Center for Public Service Assessment:

PERMIT STREAMLINING FOR PRIVATE SECTOR PROJECTS

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Prepared for:

City of Portland
Bureau of Environmental Services

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EXECUTIVE SUMMARY

In 2003, the City of Portland's Bureau of Environmental Services (BES) established a team to streamline environmental permits for City-managed projects. Today, this Streamlining Team is comprised of representatives from city, state, and federal regulatory agencies (BES, 2015a). Facilitated by BES, the team meets monthly with public sector project managers / applicants. The team reviews projects early in the design phase and offers collective feedback regarding the types of permits needed, suggested actions, potential areas of difficulty, and other advice to help ease the otherwise lengthy and often disjointed permitting process (BES, 2015b). Periodic internal assessments by BES and a third-party assessment conducted by Portland State University's Center for Public Service (CPS) in 2014 found that the process fosters collaboration, saves time, improves the overall environmental quality of projects, and improves consistency in agency decision making (Mogren and Fitch, 2014; Reed, 2014). The Streamlining Team's success generated interest among City bureau leaders about whether the results from the public sector projects could be duplicated with projects being carried out within the city by private sector developers.

BES subsequently contracted with CPS to assess an expansion of the City's Streamlining Team process to include private sector projects (BES, 2015b). The goal of this assessment was to explore the creation of a coordinated permit review process for private applicants that builds on the successful attributes of the existing Streamlining Team process while ensuring the current team process remains successful. This report constitutes the CPS response to the City's request.

Relying primarily on interviews with current Streamlining Team members and a small number of private sector stakeholders willing to speak with the CPS assessment team, the assessment team found the following:

1. Current Streamlining Team members strongly support development of a streamlining process for private sector projects.

2. Current team members believe that streamlining processes used for public sector projects are transferable to a private sector process.

3. Only a small number of people from the private sector agreed to be interviewed. In contrast to current Streamlining Team members, private sector respondents expressed mixed and conditioned support for a private sector streamlining process.

4. Both groups recognized advantages in a permit streamlining process for "some projects."

5. Both groups of interviewees recognized risks and challenges to implementing a streamlining process for private sector projects. However, the perception as to what those risks and challenges are varied markedly between the two groups.

6. Interviewees identified three feasible alternatives for where an expanded team could be located. These were BES, BDS, and the Kaizen Team.

7. There was unanimous agreement that a private sector streamlining process be voluntary in nature.

Although the current team voiced strong support for a private streamlining process, the discrepancies in perceived benefits and risks, the limited number of interviewees from the private sector, and the tempered and conditioned responses from private sector interviewees leads to the conclusion that initiating a permanent private sector streamlining team at this time is premature. It is not clear that sufficient support for such a service exists among private sector developers and consultants to where the investment needed would be worthwhile.

Instead, the assessment team recommends the City initiate a one-year pilot project of the concept. The team further recommends that this pilot be conducted within the current Streamlining Team under direction of BES. Participation should be voluntary, with criteria to define the types of projects most likely to benefit from the process. No fees should be charged to applicants as an incentive to participation. The design of the pilot effort should include robust outreach to private sector to explain the merits of permit streamlining, a monitoring effort to track results, strong facilitation, and a defined endpoint. At that time, a decision to proceed with a permanent process, to extend the pilot, or to terminate should be made.

INTRODUCTION

In 2003, the Bureau of Environmental Services (BES) established an environmental Permit Streamlining Team through a memorandum of understanding with several federal regulatory agencies (BES, 2015b). Its goal was to provide a unified review of projects within the City of Portland. Representatives from state agencies and the Bureau of Developmental Services were added to the team in the years immediately thereafter. Today, the Permit Streamlining Team brings permitting managers from local, state, and federal permitting agencies together around one table, facilitated by BES. Public Sector project managers / applicants come to the team to present projects early in the design phase and get collective feedback regarding the permits they will need, suggested actions, potential areas of difficulty, and other advice to help ease an otherwise lengthy and often disjointed permitting process (BES, 2015a). Periodic internal assessments by BES and a third-party assessment conducted by Portland State University's Center for Public Service (CPS) in 2014 found that the streamlining process fosters collaboration, saves time, improves the overall environmental quality of projects, and improves consistency in agency decision making (Mogren and Fitch, 2014; Reed, 2014).[1]

Currently, the Streamlining Team only reviews public sector projects initiated by the City of Portland. The Streamlining Team's success generated interest among city bureau leaders about whether the results from the public sector projects could be duplicated with projects being carried out within city limits by private sector developers. This interest is due to several factors.

The first is the success of the public sector streamlining process in saving permitting time and costs (Mogren and Fitch, 2014; Reed, 2014). Second is the number of private sector permit applications the city receives. For example, BES collected data showing that between 2006 and 2008, twelve proposed private sector activities would likely require an environmental permit from state and/or federal authorities as compared to ten City proposed activities over the same time period (Reed, 2008). This implies that there may be about as many private as public sector projects requiring permits at any point of time. We note that the BES data was collected immediately before and during the last recession. The city expects increasing numbers of permit applications from the private sector as the economy continues to improve (BES, 2015b).

Third, property owners and developers complain that city permitting processes, particularly along the riverfront, are confusing and sometimes inconsistent – a charge borne out by responses to our interview questions. These difficulties add time and money to projects. Private sector respondents suggested that a permit streamlining process for may offer at least a partial solution to these issues (See Appendix 1, Exhibit Eleven).

The Bureau of Environmental Services contracted with CPS to provide an assessment of a proposed expansion of the City's Streamlining Team process (BES, 2015b). The goal of this assessment was to explore the creation of a coordinated permit review process for private applicants that builds on the successful attributes of the existing Streamlining Team process while ensuring the current team process remains successful. This report constitutes the CPS response to the City's request.

The report starts by describing the methods used to carry out this assessment. The methods section is followed by a discussion of our key findings and the resulting conclusions which, in turn, is followed by our conclusions. A detailed discussion of the findings, illustrated with a series of graphs and a table, are provided in Appendix 1. Appendices 2 and 3 provide the interview questions used for the current streamlining team members and private stakeholders, respectively.

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[1] There was no CPS authored report written for the 2014 assessment of the public sector permit streamlining process. Rather, the findings, conclusions, and recommendations were delivered in a PowerPoint presentation to the Portland City Council on October 22, 2014. Mike Reed copied the information on those PowerPoint slides to share with city and bureau leaders prior to the October 22 council meeting. It is the CPS PowerPoint slides and Mike Reed's document that are cited here.

METHOD

Background Research

We began by reviewing the 2014 CPS permit streamlining team assessment (Mogren and Fitch, 2014; Reed, 2014) and documents provided by BES, the Bureau of Planning and Sustainability (BPS), and the Bureau of Development Services (BDS) to refamiliarize ourselves with the current streamlining team's history, processes and context and to obtain background information on the private sector permit environment. These included the *BES Streamlining Agreement: Ten Year Status Report of the Streamlining Team Process* (2003-2013) (2014); *Standard Operating Procedures for the City of Portland Streamlining Team Meetings* (2015); and the *City of Portland Coordination of the Streamlining Agreement: The Role of the Streamlining Team Chair* (2015).

Additionally, a member of the CPS assessment team attended a streamlining team meeting to see first-hand how the team operates and attended the team's annual training workshop. We also reviewed the *Bureau of Planning Service's The River Plan: North Reach* (BPS, 2009), which discusses the need for a coordinated permit review process for private sector development along the Willamette River.

This background research gave us foundational knowledge about the streamlining team in its current role and setting and insights into the interest in studying a similar process for the city's private sector development. Using this knowledge and a discussion with representatives from BES, BPS, and BDS we constructed our interview questions. While the background material we gathered was beneficial, the report's findings and conclusions rely primarily on the information obtained from the interviews.

Interview Process

We identified two groups to interview early in the assessment process. One consisted of the members of the current Streamlining Team. The other consisted of representatives from private or quasi-public sector developers and/or consultants. The interviews were purposeful in nature. By that we mean that the names of those to be interviewed were as recommended by city bureau staff and leaders, streamlining team members, and, in some cases, the interviewees. In other words, the interview population does not represent a random sampling of Portland's private sector development community.

We conducted fifteen interviews over the course of four months, the relatively long time period due to challenges in scheduling time with those with whom we wished to speak. Interviews typically lasted 60 to 90 minutes and were conducted either at the workplace of the interviewee, Portland State University, over the phone, or in a public coffee shop based on convenience to the interviewees. All interviews were conducted on a non-attribution basis. We consolidated the interview responses and present them in Appendix 1.

We developed separate question sets for each of the two groups. While we asked some questions to both groups, we also developed questions to obtain information unique to each. The questions were both directed, seeking specific information, and open-ended, allowing respondents to share what they thought was relevant and important. Copies of interview questions for streamlining team members and private sector representatives can be found in Appendices 2 and 3, respectively.

We interviewed all nine of the current permit streamlining team members. While we reached out to ten individuals and/or firms from Portland's private development sector, only five made themselves available. Additionally, we interviewed one member from BES management. That person's insights helped inform our conclusions, but, because the individual was not a member of either of the two groups, the responses are not included in the graphs in Appendix 1. Original interview notes are on file in the Center for Public Service at Portland State University.

Table 1 presents the names of the organizations from which representatives were interviewed.

Limitations and Constraints

The most significant limitation in this assessment is the small sample size of private sector stakeholders. We initially anticipated interviewing up to sixteen people. Ten names or firms were identified by bureau staff or leaders or streamlining team members. Of these, we were only able to schedule time with five. Even when stakeholders agreed to an interview, setting up the interview proved to be difficult, and some took many weeks of back-and-forth to schedule. The upshot is that the interview results represent the perspectives of a very limited and non-random sampling of the Portland private development community.

Table 1:
Organizations Interviewed

Streamlining Team Member Agencies:	Private/Quasi-Public Sector Stakeholder Organizations:
City of Portland Bureau of Environmental Services	The Port of Portland
City of Portland Bureau of Developmental Services	Angelo Planning Group
Oregon Department of State Lands	Portland General Electric
Oregon Department of Fish and Wildlife	AECOM/URS
Oregon Department of Environmental Quality	Maul Foster Alongi Environmental Engineering and Consulting
National Marine Fisheries Service	
U.S. Fish and Wildlife Service	
U.S. Army Corps of Engineers	

At the outset, we planned to ask private sector representatives whether they would support a private-sector permit streamlining process. However, it was not until midway through the interview process that we realized how pivotal this question proved to be and the potential nuances of the responses. It became evident as we went through the interviews that the answer to this question presents a fundamental determinate as to whether a private sector streamlining process can be successful and, if so, how it should be designed and implemented. The implications of the responses received, coupled with the limited number of interview subjects, are developed further in the sections that follow.

Bias

We acknowledge a "pro-streamlining" bias in this assessment in two ways. First, the Center for Public Service conducted the 2014 assessment of the streamlining team (Mogren and Fitch, 2014). Although we entered the 2014 assessment with an open mind, our findings impressed on us the benefits of the city's permit streamlining process. We therefore entered this assessment with the perspective that permit streamlining is a good idea; the question was whether and, if so, how the success seen with public projects could be duplicated with private sector projects.

Second, the members of the current streamlining team universally support the process as practiced with public projects and see benefits in relationship building, increased efficiency, higher quality, and shared knowledge if the same process were to be offered to private sector applicants (see Exhibit Three in Appendix 1). Six of nine respondents said they would support and participate in a private sector process if offered, with two responding "yes" but needing approval from their organization and one responding "maybe" (see Exhibit Nine in Appendix 1). While all saw some risks and challenges to be overcome (see Appendix 1, Exhibits One and Four), all felt those challenges and risks were more than outweighed by the potential benefits.

We next present and discuss the seven key findings as derived from the interviews and offer our conclusions as to what they mean.

FINDINGS, DISCUSSION, AND CONCLUSIONS

Findings and Discussion

Finding #1:

Current Streamlining Team members voiced strong support for developing a streamlining process for private sector projects, although some felt they would need approval of organizational leaders before they could commit to participating, as shown in Appendix 1, Exhibit Nine.

Discussion:

Current team members recognized that an expansion of the streamlining team had potential benefits for private sector projects. Although this would stretch the already limited capacity of the permitting agencies, in the minds of team members, the tradeoff appears to be worth it. Team members stated that spending time to review a project in its beginning phases would most likely save time later on in the permitting process. As presented in Exhibit Three, it was felt that a collaborative process brings more opportunity for building relationships and networking between the two sectors, which could ultimately lead to higher quality projects that better protect natural resources and, through relationship building, better communications in permit processing.

Finding #2:

Current Streamlining Team members thought that most processes used by the current team would lend well to a private sector process.

Discussion:

Several current team members offered ideas about measures that could be taken to make the team more efficient and lessening the burden on their workload. For example, agency members suggested measures to ensure participants were fully prepared to present to the Streamlining Team, including a checklist or threshold that applicants would need to meet. They also thought that a way to formally opt out of attending a meeting that their agency's permits were not discussed would be a time saving principle that everyone could adhere to. All suggestions are summarized in Appendix 1, Exhibit Five.

Finding #3:

Collectively, private sector respondents expressed mixed support for a private sector streamlining process.

Discussion:

During interviews, we received mixed responses when we asked stakeholders to describe their thoughts about permitting and permit streamlining in general. Remarks about unclear processes, subjective review from permitting managers, and overlapping permit requirements are discussed in Appendix 1, Exhibit Ten. Streamlining was identified by some interviewees as a potential solution, along with other suggestions shown in Appendix 1, Exhibit Eleven. Generally, discussions about the benefits of participation with the team were more limited with the stakeholder group than with current team members.

After interviewing the five non-team member stakeholders, we were left with an overall sense of uncertainty, particularly surrounding the questions about demand and utilization of a private sector streamlining team. Furthermore, from the beginning, there was an unwillingness of several stakeholders to interview. We draw no conclusions from this lack of response; we simply report that it occurred.

When asked directly, representatives from the private sector stakeholder group expressed support for a collaborative approach to permitting by using a medium such as the streamlining team, as opposed to a more strategic approach of contacting agencies one by one during the permitting process. However, they were less supportive as to whether they would actually take advantage of it. These responses are presented in Appendix 1, Exhibits Fifteen and Sixteen. These responses reflect an overarching sentiment: just because private sector project managers may prefer a collaborative streamlining approach, this does not mean that they will use it unless it is in their firm's clear interests to do so.

Finding #4:

Both groups of interviewees recognized advantages in a permit streamlining process for "some projects."

Discussion:

Overall, current team members and private sector stakeholders reported that they supported permit streamlining for some types of private sector projects. They also shared the opinion that not all projects would benefit from the streamlining process. The types of projects that would include complex projects near waterways requiring permits from multiple agencies (see Appendix 1, Exhibits Six and Sixteen). However, when we took our questions one step further and asked about participating in a collaborative process such as the streamlining team, private sector responses were cautious and conditioned, with one saying they support the idea but likely would not participate, others saying they would only use the collaborative approach for some projects, and some saying that an incentive for participation would be needed (see Appendix 1, Exhibits Fifteen and Sixteen).

City bureaus had their own concerns over the types of projects appropriate for streamlining. In 2008, BES identified criteria for determining which types of private sector projects made the most appropriate use of the Streamlining Team and applicant time (Reed, 2008). The purpose was to ensure the Streamlining Team, in accepting private sector projects for review, would be acting in accordance with the government-to-government agreement under which the Team was originally established. Those criteria were:

- The applicant [project] must require permits from all three levels of government (City, state, and federal).

- The Streamlining Team must agree to the private applicant using the Streamlining Team's review process. If the Team does not so agree, then the applicant will be advised to use the agencies individual pre-application process.

These criteria were established to preclude confusion among applicants needing only a BDS land use review who may otherwise seek to use the free Streamlining Team process to circumvent paying BDS fees (Reed, 2008).

Finding #5:

Both groups of interviewees recognized risks and challenges to implementing a streamlining process for private sector projects. However, the perception as to what those risks and challenges are varied markedly between the two groups.

Discussion:

There were different perceptions of risk between public and private interviewees. To some degree, in our opinion, seem to be based on generalizations that interviewees projected onto the other group. For example, current team members were worried about the risk of attorney presence and litigation from private sector applicants (see Appendix 1, Exhibit Four). However, during interviews with the private sector representatives, there was no mention of attorneys or concerns over litigation. Private sector stakeholders were worried about losing control over their projects and about unanticipated requirements being added onto their regulatory burden that go beyond what is required (see Appendix 1, Exhibit Fourteen). Should the City decide to proceed with a private sector streamlining process, an early order of business should be to obtain a shared understanding among all parties of potential risks and opportunities.

Finding #6:

Interviewees identified three feasible alternatives for where an expanded team could be located. These were BES, BDS, and the Kaizen Team.

Discussion:

Interviewees identified a variety of coordination processes in which they participate (see Appendix 1, Table Two under "Other Findings"). Of these, current team members identified three feasible options for where a private sector streamlining team could be housed. The first is to keep the team in BES, with a private sector team meeting in the afternoon on the same day as the public sector meeting. The second option is to move the private sector team out of BES and house it in the Bureau of Developmental Services (BDS). Essentially, this would mean an expansion of the Bureau's current pre-application process. The third option is to not expand the current team at all, but participate with another streamlining team under the *Kaizen* process.[2]

2 These three locations were provided in response to current Streamlining Team interview question #5 (see Appendix 2). The responses to that question were not graphed.

Housing the private sector streamlining process in BES offers several advantages. There is already an established, well-functioning team willing to embrace expanding their process to the private sector. The transaction costs of adding additional responsibilities to the existing team would likely be far lower than creating a new process in another bureau. The types of permits to be issued tend to be natural resource-oriented, such as the §404 permits administered by the US Army Corps of Engineers under the Clean Water Act or §7 consultations admin-istered by the National Marine Fisheries Service or US Fish and Wildlife Service. These environment-oriented permits naturally align with the jurisdictional responsibilities of the Bureau of Environmental Services. Furthermore, the BES review process is free – a consideration given private sector stakeholder inter-ests in incentives for agreeing to participate in a streamlining process (see Appendix 1, Exhibits Fourteen and Seventeen).

One downside relates to staff workload. While Streamlining Team members believe that the efficiencies gained through streamlining offset the extra time consumed in processing permits individu-ally (see Appendix 1, Exhibit Eight), there would be an increased workload demand on BES for facilitation services and administra-tive support. Another downside is the potentially poor reputation BES has with most of the private sector interviewees. Four of the five interviewees described the permit process as unpre-dictable with no set process. Three of the five said permits are subject to the opinion or subjective interpretation of the permit officials (see Appendix 1, Exhibit Ten). When pressed, these respondents said they were more referring to BES than other permitting agencies. This perception will have to be addressed if a credible streamlining process is to be established in BES.

Currently, BDS manages land use and construction permits and utilizes a pre-application process to inform applicants of bureau requirements. Housing the process in BDS would bypass the BES reputation issue, especially since the BDS process was generally well regarded by our private sector interviewees. Creating a new process, however, would involve transaction costs within BDS in establishing the administrative and facilita-tion support needed. Adapting to the requirements of a new bureau, with a fundamentally different jurisdictional mission than BES would place staff demands on the new streamlining team's members as they adapt to the new procedures, even if those team members are the same people as comprise the current public sector team. Moreover, BDS operates on a fee-for-service basis. Private sector interviewees may be looking for incentives to participate (see Appendix 1, Exhibits Fourteen and Seventeen). We did not ask – and the private respondents did not

volunteer – what type(s) of incentives they like to see. They did state that participation in the pilot project would be less likely if forced to pay a fee for environmental permit streamlining when they can approach each permit agency individually for free.

In 2011, the US Army Corps of Engineers and the Oregon Department of Environmental Quality developed a Kaizen process to improve an existing state-wide permit coordination process. Up to ten other state and federal agencies participate depending on the project and issue in question. The goal of Kaizen is to elimi-nate waste, improve productivity, and achieve continual improve-ment in target activities (DEQ, n.d.). The process is intended for large projects and currently serves the lower Willamette valley. Participants tend to be senior managers that oversee their agency's regulatory activities rather than the permitting officials themselves (in contrast to the current Streamlining Team). The purpose and goals of Kaizen are in general alignment with those of the current Streamlining Team. However, expanding Kaizen to include city projects would involve the transaction costs of rede-signing the process to incorporate BDS regulatory representatives and educating participants on City regulatory requirements.

Finding #7:
There was unanimous agreement from both groups that a private sector permit streamlining process be voluntary in nature.

Discussion:
All interviewees were unanimous that a private sector process be voluntary (Appendix 1, Exhibit Seven). However, input from the private sector indicates that voluntary participation alone will not be sufficient. While their responses indicate for streamlining in general (Appendix 1, Exhibits Nine, Eleven, and Thirteen), they offered some concerns (Appendix 1, Exhibits Ten and Fourteen). They also stated that support for streamlining will depend on the type of project, the degree to which positive relationships with regulatory agencies have already been established, participa-tion incentives, and the risks and benefits perceived (Appendix 1, Exhibits Ten, Eleven, Twelve, Thirteen, and Fourteen).

Interestingly, when asked to choose between saving project time through streamlining at the risk of a greater regulatory burden versus a lower regulatory burden at the risk of extended project time, four of the five private sector respondents chose the former. One indicated they prefer to rely on the agency relationships they have developed over the years. Another, while supporting the shorter time option conditioned their response by saying it would depend on the project (Appendix 1, Exhibit Fifteen).

Conclusions

Based on the foregoing discussion, we conclude the following:

- While there is strong and enthusiastic support from the current streamlining team about expanding the process to cover private sector projects, support from private sector stakeholders is more tempered and conditioned. While private sector interviewees acknowledge potential advantages to a streamlining process, they also perceive potential risks. It is therefore uncertain as to if or how often private sector developers would utilize a streamlining process and the types of projects they would bring to the team.

- Establishing a new, permanent, streamlining process at this time is, therefore, premature. Instead, we conclude it more appropriate to establish a pilot project – perhaps of one year in duration – to test whether expansion of the streamlining team to the private sector would be supported to the point where the costs and staff effort involved would be worthwhile.

- To minimize transaction costs, take advantage of current expertise and established processes, and provide a no-fee service, we conclude that the process should be housed in the Bureau of Environmental Services for the period of the pilot effort.

- Private sector participation must be voluntary and will need to be induced. Convincing private sector participation will require a robust outreach campaign that demonstrates the time and cost savings realized by the public sector projects and incentives to encourage participation.

- Incentives should be considered to encourage participation in the pilot effort. An examination of incentive types should be explored during pilot design. At a minimum, fees should not be charged.

- Pilot design would benefit from private sector participation. Having private sector representatives assist in the pilot process design may help (1) ensure a common understanding of risks and benefits by all parties, (2) ensure private sector concerns are factored into the pilot design, and (3) provide a conduit for informing the private community of the value of streamlining.

- Criteria should be established to assist private sector applicants as to what types of projects would or would not be suitable for the streamlining process. The Streamlining Team, in coordination with the applicant, would make the final determination whether a project is suitable for streamlining or not.

- The pilot project should be designed to conclude on a specific date. At that time, a determination can be made as to whether to (1) establish on a permanent basis and, if so, where it should be housed; (2) to extend the time of the study to obtain additional information; or (3) to not implement a private sector streamlining process. To assist in this determination, the pilot should include a monitoring and assessment process of progress, issues, and accomplishments in order to inform the ultimate decision.

RECOMMENDATIONS

CPS recommends a one-year pilot project in order to determine the level of demand for a private sector permit streamlining process. The supportive responses from team members and BES staff lend more confidence to our recommendation that a trial expansion of the team will not undermine the current success of the team. A pilot project will allow BES and team member agencies to determine together, based on their experiences over the course of one year, whether a permanent expansion is a valuable use of their resources.

A pilot project will allow BES to determine not only the demand level from the private sector, but will allow them to answer other questions as well. Although current team members thought that the tradeoff between increased workload and efficiency gains would be worth it, a one-year timeline and experience with several private sector projects will give them a real sense of what the tradeoffs will truly be. Current team members thought that the successful outcomes and time savings that resulted from streamlining public sector projects could also be true for private sector projects. The pilot project can test that notion to see if it is in fact true, as efficiency gains and higher quality projects can be measured and assessed. A pilot project will allow the team to experiment with different processes and protocols over the course of the study to see if one approach works better than another to meet the team's overall goals. Our findings point to a high level of confidence from current team members that an expansion can be successful; a pilot project will allow them to experience the expansion to see if the perceived benefits discussed in our key findings are actually there.

We further recommend that the pilot be designed with a results-monitoring protocol and a fixed end date. At the end of the pilot period, an assessment of the results would be made to determine whether to (1) establish on a permanent basis and, if so, where it should be housed; (2) extend the time of the study to obtain additional information; or (3) not implement a private sector streamlining process.

Of the three location options, keeping the team housed in BES over the course of the pilot study is recommended for several reasons. Currently, the focus of the team is on environmental

permits, and environmental agencies make up a majority of team members. Because of the team's focus, it makes sense to keep it housed in an environmentally-centered Bureau. Current team members are supportive of adding private sector projects, and they are already trained in the processes and protocols of streamlining. We recommend that during the pilot study, the same team members participate, based on suggestions shown in Exhibit Five. A transition of the current team to include private sector projects would be smoother than if the team was moved to another Bureau, which would result in higher transaction costs because of training and potential policy changes. If housed in BDS, a fee for utilizing the team would be implemented. This could deter participation from private sector applicants, who specifically noted that fees were a deterrent for use in Exhibit Fourteen. In BES, there is a lower likelihood that a fee for use would be employed, which is more attractive to applicants.

Although the current streamlining team has been established in Portland for several years, marketing and outreach efforts will be needed to spread the word about the expanded scope of the team. This will take time and effort from BES, but they can enlist help from the team's permitting agencies to reach out to their networks too. Representatives from the Kaizen process noted that marketing and outreach to potential users has been their biggest challenge, and a reason why they are seeing low levels of participation. As a targeted approach to marketing, the team can determine which types of projects they feel would be best suited to the streamlining process, and seek out projects in the city that fit their description. The team could also identify a list of developers or consultants that they feel would be akin to the process and willing to participate, and contact them early on.

Although team members thought that many components of the current team could be successfully transferred to a private sector setting, several points were raised about changes that may be needed to bolster team success, specifically noted in Exhibits Two, Four, and Five. Initially, the team can work together to establish procedures, with the understanding that mid-course corrections may be needed. Several issues pertaining to team structure and process were discussed during interviews and suggestions made for how to improve upon these potential difficulties:

- Fees: for the pilot project, we recommend that no agency charge a fee for use, as charging fees will likely prove a disincentive for private sector participation. If the pilot project is deemed a success, fees can be re-evaluated at a later date.

- Preparation Requirements: private sector applicants may need more guidance about preparing for the streamlining meeting. Coming to the meeting with a full presentation is necessary for effective use of time. Team members discussed the option of deferring an applicant from participating if they are not deemed to be completely prepared.

- Staff support and workload issues: capacity was discussed as a main concern from team members. One suggestion was the ability for team members to "bow out" of meetings if their agency's permits are not involved. Virtual participation was also discussed, but seen as a potential threat to the successful nature of an in-person team meeting.

- Project criteria: For purposes of the pilot effort, we recommend the project criteria identified in Reed (2008) be used. Revisions or adjustments can be made based on the results observed.

- During the pilot design phase, several private sector stakeholders should be invited to help design part or all of the procedures. This can legitimize the expansion and build a strong foundation that is based on networking, collaboration, and relationship building between the two sectors, something that both parties thought was a benefit of the expansion.

Monitoring and evaluation guidelines should be developed and followed throughout the pilot project, and then synthesized as a whole once the one-year timeline has ended. At that point, an informed decision can be made about whether a full investment into expanding the team will prove a wise use of resources.

APPENDIX 1: DETAILED FINDINGS

This section is organized in a way that team member interview responses are presented first, and then non-team member interview responses follow. The graphs are presented in the order that they were asked in the interviews.

A few questions asked in the interviews have been omitted from the detailed findings section as their own charts. This is because the questions were simply for background/contextual understanding, or they were very broad and could not be accurately represented as a chart. Any responses to questions that were not included as their own charts were incorporated into other charts where they fit most appropriately.

Current Team Member Interview Findings

Exhibit One:
What Works with the Current Streamlining Process?

Team Member Responses
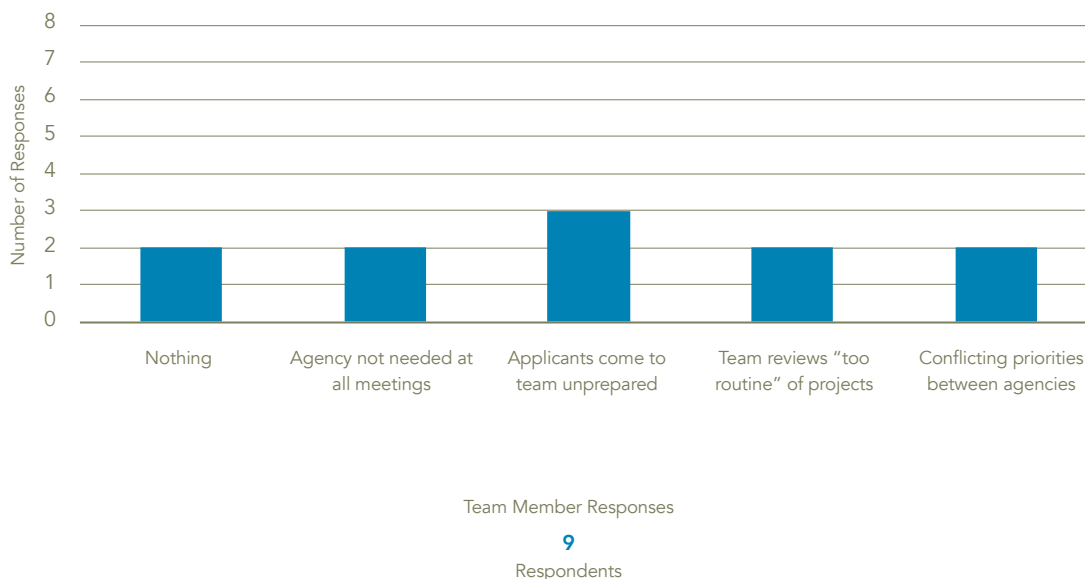
9
Respondents
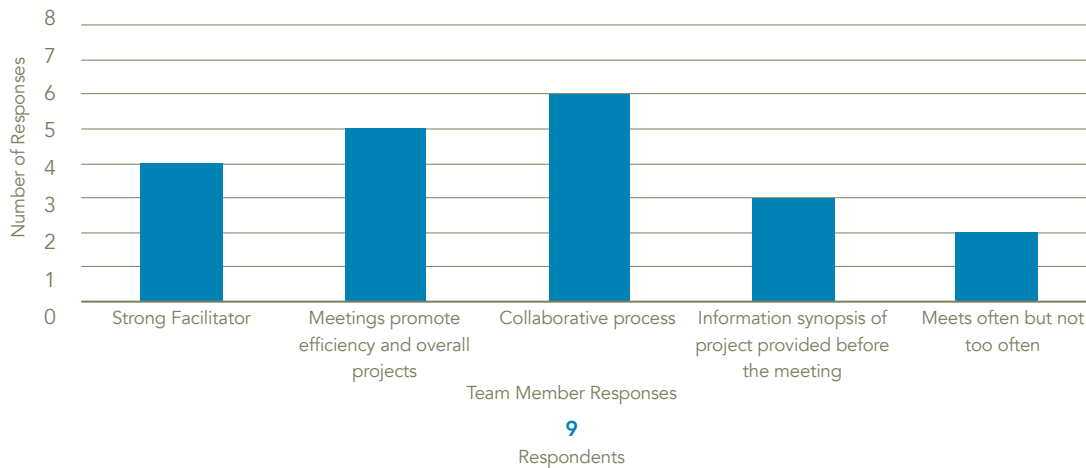
What works with the current streamlining process?
(Question 3):

When we asked current team members this question, we received very positive feedback. Answers were in alignment with the Center for Public Service's 2014 assessment of the team's effectiveness. Six of the nine respondents discussed the positive outcomes that result from the collaborative nature of the team, including better project outcomes, shared understanding of each agency's permitting role, and overall efficiency improvements in permitting content and timelines. Four team members spoke highly of the strong facilitation before, during, and after the meetings. Three team members like the fact that information and synopses of projects are provided to them before meetings, so that they can better prepare. Two team members mentioned that the number of meetings was right: the team convenes often enough to meet the demand of applicants, but not so often that it bogs down their schedules.

Exhibit Two:
With the Current Streamlining Team, What Doesn't Work?

Number of Responses

8	
7	
6	
5	
4	
3	
2	
1	
0	

Nothing | Agency not needed at all meetings | Applicants come to team unprepared | Team reviews "too routine" of projects | Conflicting priorities between agencies

Team Member Responses

9
Respondents

What is not working [with the current streamlining team]?
(Question 4):

As a follow up question, we asked current team members to tell us about anything that is not working with the team. Two members stated explicitly that nothing is wrong, and that the team is operating very well. Three members claimed that some applicants come to the meeting unprepared, which lessens the efficiency gains and effective use of everyone's time. Two mentioned the fact that they are not needed at all meetings, leading back to the discussion of stretched capacity. Collaboration was brought up as a positive attribute of the team, but also as a challenge, as two people brought up the idea that conflicting agency permitting priorities were sometimes difficult to deal with. Finally, two members think that sometimes the team reviews projects that are "too routine", meaning they are simple projects which qualify for basic permits. Respondents felt that these 'routine' projects did not need to come to the streamlining team.

Exhibit Three:
If a Process for Private Project Streamlining is Established, Where are the Major Opportunities for Success?

Team Member Responses

9
Respondents

If a process for private project streamlining is established, where are the major opportunities for success?
(Question 7A):

Nine respondents identified opportunities for success that could result from the expansion of the Streamlining Team to cover private sector projects. Specifically, five people thought that the increased efficiency for the applicant and agency, which has been so lauded in the public team setting, could be a benefit that the private sector could capitalize on as well. Four responses mentioned the opportunity for increased networking and relationship building with applicants from the private sector, and two responses spoke to an increase in knowledge sharing between the two sectors. Four responses mentioned that the expansion of the team could lead to overall better on the ground project results.

Exhibit Four:
If the Team was Expanded to Include Private Sector Projects, What Challenges May Need to be Overcome? What Risks May be Present?
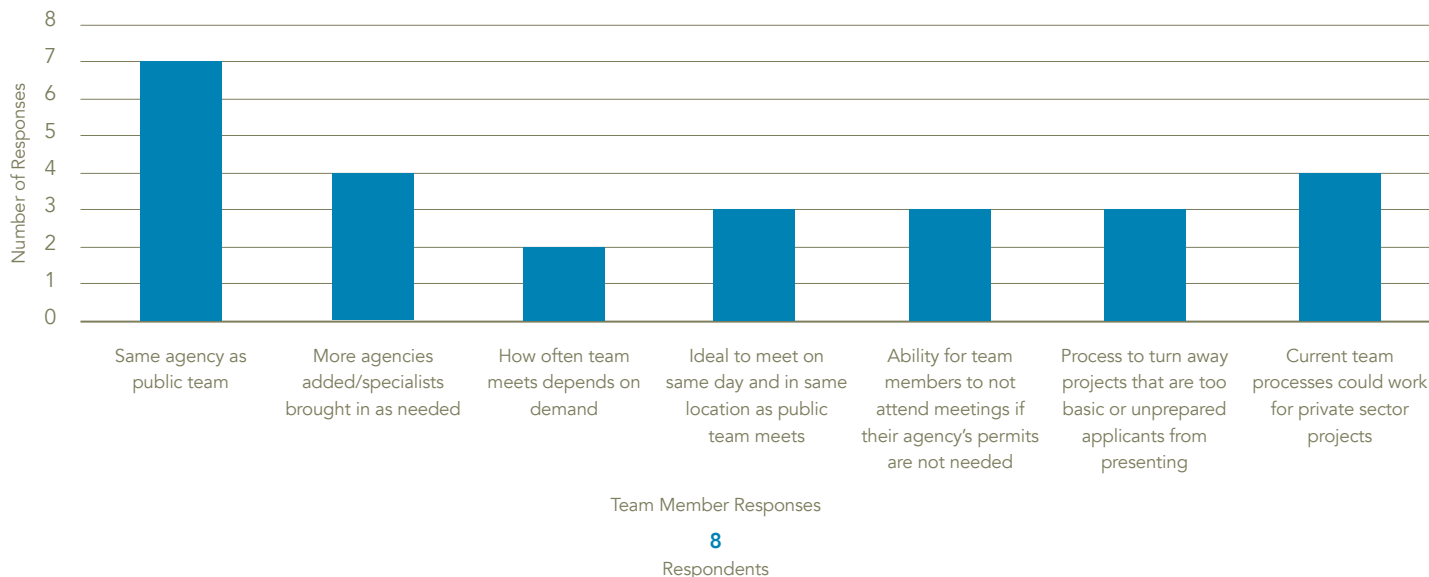

Team Member Responses
8
Respondents
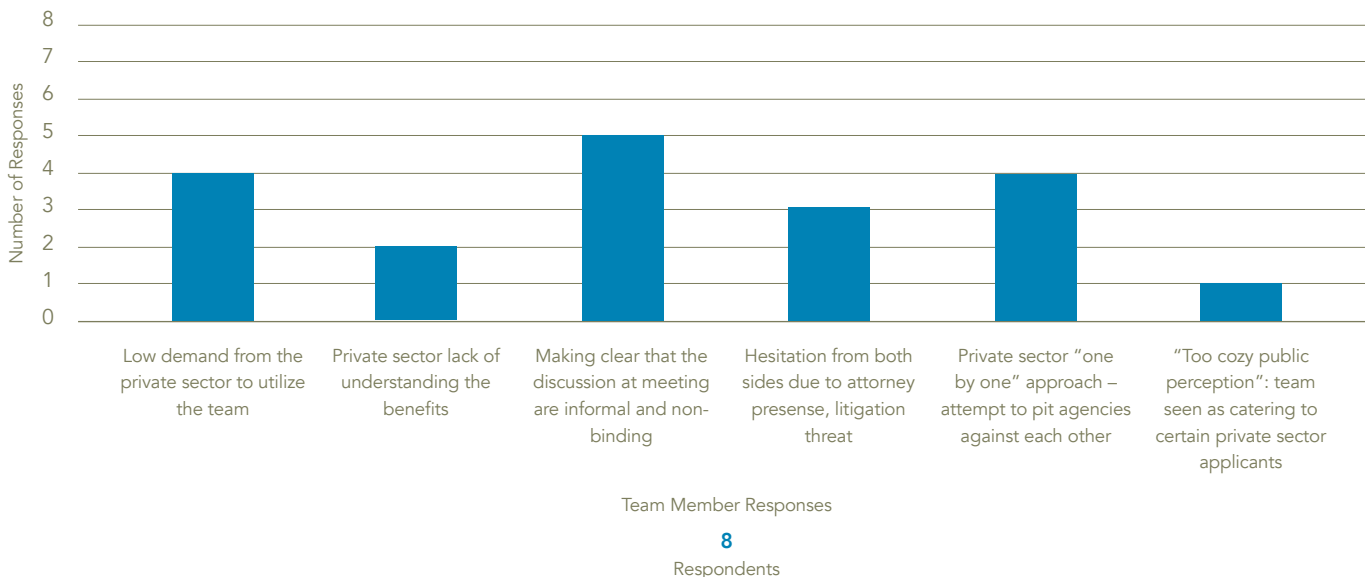
If a process for private project streamlining is established, what challenges do you see that would have to be overcome? What risks, if any, do you foresee in establishing a private project streamlining process?
(Questions 7B and 8):

Due to similar answers, responses about challenges and risks were synthesized together. Overall, five team members expressed worry in the ability to make it clear to private sector applicants that the advice given at the meeting is not final in any way, and could be subject to change. This brought up discussion about potential attorney presence at the meeting, and concerns about litigation were addressed by three interviewees. Four team members saw low demand from the public sector as both a challenge and a concern. Two team members did not know whether the private sector would realize the benefits associated with participating with the team. This perceived lack of understanding is a risk that may mean the team will not be utilized. One team member worried about the public perception that may arise from expanding the team, wondering if citizens may view this process as catering to certain private sector applicants.

Exhibit Five:
How Would You Organize a Private Sector Permit Streamlining Team?

Team Member Responses
8
Respondents

How would you organize a private streamlining team? If a private project streamlining process were to be established, where should be housed?
(Questions 9 and 5):

Team member responses covered different aspects of team structure and protocol and also included suggestions for improvement should the team be expanded. Of the nine respondents, seven stated that they would like the same agencies to participate as sit on the current team. Four respondents thought that more agencies should be added to the team, with specialists brought in to give feedback as needed. Four respondents thought that processes currently followed by the team would work well with private sector applicants as well. It was specifically noted that the preparation work done prior to the meetings by the applicants and the facilitator makes the process run smoothly, and team members would like to see that process continued if the team were expanded. Three respondents mentioned that keeping the meeting on the same day, extended into the afternoon, would make for the best use of their time. Two mentioned that the frequency of meetings would depend on the demand, and that less frequent meetings may be sufficient. Three team members brought up that they would like the ability to "bow out" and not attend a meeting if they felt their insight was not needed. Three responses suggested the establishment of a "turning away" process to deny review of those projects that the team felt they were unprepared or too basic to warrant a streamlining team review.

Exhibit Six:
What Types of Projects Benefit from a Collaborative Review?


Team Member Responses
9
Respondents
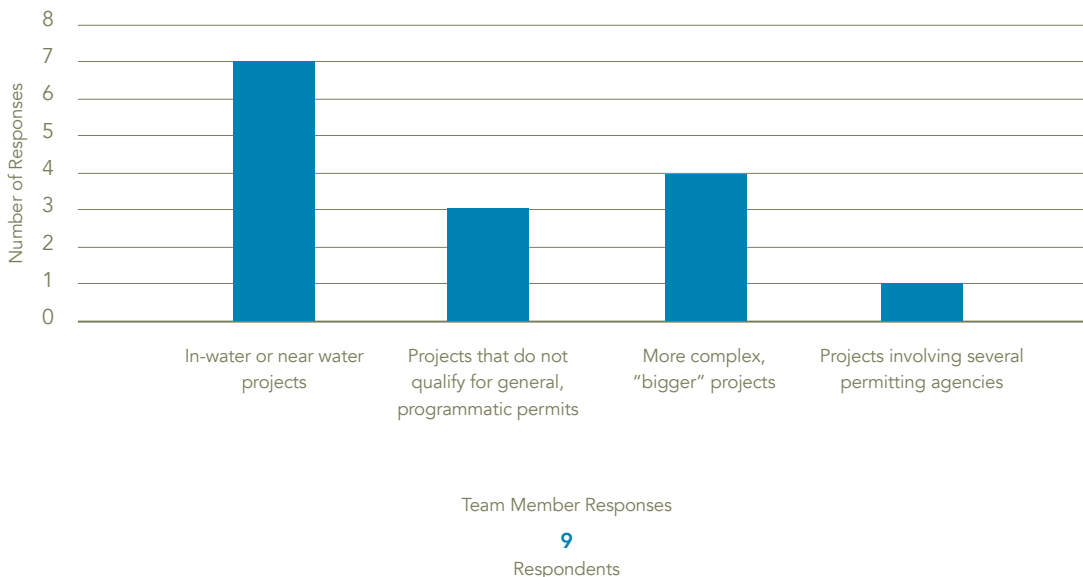
What types of projects do you think would benefit most from a collaborative review under a private project streamlining process?
(Question 10):

When asked, team members most frequently responded that projects in or near water would benefit most from a collaborative review, mentioned be seven respondents out of nine. In addition, four team members stated that "bigger" or more complex projects were a better fit for the streamlining team, but there were different discussions about what the term "bigger" exactly meant. One team member asserted that sometimes projects that seem basic at the outset can then become the most complicated of all. Three different team members mentioned that those projects that qualify for general, programmatic permits are too routine and do not need to be brought to the streamlining team. One answer was given that if a project involves several permitting agencies, it is a good candidate for streamlining team review.

Exhibit 7:
Should Private Sector Streamlining Team be Voluntary or Mandatory?

Team Member Responses

9
Respondents
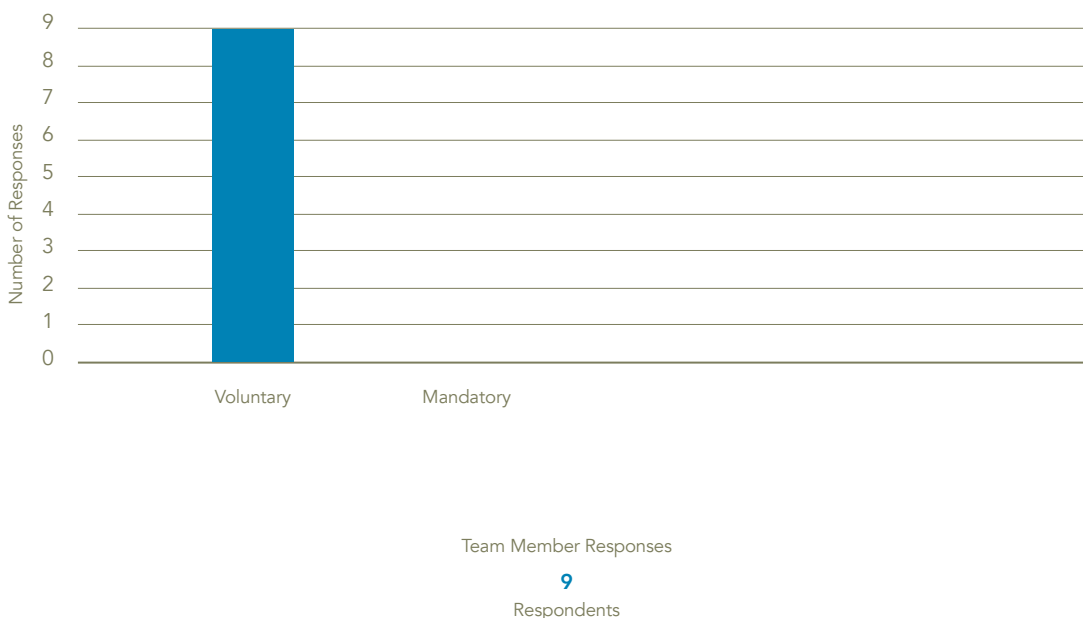
Should the process be voluntary or mandatory?
(Question 10A):

All nine interviewees unanimously agreed that participation of private sector applicants with the streamlining team needs to be voluntary. Several team members thought that there is no legal way to require participation with the Streamlining Team. Others mentioned feelings of resentment that may arise if the private sector applicants were forced to attend and present at meetings. Participation on the team can be strongly encouraged, but as a whole the team felt it could not be forced.

Exhibit Eight:
How Would Participating in a Second Team Impact Your Organization?


Team Member Responses

9
Respondents
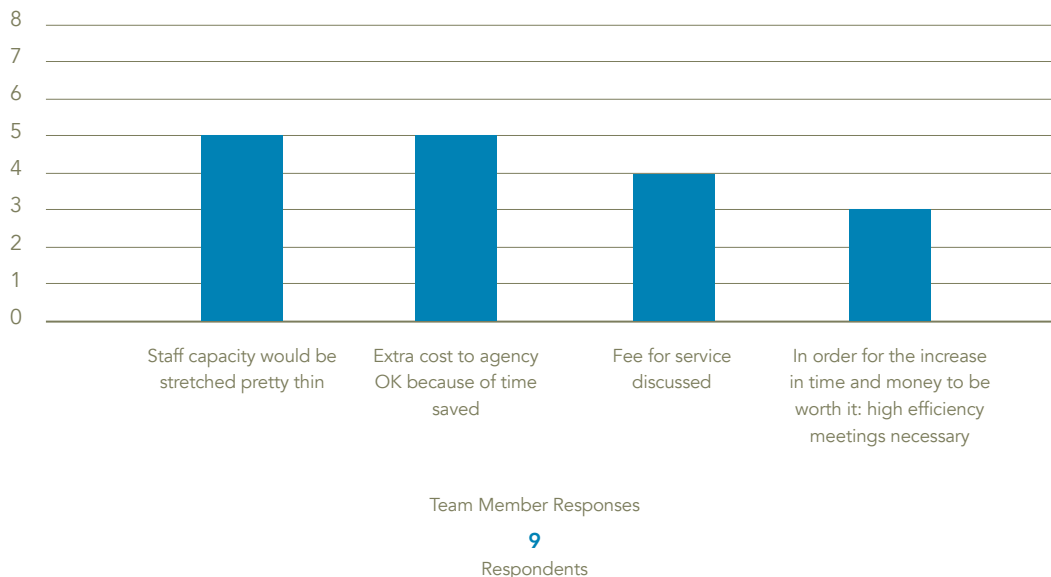
How would participating in a second streamlining process affect your organization?
(Question 11):

Team members spoke of positive and negative impacts on their organization should the streamlining process be expanded. Staff capacity and budgets are stretched thin, and an expansion would add to already heavy workloads. Five interviewees of the nine specifically mentioned capacity issues. Four interviewees discussed a potential fee for service that their respective agencies may need to charge to private sector applicants that bring their projects to the streamlining team. Although capacity and cost impacts were concerns of five agencies, another five responses pointed out the positive impact of increased efficiency. Three respondents stated that meetings must continue to be run in an efficient and effective manner for their participation to be worth it. Essentially, a "pay now or pay later" theme emerged from conversations with streamlining team members. If their agencies commit the time and money to participating on the team and addressing applicants up front, they will most likely save themselves time and money in the future, as permitting times may be quicker, permit managers are informed about projects before the applications hit their desks, and the permit applications are more complete and correct, as there was time and collaboration from the start.

Exhibit Nine:
Would your Agency Participate on the Team if Expanded to
Include Private Sector Projects?

Team Member Responses

9
Respondents
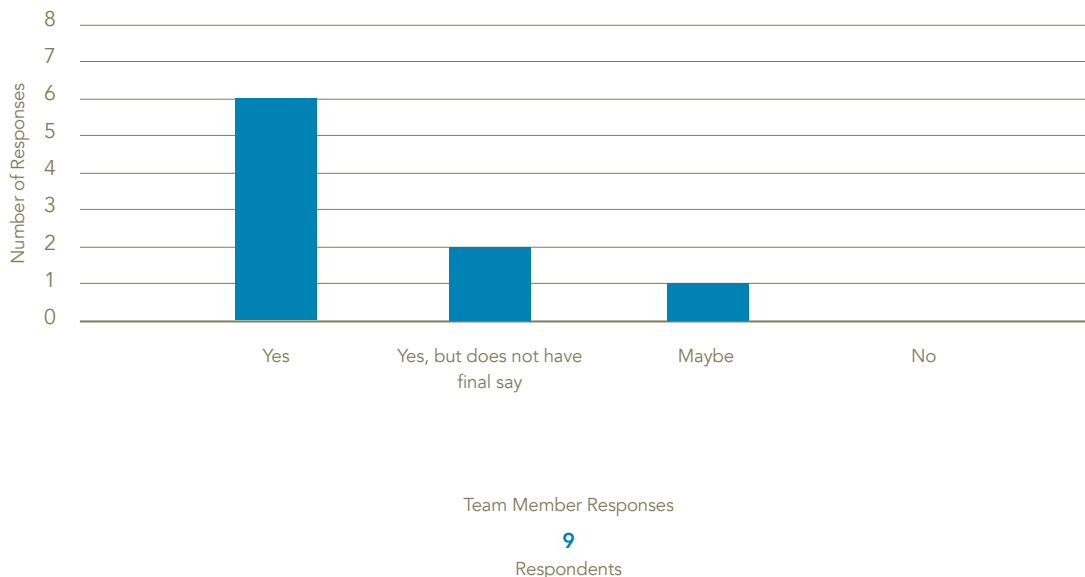
Would your organization participate in a streamlining process for private projects?
(Question 6):

When the nine team members were asked about an expanded commitment, six team members said that their agency would participate. Two said yes, but that the decision is not ultimately theirs, and would be made by higher management. One said that they may participate, if the perceived benefits are there. No interviewee said that they would not participate.

Private Sector Stakeholder Interview Findings

Exhibit Ten:
What are your General Thoughts About Streamlining?
Experiences with Permitting Agencies
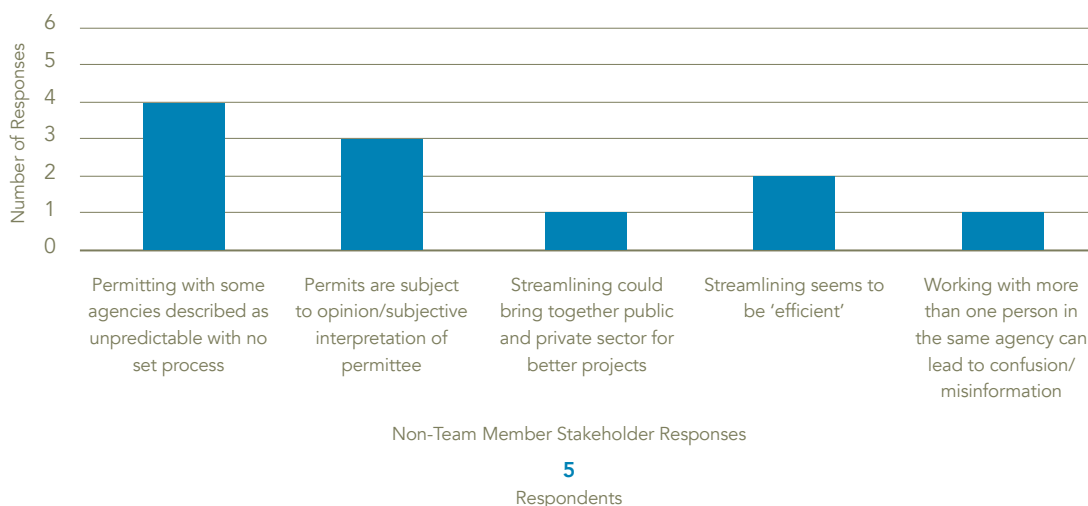
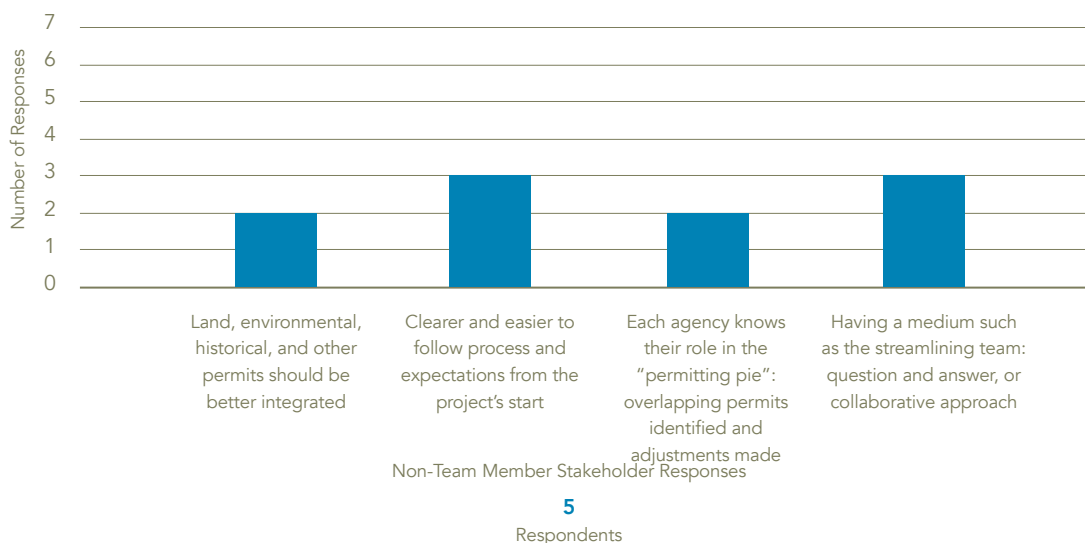Non-Team Member Stakeholder Responses

5
Respondents

What are your thoughts or impressions regarding permitting or permit streamlining in general? What experiences have you had with permitting agencies?
(Question 16 and 17B):

We began interviews with private sector stakeholders by asking them to describe their thoughts about permitting and/or permit streamlining in general. Many responses coincided with another interview question, in which we asked stakeholders about their experiences with permitting agencies. Because of the similarities, the findings for both interview questions were combined into one finding with a larger number of responses. Four out of five private sector stakeholders described the permitting processes of some agencies as unpredictable, with no set protocols. Three interviewees mentioned the permits that they apply for are subject to the opinion of the permit manager, and that conditions can vary widely. Two interviewees said that they thought streamlining seemed efficient, while one person brought up the perceived benefit of brining the public and private sectors together.
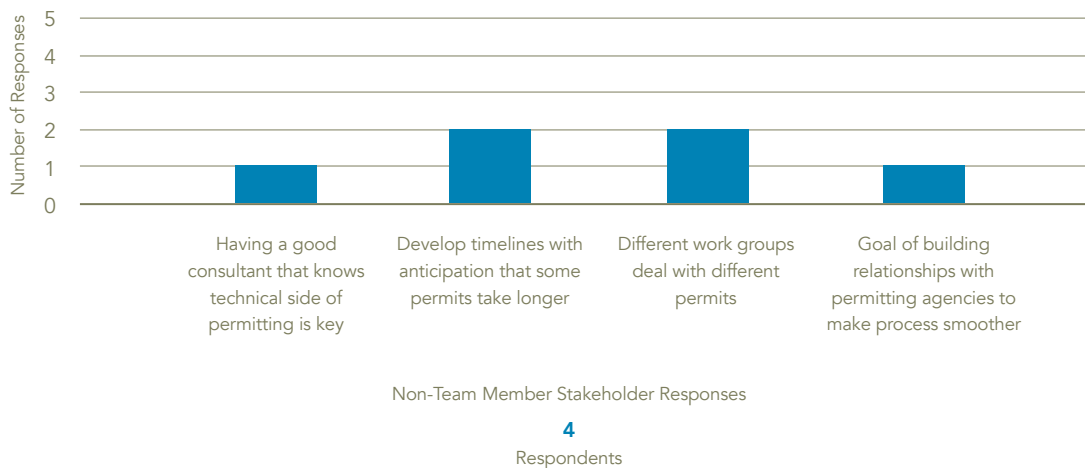
Exhibit Eleven:
What Could be Done to Make the Permitting Process More Efficient?

Number of Responses (y-axis: 0–7)

| Land, environmental, historical, and other permits should be better integrated | Clearer and easier to follow process and expectations from the project's start | Each agency knows their role in the "permitting pie": overlapping permits identified and adjustments made | Having a medium such as the streamlining team: question and answer, or collaborative approach |

Non-Team Member Stakeholder Responses

5
Respondents

What could be done to make the permitting process more efficient?
(Question 16A):

Three of five stakeholders responded to this questions by suggesting that processes be made clearer and that protocols should be in place and followed to ensure consistency. Additionally, two interviewees thought that agencies should gain a better understanding of their role in the permitting process, and how it fits into the larger scheme of the overall permitting framework. This way, overlapping permits may be identified and agencies can work together to reorganize. Three responses centered around having access to a medium such as the streamlining team, and two suggested that other types of permits, such as land use or historical, could be integrated into a permit streamlining process.

Exhibit Twelve:
How are Permit Consultations Currently Handled?

Number of Responses

| Having a good consultant that knows technical side of permitting is key | Develop timelines with anticipation that some permits take longer | Different work groups deal with different permits | Goal of building relationships with permitting agencies to make process smoother |

Non-Team Member Stakeholder Responses

4
Respondents

How are permit consultations currently processed/handled?
(Question 17A):

Private sector stakeholders discussed several different approaches they use when applying for permits. One person mentioned the importance of having a good consultant that knows the technical components of permitting. Two others talked about the importance of developing timelines, with the knowledge that some permits take longer to obtain than others, and to plan accordingly. Two interviewees said that different employees within their organization are responsible for getting different permits, as opposed to one person applying for them all. One interviewee discussed their attempts to build relationships with permitting agencies, with the goal of making the overall permitting process go smoother.

Exhibit Thirteen:
Streamlining Process Described: Do You See any Advantages for
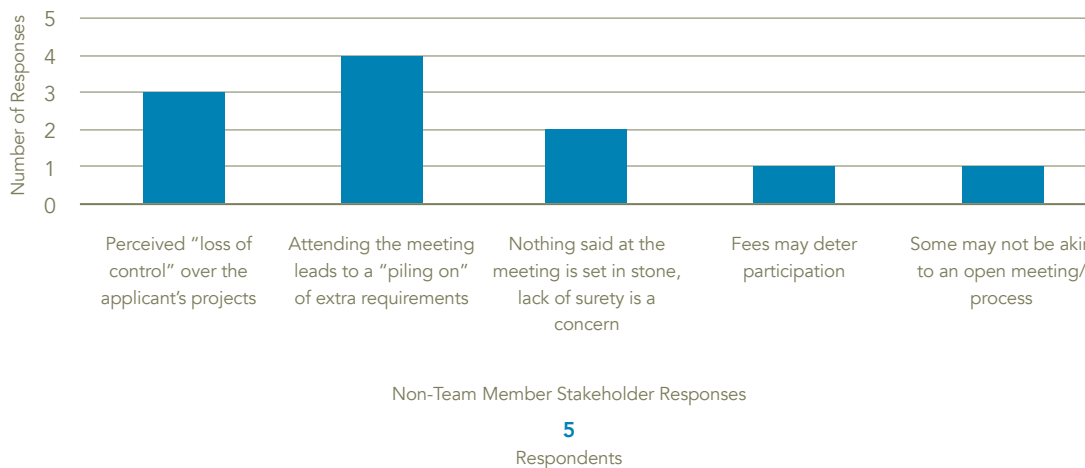Private Sector Developers?

Non-Team Member Stakeholder Responses

4
Respondents
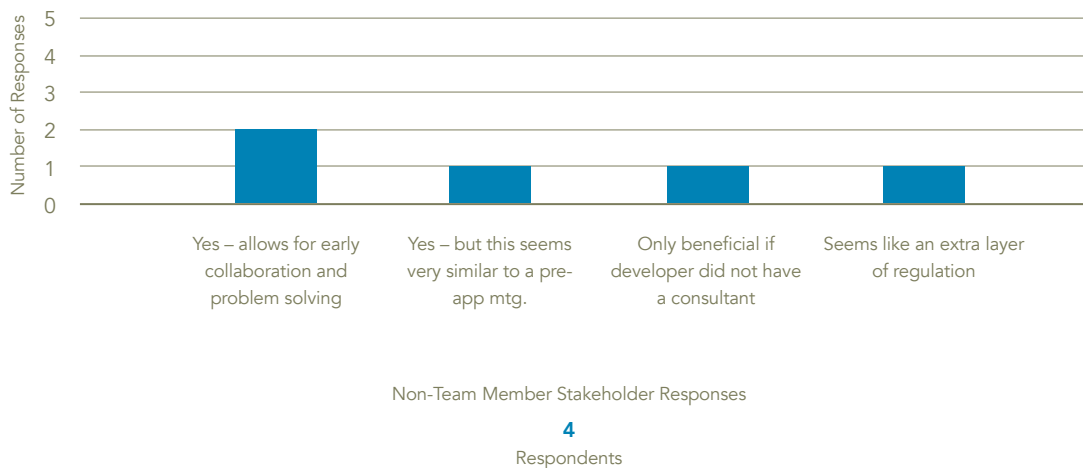
Interviewees read a brief description of the streamlining team processes, and were then asked, "Do you see any advantages for private sector developers for a process similar to the one described?"
(Question 18):

Of four total responses (one interviewee did not answer this question), two interviewees said yes, that they felt the collaborative nature of the team would be beneficial, as problems could be flagged early on, and the developer or consultant could ask any questions to help guide them through their project's design and execution. One interviewee thought that coming to the team at a 10% design phase was ideal, as their project was just beginning to take shape, while another thought that coming to the team at the 50% design phase would be better, as the project would have more structure and details to present to the streamlining team.

One respondent said that the concept of the process was sound, but thought that it sounded very similar to a pre-app meeting. Another interviewee stated that bringing a project to the streamlining team would only be beneficial for a developer that did not have a consultant, and might be less experienced in getting permits. The same respondent stated that the streamlining team seemed like an extra layer of regulation for applicants.

Exhibit Fourteen:
Risks or Challenges Perceived by Non-Team Members Regarding
Streamlining Team Participation

Non-Team Member Stakeholder Responses

5
Respondents

Do you see any risks for private sector developers in the process described? What concerns would private sector developers have over a streamlining process?
(Questions 19 and 20):

Similar responses arose when we asked interviewees to describe perceived risks and concerns about participating in a private sector permit streamlining process, so all responses were analyzed together as one finding. Four out of five interviewees expressed concern about presenting their projects to the streamlining team, only to receive feedback including extra, possibly unnecessary, requirements by the agencies around the table. As a similar point, three respondents discussed the loss of control over their project that may ensue if they bring it to the streamlining team. Two interviewees said that what is decided at the meeting is not set in stone, and that the agencies could then change their requirements later. The lack of surety would be a concern that may deter participation.

One respondent pondered that a fee may deter participation from the private sector in an expanded streamlining team. The issue of charging fees was brought up when interviewing current team members as well. Some agencies said that they would have to charge private sector applicants that present to the streamlining team, and others said they would not, or could not charge. If the team were expanded, this is an issue that would need to be analyzed further. The fact that public sector applicants are not charged for presenting to the streamlining team but private sector applicants would have to pay is a decision that would need to be discussed and justified by the City and involved agencies.

Exhibit Fifteen:
Which Perspective Best Describes Your Organization's Approach to Permitting?

Non-Team Member Stakeholder Responses

5
Respondents

Agencies were read two statements of different approaches to permit streamlining. These statements are the two leftmost responses on the above graph. Interviewees were then asked: Which of the perspectives best fits your organization's strategic approach to permitting?
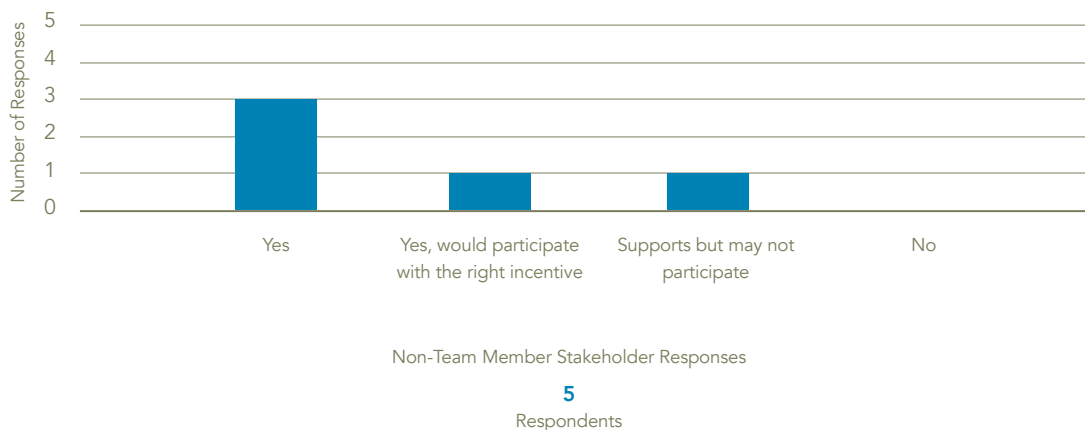*(Question 21):*

Of the five interviewees, four chose the perspective which stated "my organization [does or would] benefit from a collaborative process, that saves overall project completion time, even if it risks a slightly higher regulatory burden". No one explicitly chose the other perspective, which stated "my organization [does or would] benefit from strategically negotiating with each agency individually with the goal of reducing the overall regulatory burden even if it risks delays to project completion". However, one respondent brought up that it really depends on the project, its timeline, and its budget, as those factors are the drivers behind an organization's approach to permitting. Another respondent again brought up the idea of building relationships with the agencies.

Several team members discussed the different approaches that applicants will use when obtaining permits. It was brought up that some applicants prefer a one by one approach, meaning that they go to each agency separately, and sometimes try to leverage what one agency said when talking with another agency. Although none of the private sector applicants interviewed specifically stated that they used this tactic, the idea of approaching the agencies one by one was discussed in every interview. So, non-team members stated that the collaborative approach was indeed favorable, but that does not mean that they would not need to approach agencies one by one. The underlying theme emerging from this finding is that collaboration is favored and the benefits are realized, but that applicants may not use a collaborative approach for every project.

Exhibit Sixteen:
Would You Support a Streamlining Process if Implemented?

Number of Responses

| | Yes, would support | Yes, but would only use it for certain projects |

Non-Team Member Stakeholder Responses

5
Respondents

Exhibit Seventeen:
Would You Support a Pilot Steamlining Process if Implemented?

Number of Responses

| Yes | Yes, would participate with the right incentive | Supports but may not participate | No |

Non-Team Member Stakeholder Responses

5
Respondents

Would you support a streamlining process if implemented? Would you support a pilot streamlining process if implemented?
(Questions 22 and 23):

When Non-Team Members were asked if they would support a streamlining process if implemented, all five interviewees said they would support the process. Two simply replied with a "yes", and three said that they would support the process, but only utilize the team for certain projects. When asked if they would support a pilot streamlining team, again all five respondents said yes. One mentioned that they would participate with a pilot process if the right incentives were there, specifically mentioning lowered fees. One respondent stated that they would support a pilot process but may not participate.

Other Findings

Table 2:
Other Collaborative Processes Identified in Interviews

Name of Streamlining Team/Process	Number of Interviewees that Said They Participate
Kaizen	4
Portland Harbor Superfund Group	3
Northwest Forest Plan	1
Lower Columbia River Estuarial Partnerships	1
Watershed Councils	1
Oregon Solutions	1
ODOT CETAS Group	1
City of Portland Pre-App Process (BDS)	1
Historic Landmarks Commission	1

Does your agency participate in/are you aware of any other streamlining processes?
(Question 12):

Current team members and private sector stakeholders were asked about their participation with any other coordinated review processes or streamlining teams, and their responses are synthesized together in the table below. Several members of the BES Streamlining Team are also members of the Kaizen process. The Kaizen group is a streamlining team, but includes a smaller number of permitting agencies, and covers primarily "larger" projects from around the state. Higher level managers sit on the Kaizen team, and invite in different permitting managers from their respective agencies depending on which project they are reviewing. Both public and private applicants can participate with Kaizen, but those we interviewed made it sound like there is a fairly high threshold, meaning the project must be very large and complex for the Kaizen team to agree to review it.

Additionally, several interviewees mentioned their involvement with the Portland Harbor Superfund group, which has a specific focus on brownfield properties along the Willamette River. Interviewees wondered about a potential partnership between the two groups. Involvement with other groups, such as the Oregon Solutions Group and the Northwest Forest plan were also mentioned. Although these are not specifically streamlining teams, the large number and wide variety of responses speaks to the idea that there are many other collaborative teams and processes that operate in Oregon.

BES Analysis of Permitting for Private Projects:

Interest about expanding the permit streamlining team was identified several years ago. In 2008, Mike Reed published a report of compiled data to show how many private sector projects had been permitted by the City (and state and federal agencies) over a period of time. Between March 2006 and May 2008, 10 public sector projects went through the streamlining team. During the same period of time 39 private sector permit applications went to the City as well. Of these 39 projects, 12 had the potential of needing state and federal permits as well. The volume of complex projects coming through the city is one piece of the equation to warrant an expanded team. Now that we know there are projects in the City that are suitable candidates for streamlining, we can turn to whether the demand for the team is there as well. Both aspects must be in place to warrant an expansion of the team.

APPENDIX 2: INTERVIEW QUESTIONS

Current Streamlining Team Members

_____   _____
Name   Date

Introductions and Background

Introduce ourselves.

We are interviewing you today on behalf of the Portland Bureau of Environmental Services and the Portland State University's Center for Public Service. The Center for Public Service is a part of PSU's Mark O. Hatfield School of Government. The Center for Public Service has been asked by BES to explore the creation of a coordinated permit review process for private project applicants similar to the process currently used for public projects. As part of our review, we have been going over pertinent documents and conducting interviews with people (like yourself) from the entire spectrum of this process. From what

we learn from these documents and interviews we will prepare a report and presentation for BES. Our goal is to objectively and accurately understand the opportunities and potential shortcomings of establishing a streamlining process for private projects to inform whatever decision the City of Portland ultimately makes. A large part of our understanding will come from these interviews and the information you share with us.

All information collected will be on a non-attribution basis. Our plan is to synthesize the results of the interviews and our research into a generalized summary of findings and conclusions. If we feel a particular comment or point you make is

Interview Questions

1. To begin, please explain your current job and role in the permit streamlining process:

2. What do you think we should know about the current streamlining process?

3. What works with the current streamlining process?

   a. Can these working attributes be easily transferred to a private streamlining process?

4. What is not working?

   a. How can those shortcomings (if any) be mitigated in a private project process?

5. If a private project streamlining process were to be established, where should be housed?

   a. With the current BES streamlining team?

   b. With a new team established within another bureau (state which bureau)?

   c. Other?

6. Would your organization participate in a streamlining process for private projects?

7. If a process for private project streamlining is established:

    a. Where are the major opportunities for success?
    b. What challenges do you see that would have to be overcome?

8. What risks, if any, do you foresee in establishing a private project streamlining process?
    Examples:

    O Risks to the jurisdictional integrity of agency permitting authorities.

    O Risk to the cooperative nature of the current streamlining team.

    O Risks to project costs and schedules.

    O Other risks?

9. How would you organize a private streamlining team?

    a. Which agencies should be members?
    b. What changes to the current process would be needed?

    c. What other changes to the current structure would be needed?

    d. How often should it meet?

    e. What operating protocols would you suggest?

10. What types of projects do you think would most benefit from a collaborative review under a private project streamlining process?

    a. Should the process be voluntary or mandatory?

11. How would participating in a second streamlining process affect your organization?

    a. Cost?

    b. Time?

    c. Impact on staff capacity?

    d. Other?

12. Does your agency participate in/are you aware of any other streamlining processes?

    a. If so, please describe.

13. Is there anything else we didn't touch on that you would like to add?

14. Who else would you recommend we talk to?

APPENDIX 3: INTERVIEW QUESTIONS

Private Sector Stakeholders

_____
Name   Date

Introductions and Background

Introduce ourselves.

We are interviewing you today on behalf of the Portland Bureau of Environmental Services and Portland State University's Center for Public Service. The Center for Public Service is a part of PSU's Mark O. Hatfield School of Government. The Center for Public Service has been asked by BES to explore the creation of a coordinated permit review process for private project applicants similar to the process currently used for public projects. As part of our review, we have been going over pertinent documents and conducting interviews with people (like yourself) from the entire spectrum of this process. From what

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All information collected will be on a non-attribution basis. Our plan is to synthesize the results of the interviews and our research into a generalized summary of findings and conclusions. If we feel a particular comment or point you make is

Interview Questions

15. To begin, please explain your current job and role in the permit streamlining process:

16. Open ended question: What are your thoughts or impressions regarding permitting or permit streamlining in general?

  a. What could be done to make the permitting process more efficient?

17. What types of permits typically apply to your organization's projects?

  a. How are permit consultations currently processed/handled?

  b. What experiences have you had with permitting agencies?

  c. What permitting agencies do you work with?

This is a short description of the current process the City uses for public sector projects:

  d. Representatives from federal, state, and city permitting agencies meet monthly to review upcoming projects.

  e. Project managers present their projects at the 10% (conceptual) design stage.

  f. The permitting agency representatives collaborate with the project manager and each other on design suggestions that would satisfy each agency's requirements.

g. Project managers must still complete consultations with individual agencies as the project progresses.

h. Project managers and process participants report significant savings in overall project completion times and corresponding project cost reductions, while permitting agencies are satisfied that their regulatory responsibilities are being satisfied.

18. Do you see any advantages for private sector developers for a process similar to the one described?

a. If so, what are they?

b. If not, please explain.

19. Do you see any risks for private sector developers in the process described?

a. If so, what are they?

b. If not, please explain.

20. What concerns would private sector developers have over a streamlining process?

21. Which of the following perspectives best fits your organization's strategic approach to permitting?

a. organization [does or would] benefit from a collaborative process that saves overall project completion time even if it risks a slightly higher regulatory burden.

b. My organization [does or would] benefit from strategically negotiating with each agency individually with the goal of reducing the overall regulatory burden even if it risks delays to project completion.

c. Other (please describe).

22. Would you support a streamlining process if implemented?

23. Would you support a pilot streamlining process if implemented?

24. Is there anything else that we haven't touched on that you think we should know for our assessment?

25. Is there anyone else that you think we should contact?

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