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

23 November 2022

CEPOD-PDC (1105)

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

SUBJECT: Review Plan Approval for Akutan Harbor 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 Akutan Harbor Navigational Improvements Study, Integrated Feasibility Report and Environmental Assessment (Encl).

c. 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.c., the authority to approve POD Review Plans covering decision documents for Civil Works studies/projects has been delegated to the POD Director of Programs. The Review Plan does not include an Independent External Peer Review or Safety Assurance Review.

3. 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.

4. 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.

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Encl

DAMON P. LILLY, SES
Director of Programs

# REVIEW PLAN

## Akutan Harbor Navigational Improvements Study
## Section 203 of the Water Resources Development Act of 2000
## Akutan, Alaska
## Integrated Feasibility Report and Environmental Assessment

## Alaska District

**MSC Approval Date: 23 Nov 2022**
**Last Revision Date: None**



US Army Corps of Engineers ®

# REVIEW PLAN

Prepared: 18 July 2022
Updated: 29 November 2022

## 1. OVERVIEW

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

- **Study Name and Overview:** Akutan Harbor Navigational Improvements Study – Section 203 of the Water Resources Development Act of 2000, Akutan, Alaska. The study is examining options for transporting people and freight between the City of Akutan and the the Akutan airport, located seven miles away on Akun Island. The present mode of transport is by helicopter. The study is examining options, such as building a protected landing on Akun for use by a water taxi/ferry, to obtain a more practicable solution.

- **P2 Number:** 495160**.**

- **Federal Project:** N/A, the new project is not an improvement to an existing Federal project.

- **Decision Document - Type:** Integrated Feasibility Report and Environmental Assessment.

- **Project Type:** Single-purpose navigation (Small Boat Harbor).

- **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).

- **RP Contacts:**

  - **District:** POA Project Manager, 907-753-5621.

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

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

## 2. KEY REVIEW PLAN DATES

| Action | Date - Actual[1] |
|---|---|
| RMO Endorsement of RP | 29 Jul 22 |
| MSC Approval of RP | 23 Nov 22 |
| Independent External Peer Review Exclusion Approval | N/A |
| Has RP changed since PCX endorsement? | N/A |
| Last RP revision[2] | N/A |
| RP posted on District Website | pending |
| Congressional notification[3] | pending |

*[1]Date action occurred or 'pending' if not yet approved*
*[2]Enter 'none' if no updates have been made since approval*
*[3]Date RIT notified Congress of IEPR decisions*

## 3. MILESTONE SCHEDULE

| Action | Date - Scheduled | Date – Actual | Status – Complete? |
|---|---|---|---|
| Feasibility Cost Sharing Agreement Signed | 19 Jul 2021 | 19 Jul 2021 | Yes |
| Alternatives Milestone Meeting (AMM) | 15 Mar 2022 | 15 Mar 2022 | Yes |
| Tentatively Selected Plan (TSP) | 21 Apr 2023 | | No |
| Release Draft Report to Public | Jun 2023 | | No |
| Agency Decision Milestone (ADM) | Oct 2023 | | No |
| Final Report Transmittal to MSC | Apr 2024 | | No |
| Chief's Report | Jul 2024 | | No |

## 4. BACKGROUND

- **RP 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.

- Quality Management System (QMS) 100.1 POD Regional Quality Management Plan, 10 March 2017.

- POA 7.1-11 POA Study Quality Management, 1 March 2018.

- District Quality Control of Civil Works Decision Documents,CEPOA-CW-6.1-2-WI-01, Updated 22 March 2016.

- Akutan Harbor Navigation Improvements Project Management Plan.

- **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) 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 Sections 135 and 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 carry out the project or separable element.

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 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.

Implementation guidance for Section 1031(a) of WRRDA 2014 and Section 1121 WRDA 2016, Tribal Partnership Program, was issued on 5 February 2018. Section 203 as originally enacted in WRDA 2000 provided that cost share agreements for such

studies are subject to the ability of a Tribe to pay, as determined by the Secretary of the Army in accordance with procedures established by the Secretary. Consequently, after application of the Section 1156 waiver, the non-federal share may be further reduced by applying a factor of 25 percent to the regular non-federal share if requested by the Tribe, and the average per capita income is below the defined threshold. Confirmation if the Native Village of Akutan (Tribe) meets the ability to pay criteria is ongoing and will be determined between the Alternatives and TSP milestones.

- **Sponsor:** The Native Village of Akutan (Tribe) and Aleutians East Borough are the cost-sharing, non-Federal sponsors of the feasibility study.

- **Specific, Measureable, Attainable, Risk-Informed, and Timely (SMART) Planning Status:** The study is 3x3 compliant, and an exemption is not anticipated at this time. It is currently between the Alternatives and TSP Milestones. 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. Those risks include evaluating whether the Federal study cost limitation is likely to be exceeded.

- **Project Area:** The project area is within the City of Akutan limits between the City of Akutan and Akun Island, the location of the Akutan Airport (Figure 1). Akutan is a city on the north shore of Akutan Harbor, a large bay within Akutan Island, which is one of the Krenitzin Islands in the Fox Island group of the Eastern Aleutians. The City of Akutan is located within the Aleutians East Borough (Borough) of the Aleutian Islands in Alaska, United States, and contains areas of both Akutan and Akun Islands. A harbor is located at the head of Akutan Harbor and is locally referred to as Akutan Harbor as well (Figure 2). The Fox Islands subgroup is the easternmost subgroup and the one closest to mainland North America in the Aleutian chain. The Native Village of Akutan is a Federally recognized tribe. Akun Island has a land area of 64 square miles. The Akutan Airport and nearby land features are shown in Figure 3.

- **Problem Statement:** The residents of Akutan Island studied the need for an airport to provide a link between the community of Akutan, which includes areas on Akun Island, and both adjacent island communities and mainland Alaska. Limited geographic area for an airport on Akutan Island led to it being built on Akun Island in 2012. The lack of marine infrastructure on Akun Island, however, results in inefficient and high costs for airline passengers, light freight, and fuel transported between Akutan and Akun Island. Prior to 2012, passengers and light freight were transported to Akutan via a Grumman Goose amphibious aircraft which offloaded on Akutan at the beach or at the Akutan seaplane base (Figure 4). After the Akutan Airport (on Akun Island) was constructed, flight routes typically went from Anchorage to Dutch Harbor/Unalaska with a smaller charter flying between Dutch Harbor and the Akutan Airport; however, direct flights between Anchorage and the Akutan Airport are possible. The Aleutians East Borough then used a hovercraft to transport passengers between Akutan and Akun. However, operation and maintenance costs of the hovercraft exceeded $4 million annually, and the hovercraft was discontinued in February 2014. Currently, passengers

and light freight are transported the approximately 7 miles from Akun Island to Akutan via helicopter. The Borough currently contracts the helicopter transport, which costs approximately $2 million annually. The helicopter service is partially subsidized by an Essential Air Service contract (from the Federal Aviation Administration) with the subsidy likely to expire during the period of analysis. The Borough believes that transport between Akutan and Akun via a conventional marine vessel would be much less financially burdensome, but there are currently no marine docking facilities on Akun Island. The inefficient transport also impacts mail delivery and community health and life safety due to unreliable transport during medical emergencies.

- **Study/Project Goals and Objectives:** The project objectives are to provide sustainable, safe, reliable access to Akutan by improving key service operations such as the transportation of passengers, goods, mail, and medical supplies between the Akutan Airport on Akun Island and the community of Akutan on Akutan Island over the 50-year period of analysis.

- **Description of Action:** The study will evaluate the feasibility of constructing a harbor on Akun Island to serve a shuttle vessel that will provide transportation between Akutan Airport on Akun Island and the community of Akutan. In order to have a complete project, suitable docking facilities at Akutan need to be verified. There are several docking options in Akutan, but the most likely is the City Dock / Ferry Dock shown in Figure 4. Potential Akun Island harbor locations were identified during the charette in the coastal area on the west side of Akun Island as shown in Figure 5. The PDT reduced the list of 9 locations to the three most viable (D, E and F) during a screening exercise due to their close proximity to the airport and potentially favorable natural wind and wave protection afforded by rocky points (Figure 6). The General Navigation Features (GNF) structural measures at each location will likely be the same and would consist of a breakwater, a dredged or blasted navigation channel, and a turning basin. Local Service Facilities (LSF) would include a dock that may be accessed from land by a relatively short road originating from the former hovercraft pad or the existing road that connects the former hovercraft pad to the airport. Alternative plans have been developed at location E based on designs developed in a previous U.S. Army Corps of Engineers (USACE) study.

- **Future Without Project:** Transport between the Akutan airport on Akun Island and the community of Akutan on Akutan Island will continue to rely on the costly and often unreliable helicopter service. Helicopter operations are subject to weather delays even when the fixed wing aircraft can complete the route Dutch Harbor to Akun. Additionally, the Essential Air Services contract provided as a federal subsidy for the helicopter is currently provided on a two-year contract, resulting in uncertainty for the community of Akutan. The Coast Guard will continue to be called in for medical emergencies. Air transportation to medical appointments off island will continue to be delayed, and medicines needed from Anchorage can be delayed because of the delays in mail from Anchorage. Delays in delivery of medications often reduce the quality of life and can cause worsening medical conditions. Future Without-Project conditions could lead to population decline and threaten the community viability at Akutan.

- **In-Kind Contributions/Services:** The In-Kind work presently included in the cost estimate is for the Aleutians East Borough (AEB) provide a local commercial marine vessel for supporting environmental data collections usually and surveys to support the request for an Incidental Take Authorization (ITA) for potential Endangered Species Act/Marine Mammal Protection Act (ESA/MMPA) listed species with a Likely to Affect determination. The AEB has let a contract to cover the known needs for this type of work. This work would be considered part of the services required for transportation.

- **Federal Interest:** The Federal Interest Determination (FID) conducted for a prior Continuing Authorities Program Section 107 (CAP 107) study looking at navigation improvements between Akutan and Akun provided one initial site with three designs based on wind speeds of 20, 30, and 40 knots which provided a range of alternatives ranging from lower cost to higher cost plans. The CAP 107 study was terminated in January 2020 because the costs would have exceeded the Federal limits afforded under the CAP program. The non-Federal sponsor subsequently expressed interest in pursuing a General Investigations Study under the Tribal Partnership Program and the Feasibility Cost Sharing Agreement was signed 19 July 2021. During the current study, three potential harbor locations will be further evaluated as more information becomes available and additional designs can be considered. Anticipated benefits of a navigation improvements project are improved efficiencies for the delivery of goods and materials to Akutan. There is also the potential of reduced fuel and freight costs if access and offloading operation conditions improve and of better utilizing airport access to expand the fresh catch market.

- **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 on Akun Island. 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.

  - The previous USACE CAP 107 cost estimates did not consider potential modifications, if necessary, to existing dock facilities in Akutan, which once considered could impact project justification.

  - 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. A dredge disposal site may need to be coordinated with EPA, in the event of open ocean disposal.

- The west coastline of Akun Island has a relatively large historic district which has a potential to increase study and project implementation costs.

- Because blasting is a likely dredging requirement for this project, the Alaska District is concerned that compliance with consultation requirements in the MMPA and ESA may be delayed until Preconstruction Engineering and Design (PED). This is a policy 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. The information necessary to obtain ITA, in the form of an Incidental Harassment Authorization (IHA) (effective up to 1 year) or a Letter of Authorization (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.

- 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 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.

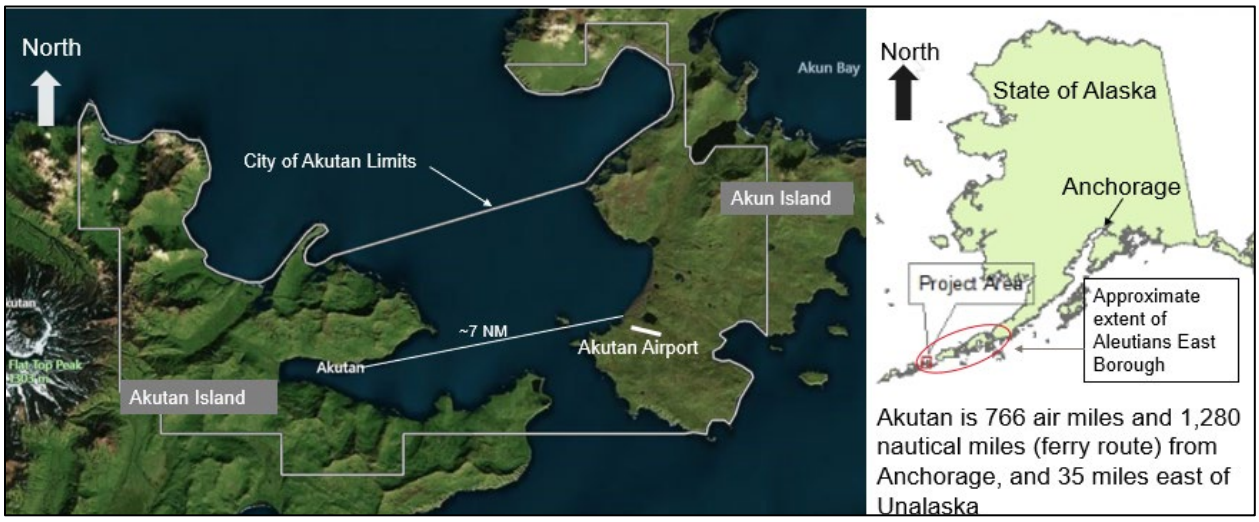


**Figure 1. Vicinity Map and Project Area**


**Figure 2. City of Akutan (on Akutan Island) Area**


**Figure 3. Akutan Airport and Local Features (on Akun Island)**


**Figure 4. The community of Akutan Marine Facilities (on Akutan Island)**


**Figure 5. Study Area on Akun Island**

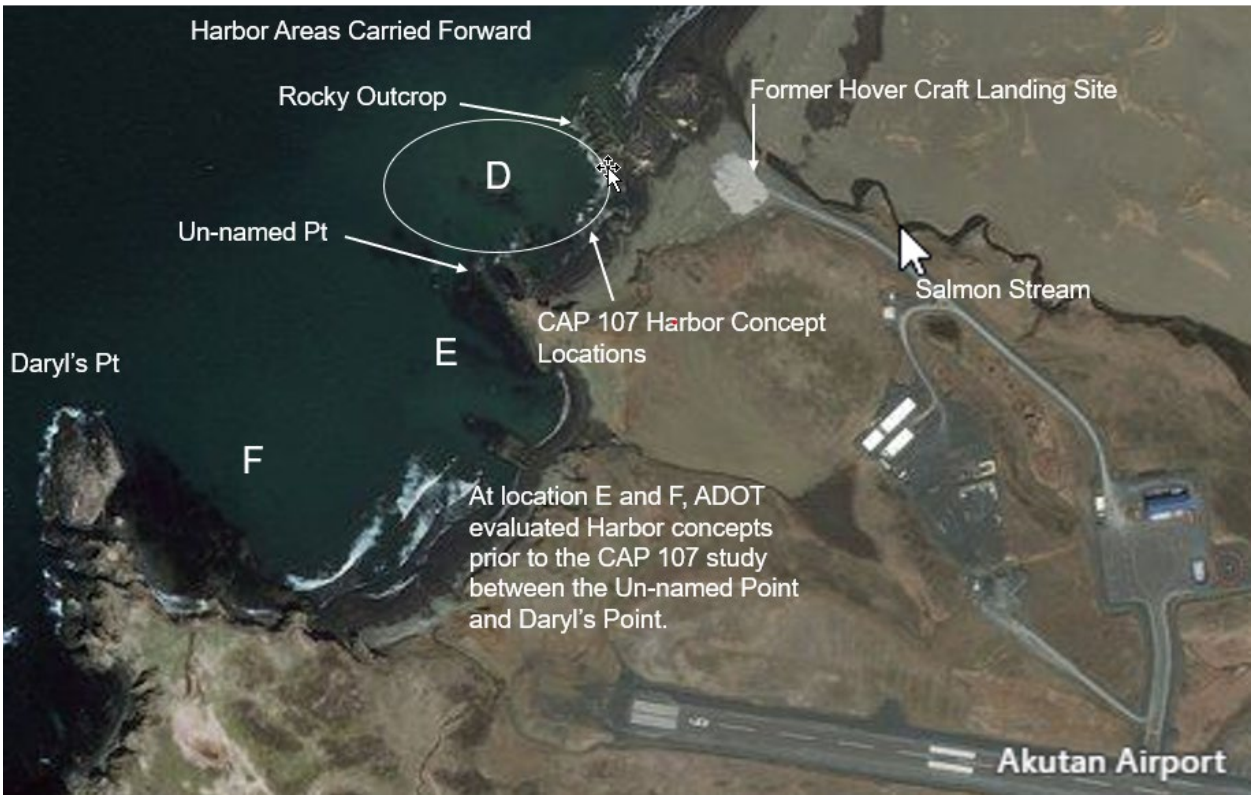


**Figure 6. Harbor Locations (D, E and F) Carried Forward After Initial Screening**

## 5. FACTORS AFFECTING THE SCOPE AND LEVEL OF REVIEW

**A. <u>Is it likely that part(s) of the study will be challenging (ER 1165-2-217, paragraph 3.6.1</u>)** 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 improve vessel efficiency and safety. Since ESA and MMPA species will likely be present in the project area on Akun Island and rock blasting is likely needed to create navigation channels, formal consultation for ITA either as an IHA or a LOA will likely be needed. This consultation is challenging in that it could delay the study schedule in order to obtain the information needed to complete this consultation. Due to cost risks noted in para 5.B, the PDT has yet to determine if a National Economic Development (NED) plan will be recommended, or if justification based on Other Social Effects (OSE) will be pursued through either the Remote and Subsistence Authority (Section 2006, WRDA 2007), or through a policy exception.

**B. <u>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).</u>**

- The previous USACE CAP 107 cost estimates did not consider potential modifications, if necessary, to existing dock facilities in Akutan. The cost from this action could lower the BCR. Although recognized as a risk, the cost magnitude of this risk is

expected to be low to medium and is not expected to impact project justification or plan selection.

- 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.

- The west coastline of Akun Island has a relatively large historic district which has a 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.

- ESA/MMPA Policy exemption risk – Population surveys are being performed quarterly, and weather has already impacted one of these surveys. The risk exists that insufficient data will be obtained to quantify a blasting plan sufficiently to complete the coordination required within the 3-year schedule, and a schedule waiver or a policy waiver may be required for completion of the report and Environmental Assessment. 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 instrumental study risk.

- Weather delays in this remote and rugged area can negatively impact or prevent data gathering and potentially influence the risk level tolerance if the project moves forward without the field data and analysis or negative impacts delays) to the study schedule and costs can occur to acquire the data if the risk is not acceptable without the data. The magnitude of this risk is estimated to be medium. 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. The Alaska District personnel have significant experience planning field work in the area, so this risk is assumed to be manageable.

**C. <u>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)?</u>** The project improvements will likely be justified through a savings in transportation costs or OSE considerations 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. Should the project not perform as expected, the impact would be a lower-than-expected benefit to NED, which does not impact human life and/or safety. Non-performance of the project would not affect the well-being of the public and/or environment but may negatively affect transportation costs for plane passengers and

some commodities (e.g., medical supplies) transported back and forth between the City of Akutan and Akutan Airport on Akun Island. There is no residual risk to account for in this project due the fact that the project purposed does not address or directly affect human health and safety. This life safety assessment has been reviewed by the Alaska 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 Environmental Assessment (EA) and in accordance with the requirements of all applicable Federal environmental laws, the District will coordinate with the relevant state and Federal resource agencies to address such interests. A set of charrette meetings and Public meetings was held on 15 – 17 November 2021 which did not generate significant public interest; public interest was typical of that usually encountered for a small boat harbor project, although specific interest was noted regarding a salmon spawning stream near potential harbor sites at the south end of Surf Bay, and in cultural sites identified in the Chulka Point region. However, 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)?**

- No. 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 proposed project has community support. During coordination of prior port improvement projects on Akutan Island for the City of Akutan (i.e., Akutan Harbor at the head of the Bay), there was no public controversy related to proposed dredging/placement activities; therefore, a similar response is anticipated for the current project.

- The Corps will hold public meeting(s) to discuss any public concerns associated with proposed project. Meeting participants were generally supportive of the study during the charette. However, concerns were expressed relating to building a harbor close to the only red salmon stream on the Akun Island, which can be avoided

since alternative locations are available. Additional meetings to address these concerns will take place as the study progresses. At this time, the concerns expressed are believed to be less than significant and are typical of those encountered on similar projects.

- The Native Village of Akutan is a Federally recognized tribe, and the District anticipates both informal and formal consultations regarding subsistence 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 (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 Environmental Impact Statement 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 twelve known cultural resources near the project area, including the Surf Bay Archaeological District (UNI-00103), which is eligible for listing in the National Register of Historic Places. Impact to this resource will continue to be evaluated as the study progresses. Once the access routes are identified and uplands areas defined for the LSF, the Area of Potential Effect will be surveyed to determine the impact to the historic properties and cultural resources in the area. It is expected that mitigation will be required, however until the project area is defined it is unknown what kind of mitigation would be expected.

**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, and data is being gathered to support that effort. According to the National Marine Fisheries Service's (NMFS) Protected Resources Division and the U.S. Fish and Wildlife Service's (USFWS) ESA mapping tools, a number of threatened or endangered species have ranges or designated critical habitat that occur within or adjacent to the project's proposed footprint. USFWS purview species include northern sea otter, southwestern Distinct Population Segment (DPS) range and designated critical habitat; short-tailed albatross range, and Steller's eider range. NMFS purview species include Steller's sea lion western DPS range and designated critical habitat; humpback whale range and humpback whale Mexico DPS and Western North Pacific DPS designated critical habitat; fin whale range; North Pacific right whale range; sperm whale range; and Western North Pacific gray whale range.

**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).

- 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 (an 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.

- 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.

- Quality Assurance Review. POD has responsibility for Quality Assurance (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.

- 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.

- 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.

- Policy and Legal Compliance Reviews (P&LCRs). 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 policy and legal compliance reviews. 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 1 provides the estimated schedule and cost for reviews anticipated for this study.

**Table 1: Akutan Harbor Navigational Improvements Study, Akutan, 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 | 02/01/2023 | 04/01/2023 | $22,500[1] | No |
| Pre-AMM Submittals | DQC | 02/18/2022 | 02/23/2022 | $5,000 | Yes |
| Pre-TSP Milestone Submittals | DQC | 04/10/2023 | 04/20/2023 | $5,000 | No |
| Draft Feasibility Report and EA | DQC | 05/25/2023 | 06/15/2023 | $55,700 | No |
| | ATR | 06/21/2023 | 07/21/2023 | $70,500 | No |
| | Public Review | 06/21/2023 | 07/21/2023 | N/A | No |
| | IEPR | N/A | N/A | N/A | N/A |
| | P&LCR | 06/21/2023 | 07/28/2023 | N/A | No |
| Pre-ADM Submittals | DQC | 09/27/2023 | 10/2/2023 | $20,000 | No |
| Final Feasibility Report and EA | DQC | 11/30/2023 | 12/07/2023 | $32,500 | No |
| | ATR | 02/05/2024 | 03/20/2024 | $ 59,700 | No |
| | P&LCR | 04/10/2024 | 05/07/2024 | N/A | No |
| Targeted reviews (e.g., commodity forecast) | N/A | N/A | N/A | N/A | N/A |
| In-kind Products[2] | N/A | N/A | N/A | N/A | N/A |
| ATR Lead Participation in Milestone Meetings | | As scheduled | As scheduled | $1,500 | No |

## C. DQC

- 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 2 identifies the required expertise for the DQC team.

[1] Estimated cost is for a simple spreadsheet model; total cost could vary based upon model complexity.

[2] Products and analyses provided by non-Federal sponsors as in-kind services are subject to DQC, ATR, and IEPR. In-kind services are expected to be provision of support for the team to access sites and perform required testing, so no review requirement is anticipated.

**Table 2: Required DQC Expertise**

| DQC Team Disciplines | Expertise Required |
|---|---|
| DQC Lead | The DQC Lead should be a senior professional with extensive experience preparing Civil Works 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 5. |
| Environmental Resources | Expertise in evaluating the impacts associated with harbors and 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. Should have experience with climate preparedness and resilience. The reviewer should also have familiarity with the HH&C model identified in Table 6. |
| 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 6. |
| 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 tribal lands, village corporation lands and regional corporation lands, and application of navigational servitude. |
| Office of Counsel | Legal expert with experience reviewing planning documents to ensure legal sufficiency. |

[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 POD 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 POD, 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. ATR

- 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 the home district 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 the 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). The ATR will not require a site visit.

- Review Team Expertise. Table 3 identifies the anticipated disciplines and ATR team expertise required for study efforts.

**Table 3: 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 with harbors and mixed subsistence-cash economies. The reviewer should have expertise with the types of economic models identified in Table 5. |
| 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 6. |
| 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 modelsidentified in Table 6. |
| 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.

- A site visit will not be required for ATR.

## E. IEPR

- 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 study/project does not warrant IEPR, as documented in detail in Section 5 of this RP and summarized below**:**

  - 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 Engineers 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 (SAR). 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 5: Planning Models**

| Model Name/Version (Discipline) | Brief Model Description and How It Will Be Used in the Study | Certification / Approval |
|---|---|---|
| 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 |
| Small Boat Harbor (SBH) Spreadsheet Model (Economics) | Spreadsheet model will be used to quantify and annualize benefits not captured in other models (i.e., SBH Simulation Model, RECONS) | Single Use Approval will be required. |

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 6: 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) | Probabilistic risk analysis techniques to evaluate the accessibility of channel reaches for multiple vessel geometries, loading, and wave conditions. | CoP Preferred |
| Microcomputer Aided Cost Engineering System (MCACES), MII (Cost Engineering) | Microcomputer Aided Cost Engineering System (MCACES) is the cost estimating software program tools used by cost engineering to develop and prepare Class 3 Civil Works cost estimates. | Civil Works Cost Engineering and Agency Technical Review 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.<br>During the alternatives 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. | Civil Works Cost Engineering and Agency Technical Review 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 Civil Works project includes all Federal and authorized non-Federal costs represented by the Civil Works 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. | Civil Works Cost Engineering and Agency Technical Review 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. | Civil Works Cost Engineering and Agency Technical Review 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 POD and Headquarters, USACE (HQUSACE) functional leaders and through collaboration with the Chief of Office of Water Project Review (OWPR), the POD 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, POD, the 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 POD Counsel functional leaders. The POD 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, POD, HQUSACE, and Assistant Secretary of the Army (CW) levels.

- Engage at both the POD 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.

## I. Review Plan Approvals and Updates.

The POD Commander has delegated the authority to approve Review Plans for decision documents to the POD Director of Programs. The approval from the POD Director of Programs reflects vertical team input (involving POA, POD, and RMO) regarding the appropriate scope, level of review, and endorsement by the RMO. The Review Plan is a living document and should be updated in accordance with ER 1165-2-217. All changes made to the approved Review Plan will be documented. The latest version of the Review Plan, along with the POD Program’s Director’s approval memorandum, will be posted on the POA District's webpage and linked to the HQUSACE webpage. The approved Review Plan should be provided to the RMO.