



ASSOCIATION OF STATE WETLAND MANAGERS  
WETLAND REGULATORY CAPACITY  
BUILDING WEBINAR SERIES

MARCH 23, 2021

PRESENTED BY

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# **BUILDING STATE AND TRIBAL WETLAND PROGRAM REGULATORY CAPACITY**

## **FINDINGS FROM ASWM'S MULTI-YEAR PROJECT**





# Wetland Regulatory Capacity Building

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WHAT IS IT?

WHY WOULD I UNDERTAKE IT?

WHEN IS IT APPROPRIATE?

IN WHAT FORM?

HOW DO I PLAN FOR IT?

WHAT ARE KEY CONSIDERATION?

ARE THERE EXAMPLES?

WHAT ARE THE LESSONS LEARNED?

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# PROJECT BACKGROUND

## A PRESSING NEED FOR CAPACITY BUILDING SUPPORTS

New opportunities for states and tribes to evaluate existing regulatory programs, including the role their state/tribal government plays in regulating wetlands.

### Findings nationally:

- **high staff turnover**
- **Reduced state budget**
- **Significant changes proposed in federal wetland programs**

Individual states and tribes have limited ability to formalize new strategies to meet these challenges and build programs.



Funded primarily by an  
**EPA Wetland Program  
Development Grant**

# ASWM WETLAND REGULATORY CAPACITY BUILDING PROJECT PURPOSE

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- Designed to support tailoring state/tribal regulatory program development
- Help states/tribes meet individual priorities
- Help states target their capacity building work to address their specific needs





# PROJECT GOALS:

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To collect, share and support the adoption of successful capacity building efforts designed to build state wetland regulatory programs

Specifically focused on:

- Peer-to-peer sharing
- Meeting states “where they are” in terms of program development.

## WETLAND REGULATORY CAPACITY BUILDING PROJECT ELEMENTS:

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*To help states ....., ASWM will work  
with a national project workgroup to:*



Facilitate peer-to-peer sharing  
around capacity-building issues

Support tailoring state/tribal regulatory  
program development

Help states/tribes meet individual  
regulatory program priorities

Help states target their capacity building  
work to address their specific needs

Share useful capacity building supports



# ASWM ASSUMPTION PROJECT **NATIONAL WORKGROUP**

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- Guided by a national workgroup
- 34 project workgroup members
- States, one tribe, federal agencies, consultants, nonprofits and academic institutions
- Two+ years of monthly working sessions and national-level dialogue





# ASWM WETLAND REGULATORY CAPACITY BUILDING PROJECT RESULTS

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## OUTPUTS

- National discussion focused on peer-to-peer sharing and brainstorming
- Capacity building resources, trainings and documentations of “best practices”
- Understanding of the role WPPs can play in capacity building
- Useful, shared models and tools for regulatory capacity building
- Development and delivery of topic-focused webinar series
- New online supports for capacity building

## OUTCOMES

### Short-term

- Participation/findings/use play a role in their decision-making
- State/tribes explore/adopt new programmatic elements
- A stronger network of states interested in capacity building, including opportunities for peer-to-peer sharing

### Long-term

- Stronger cooperative federalism
- S/T able to protect all waters states they want to protect
- More effective state protection of wetlands and other aquatic resources through the enhancement of state program elements





## ASWM WETLAND REGULATORY CAPACITY BUILDING PROJECT

# EXPLORATION OF PRACTICE

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- ✓ Engaging in strategic planning
- ✓ Crafting EPA Wetland Program Plans
- ✓ Communicating regulatory information effectively
- ✓ Securing sustainable funding
- ✓ Improving compliance and enforcement
- ✓ Filling regulatory gaps
- ✓ Working with state legislatures
- ✓ Integrating with other state agency programs
- ✓ Partnering with state wetland associations

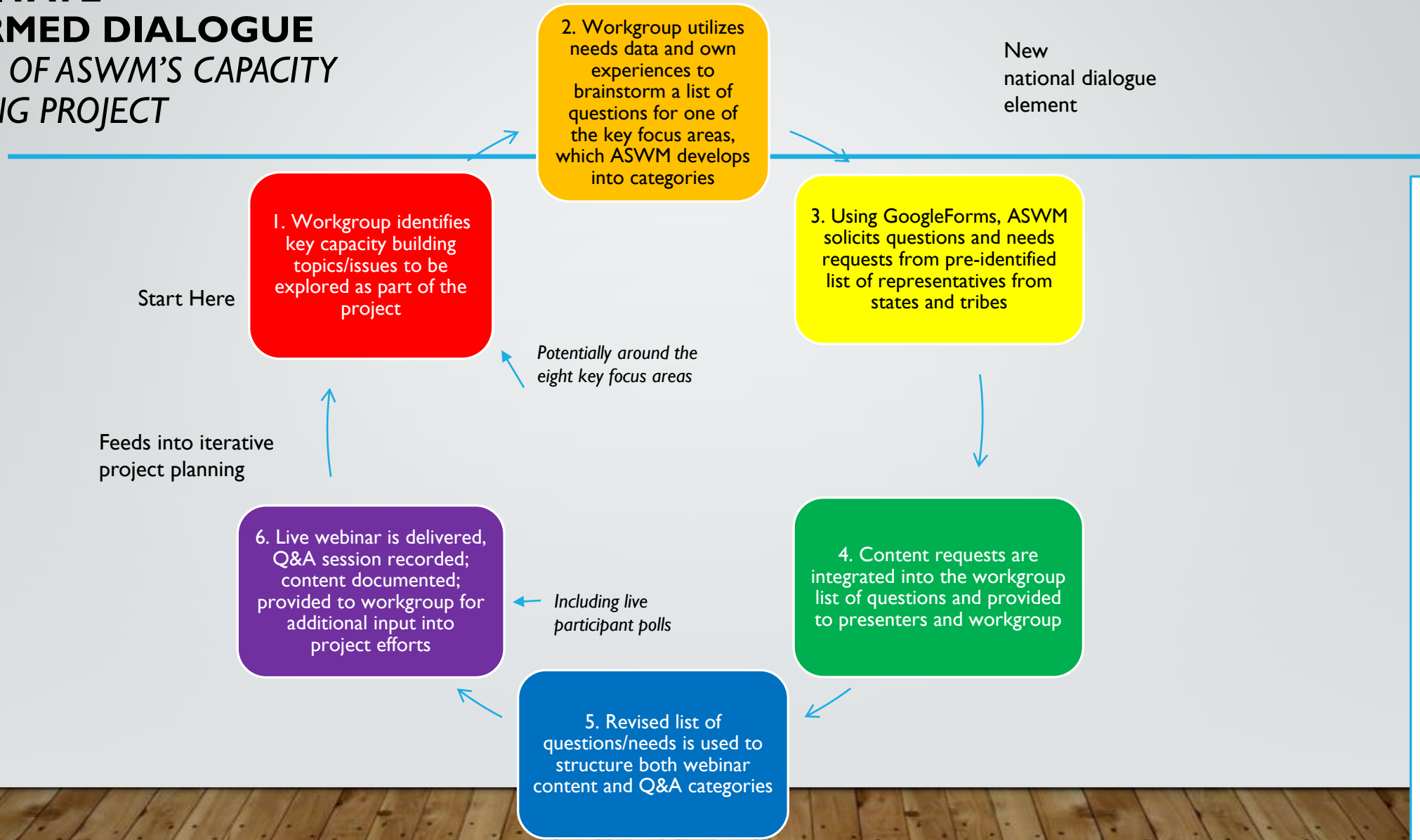
[Photo Source: public domain photos - Bing images](#)



# PROCESS TO FACILITATE INFORMED DIALOGUE AS PART OF ASWM'S CAPACITY BUILDING PROJECT



New national dialogue element



Start Here

Feeds into iterative project planning

Potentially around the eight key focus areas

Including live participant polls

- Opportunity for all states to weigh in
- Easy to use
- Able to take pulse of emerging issues over time (not one and done)
- Allows for different comfort levels/styles around sharing and asking
- Documents input for decisions



# ASWM ASSUMPTION PROJECT REVIEW OF EXISTING MATERIALS



- Learn from each other
- Identify existing resources and models
- Create access to useful resources



# WHY BUILD WETLAND REGULATORY PROGRAMS?

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Various reasons that a state/tribe's regulatory program is inadequate for meeting state or tribal needs and decide to expand or maximize their authorities.

Most state and tribes with existing regulatory programs are coordinated to some degree with the Corps permitting program.

*Regulations for dredging or filling wetlands are in effect nationally under §404 of the Clean Water Act (33 U.S.C. §1251 et seq.), and Section 10 of the Rivers and Harbors Act, with permits issued by the U.S. Army Corps of Engineers (Corps).*

The end goal of building regulatory capacity should be having the regulated community efficiently and effectively comply with requirements.



# WITH/WITHOUT REGULATORY PROGRAMS TAILORING CAPACITY BUILDING TO NEEDS

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For states or tribes that have not previously administered a regulatory program

- An initial consideration may be the extent of responsibility that the state or tribe wishes to assume relative to the federal program to meet their own wetland management goals and objectives.

For states or tribes that are currently regulating wetland alteration

- May wish to consider modification or expansion of their responsibilities for improved and tailored wetland management.

# PRIMARY OPTIONS FOR BUILDING THE CAPACITY AND IMPROVING WETLAND MANAGEMENT

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- 1. Use of Existing Authority:** States and tribes with active CWA §401 certification programs can prohibit certain federal permits or licenses from being issued, or if issued require that the permits or licenses include mandatory conditions.
- 2. New Independent Authority:** States and tribes can also develop their own permitting programs to avoid, minimize, and or compensate for impacts to wetlands and other aquatic resources.
- 3. State/Tribal Authority with Federal General Permit:** State Programmatic General Permits (SPGPs) or Regional General Permits (RGPs)
- 4. State/Tribal Assumption of Federal Program:** In a §404 assumed program, the state or tribe becomes the permitting authority and provides funding and staffing for the federal 404 permitting program.



# ADDITIONALLY, STATES AND TRIBES CAN ENHANCE REGULATORY CAPACITY BY:

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- Coordinating State/Tribal and Federal permitting with Corps through Joint Application and/or Joint Public Notice
- Developing Wetland Specific Water Quality Standards



# THE EFFECTIVENESS OF PROGRAM DEPENDS ON HOW WELL THREE BASIC PROGRAM ELEMENTS ARE ADDRESSED:

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1. Definition of the jurisdictional scope of the program
2. Administration of regulatory activities
3. Evaluation, inspection, and enforcement of regulatory activities to ensure environmental results



# ANY ADDITION, REVISION, OR EXPANSION OF A PROGRAM REQUIRES MULTIPLE ACTIONS, INCLUDING:

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- Assessment of state/tribal needs and priorities
- Drafting of potential regulatory language/guidance
- Provision for input from stakeholders
- Development of administrative materials
- Development of decision-making tools
- Development of computerized tracking systems
- Staff training



# ASWM WETLAND REGULATORY CAPACITY BUILDING CHECKLIST

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Help states and tribes:

- Develop an implementable, sustainable regulatory program at a scale makes sense for the state or tribe
- Not an all-inclusive list, but instead a set of considerations
- Help inform and make capacity building as efficient and effective as possible





## Building Regulatory Capacity for Aquatic Resource Programs: A Checklist of Initial Considerations

Last Revised: 4/22/20

**FOCUS:** This resource provides an overview of key elements related to building regulatory programs at the state/tribal level and considerations for agencies embarking on this work.

The building of regulatory capacity occurs after a state/tribe has determined what their goals are for the wetland resource, and how the various options would meet these goals. Building regulatory capacity is an ongoing process for most state-and-tribal-run water resource programs. Identifying and interpreting legal statutes, communicating rules to the regulated community, and enforcing these rules takes a coordinated and concerted agency-wide effort. To ensure that this effort is productive and staff time is not wasted, it is important for agency leadership to design a clear plan and involve stakeholders whenever new regulations are being developed or implemented, or when new statutes are [introduced](#) and existing statutes are reintegrated. This plan should identify the regulated community, the permits they are required to obtain, any enforcement mechanisms, and relevant state agencies.

Throughout this process, it is important to issue clear, consistent guidance and request for comment to the regulated community about proposed regulations, permits, and penalties. The better the regulated community understands the regulations and procedures, the easier it will be to achieve compliance. This may mean having staff arrange meetings with project proponents/key stakeholders in the state/on tribal lands or attending and presenting at meetings where the regulated community will gather in person. This will give staff the opportunity to make connections with those who are regulated and allow them to ask questions and better understand the regulations.

The end goal of building regulatory capacity should be having the regulated community efficiently and effectively comply with requirements. To reach this goal, relevant, targeted regulatory tools should be developed and implemented by the state/tribe. Staff should look to the methods of other states and tribes to see what policies have achieved the highest compliance and whether those methods are adaptable to their own state or tribal context. Most states and tribes interact closely with the regulated community, holding meetings and

Informational sessions to ensure that everyone is up to date on the latest regulation and permit requirements. Site checks with the threat of fines or ceasing work are often an incentive for the regulated community to comply. Site checks also educate staff on what development projects look like in reality, rather than just on paper. Whatever regulatory approaches are selected, it is essential that they complement each other and act as checks and balances to each other.

The following checklist provides some tasks for consideration by states and tribes seeking to build regulatory capacity:

### Scoping Potential Regulatory Changes or Explanations

- **Bring Together Information Providers from the Start of the Rulemaking Process**
  - States and tribes should include key information providers from the start of the capacity building process, exploring with them what new/modified regulatory elements might be necessary. Make sure that those who will have a role in implementing, enforcing, and complying with these changes are at the table as early as possible.
  - [Participants.cso](#) include agency technical staff, data managers at the agency, other agency policymakers, stakeholders from the regulated community, academic scientists, and the general public.
  - "Key" participants will be affected by the geographic reach of potential regulatory changes or explanations, and the activities regulated.
  - While initial exploration may remain internal, engagement of stakeholders early in the process has been shown to be key in regulations' successful approval and adoption, as well as improve future compliance within the regulated community.
- **Understand state/tribal processes for collaborative policymaking.**
  - Identify state/tribal processes that direct how policy input is sought and reflected in regulatory changes. Understand these limitations and opportunities before engaging with outside participants.
  - Identify the following points of contact and connect to request that state/tribal agency perspectives are represented in the regulatory scoping process:
    - Who has primary responsibility for the development of these regulations?
    - What agency/department has primary responsibility for promulgation of the regulations?
    - Which agency/department has liability with respect to assuring compliance?
    - Is there executive level support for new or expanded regulations?
- **Understand Existing Statutory Authorities as a Regulatory Basis**

- **Determine if existing state/tribal regulations are less or more protective than federal minimums**
  - At the federal level, the Clean Water Act serves as the foundation of federal wetland protections. All federal regulations are rooted in the Clean Water Act and permit programs are based on these regulations.
  - State and tribal agencies should understand how their regulations and statutes compare to the federal minimums. Are the regulations and statutes [more or less stringent](#), either in scope (waters covered) and stringency (requirements and enforcement)? Furthermore, [state or tribal agencies](#) should understand if their own regulations fully implement their underlying state and tribal statutory authority.
  - Without state level statutes, a state must rely on the policies and procedures of EPA and the Corps.
- **Identify Appropriate Statutes, Rules, and Policies that Can be Used by the State/Tribe**
  - **Questions to consider:**
    - Are there existing standards for wetland management, and do these need to be developed or revised?
    - Is there existing legislation in place that allows or facilitates the establishment of permitting fees?
    - Are adequate personnel and infrastructure in place for implementation, and if not, what is needed?
    - What documentation is available to communicate processes (for example: process flow charts)?
    - What penalties need to be created for non-compliance with new regulations?
    - What appeals process/mechanisms will be used/need to be created to support the new laws/regulations?
- **Identify and Document the Regulated Community**
  - The regulated community that the new regulatory elements may affect should be clearly defined and invited to participate.
  - Staff should think about how regulations will be conducted on the ground and work to make the regulations clear and specific for the regulated community.
  - **Identify:**
    - What is the geographic reach of the new regulations? (Statewide, specific counties, local government units)?
    - What activities may be regulated, and what groups typically conduct those activities (e.g., discharges from land clearing by the homebuilding community)?

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- Who is responsible for compliance with permits (for example, corporation, homeowner, etc.)?
  - Where in your agency does the data reside that identifies the regulated community individuals or entities? Who is responsible for this data management and communication?
- **Understand the Context for Regulatory Changes**
    - Understand the historical, political, social, economic, demographic, and regulatory information, as well as information on the water resources being regulated.
    - Know your resources - Document both the regulated water resources as well as the extent of unregulated areas or exemptions, if any. This includes mapping and assessment of aquatic resources within the specified jurisdiction.

### Developing Regulatory Changes or Explanations

- **Identify Regulatory Gaps**
  - Regulatory programs are based on statutes that authorize them and are implemented in ways that address well-documented needs for multiple stakeholders. It is important to identify not only resource protection needs, but also needs for regulatory certainty and efficiency as well as cost should all be considered when developing new regulations or establishing a regulatory program.
  - Document carefully researched justifications for filling regulatory gaps
  - As part of this process, documenting the benefits and costs of regulation development or regulatory program building to both the agency and the regulated community (especially permit applicants) will be essential to making your case.
  - **Questions to consider:**
    - Which acts, laws, or similar enable the regulation?
    - Which acts, laws, or similar need to be created?
- **Consistent with the engagement processes/requirements from federal processes, be prepared to provide additional responses for consideration by decision makers**
  - Work with your planning team to brainstorm potential areas that will require additional responses
  - Ensure that planning activities include stakeholders that can help the planners to think ahead about areas of concern and resolve them in advance or be prepared to respond.
  - Develop a decision-making chain to be in place for responding to more difficult or complex questions/inquiries (who needs to decide, approve, or deliver messages).
- **Work with the legislature if additional statutory authority might be necessary**

# SCOPING POTENTIAL REGULATORY CHANGES OR EXPLANATION

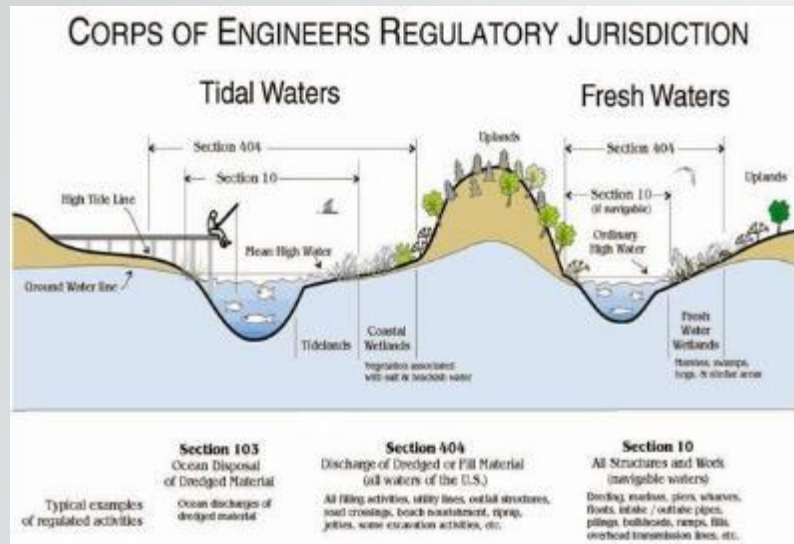
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- ✓ Bring together information sources from the start of the rulemaking process
- ✓ Understand state/tribal processes for collaborative policymaking.
- ✓ Understand existing statutory authorities as a regulatory basis
- ✓ Identify appropriate statutes, rules, and policies that can be used by the state/tribe
- ✓ Identify and document the regulated community
- ✓ Understand the context for regulatory changes





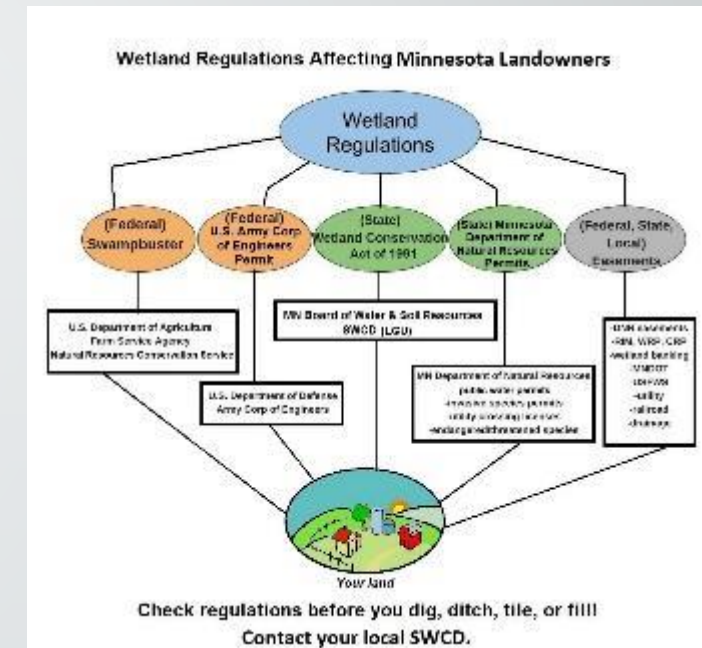
# DEVELOPING REGULATORY CHANGES OR EXPLANATIONS




- ✓ Identify regulatory gaps
- ✓ Be prepared to provide additional responses for consideration
- ✓ Work with the legislature if additional authority needed
- ✓ Work to reduce uncertainty and/or improve processes
- ✓ Establish minimum acceptable regulatory standards
- ✓ Develop and/or reconcile necessary regulatory documents

# IMPLEMENTING REGULATORY CHANGES

- ✓ Develop process flowcharts for permitting processes
- ✓ Identify necessary staffing and resources to support new regulatory elements
- ✓ Ensure that permit applications are easy to access





A vibrant green forest landscape. In the foreground, there are dense green bushes and a small stream. A tree stump is visible in the middle ground. The background is filled with tall, green trees under a bright sky.

Yvonne Vallette, EPA Region 10

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A scenic view of a forest clearing. In the foreground, there is a stream with a large, weathered tree stump on the left bank. The middle ground is a lush green field of tall grasses and ferns. The background is a dense forest of tall trees with vibrant green foliage. A dark, semi-transparent rectangular box is overlaid on the right side of the image, containing the text "Matt Schweisberg, WSS" in white. A thin yellow horizontal line is positioned below the text box.

Matt Schweisberg, WSS



A scenic view of a forest with a stream and a large tree stump in the foreground. The background is filled with lush green trees, and the foreground shows a rocky stream bed with a large, weathered tree stump. The overall scene is vibrant and natural.

# ASWM RESOURCES

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# WETLAND REGULATORY CAPACITY-FOCUSED DIALOGUES



Each topic covered in this webinar

- Navigable Waters Protection Act (WOTUS)
- Section 401 Water Quality Certifications
- Nationwide Permits
- Isolated Wetlands
- Mitigation Banking
- COVID-19 Pandemic - Adaptations







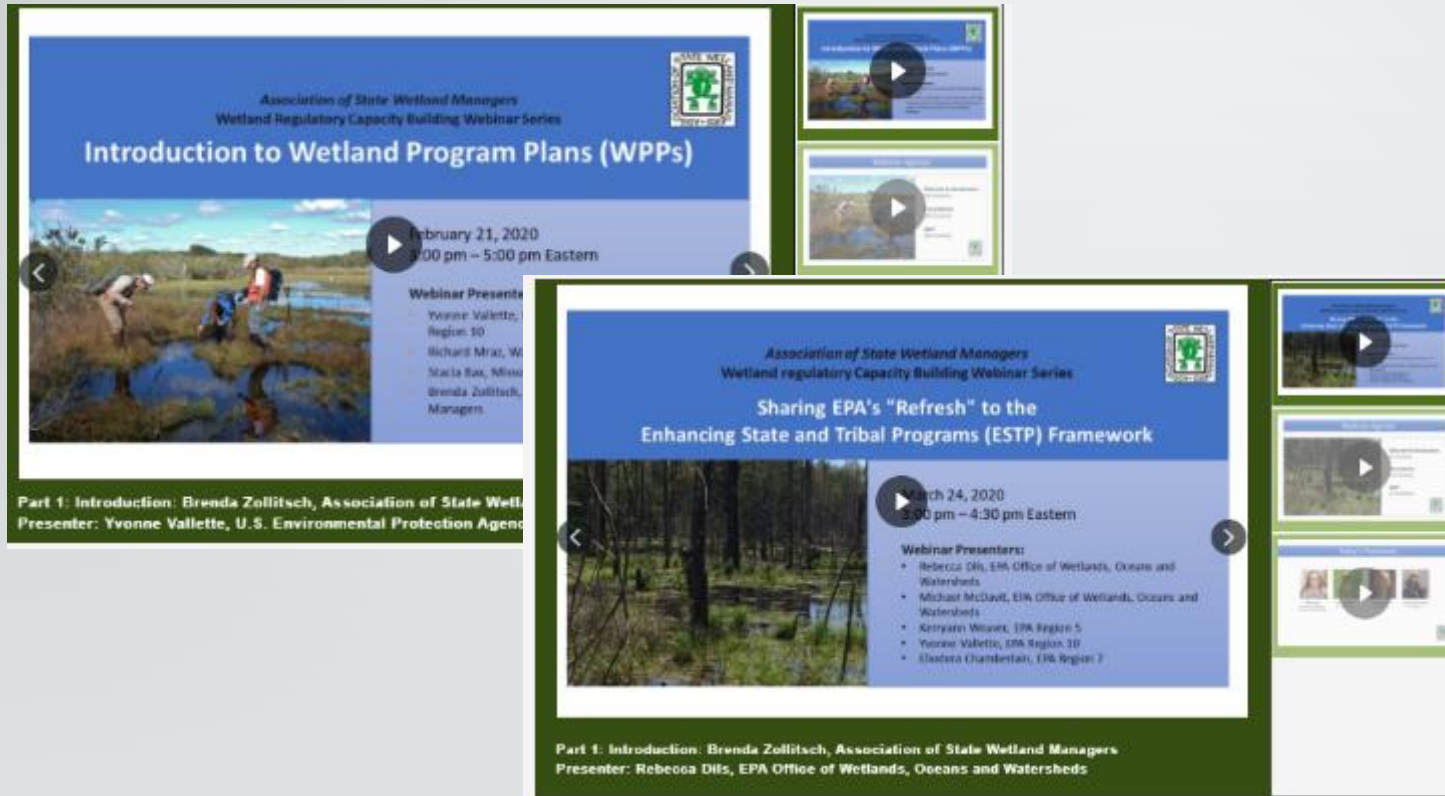
## ASWM WETLAND REGULATORY CAPACITY BUILDING WEBINAR SERIES

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- Filling Wetland Regulatory Gaps: Approaches and Lessons Learned
- Communications Strategies and Lessons Learned for Wetland Programs
- Improving Enforcement in Wetland Regulatory Programs
- Building Capacity to Protect and Manage Wetlands through the Development of State Wetland Associations
- Conducting State/Tribal Review of the 2020 Nationwide Permits



# WPPs and ESTP Framework

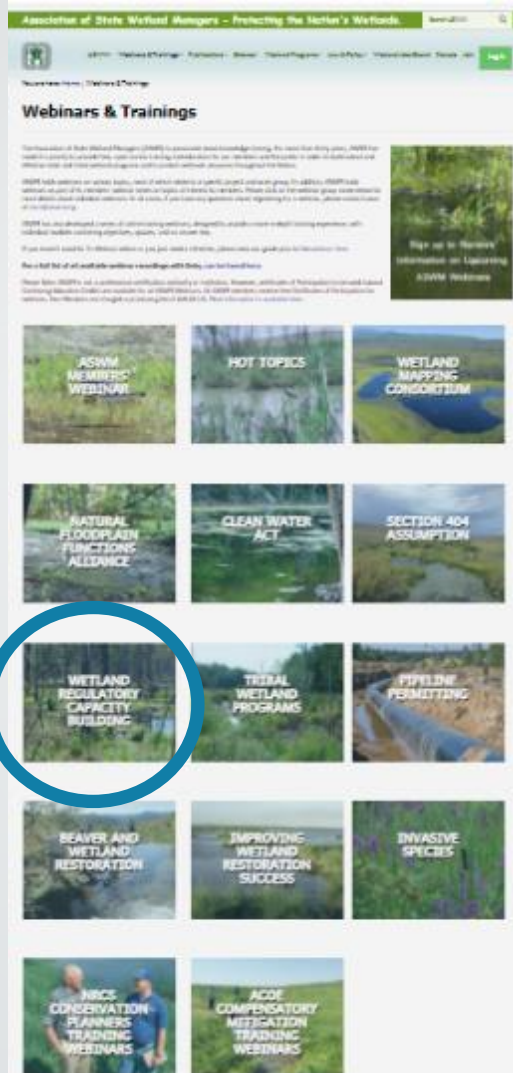


- How WPPs can be used as a capacity building tool
- Examples of two state WPPs, each taking a different approach to fulfilling the required elements of a WPP
- Benefits of WPPs
- “Refreshes” being made in each of the four core element areas addressed in the ESTP Framework



# ASWM REGULATORY CAPACITY BUILDING PROJECT

# ARCHIVE OF WEBINAR RECORDINGS AND POWERPOINTS



## 2020

**November 13, 2020** [View recording here](#)

Filling Wetland Regulatory Gaps: Approaches and Lessons Learned – Yvonne Vallette, U.S. Environmental Protection Agency, Region 10; Denise Clearwater, Maryland Department of the Environment; Richard Mraz, Washington State Department of Ecology; and Michelle Cook, Kentucky Division of Water

**September 29, 2020** [View recording here](#)

Improving Enforcement in Wetland Regulatory Programs – Yvonne Vallette, U.S. Environmental Protection Agency, Region 10; Stacia Sax, Missouri Department of Natural Resources; Sara Slater, Oregon Department of Environmental Quality

**September 16, 2020** [View recording here](#)

Conducting State/Tribal Review of the 2020 Nationwide Permits – David Olson, U.S. Army Corps of Engineers; Panel of State Wetland Program Managers – Dave Dixie, Virginia Department of Environmental Quality and Richard Mraz, Washington State Department of Ecology

**August 20, 2020** [View recording here](#)

Communications Strategies and Lessons Learned for Wetland Programs – Alison Rogerson, Delaware Department of Natural Resources and Environmental Control; Laura Lapierre, Vermont Department of Environmental Conservation; and Mary Ann Tilton, New Hampshire Department of Environmental Services

**June 24, 2020** [View recording here](#)

Building Capacity to Protect and Manage Wetlands through the Development of State Wetland Association – Erin O'Brien, Wisconsin Wetlands Association; Rick Savage, Carolina Wetlands Association; and Kim Matthews, Carolina Wetlands Association

**March 24, 2020** [View recording here](#)

Sharing EPA's "Refresh" to the Enhancing State and Tribal Programs (ESTP) Framework – Rebecca Dix, EPA Office of Wetlands, Oceans and Watersheds; Michael McDavid, EPA Office of Wetlands, Oceans and Watersheds; Kerryann Weaver, EPA Region 5; Yvonne Vallette, EPA Region 10; and Ekodora Chamberlain, EPA Region 7

**February 21, 2020** [View recording here](#)

Introduction to Wetland Program Plans (WPPs) – Yvonne Vallette, U.S. Environmental Protection Agency, Region 7; Stacia Sax, Missouri Department of Natural Resources; Richard Mraz, Washington State Department of Ecology; Brenda Zollitsch, Association of State Wetland Managers



# INFORMATION FOR CAPACITY EXPLORERS AND BUILDERS







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# ASWM INFORMATION SHEETS



-  1. Introduction to Wetland Regulatory Capacity Building Information Sheet - Last Revis...  
Authors: Brenda Zollitsch
-  2. Checklist for Building Wetland Regulatory Capacity Initial Considerations - Last Revis...  
Authors: Olin Jenner
-  3. Wetland Program Plans as Building Blocks for State Wetland Regulatory Programs  
Authors: Brenda Zollitsch
-  4. Sustainable Funding Strategies for Wetland Regulatory Programs - March 2021  
Authors: Brenda Zollitsch
-  5. Effective Communication Strategies for State Wetland Programs - March 2021 R  
Authors: Olin Jenner
-  6. Working with State Legislatures in Support of State Wwtland Regualtory Programs - ...  
Authors: Brenda Zollitsch
-  7. Improving Compliance and Enforcement in State Wetland Regulatory Programs  
Authors: Olin Jenner
-  8. Integrating with Other Programs to Increase Wetland Program Capacity - March 2021  
Authors: Brenda Zollitsch
-  9. Partnering with State Wetland Associations to Build State Wetland Program Capacity ...  
Authors: Brenda Zollitsch
-  10. Additional Resources for Wetland Regulatory Capacity Building March 2021  
Authors: Brenda Zollitsch



# NATIONAL WETLAND CONDITION ASSESSMENT (NWCA)

## COMMUNICATION TEMPLATES

NWCA Template  
Factsheet for  
States and Tribes

NWCA Template  
Administrative  
Brief

NWCA Template  
Legislative Brief

NWCA  
Communication  
Tips

NWCA Draft  
Social Media  
Prompts

### National Wetland Condition Assessment

The National Wetland Condition Assessment (NWCA) is a collaborative survey of our Nation's wetlands. The NWCA examines the chemical, physical and biological integrity of wetlands through a set of commonly used and widely accepted indicators.





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## Wetland Programs

- EPA Core Elements Framework
  - Wetland Program Plans
  - Monitoring and Assessment
  - Regulation
  - 401 Certification
  - State Programmatic General Permits
  - 404 Assumption
  - Dredge & Fill
  - Oil and Gas Pipeline Permitting
  - Compensatory Mitigation
  - In-Lieu Fee
  - Stream Mitigation
  - Water Quality Standards for Wetlands
  - Voluntary Restoration & Protection
- State & Tribal Wetland Programs
  - State Program Summaries
  - Sustainable Financing
- Federal Wetland Programs
  - 2) restoration, 3) water quality (or Pollution)
  - there is sometimes a mitigation component
  - in wetland programs include the U.S.
  - National Oceanic Atmospheric Administration,
  - water quality and pollution control

Wetland programs are administered at local, state and federal levels. State wetland programs (control), 4) monitoring/assessment, 5) wetland mapping, 6) wildlife/fisheries and sometimes to a state wetland program. At the Federal level, wetland programs mostly fall under the Environmental Protection Agency, Fish and Wildlife Service, U.S. Army Corps of Engineers. Local wetland programs are run by a number of local governments, including conservation organizations, counties and other interest groups.

Below you will find links to specific wetland program topic areas:

- [EPA Core Elements Framework](#)
- [Wetland Program Plans](#)





# THE VALUE OF NATIONAL DIALOGUE

- Hearing ideas and updates
- Peer-to-peer networking and sharing was great
- Helped by input from the workgroup
- Shared really good ideas and “shamelessly” adopted many
  - Can we do this, crafting new approaches,
  - Able to try ideas on for size - see what it would look like, what changes it would bring
  - Able to “seed ideas” about a wetland regulatory program for the state
- Took ideas and discussed with management
  - Enhanced inhouse discussion for strategies
  - Affected certification decisions.

- Worked through the many changes that have happened in the last two years.
  - Without the group would have been harder to navigate the changes.
  - Seeing and hearing what others were doing with the new rules.
  - Listen, learn about changes.
  - Able to go to management with things that we should look at that we weren't.
- Heard about other federal regional and district level agency approaches
- An exciting, cooperative approach to difficult work
- Substituted normal interaction during pandemic



# CLOSING THOUGHTS

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KEY TAKEAWAYS

- ❖ Clarify resource and regulatory goals
- ❖ Identify what you need
- ❖ Review menu of options and resources
- ❖ Engage with the regulated community early and often
- ❖ Run it through the “reality lens”
- ❖ Incremental change is still progress
- ❖ Plan strategically
- ❖ Garner support
- ❖ Learn from others
- ❖ There is no one size fits all





# FOR MORE INFORMATION

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## Association of State Wetland Managers

[www.aswm.org](http://www.aswm.org)

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