

REVIEW PLAN
USING THE NWD MODEL REVIEW PLAN
for
Continuing Authorities Program
Section 103, 205 and projects directed by guidance to use CAP procedures

[Alki Seawall Erosion Control Project](#)

[Seattle, WA](#)

Section *103* Project

[Seattle District](#)

MSC Approval Date: [4 March 2013](#)

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**US Army Corps
of Engineers ®**

REVIEW PLAN
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[Alki Seawall Erosion Control Project](#)
[Seattle, WA](#)
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TABLE OF CONTENTS

1. PURPOSE AND REQUIREMENTS.....	3
2. REVIEW MANAGEMENT ORGANIZATION (RMO) COORDINATION	3
3. STUDY INFORMATION.....	4
4. DISTRICT QUALITY CONTROL (DQC).....	4
5. AGENCY TECHNICAL REVIEW (ATR)	4
6. INDEPENDENT EXTERNAL PEER REVIEW (IEPR).....	6
7. POLICY AND LEGAL COMPLIANCE REVIEW	8
8. COST ENGINEERING Directory of Expertise (DX) REVIEW AND CERTIFICATION	8
9. MODEL CERTIFICATION AND APPROVAL.....	8
10. REVIEW SCHEDULES AND COSTS.....	9
11. PUBLIC PARTICIPATION	9
12. REVIEW PLAN APPROVAL AND UPDATES.....	9
13. REVIEW PLAN POINTS OF CONTACT	9
ATTACHMENT 1: TEAM ROSTERS.....	Error! Bookmark not defined.
ATTACHMENT 2: REVIEW PLAN REVISIONS.....	10

1. PURPOSE AND REQUIREMENTS

- a. **Purpose.** This Review Plan defines the scope and level of peer review for the [Alki Seawall Erosion Control Project, Seattle, WA](#) Section [103](#) project.

[Section 103 of the Rivers and Harbors Act of 1962, as amended, authorizes the US Army Corps of Engineers \(USACE\) to study, adopt and construct continuing authority beach erosion control \(coastal storm damage reduction\) projects. The Continuing Authorities Program \(CAP\) focuses on water resource related projects of relatively smaller scope, cost and complexity. Traditional USACE civil works projects are of wider scope and complexity and are specifically authorized by Congress. The Continuing Authorities Program is a delegated authority to plan, design, and construct certain types of water resource and environmental restoration projects without specific Congressional authorization.](#)

Additional Information on this program can be found in Engineering Regulation 1105-2-100, Planning Guidance Notebook, Appendix F Amendment #2.

- b. **Applicability.** This review plan is based on the NWD Model Review Plan for Section 103, 205 and authorities directed by guidance to follow CAP procedures, which is applicable to projects that do not require an EIS.

c. References

- (1) Continuing Authority Program Planning Process Improvements, Director of Civil Works' Policy Memorandum #1, 19 Jan 2011
- (2) Engineering Circular (EC) 1165-2-[214](#), Civil Works Review Policy, [15 Dec 2012](#)
- (3) EC 1105-2-412, Model Certification, 31 May 2005
- (4) Engineering Regulation (ER) 1110-1-12, Quality Management, 30 Sep 2006
- (5) ER 1105-2-100, Planning Guidance Notebook, Appendix F, Continuing Authorities Program, Amendment #2, 31 Jan 2007
- (6) ER 1105-2-100, Planning Guidance Notebook, Appendix H, Policy Compliance Review and Approval of Decision Documents, Amendment #1, 20 Nov 2007
- (7) [Project Management Plan for the Alki Seawall Erosion Control Project, Seattle, WA](#)
- (8) [Seattle District Program Management Plan for the Continuing Authorities Program](#)

2. REVIEW MANAGEMENT ORGANIZATION (RMO) COORDINATION

The RMO is responsible for managing the overall peer review effort described in this review plan. The RMO for Section [103](#) is the home MSC. The MSC will coordinate and approve the review plan and manage the Agency Technical Review (ATR). If Type I Independent External Peer Review (IEPR) will be performed, the MSC will coordinate with the IEPR effort with the appropriate PCX, which will administer the Type I IEPR. The home District will post the approved review plan on its public website and provide the appropriate NWD District Support Planner with the link. A copy of the approved review plan (and any updates) will be provided to the [PCX-CSDR](#) to keep the PCX apprised of requirements and review schedules.

3. PROJECT INFORMATION

- a. **Decision Document.** The [Alki Seawall Erosion Control Project, Seattle, WA](#) decision document will be prepared in accordance with ER 1105-2-100, Appendix F Amendment #2. The approval level of the decision document (if policy compliant) is the home MSC. [NEPA compliance documents will be prepared along with the decision document. An Environmental Impact Statement is not expected to be completed as part of the project. The decision document will not require Congressional authorization because it falls within the Continuing Authorities Program limits.](#)
- b. **Study/Project Description.** [The project will replace an aging 500 foot long seawall located a few miles south of Alki Beach in Puget Sound. The existing structure is deteriorating and is at risk of failure from continuous storm damages. The structure is nearly 100 years old and protects critical public infrastructure located immediately behind the seawall. Failure of the seawall would likely result in the collapse of a sewer force main located under the adjacent roadway. Failure of the sewer main would threaten critical aquatic life and habitat in Puget Sound, an Estuary of National Significance. The non-Federal sponsor is the City of Seattle. Total project costs are expected to be between \\$1 and \\$2 million.](#)

[Study challenges include maintaining close coordination with the sponsor and quickly moving through the planning process, following new Corps planning guidance, in order to keep study costs low and meet the schedule being developed by the PDT. Other study challenges include completing environmental coordination, completing the study with currently limited study funds, and reaching agreement on the final array of alternatives.](#)

[Key areas of risk include budget and schedule, the need for mitigation for construction activities, and concurrence on a recommended alternative from Resource Agencies. The potential risks could result in increased study or construction costs which could also impact construction timing and ensuring that protection from storm damages is maintained. An additional area of risk is no action, as the project area would remain threatened by coastal storm, potentially resulting in environmental impacts to Puget Sound and economic impacts to the Seattle area.](#)

- c. **In-Kind Contributions.** Products and analyses provided by non-Federal sponsors as in-kind services are subject to District Quality Control (DQC) and ATR, similar to any products developed by USACE. [Currently, the sponsor is not expected to contribute in-kind services as part of the study phase. Any in-kind services will be coordinated with the Seattle District PDT for concurrence on scope, budget, and quality assurance practices.](#)

4. DISTRICT QUALITY CONTROL (DQC)

All decision documents (including supporting data, analyses, environmental compliance documents, etc.) shall undergo DQC prior to ATR. The home district shall manage DQC.

5. AGENCY TECHNICAL REVIEW (ATR)

One ATR is mandatory for all decision documents (including supporting data, analyses, environmental compliance documents, etc.). However, additional ATRs may be performed if deemed warranted. ATR is managed within USACE by the designated RMO and is conducted by a qualified team from outside the

home district that is not involved in the day-to-day production of the project/product. ATR teams will be comprised of senior USACE personnel. The ATR team lead will be from within the home MSC.

- a. **Required ATR Team Expertise.** The ATR will be scalable to the complexity of the project and that of CAP as a whole. Where possible, an ATR team member may fill multiple roles, such as team lead and planning reviewer. The ATR team should have experience in coastal storm damage type projects and with projects in CAP to ensure efficient and accurate reviews. Provided below is a list of ATR team members that will likely be included in the ATR of the draft DPR/EA and the experience required.

ATR Team Members/Disciplines	Expertise Required
ATR Team Lead & Planning/Economics	<u>The ATR lead should be a senior professional preferably with experience in preparing Section 103 decision documents and conducting ATR. The lead should also have the necessary skills and experience to lead a virtual team through the CAP ATR process. The ATR lead MUST be from outside Seattle District. The ATR lead should be a senior planner/economist with experience in Section 103 decision documents, or similar programs to ensure appropriate scalability of the review.</u>
Environmental Resources	<u>The environmental reviewer should be a senior professional with experience in preparing CAP decision documents/NEPA coordination. The reviewer should have a general knowledge of ecosystem in the Pacific Northwest region, preferably experience working in Puget Sound.</u>
Coastal Engineering	<u>The coastal engineer reviewer should have experience in coastal engineering on the West Coast/Pacific Ocean, specifically small scale, CAP-like projects. The reviewer should have a good understanding of seawall concepts and construction techniques for public infrastructure.</u>
Structural Engineering	<u>Structural engineer reviewer should be a senior professional and have experience in designing structural seawalls, or flood walls at a minimum, on a small-scale on the west coast, preferably around the Puget Sound area.</u>
Cost Engineering	<u>The cost engineer reviewer should have experience in estimating small-scale flood wall or seawall construction projects around the Puget Sound area and a general knowledge of the CAP process.</u>

- b. **Charge Document.** The RMO will prepare the charge document which clearly identifies the review requirements. This document must be completed prior to requesting an ATR team.
- c. **Documentation of ATR.** DrChecks review software will be used to document all ATR comments, responses and associated resolutions accomplished throughout the review process. Comments should be limited to those that are required to ensure adequacy of the product. If an ATR concern cannot be satisfactorily resolved between the ATR team and the PDT, it will be elevated to the vertical team for further resolution in accordance with the policy issue resolution process described in either ER 1110-2-12 or ER 1105-2-100, Appendix H, as appropriate. Unresolved concerns can be

closed in DrChecks with a notation that the concern has been elevated to the vertical team for resolution.

6. 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 certain 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. A risk-informed decision, as described in EC 1165-2-209, is made as to whether IEPR is appropriate. IEPR panels will consist of independent, recognized experts from outside of the USACE in the appropriate disciplines, representing a balance of areas of expertise suitable for the review being conducted. There are two types of IEPR:

- **Type I IEPR.** Type I IEPR reviews are managed outside the USACE and are conducted on project studies. Type I 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. Type I IEPR will cover the entire decision document or action and will address all underlying engineering, economics, and environmental work, not just one aspect of the study. For decision documents where a Type II IEPR (Safety Assurance Review) is anticipated during project implementation, safety assurance shall also be addressed during the Type I IEPR per EC 1165-2-209.

For Section 103 and 205 decision documents prepared under the NWD Model Review Plan, Type I IEPR may or may not be required.

- **Type II IEPR.** Type II IEPR, or Safety Assurance Review (SAR), are managed outside the USACE and are conducted on design and construction activities for hurricane, storm, and flood risk management projects or other projects where existing and potential hazards pose a significant threat to human life. Type II IEPR panels will conduct reviews of the design and construction activities prior to initiation of physical construction and, until construction activities are completed, periodically thereafter on a regular schedule. The reviews shall consider the adequacy, appropriateness, and acceptability of the design and construction activities in assuring public health safety and welfare.

For Section 103 and 205 decision documents prepared under the model National Programmatic Review Plan, Type II IEPR may or may not be anticipated to be required in the design and implementation phase. The decision on whether Type II IEPR is required will be verified and documented in the review plan prepared for the design and implementation phase of the project.

- a. **Decision on IEPR.** It is the policy of USACE that Section [103](#) project decision documents should undergo Type I IEPR unless ALL of the following criteria are met:

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

- Life safety consequences and risk of non-performance of a project are not greater than under existing conditions;
- There is no request by the Governor of an affected state for a peer review by independent experts;
- The project does not require an EIS;
- The project/study is not likely to involve significant public dispute as to the size, nature, or effects of the project;
- The project/study is not likely to involve significant public dispute as to the economic or environmental cost or benefit of the project;
- The information in the decision document or anticipated project design is not likely to be based on novel methods, involve the use of 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;
- The project design is not anticipated to require redundancy, resiliency, and/or robustness, unique construction sequencing, or a reduced or overlapping design construction schedule; and
- There are no other circumstances where the Chief of Engineers or Director of Civil Works determines Type I IEPR is warranted.

Further, if Type I IEPR will not be performed:

- Risks of non-performance and residual flooding must be fully disclosed in the decision document and in a public forum prior to final approval of the decision document;
- The non-Federal sponsor must develop a Floodplain Management Plan, including a risk management plan and flood response plan (and evacuation plan if appropriate for the conditions), during the feasibility phase; and
- The non-Federal sponsor must explicitly acknowledge the risks and responsibilities in writing in a letter or other document (such as the Floodplain Management Plan) submitted to the Corps of Engineers along with the final decision document.

The decision on whether the above criteria are met (and a Type I IEPR exclusion is appropriate) is the responsibility of the MSC Commander. Additional factors the MSC Commander might consider in deciding if an exclusion is appropriate include, but are not limited to: Hydrograph / period of flooding, warning time, depth of flooding, velocity of flooding, nature of area protected, and population protected.

Type I IEPR is not expected to be required at this time because the requirements of Section 6a are met, indicating that an IEPR is not required for the study. The study is a small-scale CAP project with limited alternatives, low costs, and relatively low risks associated with the design and implementation.

b. Products to Undergo Type I IEPR. *Not Applicable.*

c. Required Type I IEPR Panel Expertise. *Not Applicable.*

IEPR Panel Members/Disciplines	Expertise Required

d. **Documentation of Type I IEPR.** [Not Applicable.](#)

7. POLICY AND LEGAL COMPLIANCE REVIEW

All decision documents will be reviewed throughout the study process for their compliance with law and policy. Guidance for policy and legal compliance reviews is addressed in Appendix H, ER 1105-2-100. These reviews culminate in determinations that the recommendations in the reports and the supporting analyses and coordination comply with law and policy, and warrant approval or further recommendation to higher authority by the home MSC Commander. DQC and ATR augment and complement the policy review processes by addressing compliance with pertinent published Army policies, particularly policies on analytical methods and the presentation of findings in decision documents.

8. COST ENGINEERING DIRECTORY OF EXPERTISE (DX) REVIEW AND CERTIFICATION

For CAP projects, ATR of the costs may be conducted by pre-certified district cost personnel within the region or by the Walla Walla Cost DX. The pre-certified list of cost personnel has been established and is maintained by the Cost DX. The cost ATR member will coordinate with the Cost DX for execution of cost ATR and cost certification. The Cost DX will be responsible for final cost certification and may be delegated at the discretion of the Cost DX.

9. MODEL CERTIFICATION AND APPROVAL

Approval of planning models under EC 1105-2-412 is not required for CAP projects. MSC commanders remain responsible for assuring the quality of the analyses used in these projects. ATR will be used to ensure that models and analyses are compliant with Corps policy, theoretically sound, computationally accurate, transparent, described to address any limitations of the model or its use, and documented in study reports.

a. **EC 1105-2-412.** This EC does not cover engineering models used in planning. The responsible use of well-known and proven USACE developed and commercial engineering software will continue and the professional practice of documenting the application of the software and modeling results will be followed. As part of the USACE Scientific and Engineering Technology (SET) Initiative, many engineering models have been identified as preferred or acceptable for use on Corps studies and these models should be used whenever appropriate. The selection and application of the model and the input and output data is still the responsibility of the users and is subject to DQC, ATR, and IEPR (if required).

b. **Planning and Engineering Models.** The following models are anticipated to be used in the development of the decision document: [No models have been identified at this time. As the feasibility phase progresses, any models used in the development of the project will be documented within an updated Review Plan.](#)

Model Name and Version	Brief Description of the Model and How It Will Be Applied in the Study	Status
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MCACES MII	Micro-Computer Aided Cost Estimating System	Approved
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10. REVIEW SCHEDULES AND COSTS

a. ATR Schedule and Cost.

Product to Undergo ATR	Schedule	Estimated Cost
Draft DPR/EA	August 2013	\$7,000

b. Type I IEPR Schedule and Cost. [Not Applicable.](#)

11. PUBLIC PARTICIPATION

State and Federal resource agencies may be invited to participate in the study covered by this review plan as partner agencies or as technical members of the PDT, as appropriate. Agencies with regulatory review responsibilities will be contacted for coordination as required by applicable laws and procedures. The ATR team will be provided copies of public and agency comments. [The public and other agencies will be permitted to provide feedback on the proposed project during the public comment period for the Environmental Assessment. Comments received will be addressed and documented as required under the National Environmental Protection Act and other applicable Federal laws.](#)

12. REVIEW PLAN APPROVAL AND UPDATES

The NWD Commander has been delegated responsibility for approving this review plan and ensuring that use of the NWD Model Review Plan is appropriate for the specific project covered by the plan. The review plan is a living document and may change as the study progresses. The home district is responsible for keeping the review plan up to date. Minor changes to the review plan since the last NWD Commander approval are documented in Attachment 2. Significant changes to the review plan (such as changes to the scope and/or level of review) should be re-approved by the NWD Commander following the process used for initially approving the plan. Significant changes may result in the NWD Commander determining that use of the NWD Model Review Plan is no longer appropriate. In these cases, a project specific review plan will be prepared and approved in accordance with EC 1165-2-209.

13. REVIEW PLAN POINTS OF CONTACT

Public questions and/or comments on this review plan can be directed to the following points of contact:

ATTACHMENT 2: REVIEW PLAN REVISIONS

Revision Date	Description of Change	Page / Paragraph Number