DEPARTMENT OF THE ARMY
PACIFIC OCEAN DIVISION, U.S. ARMY CORPS OF ENGINEERS
573 BONNEY LOOP, BUILDING 525
FORT SHAFTER, HAWAII 96858-5440

CEPOD-PDC (1105) 24 Aug 23

MEMORANDUM FOR Commander, Alaska Engineer District (CEPOA-PM-C/Erin Stockdale), P.O. Box 6898 JBER, AK 99506-0898

SUBJECT: Review Plan Approval for Atka Navigational Improvements Study, Integrated Feasibility Report and Environmental Assessment

1. References:

a. Engineering Regulation 1165-2-217, Civil Works Review Policy, 1 May 21.

b. Review Plan for Atka Navigational Improvements Study, Integrated Feasibility Report and Environmental Assessment (Encl 1).

c. CESAM-PD-D memorandum (Review Plan (RP) Endorsement, Atka Navigational Improvements Study, Integrated Feasibility Report and Environmental Assessment (EA)), 9 May 23 (Encl 2).

d. HQ POD, CEPOD-PDC memorandum (Delegation of Approval Authority for Review Plans for Civil Works Products), 6 Aug 22.

2. The Pacific Ocean Division (POD) is the lead office to execute this Review Plan. In accordance with Reference 1.d., the authority to approve POD Review Plans covering decision documents for Civil Works studies/projects has been delegated to the POD Director of Programs.

3. The Review Plan has been endorsed by the Deep Draft Navigation Planning Center of Expertise, as required by Reference 1.a. in lieu of the Small Boat Harbor Planning Sub-Center of Expertise to maintain the proper level of independence of the review. The Review Plan does not include an Independent External Peer Review or Safety Assurance Review.

4. I hereby approve this Review Plan, which is subject to change as circumstances require, consistent with work product development under the Project Delivery Business Process. Subsequent revisions to this Review Plan or its execution due to significant changes in the study/scope or level of review will require written approval from the POD Director of Programs.

5. POC is Mr. Russell Iwamura, Team Leader for Planning and Policy, Pacific Ocean Division, at 808-835-4625 or at Russell.K.Iwamura@usace.army.mil.

Encls

DAMON P. LILLY, SES
Director of Programs

REVIEW PLAN

Atka Navigational Improvements Study

Section 203 of the Water Resources Development Act (WRDA) of 2000

Integrated Feasibility Report and Environmental Assessment Atka, Alaska

Alaska District

MSC Approval Date: 24 August 2023

Last Revision Date: None

US Army Corps of Engineers ®

Decision Document Review Plan
Prepared: May 2023
Updated: September 2023

1. OVERVIEW

This review plan (RP) defines the scope and level of peer review for the following study:

- **Study Name:** Atka Navigational Improvements Study – Section 203 of the Water Resources Development Act (WRDA) of 2000, Atka, Alaska

- **P2 Number:** 495159

- **Decision Document Type:** Integrated Feasibility Report and Environmental Assessment (EA)

- **Project Type:** Single-purpose navigation (Small Boat Harbor), Tribal Partnership Program (TPP)

- **Specific, Measurable, Attainable, Risk-Informed, and Timely (SMART) Planning Status:** The study will require a 3x3 waiver for exceeding the 3-year limit by 9 months. HQ approval will also be required for the anticipated federal cost of $1.7 million, exceeding the $1.5 million federal cost study limit. The study is currently between the Alternatives Milestone and Tentatively Selected Plan Milestone. The project delivery team (PDT) has a clear and logical formulation and evaluation rationale. The PDT is identifying risks and making risk-informed decisions and has a clear direction on next steps to complete the study.

- **Congressional Approval Required (Yes/No):** Yes

- **District:** Alaska District (POA)

- **Major Subordinate Command (MSC):** Pacific Ocean Division (POD)

- **Review Management Organization (RMO):** Deep Draft Navigation Planning Center of Expertise (DDNPCX). The DDNPCX is the RMO instead of the Small Boat Harbor Planning Sub-Center of Expertise to maintain the proper level of independence and objectivity for the review of this study.

- **Review Plan Contacts:**

  - District Contact: POA Project Manager, 907-753-5621

  - MSC Contact: POD Planning and Policy Chief, 808-835-4625

- RMO Contact: DDNPCX Review Manager, 251-694-3842

2. KEY REVIEW PLAN DATES

KEY REVIEW PLAN DATES

Date of RMO Endorsement of Review Plan (RP)	09 May 2023
Date of MSC Approval of Review Plan	24 August 2023
Independent External Peer Review (IEPR) Exclusion	N/A
Date of Last Review Plan Revision	NONE
Date of Review Plan Web Posting	TBD
Date of Congressional Notifications	TBD

3. MILESTONE SCHEDULE

	Scheduled	*Actual*	*Complete*
Feasibility Cost Sharing Agreement (FCSA) Signed	*23 June 2022*	*23 June 2022*	*Yes*
Federal Funds Received		*4 Aug 2022*	*Yes*
Alternatives Milestone Meeting (AMM)	*19 Dec 2022*	*19 Dec 2022*	*Yes*
Tentatively Selected Plan (TSP) Milestone	*11 Sep 2024*		*No*
Initiate District Quality Control (DQC) of Draft	*01 Nov 2024*		*No*
Initiate Office of Counsel (OC) Legal Sufficiency Review of Draft	*13 Nov 2024*		*No*
Initiate Agency Technical Review (ATR) of Draft[1]	*21 Nov 2024*		*No*
Release Draft Report to Public	*21 Nov 2024*		*No*
Initiate Policy and Legal Compliance Review (P&LCR) of Draft	*21 Nov 2024*		*No*
Agency Decision Milestone	*25 Mar 2025*		*No*
Initiate District DQC of Final	*03 Jul 2025*		*No*
Initiate OC Review of Final[2]	*08 Aug 2025*		*No*
Initiate ATR of Final	*22 Sep 2025*		*No*
Complete OC Legal Certification Review of Final	*22 Nov 2025*		*No*
Final Report Transmittal	*25 Nov 2025*		*No*
P&LCR of Final	*04 Dec 2025*		*No*
Chief's Report	*30 Mar 2026*		*No*

[1] Draft report will be released after 60 days of TSP Milestone due to timing of H&H data availability. Additional time required for incorporation of data into economics appendix. Schedule coordinated with Vertical Team.

[2] OC will review interim products to streamline reviews of larger documents. These reviews are integral to the DQC process, even though the certification itself is a post-DQC task.

4. BACKGROUND

- **References:**

  - Engineer Regulation (ER) 1165-2-217, Civil Works (CW) Review Policy, 1 May 2021

  - Engineer Circular (EC) 1105-2-412, Assuring Quality of Planning Models, 31 March 2011

  - ER 1105-2-100, Planning Guidance Notebook, Appendix H, Policy Compliance Review and Approval of Decision Documents, Amendment #1, 20 November 2007

  - Director's Policy Memorandum (DPM) CW Programs 2018-05, Improving Efficiency and Effectiveness in USACE CW Project Delivery (Planning Phase and Planning Activities), 3 May 2018

  - Director of Civil Works (DCW) Memorandum, Revised Delegation of Authority in Section 2034(a)(5)(A) of the Water Resources Development Act of 2007 (WRDA 2007), as amended (33 U.S.C. 2343), 7 June 2018

  - Planning Bulletin (PB) 2018-01, Feasibility Study Milestones, 26 September 2018

  - Planning Bulletin (PB) 2018-01(S), Feasibility Study Milestones Supplemental Guidance, 20 June 2019

  - DPM 2019-01, Policy and Legal Compliance Review, 9 January 2019

  - Atka Navigation Improvements Study, Project Management Plan, March 2023

  - Pacific Ocean Division Civil Works Quality Management Plan, November 2022

- **Authority:** This study is being pursued via Section 203 of WRDA 2000, as amended by Section 1031(a) of the Water Resources Reform and Development Act (WRRDA) of 2014, and Section 1121 of the Water Infrastructure Improvements for the Nation Act of 2016 (WIIN/WRDA 2016), which provide authority for the Corps in cooperation with Indian tribes and heads of other federal agencies to carry out the Tribal Partnership Program, consisting of water-related planning activities, and activities related to the study, design, and construction of water resources development projects, that substantially benefit federally-recognized Indian Tribes and that are located primarily within Indian country or in proximity to Alaska Native Villages.

Section 1157 of WRDA 2018 and Section 303 of WRDA 2020 further amended Section 203 to authorize the Secretary to undertake design and construction of a water resources development project formulated under the Tribal Partnership Program that the Secretary determines to be feasible if the federal cost of the project or separable element is not greater than $18,500,000. If the federal cost of the project or separable element is greater than $18,500,000, the Secretary may only carry out the project or separable element if Congress enacts a law authorizing the Secretary to do so.

In accordance with Section 1156 of WRDA 1986, as amended, the Federal Government will waive up to the first $530,000 of study execution costs from study cost-share requirements. The $530,000 for the Section 1156 waiver is the amount in effect at the time of execution of the FCSA on 22 June 2022.The waiver amount is excluded from shared study costs and is funded with federal funds. The excluded amount is included in calculating the maximum federal study cost, which is $1.5 million absent approval of a higher amount.

- **Sponsor:** The non-federal sponsor is the Native Village of Atka. The original Letter of Intent received from the Sponsor is dated 12 June 2019; the following September the project was selected as a priority project under the Tribal Partnership Program. In a letter dated 8 July 2020, the Sponsor requested a deferment due to community concerns regarding the COVID-19 pandemic. The sponsor's commitment to providing the non-federal match for the project was later renewed via letter on 26 January 2022**.**

- **Type of Study:** Small Boat Harbor Feasibility Study

- **Project Area:** The Native Village of Atka is located on Atka Island within the Andreanof Island group of the western Aleutian Islands. It is 1,100 air miles from Anchorage and 90 Air miles east of the Native Village of Adak located on Adak Island. The project area is within the City of Atka in more protected waters south of the city between Atka and Bolshoi islands (Figure 1). The Native Village of Atka is a federally recognized tribe. Atka is in the heart of a productive fishing area**.** Traditional Food Activities- including fishing, hunting, and gathering- are an integral part of the cultural identity of the Native Village of Atka.

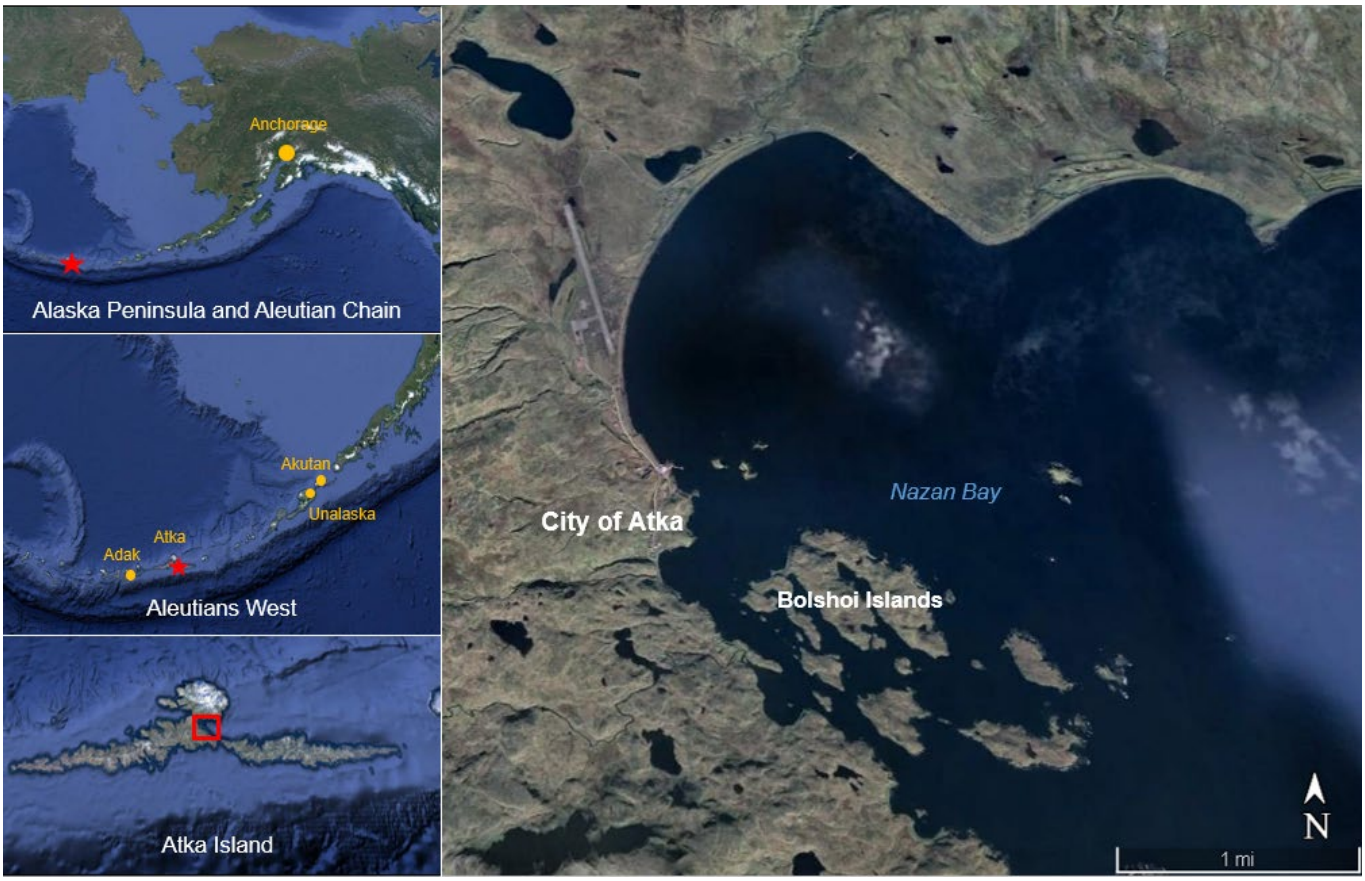

Figure 1. Location of Atka, Alaska

- **Problem Statement:** Limited marine infrastructure and protected moorage in Atka results in operational inefficiencies and vessel damages, reduced emergency response capacity, and missed traditional food activities and economic opportunities, threatening the long-term viability and cultural continuity of Atka.

Minimally protected natural moorage at Atka is found in Nazan Bay for large (> 100 ft. length) vessels that can moor with a wave climate up to 6 ft. Smaller vessels must be moved as storms pass to maintain safe moorage. Local vessels are limited to those that can be removed from the water as storms pass through.

Residents of the Native Village of Atka currently use small skiffs launched from the beach to access the resources in the waters of the protected Nazan Bay and the open Bering Sea. Skiffs are also utilized to support time-sensitive water-based traditional food activities, such as seeing a resource in the water from land and quickly mobilizing to seize the opportunity. Currently, commercial fishing boats are active in the local fishery. Members of the Native Village of Atka hold quota of halibut and sablefish which could be fully realized with the use of larger vessels.

Emergency response operations, including spill response and medevac, are significantly delayed due to the inability to house a large vessel capable of operating on

the open ocean. Currently, medical emergency response is restricted during extreme weather and dependent on the ability to operate aircraft.

Due to the lack of safe moorage, residents and commercial fishing interests are unable to take full advantage of the fishing abundance and traditional food activity-related opportunities in the area, therefore limiting economic opportunity. A small boat harbor at Atka has the potential to provide safe harbor for vessels seeking moorage during extreme weather conditions. Additionally, significant population decline due to limited economic opportunities threatens the continuity of traditional culture and values and decreases the Native Village of Atka's resilience to change. This study is intended to identify a feasible location and appropriate size for a small boat harbor that provides safe, reliable, and efficient navigation and mooring for local vessels and a fishing fleet with the goals of expanding usage and type of user groups in the Atka area; increasing emergency responses capabilities; and supporting the long-term viability of the Native Village of Atka.

- **Study Opportunities:**

  - Expand moorage capacity and improve launch, recovery, and storage conditions for skiffs/small boats.

  - Increase opportunities for harvest and improve access to water-based traditional food activities.

  - Encourage participation in and expansion of fishing-related economic development opportunities.

  - Increase recreation and tourism opportunities.

  - Reduce cost of living to the community.

  - Utilize Atka as a staging area for vessel response needs in the event of a marine disaster or oil spill.

  - Provide moorage for a vessel capable of getting to Adak for use when air travel is not possible due to weather or service.

  - Reopen the Atka Pride Seafood Processing Plant.

  - Reduce the cost of transportation from Atka Island to Dutch Harbor and Anchorage**.**

- **Study Goals and Objectives:**

  - Support the long-term viability of Atka.

- Reduce fishing costs to the existing and future local fleet at Atka.

- Provide improved access to local fisheries and improved response/recovery time for water-based traditional food activities.

- Provide safe, reliable, and efficient waterborne transportation systems for movement of commerce (including commercial fishing), traditional food activities, and marine emergency response.

- Promote economic growth by empowering residents to participate in the traditional fishing economy and attracting economic opportunities associated with the commercial fishing industry**.**

- **Study Constraints:** The universal constraints identified during the charette included**:**

  - Avoid or mitigate for Atka Island historic and cultural resources.

  - Avoid or mitigate for any impacts to environmental resources.

  - Two study-specific constraints were identified during the charette included:

    - Avoid negative impacts to existing commercial fisheries and traditional food activity resources.

    - Avoid or minimize impacts to critical infrastructure including access roads, docks, and the power plant in Atka**.**

- **Future Without Project Conditions:** The cultural identity of Alaska Native Tribes is highly dependent upon traditional food activities tied to specific locations and deep historical knowledge of land and water resources. Atka's economy is characterized as a mixed, subsistence-cash economy in which the traditional food activity and cash sectors are interdependent and mutually supportive. The ability to successfully participate in traditional food activities relies on the opportunity to earn some form of monetary income and access the resources needed to engage in traditional food activities. Without a safe and functioning harbor, economic opportunities in the community would continue to be hindered and the costs of essential goods would remain prohibitively high, contributing to continued out-migration from Atka.

- **Management Measures and Alternative Plans:** Both structural and nonstructural measures were considered to address study area problems. All structural measures were considered potentially applicable to any of the proposed harbor locations and were carried forward for the Atka Island study (Table 1). As the study progresses additional measures could be identified, and others could be screened out. Non-structural measures were initially screened with two not being carried forward for further consideration (Table 2).

Table 1. Structural measures and initial screening

Measures	Carried Forward (Yes/No)
General Navigation Features (GNF) – Structural	
Rubble mound breakwater	Yes
Floating breakwater	Yes
Dredging	Yes
Blasting	Yes
Entrance/Approach Channels	Yes
Aids to Navigation	Coast Guard
Local Service Facilities (LSF) - Structural	
Road	Yes
Harbor support facilities	Yes
Docks	Yes
Boat launch	Yes
Fish cleaning station	Yes
Moorage basin	Yes
Float system	Yes
Uplands	Yes

Table 2. Non-structural measures and initial screening

Non-Structural Measures-	Carried Forward (Yes/No)	Screening Comments
Meteorological equipment	No	Already locally available
Americans with Disabilities Act compliance	Yes	Assumes any harbor option will need
Procedural Control for harbor accessibility/limitation	Yes	Assumes any harbor option will need
Lightering	No	Deep water- lightering not necessary

- **Initial Array of Alternatives:** For this study, prior to developing alternative plans and measures, potential harbor locations needed to be identified. Potential harbor locations on the northeast side of Atka Island and near the City of Atka were identified. Six potential harbor locations, labeled A through F, were identified (Figure 2). This initial array of locations was screened by the PDT and community members resulting in two locations, the Old Village (A) and Chaliiluĝix̂ South (B) sites, being carried forward for further evaluation as summarized in Table 3.

Figure 2. Potential Harbor Locations Identified

- **Alternative 1: No Action Alternative**

- **Alternative 2: Old Village Site, Small Fleet Multi-Use Harbor**

The Old Village Site is closest to the village site, has an existing road, access to power and water, and is where most people currently launch skiffs from the beach. Based on the charette this is the location most preferred by the community. This site was carried forward into 2 alternatives of differing harbor size.

This alternative includes the smallest harbor necessary to meet the local needs of small skiffs and a fishing fleet. The small harbor is tentatively defined as a harbor with permanent moorage for at least 25 local skiffs and 10 58-ft. fishing vessels. GNF include a floating breakwater or rock breakwater with notch to allow for fish passage, turning basin and entrance channel. LSF needed include a moorage basin, power and water, boat ramp and fish cleaning station.

- **Alternative 3: Old Village Site, Large Fleet Multi-Use Harbor**

This alternative includes a large harbor at the Old Village Site designed to accommodate the largest fishing fleet. The large harbor was tentatively defined as a harbor with moorage for 35 local skiffs and 20 spots for vessels at 58-ft. for a fishing fleet and transient vessel moorage. GNF include a floating breakwater or rock breakwater with notch to allow for fish passage, moorage basin and entrance channel. LSF include power and water, boat ramp, fish cleaning station, upland kayak storage (a secure building with locks), repair station, and a harbor master office.

- **Alternative 4: Chaliiluĝix̂ South Site, Small Fleet Multi-Use Harbor**

The Chaliiluĝix̂ South Site is directly southeast of the Old Village Site but is not as easily accessible. There is a primitive road leading overland to the site, but no waterside road access. The access point to this site is steep, and this area has a high abundance of cultural artifacts. This site was carried forward due to the favorable depth in the water and the proximity to the village and separated into 2 alternatives of differing harbor size. This alternative includes the smallest harbor necessary to meet the local needs of small skiffs and a fishing fleet. The small harbor is tentatively defined as a harbor with moorage for at least 25 local skiffs and 10 58-ft. fishing vessels. GNF include a floating breakwater or rock breakwater with notch to allow for fish passage, turning basin and entrance channel. LSF needed include an access road, moorage basin, power and water, boat ramp and fish cleaning station.

- **Alternative 5: Chaliiluĝix̂ South Site, Large Fleet Multi-Use Harbor**

This alternative includes a large harbor at the Chaliiluĝix̂ South Site designed to accommodate the largest fishing fleet. The large harbor is tentatively defined as a harbor with permanent moorage for 35 local skiffs and 20 spots for vessels at 58-ft. for a fishing fleet and transient vessel moorage. GNF include a floating breakwater or rock breakwater with notch to allow for fish passage, turning basin and entrance channel. LSF include an access road, moorage basin, power and water, boat ramp, fish cleaning station, upland kayak storage (a secure building with locks), repair station, and a harbor master office.

- **Alternative 6: Chinixsax Site**

The Chinixsax site was initially considered for a harbor due to the perceived proximity to town and natural protection. This site was screened out at the charette due to the consistently shallow depths, high abundance of wildlife activity, primitive road access and lack of approach from the southeast direction. Community members stated that it is often impossible to even get a kayak into the site from the southeast approach; boats entering this harbor would have to enter and exit from the northern approach.

- **Alternative 7: Atka City Dock Site**

The Atka City Dock site is located on a primitive road 3.5 miles from the city of Atka. While this dock is currently operational for deliveries from Coastal Transportation, the community stated that the costs in transportation required to get to the location would deter most primary users of a small boat harbor. There was also a concern regarding the ability to call for help if needed due to the distance from town. The water is approximately 35 ft. deep at this location.

- **Alternative 8: Atka Pride Seafoods Dock Site**

The Atka Pride Seafoods Dock site was screened as an alternative harbor location but ruled out due to the primary function of the dock as servicing the Atka Pride Seafood Processing Plant. Increased boat traffic near the dock would hinder plant operations and cause congestion. While the plant is not open currently, the community categorized the reopening of the plant as a high priority and included the goal in a community development plan currently in draft form. Additional reasons for screening out the dock

include the proximity to a sewage outfall site, nearby rock reefs, big tidal swings, and dangerous swells.

- **Alternative 9: North Shore Site**

The north shore beach was discussed as a possible site for a small boat harbor but was quickly ruled out due to the consistent big swells, strong southerly wind, strong storms, and dangerous currents. The distance from the town, cost of fuel required to travel to this side of the island to launch skiffs, and lack of any existing infrastructure were also cited as reasons to screen out this location. The roads leading to the north shore site are primitive dirt roads, though community members mentioned that there is a plan to install a better road leading to the north shore. Currently, residents travel to the north shore site infrequently. Residents also noted that the community desire is to keep this site wild, as there is a high abundance of wildlife activity important to traditional food activities that need protection.

Table 3. Atka Island Harbor Location Screening Summary

Project Locations		Carried Forward (Yes/No)	Screening Comments
A	Old Village Site	Yes	• Closest site to town • Existing primitive road and power/water infrastructure • Close to a Native American Lands Environmental Mitigation Program site- environmental considerations • Cultural resource considerations • Marine mammals present • Likely larger waves than Chaliiluĝix̂ South and Chunixsax̂ sites
B	Chaliiluĝix̂ South Site	Yes	• Primitive, steep existing road with challenging site conditions; road insufficient for trailering boats • Cultural resource considerations • Possibility that breakwater not required (calmer wave environment) • Marine mammals present • No existing road to actual waterside site (steep grade road extension necessary)
C	Chunixsax̂ Site	No	• Very shallow, especially at low tide • Far distance from town • Long primitive road with challenging site conditions; road insufficient for trailering boats • Longer vessel approach distance from Nazan Bay (SE approach too shallow) • Many cultural resource concerns • High abundance of wildlife activity
D	Atka Pride Seafoods (APS) Dock	No	• Designated use for processing plant; if plant reopens a harbor would crowd area • High wave action and intense storms
E	Atka City Dock Site	No	• 3.5 miles from town- cost and logistics are deterrent for use
F	North Shore Site	No	• Long primitive road, far distance from town • High wave action and intense storms • High abundance of wildlife activity

- **Final Array of Alternatives:** Figure 3 and Figure 4 show preliminary design ideas for a small boat harbor at the Old Village Site (Alternatives 2 and 3) and the Chaliiluĝix̂ South Site (Alternatives 4 and 5), respectively**.**

- **Alternative 1: No Action Alternative**

- **Alternative 2: Old Village Site, Small Fleet Multi-Use Harbor**

This alternative includes the smallest harbor necessary to meet the local needs of small skiffs and a fishing fleet. Harbor with float or moorage system for at least 25 local skiffs and 10 58 ft. fishing vessels. GNF: floating breakwater or rubble mound breakwater with fish passage break, turning basin and entrance channel. LSF: access road, uplands, power and water, moorage basin, boat ramp and fish cleaning station.

- **Alternative 3: Old Village Site, Large Fleet Multi-Use Harbor**

This alternative includes a large harbor at the Old Village Site designed to accommodate the largest fishing fleet. Harbor with a float or moorage system for 35 local skiffs and 20 vessels at 58 ft. for a fishing fleet and transient vessel moorage. GNF: floating breakwater or rubble mound breakwater with fish passage break, turning basin and entrance channel. LSF: access road, uplands, power and water, boat ramp, fish cleaning station, upland kayak storage (a secure building with locks), moorage basin, repair station, and a harbor master office.

- **Alternative 4: Chaliiluĝix̂ South Site, Small Fleet Multi-Use Harbor**

This alternative includes the smallest harbor necessary to meet the local needs of small skiffs and a fishing fleet. Harbor with a float or moorage system for at least 25 local skiffs and 10 58 ft. fishing vessels. GNF: floating breakwater or rubble mound breakwater with fish passage break, turning basin and entrance channel. LSF: access road, uplands, power and water, moorage basin, boat ramp and fish cleaning station.

- **Alternative 5: Chaliiluĝix̂ South Site, Large Fleet Multi-Use Harbor**

This alternative includes a large harbor at the Chaliiluĝix̂ South Site designed to accommodate the largest fishing fleet. Harbor with float or moorage system for 35 local skiffs and 20 vessels at 58 ft. for a fishing fleet and transient vessel moorage. GNF: floating breakwater or rubble mound breakwater with fish passage break, turning basin and entrance channel. LSF: access road, uplands, power and water, boat ramp, fish cleaning station, upland kayak storage (a secure building with locks), moorage basin, repair station, and a harbor master office.

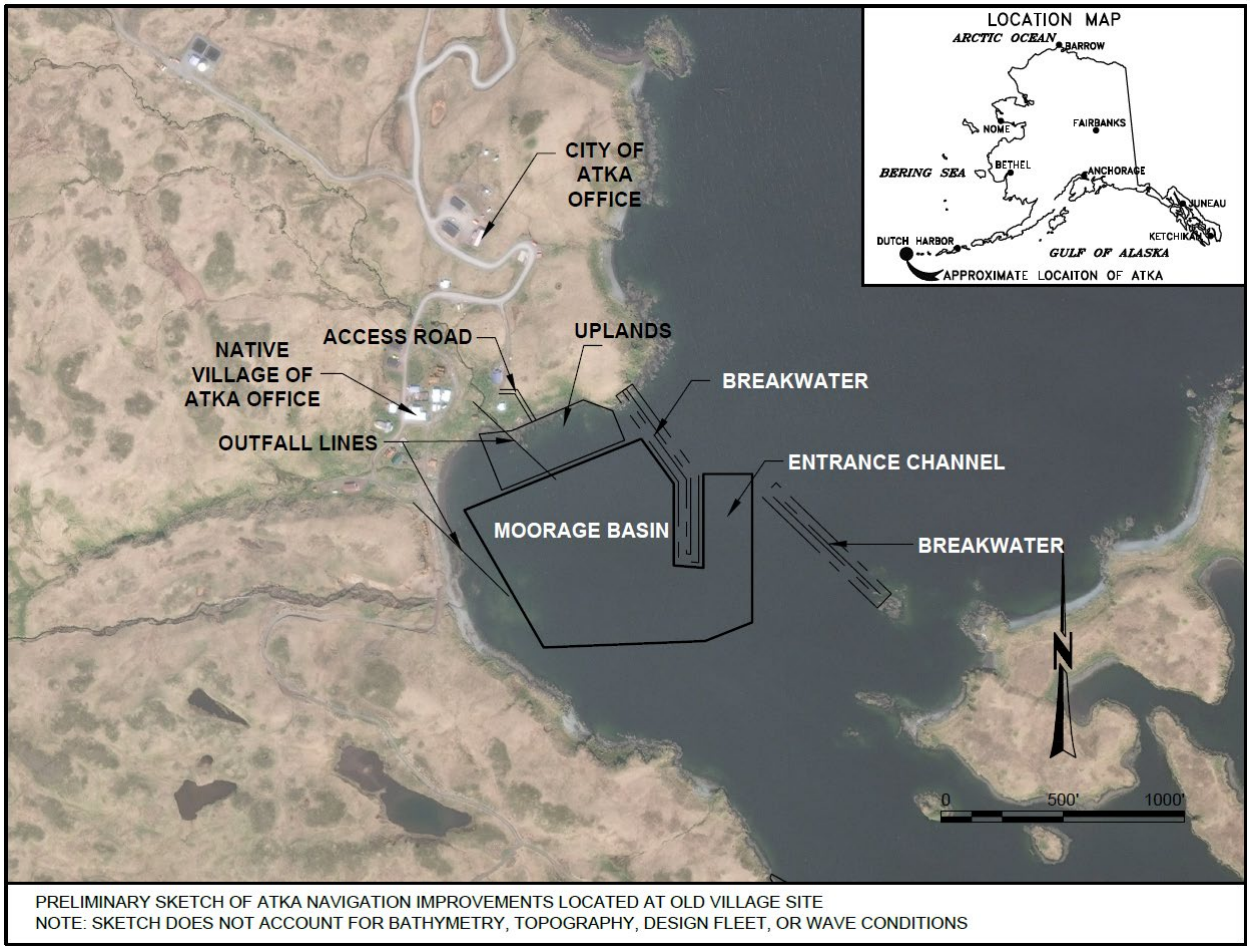

Figure 3. Preliminary sketch for a small boat harbor at the Old Village Site

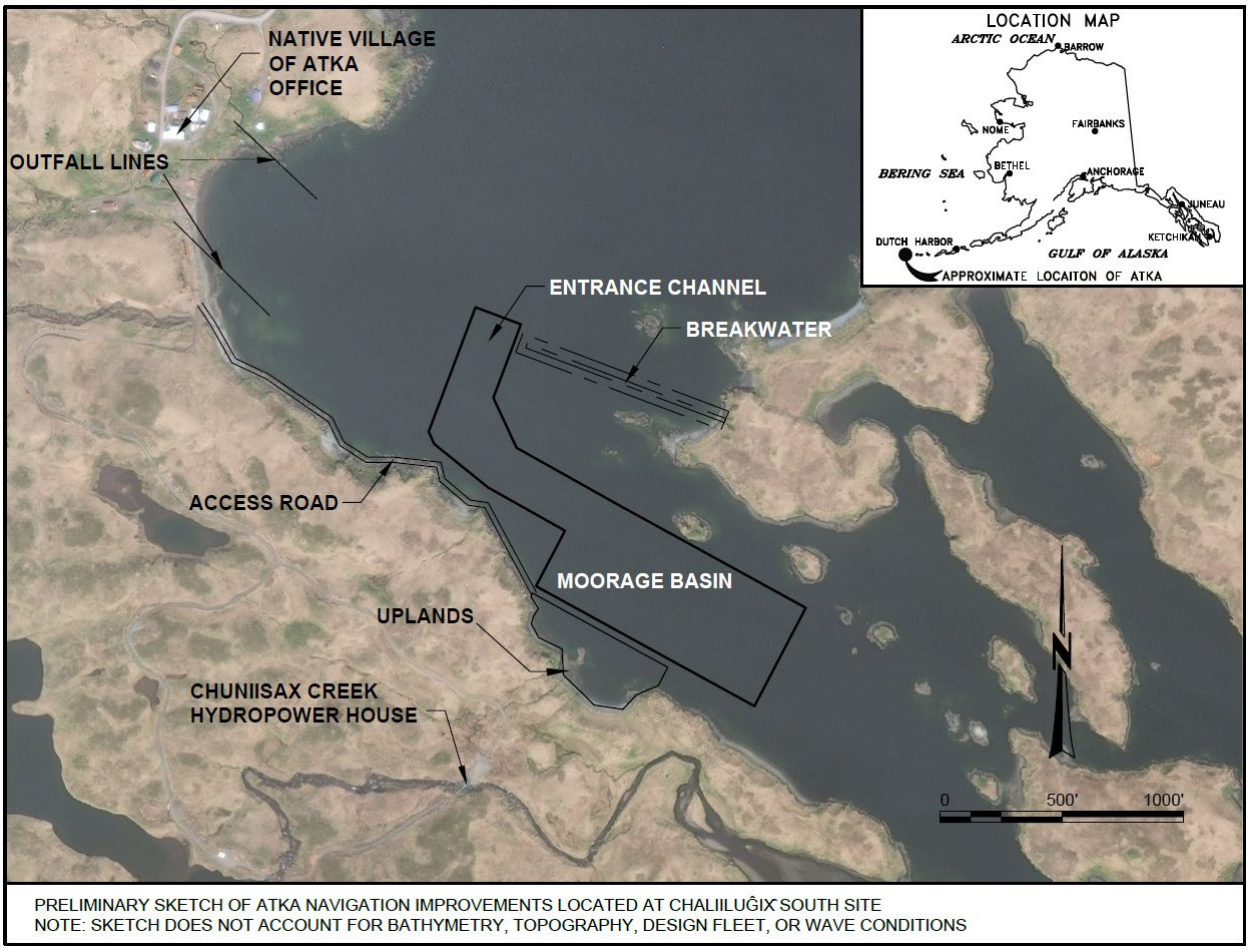

Figure 4. Preliminary sketch for a small boat harbor at the Chaliiluĝix̂ South Site.

- **Federal Interest:** This study evaluates alternative plans based on economic, engineering, environmental, and cultural resource factors under the authorities referenced above. Under Section 203 the alternative plans will be evaluated for federal interest based on benefits in the following categories**:**

  - **National Economic Development (NED)**

    - Traditional food harvest benefits

    - Potential increase in export of fresh fish product

  - **Regional Economic Development (RED)**

    - Corps of Engineers Regional Economic System (RECONS) model will be used to evaluate the increase in jobs and income generated from construction and support infrastructure around a SBH (wharf, services, lodging, charters)

- **Environmental Quality (EQ)**

  - Environmental impacts will be analyzed in cooperation with input from the environmental resource (ER) project development team (PDT) member.

  - Enhanced spill response from USCG (personnel and logistics resupply)

- **Other Social Effects (OSE)** will consider community viability, and health & safety including access to medical supply deliveries and reliable access to emergency medical care. OSE factors will include:

  - Real incomes (cost of living/standard of living)

  - Employment (stability and business climate)

  - Population (since 2018, Atka's population vulnerability designated "High" by National Oceanic and Atmospheric Administration Environmental Justice indicators)

  - Fiscal condition of Village/Aleutian Pribilof Island Community Development Association (revenues, better utilization of existing fishing programs)

  - Educational opportunities (keeping the school open)

  - Life, health, safety (more robust Medevac capabilities)

  - Increase in community's resilience to change

  - Continuity of traditional culture and activities

- **Dredged Material Management Plan:** Dredging methods will likely include mechanical dredging to remove sediment and rock debris created by blasting. Blasting is likely required to remove rock within the dredge prism and /or remove rock that represents an unacceptable navigation risk to vessels leaving or accessing the proposed harbor. It is anticipated that initial construction and maintenance dredged sediments will be placed in an open water site. A dredge material management plan will be required to identify the most cost effective and environmentally acceptable management method of the dredged material. Management of the dredged material will include consideration of beneficial use. Currently there are no in-water disposal or placement sites identified in the immediate area.

- **Risk Identification:** Conditions now or in the future are not expected to impose a significant threat to human life or the environment. Potential study risks presented below could impact study schedule and / or costs. These risks are further described in Section 5.B**.**

- Not enough is understood at this time to verify the management of the dredged material or the amount of blasting that will likely be required to construct the harbor.

- Limited to no cultural resource surveys have been conducted in the proposed project area. Archaeologists will conduct archaeological survey of the area that the proposed harbor will impact including Atka shorelines and nearby islands to identify any cultural resources. The presence of cultural resources has the potential to increase study and project implementation costs.

- Due to the marine construction requirement for this project and the classification of Nazan Bay as critical habitat for both Stellar sea lion and sea otter, it is likely that the construction of any project in Nazan Bay would include the destruction or adverse modification of critical habitat. Federal agencies are required to avoid "destruction" or "adverse modification" of designated critical habitat. POA will likely need to develop acceptable mitigation through consultation with U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS).

- Because blasting is a likely dredging requirement for this project, POA is concerned that compliance with consultation requirements in the Marine Mammal Protection Act (MMPA) and in the Endangered Species Act (ESA) may be delayed until Preconstruction Engineering and Design (PED). This is a study risk because when it is likely there are species covered under both the ESA and MMPA and there is a probable "likely to adversely affect" determination under ESA, the ESA regulations require the Services to confirm the take is authorized under MMPA before they may complete consultation under ESA.

- Weather delays in this remote and rugged area can negatively impact or delay data gathering and potentially influence the risk level tolerance. If the project moves forward without the field data and analysis, or with negative impacts (delays) to the study schedule and costs impact data acquisition, the risk to completion within the 3-year schedule will probably exceed the risk of having a technically unacceptable report without the data. Weather delays and impacts preventing data gathering will be tabulated and reported throughout the course of the study.

- There is no wave data for Nazan Bay, and data must be collected to determine specific harbor features required for the TSP milestone. Data must be collected over a 12-month period. This effort was initiated in the spring of 2023. Potential delays in data collection pose a schedule risk.

5. FACTORS AFFECTING THE SCOPE AND LEVEL OF REVIEW

A. **Is it likely that part(s) of the study will be challenging (ER 1165-2-217, paragraph 3.6.1)**? The project study does not have any significant technical, institutional, or social challenges. The study consists of evaluation of a range of small

boat harbor alternatives to increase vessel access to Atka and the surrounding fishery. Since ESA and MMPA species will likely be present in the project area and rock blasting is likely needed, formal consultation for Incidental Take Authorization (ITA) either as an Incidental Harassment Authorization (IHA) or a Letter of Authorization (LOA) will likely be needed. This consultation is challenging in that it requires obtaining the information needed to complete it that could delay the study schedule.

B. Provide a preliminary assessment of where the project risks are likely to occur and assess the magnitude of those risks (ER 1165-2-217, paragraph 3.6.1/3.6.2.2).

- Designation of a dredged material placement site will be required as part of the feasibility study. Not enough is understood at this time to verify the management of the dredged material or the amount of blasting that will likely be required to provide safe navigation. Coordination with regulatory agencies has already begun, and the risk level is assumed to be low and will be managed as the project progresses and more data is available.

- Limited to no cultural resource surveys have been conducted in the proposed project area, but an initial site visit and discussions with members of the community indicate that Atka Island has a large historic district. Archaeologists will conduct surveys of the project area to identify cultural resources; the presence of cultural resources has the potential to increase study and project implementation costs. The risk level is assumed to be medium. Early coordination with applicable agencies and affected tribes will be key to managing this risk.

- Consultation requirements in the MMPA and in the ESA may be delayed until the PED phase, which creates a policy risk due to ESA regulations as described above. The information necessary to obtain ITA, in the form of an IHA (effective up to 1 year) or a LOA (effective up to 5 years), under the MMPA includes very detailed construction information normally obtained during PED. Completing ESA consultation during the feasibility phase of a project would therefore require obtaining the necessary construction information earlier in the process, in the feasibility phase. The magnitude of the impact to study schedule is unknown, but the study delay could be as much as 0.5 to 1 year, or if the schedule or policy waiver are not approved the project may have to be terminated because the agency coordination due to the need for an ITA will be incomplete. This risk is assessed to be high and is considered an integral study risk.

- Weather delays in this remote and rugged area can negatively impact or delay data gathering and potentially influence the risk level tolerance. The weather delays are unpredictable and can result is a delay that is recoverable during a field season or result in a delay to the next year's field season. The magnitude could be a few days to a year. POA personnel have significant experience planning field work in the area, so this risk is assumed to be manageable. The magnitude of this risk is estimated to be medium.

- Wave data must be collected over a 12-month period. This effort was initiated in the spring of 2023. Potential delays in data collection pose a schedule risk. A fully resolved wave model will utilize updated Wave Information Study hindcast data to establish the model boundary condition and will use the Nazan Bay wave data to calibrate the results to ensure the physics is adequately estimated within the model. Once the model is calibrated, hindcast data can be used to establish 50-year design wave conditions for the future-without-project (FWOP) conditions and estimate wave heights within alternative harbors for the future-with-project (FWP) conditions. This risk is considered low, as data will be collected and made available in real time and will inform planning decisions as the study progresses.

C. **Is there a significant threat to human life associated with aspects of the study or failure of the project or proposed project (ER 1165-2-217, paragraph 3.6.2.2.2)?** The project improvements will be justified through a comprehensive benefits strategy and will not be justified by life safety. There are no significant threats to human life associated with either construction of the proposed improvements, operation, and maintenance of the proposed project, or with the project failure.

There is no residual risk to account for in this project due the fact that the project purpose does not address or directly affect human health and safety. This life safety assessment has been reviewed by the District Chief of Engineering and has his concurrence.

D. **Does/will the study/project have significant interagency interest (ER 1165-2-217, paragraph 3.7.2.2)?** The project is anticipated to have less than significant interagency interest. During development of the EA and in accordance with the requirements of all applicable federal environmental laws, POA will coordinate with the relevant state and federal resource agencies to address such interests. A set of charrette meetings was held on 2-4 November 2022, which did not generate significant public interest; public interest was typical of that usually encountered for a small boat harbor project.

Close coordination with natural resource agencies and tribes is typical and expected for projects in Alaska due to environmental and tribal resources of the region. In addition, no significant impacts have been identified at this point that would be expected to generate large-scale controversy.

E. **Is the estimated total cost of the project greater than $200 million (ER 1165-2-217, paragraph 6.4.1)?** No. The estimated total cost of the project, including mitigation costs, is expected to be in the range of $40-$75 million.

F. **Has the Governor of an affected state requested a peer review by independent experts (ER 1165-2-217, paragraph 6.4.2**)? No. There has been no request by the Governor of Alaska for peer review by independent experts and such a request is not anticipated.

G. **Has the Chief of Engineers determined that the project study is controversial due to significant public dispute over the size, nature, or effects of the project or the economic or environmental costs or benefits of the project (ER 1165-2-217, paragraph 6.4.3)?** The study/project is not likely to be controversial due to significant public dispute as to its size, nature, or effects of the project as the proposed project has community support.

The Corps will hold public meetings to discuss any public concerns associated with the proposed project throughout the duration of the feasibility study. During the public charette meetings held in Atka from 2-4 November 2022, no public concerns were raised. The Native Village of Atka is a Federally recognized tribe, and the District anticipates both informal and formal conversations regarding traditional food resources and other tribal concerns during this study.

H. **Has another agency requested IEPR due to significant environmental impacts (ER 1165-2-217, paragraph 6.5.1.1)?** No agency has requested an IEPR.

I. **Is the information in the decision document or anticipated project design likely to contain influential scientific information or be a highly influential scientific assessment – i.e., be based on novel methods, involve innovative materials or techniques, present complex challenges for interpretation, contain precedent-setting methods or models, or present conclusions that are likely to change prevailing practices (ER 1165-2-217, paragraphs 6.5.2 and 7.4.1.1)?** No. Project design and implementation techniques will be based on similar harbor projects in Alaska and are unlikely to be precedent setting, unique, or change prevailing practices.

J. **Will the study/project require an environmental impact statement (EIS) (ER 1165-2-217, paragraph 6.6.1)?** No. The PDT is currently assuming an EA will be sufficient under the National Environmental Policy Act (NEPA). This decision will continue to be evaluated as the study progresses. USACE assessment of the significance of the potential environmental impacts of the alternatives in the final array carried forward for analysis will determine if an EIS is necessary.

K. **Is the project expected to have more than negligible adverse impacts on scarce or unique tribal, cultural, or historic resources (ER 1165-2-217, paragraph 6.6.1.2)?** There are 22 known cultural resources near the project area. None are listed in the National Register of Historic Places (NRHP), 3 are eligible for the NRHP, 3 are not eligible for the NRHP, and 16 have not been evaluated for eligibility. The impact this project will have to these resources will continue to be evaluated as the study progresses. Once the access routes are identified and upland areas are defined, the Area of Potential Effects will be surveyed to determine impacts on historic properties and cultural resources in the area. The project area is not yet defined, and therefore, the need for and type of mitigation is unknown.

L. **Is the project expected to have substantial adverse impacts on fish and wildlife species and their habitat prior to the implementation of mitigation measures (ER 1165-2-217, paragraph 6.6.1.3)?** Yes, the PDT is assuming that blasting is necessary for project construction; therefore, prior to the implementation of mitigation measures, substantial adverse impacts to wildlife species (e.g., marine mammals) are expected. Impacts would cease post implementation. Environmental windows would be established and avoided as appropriate. Mitigation items will be outlined in the EA. Avoidance measures to be taken during project implementation will be included, if applicable, under the mitigation section of the EA. As noted, the PDT is assuming that all alternatives will require blasting until the analysis to inform this decision is complete (geophysical survey). If the analysis determines that blasting is not necessary, substantial adverse impacts on fish and wildlife and their habitat are not expected. As such, this RP and subsequent planning documents will continue to be revised as more geotechnical analysis becomes available.

M. **Is the project expected to have, before mitigation measures, more than a negligible adverse impact on an endangered or threatened species or their designated critical habitat (ER 1165-2-217, paragraph 6.6.1.4)?** Yes, the PDT is assuming that blasting is necessary for project construction; therefore, prior to the implementation of mitigation measures, the project is expected to have more than a negligible adverse impact on endangered or threatened species or their designated critical habitat. Impacts would cease post implementation. Environmental windows would be established and avoided as appropriate. Avoidance measures to be taken during project implementation will be included, if applicable, under the mitigation section of the EA. As noted, the PDT is assuming that all alternatives will require blasting until the geotechnical analysis to inform this decision is complete. If the analysis determines that blasting is not necessary, more than negligible adverse impacts to ESA-listed species or their critical habitat will not be expected. As such, this RP and subsequent planning documents will continue to be revised as more geotechnical analysis becomes available. The requirement to obtain an ITA (either IHA or LOA) is anticipated.

N. **Does the project study pertain to an activity for which there is ample experience within the USACE and industry to treat the activity as being routine (ER 1165-2-217, paragraph 6.6.2.2)?** Yes, the final integrated feasibility report and supporting documentation will contain standard engineering, economic, and environmental analyses, and information. The proposed project is for breakwater construction and dredging with the potential for blasting and will include the Federal Standard, or least cost, environmentally acceptable, technically feasible dredged material placement plan for which there is ample experience within the USACE and industry to be considered routine. Novel methods will not be utilized, and methods, models, or conclusions will not be precedent-setting or likely to change policy decisions.

6. REVIEW EXECUTION PLAN

This RP section provides a general description of each type of review and identifies the reviews anticipated for this study/project.

A. Types of Review

- **District Quality Control (DQC).** DQC is an internal review process of basic science and engineering work products focused on fulfilling the project quality requirements of the project management plan. All decision documents (including data, analyses, environmental compliance documents, etc.) undergo DQC review. Additionally, DQC of milestone submittals is required (PB 2018-01, PB 2018-01(S)).

- **Agency Technical Review (ATR).** ATR is performed to assess whether study/project analyses are technically correct and comply with USACE guidance and whether documentation explains the analyses and results in a clear manner. Further, the ATR team will ensure that proper and effective DQC has been performed (as assessment of which will be documented in the ATR report) and will ensure that the product is consistent with established criteria, guidance, procedures, and policy. ATR of the draft and final decision documents and supporting analyses is required (ER 1165-2-217, paragraph 5.3). Targeted reviews may be scheduled as needed. A site visit is not required for the ATR team.

- **Cost Engineering Review**. All decision documents will be coordinated with the Cost Engineering and ATR Mandatory Center of Expertise (MCX). The MCX will provide the cost engineering expertise needed on the ATR team and will provide certification of cost estimates. The RMO is responsible for coordinating with the MCX for cost reviews. Cost reviews may occur as part of the draft/final report ATRs but the schedule for specific reviews may also vary. Accordingly, the PDT should closely coordinate review related needs with both the MCX and RMO.

- **Independent External Peer Review (IEPR)**. IEPR may be required for decision documents under certain circumstances. IEPR is the most independent level of review and is applied in cases that meet criteria where the risk and magnitude of the proposed project are such that a critical examination by a qualified team outside of USACE is warranted. The PDT performs a risk-informed assessment whether IEPR is appropriate and documents that assessment/ recommendation in the RP (ER 1165-2-217, paragraph 6.5.2). Should IEPR be required, the RMO should be contacted at least three months in advance of the anticipated start of the concurrent review period to allow sufficient time to obtain contract services. If required, IEPR will be managed by an Outside Eligible Organization (OEO), external to USACE. Neither the public nor scientific or professional societies would be asked to nominate potential external peer reviewers.

- **Model Review and Approval/Certification**. EC 1105-2-412 provides the process and requirements for ensuring the quality of planning models. The EC mandates use of certified or approved planning models for all planning activities to ensure that planning products are technically and theoretically sound, compliant with USACE policy, computationally accurate, and based on reasonable assumptions

regarding the availability of data, transparent, and described in sufficient detail to address any limitations of the model or its use.

- **Quality Assurance Review (QA)**. CEPOD has responsibility for QA. QA includes verifying that the overall project quality control activities are effective in producing a work product that meets the desired end quality. QA activities include reviewing work performed by the District (including implementation of the DQC and ATR processes) and the ATR Team

- **Policy and Legal Compliance Reviews (P&LCR)**. All decision documents will be reviewed throughout the study process for compliance with law and policy. ER 1105-2-100 (Appendix H) and DPM CW/DCW memos, provide guidance on P&LCRs. These reviews culminate in determination whether report recommendations, supporting analyses, and coordination comply with law and policy and whether the decision document warrants approval or further recommendation to higher authority by the POD Commander.

- **Public Review**. POA will post the RMO endorsed and POD approved RP on the District's public website. Internet posting of the RP provides opportunity for the public to comment on that document. It is not considered a formal comment period, and there is no set timeframe for public comment. The PDT should consider any comments received and determine if RP revisions are necessary. During the public comment period, the public will also be provided with the opportunity to review and comment on the draft and final reports. Should IEPR be required, public comments will be provided to the IEPR panel for consideration**.**

B. Anticipated Project Reviews and Estimated Costs

Table 4 provides the estimated schedule and cost for reviews anticipated for this study.

Table 4: Atka Navigational Improvements Study, Atka, Alaska – Anticipated Reviews and Costs

Product to Undergo Review	Review	Start Date (MO/DA/YR)	End Date (MO/DA/YR)	Cost	Complete
Economic Spreadsheet Model	Approval for use	11/06/2023	01/08/2024	$22,500[3]	No
Pre-AMM Submittals	DQC	12/06/2022	12/13/2022	$5,000	Yes
Pre-TSP Milestone Submittals	DQC	08/14/2024	09/04/2024	$5,000	No
Draft Feasibility Report and EA	DQC	11/01/2024	11/12/2024	$55,700	No
	ATR[4]	11/21/2024	12/31/2024	$65,400	No
	Public Review	11/21/2024	12/31/2024	N/A	No
	IEPR	N/A	N/A	N/A	N/A
	P&LCR	11/21/2024	12/31/2024	N/A	No
H&H Model and Inputs	Targeted ATR	04/05/2024	04/25/2024	$10,000[5]	No
Pre-ADM Submittals	DQC	03/10/2025	03/18/2025	$20,000	No
Final Feasibility Report and EA	DQC	07/03/2025	07/18/2025	$32,500	No
	ATR	09/22/2025	10/22/2025	$ 65,400	No
	P&LCR	11/25/2025	01/05/2026	N/A	No
In-kind Products[6]	N/A	N/A	N/A	N/A	N/A
ATR Lead Participation in Milestone Meetings		As scheduled	As scheduled	$1,500	No

[3] Estimated cost is for a simple spreadsheet model; total cost could vary based upon model complexity.
[4] The basis for estimated ATR costs is provided in Attachment 2 of this RP.
[5] Estimated cost is for one reviewer.
[6] Products and analyses provided by non-Federal sponsors as in-kind services are subject to DQC, ATR, and IEPR. In-kind services will consist of the non-federal sponsor providing the PDT with access to sites to perform testing; therefore, reviews are not applicable.

C. District Quality Control

POA shall manage DQC and will appoint a DQC Lead to oversee that review (ER 1165-2-217, paragraph 4.4.2).

- **Review Team Expertise.** Table 5 identifies the required expertise for the DQC team.

Table 5**.** Expertise required for the DQC team

DQC Team Disciplines	Expertise Required
DQC Review Lead	The DQC Review Lead should be a senior professional who has no production role in the work product. with extensive experience preparing CW decision documents and conducting DQC,. The lead may also serve as a reviewer for a specific discipline (such as planning, economics, environmental resources, etc.).
Plan Formulation	A senior water resources planner with experience in harbors and SMART Planning.
Economics[1]	A senior economist with experience with harbors and mixed subsistence-cash economies. The reviewer should also have familiarity with the economic models identified in Table 7.
Environmental Resources	Expertise in evaluating the impacts associated with harbors, dredged material placement, and beneficial use options. Should also be experienced with environmental coordination, NEPA requirements, ESA requirements, MMPA, and the unique needs and lifestyles of subsistence communities.
Cultural Resources	Expertise in evaluating the impacts associated with harbors and dredging, as well as familiarity with environmental coordination and NEPA/National Historic Preservation Act (NHPA).
Hydrology, Hydraulics and Coastal (HH&C) Engineer	Expert in the field of coastal hydraulics and have a thorough understanding of analyses of winds, waves, currents, hydrodynamic-salinity, harbor/channel design, and breakwater construction. A registered professional engineer is recommended. The reviewer should also have familiarity with the HH&C models identified in Table 8. The HH&C Engineer is anticipated to complete the Climate Preparedness and Resilience DQC review.
Geotechnical Engineer/Geologist	Experienced in geotechnical investigation practices including soil classification, the design of breakwater foundations, and the classification of rip rap and core materials for suitability in use of breakwater construction. A registered, professional engineer is recommended.
Cost Engineer	Familiar with cost estimating using the Microcomputer Aided Cost Engineering System (MCACES) model and preparation of an MII Cost Estimate. The reviewer will be Certified Cost Technician, Certified Cost Consultant, or Certified Cost Engineer. The reviewer should also have familiarity with the cost engineering models identified in Table 8.
Real Estate	The real estate reviewer will be experienced in Federal CW real estate law, policy, and guidance, development of Real Estate Plans for CW studies, particularly regarding tribal lands, village corporation lands and regional corporation lands, and application of navigational servitude.

[1]The economics DQC team member will be identified by the DDNPCX (OPORD 2012-15).

- **Documentation of DQC**. Quality Control should be performed continuously throughout the study. DrChecks software will be used to document DQC review comments, responses, and issue resolution. Certification of DQC completion is required at the draft and final report stages. Documentation of DQC should follow the District Quality Manual and the MSC Quality Management Plan. An example DQC Certification statement is provided in ER 1165-2-217 (Appendix D).

- Documentation of the completed DQC review (i.e., all comments, responses, issue resolution, and DQC certification) will be provided to the MSC, RMO, and ATR Team leader prior to initiating an ATR. The ATR team will assess the quality of the DQC performed and provide a summary of that assessment in the ATR report. Missing or inadequate DQC documentation can result in the start of subsequent reviews being delayed (ER 1165-2-217, paragraph 5.2.2).

D. Agency Technical Review

- ATR is mandatory for draft and final decision documents and supporting analyses (ER 1165-2-217, paragraph 5.3). The RMO will manage the ATR. ATR will be performed by a qualified team from outside POA that is not involved in the day-to-day production of the project/product. ATR will be performed by a team whose members are certified or approved by their respective Communities of Practice (CoPs) to perform reviews. The RMO will identify an ATR lead and ATR team members. Neither POA nor POD will nominate review team members. The ATR team lead will be from outside POD. The ATR team lead is expected to participate in the study's milestone meetings (PB 2018-01**).**

- **Review Team Expertise.** Table 6 identifies the anticipated disciplines and ATR team expertise required for study efforts.

Table 6: Required ATR Team Expertise

ATR Team Disciplines	Expertise Required
ATR Lead	The ATR lead will be a senior professional with extensive experience preparing CW decision documents and conducting ATR. The lead should have the skills to manage a virtual team through an ATR. The lead may serve as a reviewer for a specific discipline (e.g., plan formulation, economics, etc.).
Plan Formulation	The plan formulation reviewer should be a senior water resources planner with experience in leading a team through a small boat harbor study and analysis of dredged material placement requirements.
Economics	A senior economist with experience evaluating small boat harbor improvements and mixed subsistence-cash economies. The reviewer should have expertise with the types of economic models identified in Table 7.
Environmental Resources	Expertise in evaluating the impacts associated with harbors and dredged material placement/ beneficial use options. Should also be experienced with environmental coordination, NEPA requirements, ESA requirements, MMPA, and the unique needs and lifestyles of subsistence communities.
Cultural Resources	Expertise in evaluating the cultural impacts associated with harbors and dredging, as well as familiarity with environmental coordination and NEPA/NHPA.
HH&C Engineer	Expert in the field of coastal hydraulics and have a thorough understanding of analyses of winds, waves, currents, hydrodynamic-salinity, harbor/channel design, and breakwater construction. A registered professional engineer is recommended. The reviewer should also have expertise with the HH&C engineering models identified in Table 8.
Geotechnical Engineer / Geologist	Experienced in geotechnical investigation practices including soil classification, the design of breakwater foundations, the classification of rip rap and core materials for suitability in use of breakwater construction, and dredged material placement, including beneficial use. A registered professional engineer is recommended.
Cost Engineer	Familiar with cost estimating using the MCACES model and preparation of an MII Cost Estimate. The reviewer will be Certified Cost Technician, Certified Cost Consultant, or Certified Cost Engineer. Coordination with the Cost Engineering MCX will be required for their selection of the cost engineering reviewer and to obtain Cost Engineering MCX certification of the cost estimate. The reviewer should also have expertise with the cost engineering models identified in Table 8.
Real Estate	The real estate reviewer will be experienced in Federal CW real estate law, policy, and guidance, development of Real Estate Plans for CW studies, particularly in regard to application of navigational servitude.
Climate Preparedness and Resilience/ HH&C Reviewer	A member of the Climate Preparedness and Resiliency CoP or a HH&C Climate reviewer will participate on the ATR team.

- **Documentation of ATR.** DrChecks will be used to document ATR comments, responses, and issue resolution. Comments should be limited to those needed to ensure product adequacy. All members of the ATR team should use the four-part comment structure (ER 1165-2-217, paragraph 5.8.3). If a concern cannot be resolved by the ATR team and PDT, it will be elevated to the vertical team for resolution using the issue resolution process identified in ER 1165-2-217. The comment(s) can then be closed in DrChecks by noting the concern has been elevated for resolution. The ATR Lead will prepare a Statement of Technical Review Report (ER 1165-2-217, paragraph 5.11), for both draft and final decision documents. Any unresolved issues will be documented in the ATR report prior to certification. The Statement of Technical Review (ATR completion) includes signatures from the ATR Lead, Project Manager, and RMO, and the Certification of ATR includes signatures from the District's Chiefs of Engineering and Planning Divisions**.**

E. Independent External Peer Review

- **Decision on IEPR.** IEPR is managed outside of USACE and is typically conducted on studies. IEPR panels assess the adequacy and acceptability of the economic and environmental assumptions and projections, project evaluation data, economic analysis, environmental analyses, engineering analyses, formulation of alternative plans, methods for integrating risk and uncertainty, models used in the evaluation of environmental impacts of proposed projects, and biological opinions of the project study**.**

- Based upon the criteria identified in ER 1165-2-217 the PDT's risk informed assessment that the study/project does not warrant IEPR is based upon the following, as documented in detail in Section 5 of this RP**:**

  - Mandatory Decision - The decision document does not meet any of the mandatory conditions or triggers for an IEPR (paragraph 6.4, Figure 6.1 of ER 1165-2-217): the total project cost will be less than the $200M trigger and will likely be from $40M to $75M;the Governor of Alaska has not requested peer review by independent experts; and the Chief of Engineer's has not determined that the project study is controversial due to significant public dispute over either the size, nature, or effects of the project or the economic or environmental costs or benefits of the project**.**

  - Discretionary Decision (ER 1165-2-217, paragraph 6.5.1) – There have been no requests for an IEPR to be conducted from heads of federal or state agencies charged with reviewing the project**.**

  - Risk Informed Decision (ER 1165-2-217, paragraph 6.5.2) - Conducting an IEPR would not substantially benefit or add value to the project study. The project: has minimal life safety risks; will not be novel, controversial, or precedent setting; does not have significant interagency interest or significant economic, environmental and social effects to the Nation; and will include evaluations for which there is ample experience within USACE and can be considered as routine.

F. Safety Assurance Review

- **Decision on Safety Assurance Review.** Safety Assurance Review (SAR) is managed outside of the USACE and is performed on design and construction activities for any project where potential hazards pose a significant threat to human life. For SARs, a panel is convened to review the design and construction activities before construction begins and periodically thereafter until construction activities are completed.

  - The District Chief of Engineering has assessed this navigation project and determined that it DOES NOT meet the criteria for conducting a SAR**:**

    - The Federal action is not justified by life safety and failure of the project will not pose a significant threat to human life;

    - The project does not involve the use of innovative materials or techniques where the engineering is based on novel methods, it does not present complex challenges for interpretations, does not contain precedent-setting methods or models, and does not present conclusions that are likely to change prevailing practices;

    - The project design does not require redundancy, resiliency, or robustness; and

    - The project does not have unique construction sequencing or a reduced or overlapping design construction schedule**.**

    - The SAR determination will be revisited and confirmed prior to initiating the design phase and documented in the PED phase Review Plan.

G. Model Certification or Approval

EC 1105-2-412 mandates the use of certified or approved models for all planning activities to ensure the models are technically and theoretically sound, compliant with USACE policy, computationally accurate, and based on reasonable assumptions. Planning models are any models and analytical tools used to define water resources management problems and opportunities; to formulate potential alternatives to address study area problems and take advantage of opportunities; to evaluate potential effects of alternatives; and to support decision making. The use of a certified/approved planning model does not constitute technical review of a planning product. The selection and application of the model and assessment of input and output data is the responsibility of the users and is subject to DQC, ATR, and IEPR (if required). The following models may be used to develop the decision document.

Table 7: Planning Models

Model Name/Version (Discipline)	Brief Model Description and How It Will Be Used in the Study	Certification / Approval
IWR-Planning Suite II, v. 2.0.9 (Economics)	IWR-Planning Suite is a water resources investment decision support tool originally built for the formulation and evaluation of ecosystem restoration alternative plans; however, it is now more widely used by all USACE business lines for evaluation of actions involving monetary and non-monetary cost and benefits. This model will be utilized to conduct Cost Effectiveness/Incremental Cost Analysis (CE/ICA), if needed.	Certified
Regional Economic System (RECONS) (Economics)	RECONS is a regional economic impact modeling tool that estimates jobs, income, and sales associated with Corps CW spending and additional economic activities. The model will be used to estimate the regional economic impacts of project implementation.	Certified
SBH Spreadsheet Model (Economics)	Spreadsheet model may be used to quantify and annualize benefits not captured in other models (i.e., SBH Simulation Model, RECONS)	Single Use Approval will be required.
Geospatial Suitability Index (GSI) Toolbox (ER)	This toolkit is intended primarily for USACE ecosystem restoration planning; however, index models are also often applied for impact assessment, compensatory mitigation, and wetland regulatory issues. A multi-criteria index model of an ecosystem defining the quality of suitable habitat. Habitat suitability is defined as an index score from 0-1, where 0 is less suitable habitat and 1 is most suitable. The assignment of scores is based on individual parameter values and suitability index tables developed from peer-reviewed literature, expert opinion, or existing USACE certified models.	Certified

EC 1105-2-412 does not address engineering models used in planning. The responsible use of well-known and proven USACE developed and commercial engineering software will continue. The professional practice of documenting the application of the software and modeling results will be followed. The USACE Scientific and Engineering Technology Initiative has identified many engineering models as preferred or acceptable for use in studies. These models should be used when appropriate. The selection and application of the model and the input and output data is the responsibility of the user and is subject to DQC, ATR, and IEPR (if required). The following models may be used to develop the decision document.

Table 8: Engineering Models

Model Name and Version (Discipline)	Brief Model Description and How It Will Be Used in the Study	Model Certification / Acceptance Status
STWAVE – Steady State Spectral WAVE (HH&C)	STWAVE simulates depth-induced wave refraction and shoaling, current-induced refraction and shoaling, depth- and steepness-induced wave breaking, diffraction, parametric wave growth because of wind input, and wave-wave interaction and white capping that redistribute and dissipate energy in a growing wave field. The model will be used when designing the harbor and entrance channel to ensure all engineering requirements are met.	CoP Preferred
Channel Design and Evaluation Tool (CADET) (HH&C)	Probabilistic risk analysis techniques to evaluate the accessibility of channel reaches for multiple vessel geometries, loading, and wave conditions.	CoP Preferred
MCACES, MII (Cost Engineering)	MCACES is the cost estimating software program tools used by cost engineering to develop and prepare Class 3 CW cost estimates.	CW Cost Engineering and ATR MCX mandatory
Abbreviated Risk Analysis, Cost Schedule Risk Analysis (Cost Engineering)	Cost risk analyses identify the amount of contingency that must be added to a project cost estimate and define the high-risk drivers. The analyses will include a narrative identifying the risks or uncertainties. During the alternative's evaluation, the PDT will assist the cost engineer in defining confidence/risk levels associated with the project features within the abbreviated risk analysis. For the Class 3 estimate, an evaluation of risks will be performed using Crystal Ball Cost Schedule Risk Analysis for construction costs over $40 million or the Abbreviated Risk Analysis for projects under $40 million.	CW Cost Engineering and ATR MCX mandatory
Total Project Cost Summary (TPCS) (Cost Engineering)	The TPCS is the required cost estimate document that will be submitted for either division or HQUSACE approval. The Total Project Cost for each CW project includes all Federal and authorized non-Federal costs represented by the CW Work Breakdown Structure features and respective estimates and schedules, including the lands and damages, relocations, project construction costs, construction schedules, construction contingencies, planning and engineering costs, design contingencies, construction management costs, and management contingencies.	CW Cost Engineering and ATR MCX mandatory
Corps of Engineers Dredge Estimating Program (CEDEP) (Cost Engineering)	CEDEP is the required software program that will be used for dredging estimates using floating plants. CEDEP contains a narrative documenting reasons for decisions and selections made by the cost engineer. Software distribution is restricted as it is considered proprietary to the Government.	CW Cost Engineering and ATR MCX mandatory

H. Policy and Legal Compliance Reviews

In accordance with DPM CW 2018-05, P&LCRs for draft and final planning decision documents are delegated to the MSC responsible for the execution of the study.

With input from MSC and Headquarters, USACE (HQUSACE) functional leaders and through collaboration with the Chief of Office of Water Project Review (OWPR), the MSC Chief of Planning and Policy is responsible for establishing a competent interdisciplinary P&LCR team (DPM 2019-01). The composition of the policy review team will be drawn from HQUSACE, the MSC, the Planning Center of Expertise (PCX), and other review resources as needed. The identification of Counsel members will follow the procedures set forth by the HQUSACE Chief Counsel, as coordinated by HQUSACE and MSC Counsel functional leaders. The MSC Chief of Planning and Policy and the Chief of OWPR will collaborate to identify and endorse a P&LCR Manager from among the P&LCR team identified for the study. The manager may be a MSC, PCX, or HQUSACE employee. The team is identified in Attachment 1 of this RP.

The P&LCR team will:

- Provide advice and support to the PDT and decision makers at the District, MSC, HQUSACE, and Assistant Secretary of the Army (CW) levels.

- Engage at both the MSC and HQUSACE levels, ensuring that the vertical teaming aspect of SMART planning is maintained.

- Help guide PDTs through project development and the completion of policy and legally compliant documents, identifying policy and legal issues as early as possible such that issues can be addressed while minimizing impacts to study and project costs and schedules.

- Provide impartial and unbiased recommendations, advice, and support to decision makers.