

# LRP Boundary Realignment Considerations

## Summary of Key Points and Strategic Impacts

Category	Impacts and Key Points
<b>Mission &amp; Efficiency</b>	Maintaining the current unit ensures the continued high-level execution of Executive Orders (i.e. energy emergency) and initiatives without the risk of transition failure.
<b>Fiscal Responsibility</b>	The taxpayer costs for reorganization have not been analyzed. Initiate a comprehensive financial impact study, pausing all physical realignment planning until this financial analysis is completed and presented to stakeholders.
<b>Personnel &amp; Retention</b>	Create a non-relocation guarantee where LRP and LRB staff remain at their current workstations, maintain job security that includes retention of pre-consolidation locality pay scale and balance of current career ladder opportunities (i.e. LRP has three (3) biologist and one future Division Chief position available for backfill). Continue open and transparent communication regarding implementation options with local unions.
<b>Stakeholder Impact</b>	Strong, existing relationships with Conservation Districts and State Agencies will be strained with the modification of common District practices. Realignment also complicates district communication, goals, and priorities. A unified concept of operations should be developed with all stakeholders that defines the new shared priorities, goals, and chains of communication, as to avoid external severance, internal misalignment, and degradation of efficiency and consistency to the public.
<b>Strategic Alternatives</b>	1) Modify Lead District Authority with Enhanced Administrative Coordination without reassigning staff. 2) Modify Lead District designation to allow LRP to assume jurisdiction of Ohio (assuming LRH then takes jurisdiction of WV) to meet the "one district per state" corporate goal. 3) Retain current leadership structure if LRP staff are reassigned to LRH (LRP staff still report to existing branch chiefs and division chiefs).

## Introduction

Based upon recent discussions between Pittsburgh District Regulatory (LRP) and Great Lakes and Ohio River Division (LRD) management, it is LRP's understanding that LRD has been given the directive to shift to a "one district per state" model. LRP's understanding is that the proposal is to designate the Huntington District (LRH) as the lead Regulatory authority for Ohio and West Virginia. Due to the Regulatory Program's complex and ever-evolving nature, to achieve consistency without operational disruption, the LRP Regulatory Team is providing this document to outline the concerns with this realignment strategy to assist leadership in making an informed decision.

**Bottom Line Up Front:** Overall, LRP's first preference would be to maintain the current district Regulatory boundaries to ensure uninterrupted mission success as well as the continued high-level execution of Executive Orders (i.e. addressing the energy emergency and initiatives). LRP's second preference, would be an administrative realignment. This would achieve consistency goals without the operational risks of geographical disruption —shifting our current structure directly under LRH command while maintaining our localized staff, pay scales, and workflows. Maintaining legacy field operations is critical due to stark regional contrasts (e.g., LRP and LRB's Great Lakes coastal expertise as well as LRP's Appalachian mining/natural gas knowledge). A decentralized execution model under a lead district per state command ensures top-level consistency while preserving vital, region-specific expertise.

Specifically, LRP Regulatory is asking for a non-relocation guarantee for career duration, retention of LRP locality pay scales, and preservation of our localized autonomous workflows and subject matter experts. We strongly recommend conducting a comprehensive cost-benefit analysis of the proposed boundary realignment to weigh the financial and personnel impacts against anticipated benefits. Finally, we urge consideration of the strategic alternatives outlined below, which accomplish the goal of increased consistency while avoiding the costs associated with reassignment.

## The Pittsburgh District Regulatory Team's Accomplishments

LRP is an award-winning workforce built on autonomy, strong leadership, and rapid lateral collaboration. This tight-knit structure enables the team to swiftly address and course-correct consistency issues inherent to an ever-evolving regulatory program.

Demonstrated Track Record:

- High Efficiency: 95% success on GPs issued within 60 days and 100% success on mitigation bank and in-lieu fee decisions.
- National Impact: Responsible for approximately 15% of National Energy Emergency Projects under E.O. 14156 and E.O. 14241 and active in national initiatives (National Regulatory Viewer (NRV), Regulatory Template Generator, Regulatory Request System (RRS)).

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- Recently Recognized Excellence: Multiple accolades including Commander Castle Awards (Lower Mon, EO 14156 Execution) and Commander District Coins (2026 NWP Execution).

While standard quantitative metrics track action volume, they fail to capture LRP's true operational tempo in a "water-rich" region. The team routinely navigates intricate, high-effort projects that demand heavy stakeholder relationship management. Furthermore, LRP's continuous efforts to streamline Pennsylvania's regulatory infrastructure actually reduce their raw metric counts on paper yet significantly enhance public service. This unique efficiency allows LRP to operate at a highly competitive level with much larger districts.

## General disadvantages of significant boundary changes

- Operational Disruption & Stakeholder Confusion: Physical boundary shifts will cause short-term confusion for applicants and the public, who are accustomed to working with specific districts for Civil Works and Section 408 requirements. Furthermore, this creates unnecessary disruption in regions (WV and LRP's jurisdiction in OH) where zero inefficiency complaints currently exist.
- Fiscal & Logistical Strain: Realignment requires significant, unanalyzed taxpayer costs for staffing, budget shifts, and field office realignments (inclusive of WRDA agreements). Additionally, if personnel relocation is proposed, it will severely increase travel costs and logistical strain to reach eastern OH and northern WV counties from Huntington.
- Personnel Tension: The Corps staff is already operating under high stress due to accelerated permitting timeframes established by executive orders and frequent changes in the regulatory environment. Potentially leading to a higher employee turnover rate which impairs efficiency.
- Loss of Diverse Perspective: Operating in one or many states without a partnering districts perspective could potentially lead a district to not recognize its own individual biases towards issues faced by state or federal partners and the general public. This has a great potential to lead to inconsistencies in maintaining a level nationwide regulatory program.

## Alternative Implementation Strategies for Consolidation

- **Alternative - Modify Lead District Authority with Enhanced Administrative Coordination** (Pittsburgh District Regulatory Team Preferred)

Concept: Maintain the current geographic boundaries and legacy staff footprints across LRB, LRP, and LRH, but unify processes and workflows under the designated Lead District.

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### Strategic Advantages:

- **Avoids Operational Disruption:** Prevents stakeholder confusion, preserves deeply established community/agency relationships, and avoids the estimated 2-year learning curve associated with geographic reassignments.
- **Respects Ecological Nuance:** Acknowledges that while a strong national framework exists, the stark ecological differences (Lake Erie coastline vs. Appalachian river basins) require dedicated, localized attention.
- **Standardized Workflows:** Develop a "Lead District SOP" that outlines permitting workflows and processes to be uniformly adopted by non-lead districts within the same state.
- **Targeted Guidance:** Develop and issue Regulatory Guidance Letters (RGLs) specifically to resolve identified inconsistencies.
- **Digital & Collaborative Integration:** Scale LRP's successful communication models across the division, including:
  - i. Open-forum MS Teams channels for real-time troubleshooting of scoping and mitigation issues (e.g., LRD Mitigation IRT chat).
  - ii. Adoption of a unified "Continuity Playbook" to model division-wide operations.
- **Alternative - Modify Lead District designation to allow LRP to assume jurisdiction of Ohio**

Concept: LRP assumes primary regulatory jurisdiction over all of Ohio, with legacy LRB and LRH staff in the state reporting directly to LRP. Simultaneously, LRH assumes full, consolidated jurisdiction over West Virginia areas within LRD. Enhanced program perspective and expertise to LRP through acquisition and realignment of previous LRH & LRB OH resources including staff, and field offices.

### Strategic Advantages:

- **Achieves Corporate Intent:** Fulfills the "one regulatory district per state" model while elevating LRP to a lead district status.
- **Optimizes Technical Capacity:** Enhances the capability of all three districts through the strategic redistribution of legacy staff and resources, rather than acquiring new personnel.
- **Preserves Localized Expertise:** Maintains critical regional knowledge by keeping legacy staff in their physical operating areas (e.g., retaining LRB's Great Lakes coastal expertise and LRP/LRH's Appalachian basin experience)

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- **Streamlines Stakeholder Coordination:** Reduces the varied regulatory bandwidth directed at partner agencies. In Ohio, a unified LRP voice may improve efficiency in handling OSAM, WQCs, and NWP reauthorizations. In West Virginia, LRH will gain the full latitude necessary to navigate shifting industry demands (e.g., transitioning from coal to oil & gas).

- **Proposed Reassignment to LRH**

Concept: To maintain mission continuity and fiscal responsibility during a transition to LRH leadership, LRD must implement formal administrative and personnel protections that preserve existing staff structures and localized expertise.

Strategic Advantages:

- **Fiscal Efficiency & Cost Avoidance:** Eliminates the need for costly Permanent Change of Station (PCS) relocations and prevents a drastic increase in travel time and expenses for routine site visits.
- **Maximum Talent Retention:** Protecting locality pay scales, duty stations, and career ladders prevents the attrition of highly trained Subject Matter Experts (SMEs), avoiding the severe sunk costs and delays associated with recruiting and training new personnel.
- **Seamless Mission Execution:** Maintaining localized supervisory structures and established Areas of Responsibility (AOR) ensures zero disruption to stakeholder relationships and eliminates the estimated 2-year learning curve associated with regional reassignments.
- **Labor & Legal Compliance:** Proactive union engagement and the continuation of Reasonable Accommodations mitigate the risk of labor disputes and ensure a smooth organizational transition.

Implementation Requirements:

- **Personnel Stability & Labor Relations:**
  - **Duty Station & Compensation:** Provide formal assurance that all reassigned LRP staff will maintain their current physical duty stations and legacy locality pay scales.
  - **Labor Coordination:** Immediately initiate open and transparent communication with local union representatives to integrate them into the implementation planning process.
  - **Accessibility:** Guarantee the seamless continuation and full support of all accessibility needs and approved Reasonable Accommodations for LRP staff operating under the new command.

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- Leadership & Career Progression:
  - Supervisory Continuity: Maintain the current leadership structure within the Pittsburgh office footprint, ensuring that reassigned staff continue to report directly to their localized supervisors.
  - FTE & Billets: Retain consistent Full-Time Equivalent (FTE) allocations and leadership positions within the physical Pittsburgh office to ensure career ladder opportunities can be backfilled locally.
  - Targeted Hiring: Mandate the consideration of localized, regional knowledge as a primary weighted factor in future hiring practices.
- Geographic & Logistical Efficiency:
  - Area of Responsibility (AOR): Maintain the current geographical AOR for staff based in Pittsburgh to leverage existing regional expertise and maintain rapid response times for complex or emergency actions.

## Conclusion

The Pittsburgh District Regulatory Team remains fully committed to enhancing the efficiency and effectiveness of the Regulatory program in alignment with our dynamic national mission. We recognize the increasing demand for transparency, predictability, and certainty in agency decisions. Accordingly, this evaluation was developed to ensure the program maintains its specialized expertise while prioritizing mission-focused outcomes—focusing on building infrastructure, not paperwork.

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