed
  - [one vote]
- Local mitigation would help wetland losses in urban areas with large amounts of development impacts. Currently with BWSR rule changes mitigation of bank credits can be as far away as anywhere in the state. This limits sponsor to banks in urban env with high land value
- Priorities for banked mitigation de-prioritized onsite mitigation even when it is ecologically preferable
  - [7 votes]
- Consider site visit early in process or offer to sponsor following/at prospectus
  - [1 vote]
- Both Corps/EPA and BWSR have limited potential credit for Minnesota wetland banks based on arbitrary and pre-conceived ideas of what is possible on a site. Potential crediting should be based on the difference between pre-restoration baseline conditions and post-restoration performance. Maximum potential credit should not be limited administratively by the agencies. Maximum potential credit should be based on actions eligible for credit (by rule) and restoration performance.
  - [2 votes]
- Great job in reducing review timeframes!!
- Re-evaluate mitigation of impacts is not truly being met if it is done with credits hundreds of miles away from original impacts

### Agency Feedback:

### Guidance (yellow)

- (Long Term Goal) All about the performance standards. Corps agrees we would like to look at long term data to review for a pulse check
  - With information coming out about reed canary grass being potentially native, and prevalence of cattails across banks and the state, is there any consideration to modify vegetation performance standards?
  - If local gov partners are struggling to meet performance standards on BWSR partner banks with decades of experience, are the performance

- standards unrealistic for private landowners/consultants with large up-front financial investment
- How do banks perform after monitoring? Review old banks to modify or revise procedures as needed
- Review hydrology PS against reference/historical data to verify standards
- Regionalize PS - especially vegetation
- (Short Term Goal) Lateral Effects, which tools to use? Corps may consider holding a webinar on lateral effects tools
  - NRCS LE Tool Vs. 2012 BWSR Setback Tables for determining ditch/tile setbacks, guidance for each tool and when to use which
  - Guidance on planting for pollinators
  - Consider ways to deal with lateral effect or back-end credit adjustments based on monitoring guidance
- (Short-term) Engineering and design training, could be a webinar
  - Consider training/guidance specific to engineering design, modeling or resources for successful designs

#### Communication (green)

- No specific comments identified for further discussion in overview

#### Agency Comments (Blue)

- (Short term) Needing more clarity in our comments back to sponsor
  - Similar comments on every application even though they may not be applicable on every site.
  - Ensure agency comments are tied to specific requirements/guidance that can reasonably be resolved
  - Agency comments that seek clarification of info should be addressed during the agency review, not included as comments in letter
  - Nearly every application I submit there is a comment about vegetation on adjacent properties, do the regulatory agencies expect us to do vegetation management on properties outside of the project
- (Short term) Clarity in IRT comments; Corps says we can work with IRT to ensure more clarity with these comments. It might be helpful to have an IRT meeting in advance of issuing the Corps' letter and in advance of each agency issuing their comments in order to resolve any potential disagreement in advance of the letter
  - Agency comments should not be contradicted by other IRT members; more IRT coordination and communication required to prevent this (prior to providing comments)

- Identify which IRT comments need to be addressed by sponsors
- Provide greater detail/clarity when requesting edits to a submittal. Sometimes best to simply tell us what you want.

### General Banking Process (Orange)

- (Long-term) Issue with vegetation and hydrology performance standards and lack of consideration of other factors such as flood storage water quality, etc. which should be considered. Long term group, need more thought, would involve a revamp of PS and crediting and coordination with state agencies. Functional assessment is not going to be a quantitative tool to determine crediting
  - Vegetation performance standards are too high, other factors such as flood storage, water quality/clarity, etc. should be considered.
- (Long-term) Local needs and where mitigation should be best put on watershed, large service areas, conflicts with preference hierarchies, e.g. how to demonstrate PRM is more environmentally favorable, need to coordinate with state on ongoing rulemaking
  - Local mitigation would help wetland losses in urban areas with large amounts of development impacts. Currently with BWSR rule changes mitigation of bank credits can be as far away as anywhere in the state. This limits sponsor to banks in urban env with high land value
  - Priorities for banked mitigation de-prioritized onsite mitigation even when it is ecologically preferable

### Questions:

Is there a national initiative to discuss change overall at the Corps, especially related to climate change? We are learning from the literature that different wetland types are valuable to sequester carbon, but we are acting that there are some things we don't know

- Some things we want to think more about and some things we are not sure how to address
- We need to keep consistency between MN and WI
- There are things we could do for prioritization
- Rewarding mitigation of certain types of communities with extra benefits with additional credit. Eg forested communities could be granted more credit due to higher inputs to
- Can we tie into the Ecosystem Markets Conference?

## 2025 MN Banking Listening Session Notes

- A lot of our headquarters guidance had been process-focused
- Districts are asking for more guidance. HQ issued Principles of Delivery
- Districts are working on overhauling mitigation programs, this is the focus
- There may be some things we can't address due to limitations of national policy

How many legacy banks do we have left?

- We have virtually none. One needs a redesign to get Corps approval
- Those long-term projects that didn't get Corps approval and were sitting or not formally approved were drawing up our timelines. Virtually all have been handled (reject or redesign for approval). This has approved our timelines

RE updating 2009 mitigation guidance - what will this include? Credit percentages?

- Credit percentages are based on 2008 Mitigation Rule, but district sets crediting percentages
- This is an opportunity to reconsider those percentages in conjunction with our agency partners
- 

Old mitigation guidance had a section on siting criteria - will new guidance have update

- Yes, metro service area does not exist, and we will work with BWSR to address this change
- We plan to follow a similar format as the WI updated mitigation guidance
- Reach out to us if you see something not in that guidance

Will you be lumping credit types like you did in WI? (please?)

- We want to be in step with our agency partners, and we don't want to make it difficult for them to track crediting
- In WI, we lumped and we thought hard about how it works for existing banks
- Recommend people look at this and let us know if you like this idea, especially in light of BWSR's HGM approach

Are you looking to work with BWSR to implement changes on same time frame as new BWSR rulemaking?

- We are coordinating with BWSR to see if there are any changes that we should consider in our update
- We are looking to see how it would affect both of our programs
- If we don't match, what would it mean, and what does Corps say about that?

Could there be two programs with different BSAs next year

- Draft is coming mid 2026 potentially

## 2025 MN Banking Listening Session Notes

- We will find a way to not have complete differences in BSA's
- Unlikely we can have draft out at the same time as BWSR
- Ben Carlson said we would not be likely to have different BSAs between agencies

We will compile feedback into AAR to share early next year.