



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
US ARMY CORPS OF ENGINEERS, SOUTH ATLANTIC DIVISION  
60 FORSYTH STREET SW, ROOM 10M15  
ATLANTA, GA 30303-8801

CESAD-RBT

2 November 2017

MEMORANDUM FOR COMMANDER, JACKSONVILLE DISTRICT

SUBJECT: Approval of Review Plan for the 2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area Revised Operational Strategy (Increment 2) and 2019 System Operating Manual Update of the 2012 Water Control Plan

1. References:

a. Memorandum, CESAJ-OD-MW, 4 October 2017, Subject: Approval of Review Plan – 20189 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area (NDA) Revised Operational Strategy (Increment 2) and 2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7 Addressing the Modified Water Deliveries (MWD) and C-111 South Dade Projects (Encl).

b. EC 1165-2-214, Civil Works Review, 15 December 2012.

2. The enclosed subject Review Plan (RP) submitted by the Jacksonville District via reference 1.a has been reviewed by this office and is hereby approved in accordance with reference 1.b above.

3. SAD concurs with the District determination that an Agency Technical Review (ATR) is not needed on Increment 2 of the 2018 Revised Operational Strategy. We also concur that neither a Type I nor a Type II Independent External Peer Review (IEPR) is required on the Increment 2 Revised Operational Strategy. We agree with the District Chief of Engineering that the failure or loss of this water operating criteria, which constitutes the field test, will not pose a significant threat to human life. We also concur with the determination of the District that an ATR and a Type I IEPR is warranted on the 2019 System Operating Manual.

4. The District should take steps to post the RP to its web site and provide a link to CESAD-RBT. Before posting to the web site, the names of Corps/Army employees should be removed. Subsequent significant changes to this RP, such as scope or level of review changes, should they become necessary, will require new written approval from this office.

CESAD-RBT

SUBJECT: Approval of Review Plan for the 2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area Revised Operational Strategy (Increment 2) and 2019 System Operating Manual Update of the 2012 Water Control Plan

5. The SAD point of contact is [REDACTED].

Encl

[REDACTED]

CF:

CESAJ-OD-MW / [REDACTED]  
CESAJ-OD-MW / [REDACTED]  
CESAJ-PM-EE / [REDACTED]



DEPARTMENT OF THE ARMY  
JACKSONVILLE DISTRICT CORPS OF ENGINEERS  
701 San Marco Boulevard  
JACKSONVILLE, FLORIDA 32207-8175

4 October 2017

CESAJ-OD-MW

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, South Atlantic Division, (CESAD-RBT), 60 Forsyth Street, SW, RM 10M15, Atlanta, GA 30303

SUBJECT: Approval of Review Plan – 2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area (NDA) Revised Operational Strategy (Increment 2) and 2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7 Addressing the Modified Water Deliveries (MWD) and C-111 South Dade Projects

1. Reference EC 1165-2-214, Civil Works Review, 15 December 2012.
2. The enclosed Review Plan (Enclosure 1) addresses two pending work products for the Modified Water Deliveries to Everglades National Park Project (MWD Project). The first will be a revision to the Increment 1.1 and 1.2 Operational Strategy Field Test, titled "2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area (NDA) Revised Operational Strategy (*Increment 2*).” The second will be a permanent revision to the 2012 Water Control Plan (WCP) by way of the development of a System Operating Manual (SOM). This second work product is titled, "2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7 Addressing the Modified Water Deliveries (MWD) and C-111 South Dade Projects" (*2019 SOM*).
3. Increment 2 allows for a continuation of field testing with a goal of incrementally increasing water deliveries to the Northeastern Shark River Slough (NESRS) while meeting the terms of the 2016 Biological Opinion (BO), adhering to operational constraints on the L-29 Canal for protection of the Tamiami Trail Highway road base, and maintaining an authorized level of flood mitigation for the 8.5 Square Mile Area (SMA). Increment 2 addresses lessons learned from the previous field testing periods and incorporates revisions necessary following the completion of key construction features, the procurement of necessary Real Estate acquisitions/approvals, as well as, the implementation of several unanticipated extreme high water operational deviations and emergency operations. Increment 2 will be supported by an updated Environmental Assessment (EA). Mandated by the 2016 BO, these operational changes must be implemented by 1 March 2018.

The 2019 SOM will incorporate results from the incremental field tests along with modeling results to make a permanent revision to the 2012 Water Control Plan (WCP). In accordance with Corps guidance, the revision will be repackaged in a Systems Operating Manual (SOM). More specifically, the commonly referred to Combined

CESAJ-OD-MW

SUBJECT: Approval of Review Plan – 2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area (NDA) Revised Operational Strategy (Increment 2) and 2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7 Addressing the Modified Water Deliveries (MWD) and C-111 South Dade Projects

Operating Plan (COP) for the MWD project operations will be contained in Volume 4, Chapter 7 of the SOM. The 2019 SOM will be supported by an Environmental Impact Statement (EIS). Mandated by the 2016 BO, these operational changes must be finalized by December 2019.

4. The enclosed Review Plan includes a District Quality Control (DQC) Review of both, 1) the Increment 2 Operational Strategy and accompanying EA, and 2) 2019 SOM and accompanying EIS.

5. Based on the EC 1165-2-214 Risk Informed Decision Process as presented in the Review Plan, Agency Technical Review (ATR) and Independent External Peer Review (IEPR) are not required for Increment 2 and accompanying EA, however, ATR and IEPR are required for the 2019 SOM and accompanying EIS.

6. Request approval of the enclosed Review Plan by 7 November 2017 to ensure implementation of Increment 2 can occur by 1 March 2018 in accordance with the terms and conditions of the 2016 BO. Once approved, the Review Plan will be posted to the CESAJ website. Names of Corps employees will be withheld from the posted version, in accordance with guidance.

7. Point of contact is [REDACTED]  
[REDACTED]

Encl

# REVIEW PLAN

## Increment 2

2018 L-29 Canal and G-3273 Constraint Relaxations, including  
Northern Detention Area (NDA) Revised Operational Strategy  
*a Revision to the Increment 1.1 and 1.2 Operational Strategy*

AND

## 2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7

Addressing the Modified Water Deliveries (MWD) and C-111  
South Dade Projects  
*an Update to the 2012 Water Control Plan (WCP), formerly known as the  
Combined Operating Plan (COP)*

Jacksonville District

September 2017

THE INFORMATION CONTAINED IN THIS REVIEW PLAN IS DISTRIBUTED SOLELY FOR THE PURPOSE OF PREDISSEMINATION PEER REVIEW UNDER APPLICABLE INFORMATION QUALITY GUIDELINES. IT HAS NOT BEEN FORMALLY DISSEMINATED BY THE U.S. ARMY CORPS OF ENGINEERS, JACKSONVILLE DISTRICT. IT DOES NOT REPRESENT AND SHOULD NOT BE CONSTRUED TO REPRESENT ANY AGENCY DETERMINATION OR POLICY.



US Army Corps  
of Engineers ®

# **REVIEW PLAN**

## **Increment 2**

2018 L-29 Canal and G-3273 Constraint Relaxations, including  
Northern Detention Area (NDA) Revised Operational Strategy  
*a Revision to the Increment 1.1 and 1.2 Operational Strategy*

**AND**

## **2019 System Operating Manual (SOM) with Updates to Volume 4, Chapter 7**

Addressing the Modified Water Deliveries (MWD) and C-111  
South Dade Projects  
*an Update to the 2012 Water Control Plan (WCP), formerly known as the  
Combined Operating Plan (COP)*

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## 1. PURPOSE AND REQUIREMENTS

**a. Purpose.** This Review Plan defines the type of document classification and the appropriate scope of review activities in accordance with the particular classification for the anticipated *Increment 2* and the *System Operations Manual (SOM)* project updates/revisions. The review activities will be defined for the operational documents along with the supporting Environmental Assessment (EA) and/or Environmental Impact Statement (EIS) documents that will accompany these revisions.

This Review Plan addresses anticipated revisions to be made to the Increment 1.1 and 1.2 Operational Strategy Field Test for the Modified Water Deliveries to Everglades National Park Project (MWD Project) as well as revisions to the 2012 Water Control Plan (WCP) for the Water Conservation Areas, Everglades National Park, and ENP-South Dade Conveyance System. These revisions will occur through separate, consecutive efforts and will be known formally as “2018 L-29 Canal and G-3273 Constraint Relaxations, including Northern Detention Area (NDA) Revised Operational Strategy (*Increment 2*)” and “System Operating Manual (*SOM*) with Updates to Volume 4, Chapter 7 Addressing the Modified Water Deliveries (MWD) and C-111 South Dade Projects, an Update to the 2012 Water Control Plan (WCP), formerly known as the Combined Operating Plan (COP)” Throughout the remainder of this document, these updated revisions will be referred to as *Increment 2* and *2019 SOM*. As in the case with the Increment 1.0 through 1.2 Field Tests, the *Increment 2* field test will continue to function as temporary deviation to the 2012 WCP and will contain water management operating criteria that eliminates the G-3273 constraint (using G-3273 as an operational monitoring gage only), continues operation of S-356 and S-357N, raises the L-29 Canal maximum operating stage limit [up to a maximum of 8.5 feet NGVD within the constraints as defined in coordination with the Florida Department of Transportation (FDOT)], incorporates operation of the completed C-111 South Dade North Detention Area (NDA), further reduces reliance on Column 2 discharges, incorporates a new extreme high water condition with associated operational action line, and incorporates new information gathered during the Increment 1.0 through 1.2 Field Test.

Construction for the C-111 South Dade NDA is anticipated to be completed prior to the start of *Increment 2*, which will allow for the 8.5 Square Mile Area S-357 pump station to be operated up to the maximum design capacity. Ultimately, data collected from the field tests from Increment 1.0 through Increment 2 will be used in the development of *2019 SOM* which will be the final of the series of revisions to the 2012 WCP, Chapter 7 of the Central and Southern Florida (C&SF) Project Master Water Control Manual, Volume 4 for the Water Conservation Areas (WCAs), Everglades National Park (ENP), and ENP-South Dade Conveyance System (SDCS).

### **b. References.**

- (1) ECB 2016-9, Civil Works Review, 4 March 2016
- (2) EC 1165-2-214, Civil Works Review, 15 December 2012

- (3) Engineer Regulation (ER) 1110-2-240, Water Control Management, 30 May 2016
- (4) Engineer Manual 1110-2-3600, Management of Water Control Systems, 30 November 1987
- (5) ER 1110-2-530 Flood Control Operations and Maintenance Policies, 30 October 1996
- (6) Engineer Technical Letter 1110-2-362 Environmental Engineering Initiatives for Water Management, 31 July 1995
- (7) ER 1110-1-12, Quality Management, 30 September 2006
- (8) ER 1105-2-100, Planning Guidance Notebook, 20 November 2007
- (9) National Academy of Sciences: Committee on Independent Scientific Review of Everglades Restoration Progress, 2010, page 122

**c. Requirements.** This Review Plan was developed in accordance with EC 1165-2-214, which establishes an accountable, comprehensive, life-cycle review strategy for Civil Works products by providing a seamless process for review of all Civil Works projects from initial planning through design, construction, and Operation, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R). The EC provides the procedures for ensuring the quality and credibility of USACE decision, implementation, and operations and maintenance documents and work products. The EC outlines three levels of review: District Quality Control, Agency Technical Review, and Independent External Peer Review.

**(1) District Quality Control (DQC).** DQC is the review of basic science and engineering work products focused on fulfilling the project quality requirements defined in the Project Management Plan (PMP). It is managed in the home District and may be conducted by staff in the home District as long as they are not doing the work involved in the study, or overseeing contracted work that is being reviewed. Basic quality control tools include a Quality Management Plan providing for seamless review, quality checks and reviews, supervisory reviews, Project Delivery Team (PDT) reviews, etc. The Major Subordinate Command (MSC)/District quality management plans address the conduct and documentation of this fundamental level of review.

**(2) Agency Technical Review (ATR).** ATR is an in-depth review, managed within USACE, and conducted by a qualified team outside of the home District that is not involved in the day-to-day production of the project/product. The purpose of this review is to ensure the proper application of clearly established criteria, regulations, laws, codes, principles, and professional practices. The ATR team reviews the various work products and assures that all the parts fit together, creating a coherent final project/product. ATR teams will be comprised of senior USACE personnel (Regional Technical Specialists (RTS), etc.), and may be supplemented by outside experts as appropriate. To assure independence, the leader of the ATR team shall be from outside the parent MSC.

**(3) Independent External Peer Review (IEPR).** 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 U.S. Army Corps of Engineers (USACE) is warranted.

Engineer Circular (EC) 1165-2-214, Civil Works Review, stipulates a risk informed decision process be used to determine if the document covered by this Review Plan is a USACE decision document, implementation document, or other work product, and the appropriate level of review for the document. The appropriate level of review should be conducted depending on the particular document classification. In this case, as discussed in Section 4 below, the **Increment 2** field test provides guidance for a temporary planned deviation and does not function as a revision to the WCP. Consistent with the process used for the Increment 1.0 and Increment 1.1 and 1.2 Review Plans, only a District Quality Control (DQC) review will be completed. Ultimately, information gathered through these field tests will provide guidance for a revision to the 2012 WCP with implementation of the **2019 SOM**. Considering this final revision will make modification to the 2012 WCP and that an EIS is anticipated, an IEPR is required for this product review.

**d. Review Management Organization (RMO).** With the exception of DQC, all reviews shall be managed by an office outside the home District and shall be accomplished by professionals that are not associated with the work that is being reviewed. The USACE organization managing a particular review effort is designated the RMO for that effort. Different levels of review and reviews associated with different phases of a single project can have a different RMO. The RMO for **Increment 2** and the **2019 SOM** is the South Atlantic Division (SAD).

## **2. PROJECT INFORMATION AND BACKGROUND**

The 2012 WCP currently governs water management operations for the C&SF Water Conservation Areas, Everglades National Park, and ENP-South Dade Conveyance System, including the constructed features of the MWD and C-111 South Dade (C-111 SD) projects. Comprehensive modifications to the WCP are necessary in order to fully realize the natural system benefits associated with the MWD and C-111 South Dade projects in accordance with the National Environmental Policy Act (NEPA) consultation. However, instead of implementing sweeping changes with little certainty as to their operational affects to the system, a series of three, incremental field test modifications has been introduced to the system which will ultimately aid in the development of the comprehensive modifications to the 2012 WCP by December 2019 as required in the 2016 Biological Opinion (BO). The incremental approach to the development of the 2019 SOM will: (1) allow interim benefits towards restoration of the natural systems; (2) reduce uncertainty of operating the components of the MWD and C-111 South Dade Projects; and (3) provide information to complete the 2019 SOM efficiently. The first of the three field tests, Increment 1.0, was implemented and operated for approximately 4 months (starting in October 2015) but was interrupted by a 2016 Temporary Emergency Deviation and subsequent recovery period (February – November 2016) to address unusually wet El Niño conditions. Increment 1.0 was initially intended to last for one to two years. Therefore, in order to complete a full 2 years of testing operations, while incorporating the mandated Reasonable and Prudent Alternative (RPA) of the U.S. Fish and Wildlife Service (USFWS) July 22, 2016 Everglades Restoration Transition Plan Biological Opinion (ERTP BO) and new information gained during the 2016 Temporary Emergency Deviation and recovery period operations, the operational plan was extended through a three year time-frame. The Increment

1.1 and 1.2 revision to the Increment 1.0 was authorized on February 16, 2017 to serve as the operational strategy for the remainder of the three year test period. Following Increment 1.1 and 1.2, the second in the series of field tests, **Increment 2**, will be implemented by March 2018 as required by the RPA of the ERTP BO. This will complete the series of testing phases which will ultimately provide valuable information needed for the development of the **2019 SOM**. The three incremental efforts and supporting NEPA documentation are summarized as follows:

	NEPA Document	Potential Activities During Increment	Post-Increment Actions
Increment 1.0	EA supporting: deviation from 2012 WCP, S-356/S-357N operations	Implement Field Test: --Deviation from S-333/S-334/S-197 operating criteria, --S-356 Operational Testing, --S-357N Testing Protocol (post construction), --Data and information gathering	Input to Increments 2 Operational Strategy and COP [a modification to the MWD 2012 WCP by incorporation into a Systems Operations Manual (2019 SOM)]
Increment 1.1 and 1.2	EA supporting: Update Increment 1.0 deviation from 2012 WCP, S-356/S-357N operations	Revise Increment 1.0 Field Test: --Continued deviation from S-333/S-334/S-197 operating criteria, --Continued S-356 Operational Testing, --Continued S-357N Testing Protocol (post construction), --Revised S-357 Operational Criteria, --Revised S-332B, S-332C, and S-332D Operational criteria to facilitate completion of C-111SD construction --Data and information gathering --Implement Everglades Restoration Transition Plan (ERTP) BO RPA criteria	Input to Increments 2 Operational Strategy and COP portion of 2019 SOM
<b>Increment 2</b>	EA supporting: changes to 2012 WCP (Increment 1.1 and 1.2 successes), deviation from 2012 WCP, S-356 operations	Implement Field Test: --Modified WCP (Increment 1 successes), --Raising of the L-29 Canal Maximum Operating Stage Limit, --Continued S-356 Operational Testing, --Continued S-357 and S-357N Operational Testing. --NDA Operational Testing --Data and information gathering --Implement ERTP BO RPA criteria	Input to COP portion of 2019 SOM
<b>2019 SOM</b>	EIS supporting: changes to WCP	Develop, evaluate, select water management operating criteria	Implement 2019 SOM

In 1970, Congress authorized a minimum schedule of water deliveries from the C&SF Project to ENP through Public Law (PL) 91-282. Section 1302 of the Supplemental Appropriations Act of 1984 (PL 98-181), passed in December 1983, authorized the USACE, with the concurrence of the National Park Service (NPS) and South Florida Water Management District (SFWMD), to deviate from the minimum delivery schedule for two-years in order to conduct an Experimental Program of Water Deliveries to improve conditions within the Everglades National Park (ENP). Section 107 of PL 102-104 amended PL 98-181 to allow continuation of the Experimental Program until modifications to the C&SF Project authorized by Section 104 of the ENP Protection and Expansion Act of 1989 (PL 101-229) were completed and implemented. The purpose of PL 101-229 was "To modify the boundaries of the ENP and to provide for the protection of lands, waters, and natural resources within the park, and for other purposes." This

act also authorized the Secretary of the Army, upon completion of a General Design Memorandum (GDM), to construct modifications to the C&SF Project to improve water deliveries into the park and, to the extent practicable, take steps to restore the natural hydrological conditions within the park. The PL for MWD Project (PL 101-229) was amended as PL 108-7 (Appropriations Act, 2003). The MWD Project GDM and Final Environmental Impact Statement (EIS) were published in July 1992. When the USACE completed the MWD Project GDM in 1992, the operational plan identified in the MWD Project GDM was not considered final. The recommended plan was selected on the basis of expected environmental benefits derived from structural modifications and a Modified Rain-Driven water delivery schedule. The MWD Project GDM called for hydrologic modeling, coordination of modeling results, and environmental evaluations to develop an acceptable water control plan. If an acceptable operational strategy was not developed at the end of the iterative process, the Modified Rain-Driven operational strategy addressed in the 1992 GDM was to be the water control plan implemented when construction of the MWD Project structural features are completed. The GDM also recognized that review and adjustment of project water management operations would continue as experience and additional assessment of data revealed potential for improvement.

The C-111 SD Project was constructed as part of the ENP – South Dade Conveyance Canals Project authorized by the Flood Control Act (FCA) of 1968 (Public Law (PL) 90-483). This Act authorized modifications to the existing C&SF Project as previously authorized by the FCAs of 1948 (PL 80-858) and 1962 (PL 87-874). Further modifications to the C-111 SD Project, described in the 1994 C-111 General Reevaluation Report (GRR), were authorized as an addition to the C&SF Project in the Water Resources Development Act of 1996 (PL 104-303) to protect the natural values associated with the ENP, while maintaining flood damage reduction within the C-111 SD Basin east of L-31N and C-111.

Prior to implementation of the temporary MWD Increment 1 field test in 2015, an elevation of 6.8 feet, NGVD at water level gage 3273 (G-3273) had been used since 1985 as a trigger to cease S-333 releases, thereby preventing water from flowing south into Northeast Shark River Slough (NESRS) as a protective measure for residential areas to the east, particularly the 8.5 Square Mile Area (SMA). Since many of the MWD and C-111 SD project features have been built, including pump station S-356, the protective levee around the 8.5 SMA, and much of the C-111 detention area to the south, there was an opportunity to begin testing the relaxation of the G-3273 constraint. Figure 1, below, shows the general location of G-3273 and other project features.

As prescribed in the 2012 WCP, the releases from S-333 are part of a regulation schedule for Water Conservation Area No. 3A (WCA-3A) and are typically dependent on the WCA-3A Rainfall Based Management Plan (Rainfall Plan). This Rainfall Plan consists of a rainfall-based delivery formula that specifies the amount of water to be delivered to ENP in weekly volumes through the S-333 and S-12 structures. Under the 2012 WCP, releases through S-333 are constrained by the trigger stage at G-3273, which is 6.8 feet, NGVD. Therefore, when G-3273 is less than or equal to 6.8 feet, NGVD, Rainfall Plan target flows are released into NESRS. However, when G-3273 is greater than 6.8 feet, NGVD, no net inflows can be released into NESRS. S-334 may be used to convey all or partial S-333 flows to the SDCS. In this manner, the G-3273 stage constraint limits the volume of water entering NESRS. The proposed

modification to the G-3273 stage constraint is anticipated to reduce the number of times that S-333 discharge is reduced and increase the number of times continued Rainfall Plan deliveries from WCA-3A through S-333 into NESRS are achieved.

The goal of the series of field tests is to allow for a gradual increase in water deliveries from WCA-3A to ENP through NESRS for the benefit of natural resources while maintaining the required water levels so as to not cause impacts to the adjacent private landowners along the L-29 Canal and within the C-111 South Dade basin. The Increment 1.0 field test, initiated on 15 October 2015, was the first in the series of three incremental efforts which will provide data input into the efforts that will ultimately result in an update to the 2012 WCP. The second incremental phase, Increment 1.1 and 1.2, was initiated on 21 February 2017 and the third, and final incremental phase, Increment 2, will be implemented no later than 1 March 2018 consistent with the 2016 ERTP BO RPA requirements. The updated operational strategy for Increment 2 will provide updates to the Increment 1.1 and 1.2 Operational Strategy. The goals remain unchanged which is to seek to increase flow to NESRS while providing operational flexibility needed to:

- A. maintain operating limits in the L-29 Canal that ensure the stability and safety of the Tamiami Trail (U.S. 41) Highway between S-333 and S-334,
- B. support MWD to ENP Project construction for the installation of S-357N, if needed,
- C. facilitate the remaining Southern Detention Area construction of C-111 South Dade Contract 8A and any remaining construction components of the Northern Detention Area Contract 8,
- D. maintain the authorized flood mitigation for the 8.5 SMA,
- E. maintain pre-existing flood protection along the L-31N and C-111 Canals,
- F. provide supplemental flows to Taylor Slough to help facilitate the recovery of Florida Bay from the 2015 extreme hyper-salinity event, and
- G. provide operational flexibilities for prescribed extreme high water conditions in WCA-3A.

Broad restoration goals and objectives of the MWD Project include improved timing, location and quantities of water deliveries to ENP. Operational constraints as defined for Increment 2 are as follows:

- A. L-29 Canal maximum operating limit of 8.5 feet, NGVD to ensure the stability and safety of the Tamiami Trail (U.S. 41) Highway between S-333 and S-334. All inflows to the L-29 Canal shall also be discontinued in advance of certain stage and weather events, as previously coordinated with the Florida Department of Transportation (FDOT) and prescribed in the 2008 Tamiami Trail Limited Re-evaluation Report for the final operating plan with the L-29 Canal limit of 8.5 feet, NGVD (section 6.3).
- B. Maintain the authorized purposes of the C&SF Project modified to include:
  - i. MWD Project
  - ii. C-111 South Dade Project
  - iii. CERP

- C. No reduction in current flood protection or mitigation to include:
  - i. MWD 8.5 SMA
  - ii. C-111 South Dade Project
- D. Maintain the current multi-species objectives of the 2012 Water Control Plan and comply with the requirements of the applicable BO from USFWS, to include the ERTTP and the CERP C-111 Spreader Canal Western Project.

To accomplish the goals of the field test, the 6.8 feet, NGVD constraint at G-3273 has been relaxed to 7.5 (Increment 1.1) to 7.8 (Increment 1.2) feet, NGVD (equivalent to the L-29 Canal maximum operating stage limit) barring any exceptions required to support item B, above. In order to account for a potential increase in seepage from NESRS to the L-31N Canal, the capability to operate the S-356 concurrently with the G-3273 relaxation was included as part of Increment 1.0. Under **Increment 2**, the constraint for G-3272 has been removed altogether and operations now rely on LPG2 and Angels. G-3273 will continue to be used as an operational gage during the transition from Increment 1.1 and 1.2 through to the development of the 2019 SOM. During the approved Increment 1.1 and 1.2 and continuing through the pending Increment 2, S-356 will be operated with the same intent as Increment 1.0 but also includes the goals of items A through D above. **Increment 2** would have the ability to raise the water level in the L-29 canal up to 8.5 feet, NGVD contingent upon the constraints defined in agreements between the USACE and the FDOT. If these conditions are not met, **Increment 2** will follow the guidelines established by Increment 1.1 and 1.2. In addition, because the 2012 WCP does not contain water management operating criteria for the planned spillway (S-357N) located in the 8.5 SMA upstream of S-357, **Increment 2** will continue additional testing protocol for S-357N similar to those tested in Increment 1.1 and 1.2. **Increment 2** will also incorporate operation of the completed C-111 South Dade NDA. Ultimately, these tests are expected to define operating criteria for the completed MWD and C-111 South Dade project features in the WCP (**2019 SOM**).

The operations for **Increment 2** are anticipated to last for approximately one and a half years beginning March 1, 2018. This final testing phase will be followed by the implementation of the **2019 SOM** by December 2019.

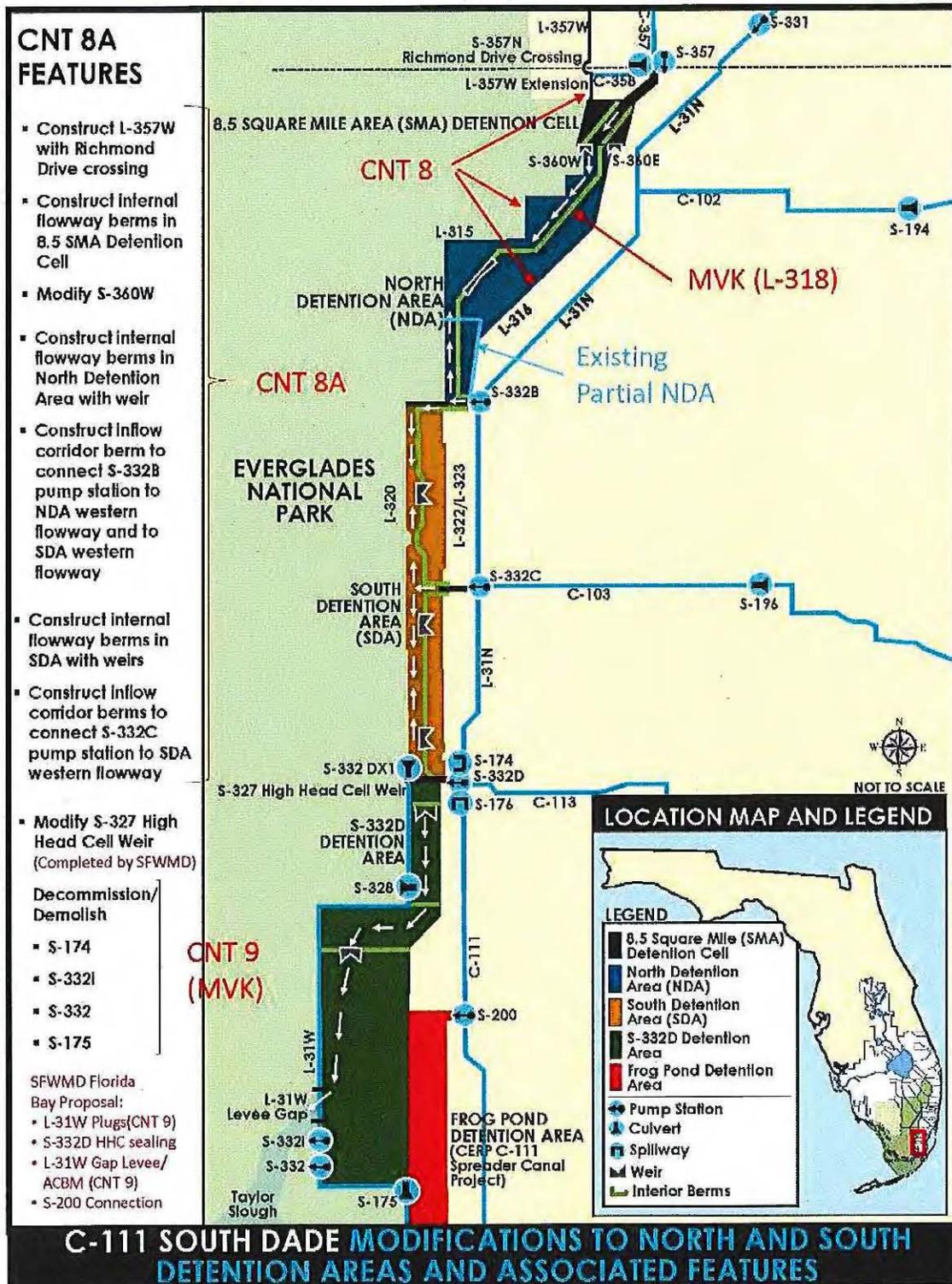


Figure 1 - General location of features relevant to the G-3273 Constraint Relaxation/S-356 and S-357N Field Test.

### **3. POLICY AND LEGAL COMPLIANCE REVIEW**

Guidance for policy and legal compliance reviews of water control systems is contained in ER 1110-2-240, Water Control Management, ER 1110-2-8156, Preparation of Water Control Manuals, and ER 1105-2-100 Planning Guidance Notebook. The guidance culminates in determinations that the document being prepared and any supporting analyses and coordination comply with law and policy, and warrant approval or further recommendation to higher authority by the home MSC.

### **4. RISK INFORMED DECISION ON TYPE OF DOCUMENT AND APPROPRIATE LEVEL OF REVIEW**

The EC 1165-2-214 for review policy direct PDTs to make a risk informed decision to determine if documents are decision documents, implementation documents, or other work products, and the appropriate level of review. DQC is required for all products. The appropriateness of ATR and IEPR are based on the risk informed decision process as presented in this section.

The **Increment 2** operational strategy is identified as an “other work product” as defined in EC 1165-2-214. The basis for this identification is that **Increment 2** and its supporting EA are for a temporary deviation from water management operating criteria contained within the 2012 WCP and is neither a decision document nor an implementation document under EC 1165-2-214.

The **2019 SOM**, a revision to the 2012 Water Control Plan for the Water Conservation Areas, Everglades National Park, and ENP-South Dade Conveyance System, is an implementation document as defined in EC 1165-2-214. The basis for this identification is that **2019 SOM** will be a revision to a WCP and will have an accompanying EIS. The modifications made will be permanent in nature.

**a. District Quality Control (DQC).** DQC and quality assurance activities for work products are stipulated in ER 1110-1-12, Engineering & Design Quality Management. DQC in the Jacksonville District (SAJ) will address **Increment 2** and the associated EA compliance as well as **2019 SOM** and the associated EIS compliance with pertinent published USACE policies. Both phases, **Increment 2** and **2019 SOM**, will perform concurrent DQC reviews for the operational document and environmental documents.

**b. Agency Technical Review (ATR).** Review of the answers to the following questions from the risk informed decision process (Section 15.b of the EC) indicated that ATR is not required for the **Increment 2** and its supporting EA, however, an ATR is required for **2019 SOM** and its supporting EIS.

(1) Does it include any design (structural, mechanical, hydraulic, etc)?

**Increment 2:** No. This work product is an operations field test which includes a temporary planned deviation from existing water management operating criteria contained in an approved WCP and continues a previously implemented testing protocol for newly constructed features of the MWD and C-111SD projects. There is no design work ongoing or currently proposed.

**2019 SOM:** No. This product is an operational document which there is no design work associated with.

(2) Does it evaluate alternatives?

**Increment 2:** Yes. This work product is an operations field test to gain data and information in support of future modification of an approved WCP. The alternatives are limited in scope considering this is a variation on the previous Increment 1.0 field tests. The alternatives in this modified field test incorporate changes from data gathered in the first field test, while also expanding the field test goals to include raising the L-29 Canal maximum operating stage limit (up to a maximum of 8.5 feet NGVD) and incorporation of operation of the completed C-111 South Dade NDA, which will allow for the 8.5 Square Mile Area S-357 pump station to be operated up to the maximum design capacity.

**2019 SOM:** Yes. The development of the SOM will include an EIS which will evaluate alternatives using data gathered from the field tests as well as hydrologic modeling.

(3) Does it include a recommendation?

**Increment 2:** Yes. The EA is expected to represent a field test with the best scenario to maintain existing flood protection and mitigation levels while also providing environmental benefits. The Field Test operating criteria is limited in scope and does not modify the WCP or make specific recommendations for permanent operational changes. The field test operating criteria will be developed and approved consistent with guidance for temporary planned deviations authorized in the 2012 WCP.

**2019 SOM:** Yes. The EIS will evaluate alternatives and assess effects to make the selection with the best opportunity to maintain existing flood protection and mitigation while also providing environmental benefits and achieving project goals. Specifically, the project goals will strive to balance the ecological restoration objectives of the MWD and C-111 SD projects while demonstrating compliance with the project constraints. Project constraints include flood mitigation requirements to prevent potential MWD project induced flood damages in the 8.5 SMA and to maintain the level of flood damage reduction associated with the 1994 C-111 GRR-EIS Recommended Plan.

(4) Does it have a formal cost estimate?

**Increment 2:** No. Completion of the field test does not include a formal cost estimate.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(5) Does it have or will it require a NEPA document?

**Increment 2:** Yes. There will be an EA prepared to assess the effects associated with implementation of **Increment 2** and to support the water management operating criteria contained within the field test. The EA will accompany the temporary planned deviation request when transmitted to SAD for approval.

**2019 SOM:** Yes. There will be an EIS prepared to assess the effects associated with implementation of **2019 SOM** and to support the water management operating criteria contained with the revised water control plan. The EIS will accompany the request for approval of **2019 SOM** when transmitted to SAD for approval.

(6) Does it impact a structure or feature of a structure whose performance involves potential life safety risks?

**Increment 2:** No. The water management operating criteria that constitutes the Field Test was specifically developed to maintain the existing ability to conduct releases from WCA-3A while improving the ability to transfer WCA-3A water to NESRS when compared to the current WCP.

**2019 SOM:** No. The water management operating criteria will be developed specifically to maintain the existing ability to conduct releases from WCA-3A while improving the ability to transfer WCA-3A water to NESRS when compared to the current WCP. Though water stages will be raised from that contained in the current WCP, the increases in stages have been accommodated through the addition of newly constructed features which aid in water management and flood protection throughout the system.

(7) What are the consequences of non-performance?

**Increment 2:** Non-performance of the modification to increase water deliveries to the NESRS prevent the project from performing in compliance with the terms and conditions of the project 2016 Biological Opinion. During construction of C-111 SD contracts 8 and 8A and construction for the deepening of the C-358 Canal & installation of S-357N there may be impacts to the sites. New mitigation features have been added to the 8.5 SMA which did not have operational criteria defined in the 2012 WCP.

**2019 SOM:** Non-performance of the modification to increase water deliveries to the NESRS prevent the project from performing in compliance with the terms and conditions of the project 2016 Biological Opinion. The Congressional Water Resources

Development Act of 2000 (WRDA 2000) prescribes completion of the MWD project, including the 2019 SOM, as a prerequisite to appropriation for construction of the Water Conservation Area 3 Decompartmentalization and Sheetflow Enhancement Project or the Central Lakebelt Storage Project identified within the Comprehensive Everglades Restoration Plan (CERP). The project performance is also hindered when the project goals are not met.

(8) Does it support a significant investment of public monies?

**Increment 2:** No. While there was significant prior investment of public monies in the construction of the C&SF, MWD, and C-111 SD project features, these features have already been constructed and are currently being operated. Increment 2 does not represent a significant investment of public monies.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(9) Does it support a budget request?

**Increment 2:** No. This effort will be funded by the Department of Interior under the MWD Project, the South Florida Water Management District (SFWMD) C-111 South Dade (SD) project, and under the Central and South Florida (C&SF) Operations and Maintenance (O&M) funding. There is no additional budget requirement.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(10) Does it change the operation of the project?

**Increment 2:** Yes, on a temporary basis. The water management operations for **Increment 2** will be implemented through a temporary deviation from the 2012 WCP that will last through February 2019.

**2019 SOM:** Yes. The water management operation for **2019 SOM** will be implemented through a permanent modification to the MWD's 2012 WCP.

(11) Does it involve ground disturbances?

**Increment 2:** No. There is no construction associated with the implementation of **Increment 2**, nor will the water management operations introduce any such disturbances.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(12) Does it affect any special features, such as cultural resources, historic properties, survey markers, etc, that should be protected or avoided?

**Increment 2:** No. Raising of the L-29 Canal stage above 8.3 feet NGVD is not expected to adversely affect cultural resources and/or historic properties in NESRS, based on the temporary nature of the deviation. However, the Jacksonville District is coordinating the avoidance and/or minimization of effects to cultural resources with the Florida State Historic Preservation Officer, the Seminole Tribe of Florida, the Miccosukee Tribe of Indians of Florida, ENP, and the Advisory Council on Historic Preservation for this test phase of the project.

**2019 SOM:** The extent, if any, impacts as a result of operations under **2019 SOM** are unknown at this time. The **Increment 2** is expected to provide additional information to help assess what impacts may result under **2019 SOM**. Raising of the L-29 Canal stage above 8.3 feet NGVD on a permanent basis has a potential to adversely affect cultural resources and/or historic properties in NESRS. The Jacksonville District will coordinate the avoidance, minimization, or mitigation of adverse effects to cultural resources with the Florida State Historic Preservation Officer, the Seminole Tribe of Florida, the Miccosukee Tribe of Indians of Florida, ENP, and the Advisory Council on Historic Preservation.

(13) Does it involve activities that trigger regulatory permitting such as Section 404 or stormwater/NPDES related actions?

**Increment 2:** No. There will be no off-site discharges that warrant Section 404 or NPDES permit actions.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(14) Does it involve activities that could potentially generate hazardous wastes and/or disposal of materials such as lead based paints or asbestos?

**Increment 2:** No. There will be no hazardous wastes and/or disposal thereof generated.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(15) Does it reference use of or reliance on manufacturers' engineers and specifications for items such as prefabricated buildings, playground equipment, etc?

**Increment 2:** No. **Increment 2** is operational in nature and will not include additional infrastructure to support implementation.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(16) Does it reference reliance on local authorities for inspection/certification of utility systems like wastewater, stormwater, electrical, etc?

**Increment 2:** No. **Increment 2** has no effect on any local utilities for inspection/certification of utility systems. All work that will be performed is confined to USACE and SFWMD personnel on existing facilities.

**2019 SOM:** No. Same response as provided for **Increment 2**.

(17) Is there expected to be any controversy surrounding the Federal action associated with the work product?

**Increment 2:** Yes. The SFWMD and FDEP often raise water quality concerns related to the potential exceedance of the 1995 Settlement Agreement either in planning for, during or after the implementation of **Increment 2**. The Florida Department of Agriculture and Consumer Services (FDACS) may be concerned that a rise in groundwater elevations within NESRS could result in root zone flooding in adjacent C-111 basin lands that may be detrimental to crops in south Miami-Dade County. The Miccosukee Tribe of Indians may be concerned with the potential for reduction of S-333 releases to remove water from WCA-3A when S-356 is operating, although this will be offset by raising the L-29 Canal maximum operating stage limit. None of these concerns are new to this region within the C&SF Project nor are they to be eliminated through implementation of this short duration, limited scope field test. However, multi-agency teams will be utilized to facilitate the development of the water management operating criteria to achieve testing objectives while, to the extent possible, incorporating items to address stakeholder concerns. This will include agency/stakeholder identified monitoring (ecological, groundwater, surface water) to be conducted during implementation of **Increment 2**. The Operational Strategy will also maintain consistency with an ongoing evolution of the potential water quality exceedance concern expressed during interagency coordination efforts. There will be additional opportunity provided to the agencies and the public for review and comment on the **Increment 2** EA. During this review, the Jacksonville District will work to reduce controversy prior to a decision to implement the field test. Information and data resulting from Increment 1.0 and Increment 1.1 and 1.2 will also be available to address concerns during implementation of the field test as well as in the development of future long term, water management operating criteria which is a fundamental reason for conducting the field test.

**2019 SOM:** Yes. The SFWMD and FDEP often raise water quality concerns related to the potential exceedance of the 1995 Settlement Agreement either in planning for, during or after the implementation of **2019 SOM**. The Florida Department of Agriculture and Consumer Services (FDACS) may be concerned that a rise in groundwater elevations within NESRS could result in root zone flooding in adjacent C-111 basin lands that may be detrimental to crops in south Miami-Dade County. The Miccosukee Tribe of Indians

may be concerned with the potential for reduction of S-333 releases to remove water from WCA-3A when S-356, although this will be offset by raising the L-29 Canal maximum operating stage limit. However, multi-agency teams will be utilized to facilitate the development of the water management operating criteria to achieve testing objectives while, to the extent possible, incorporating items to address stakeholder concerns. This will include agency/stakeholder identified monitoring (ecological, groundwater, surface water) to be conducted during implementation of **2019 SOM**. **2019 SOM** will also maintain consistency with an ongoing evolution of the potential water quality exceedance concern expressed during interagency coordination efforts. There will be additional opportunity provided to the agencies and the public for review and comment on the **2019 SOM** EIS. During this review, the Jacksonville District will work to reduce controversy prior to a decision to implement **2019 SOM**. Information and data resulting from Increment 1.0, Increment 1.1 and 1.2, as well as Increment 2 will also be available to address concerns during implementation of **2019 SOM**.

**c. Independent External Peer Review (IEPR).**

**(1) General.** EC 1165-2-214 provides implementation guidance for both Sections 2034 and 2035 of the Water Resources Development Act (WRDA) of 2007 (Public Law (P.L.) 110-114). The EC addresses review procedures for the Planning, the Design and Construction and Operation and Maintenance phase responsibilities. Type I is generally for decision documents and Type II is generally for implementation documents. A risk-informed decision concerning need for a Type I and/or a Type II IEPR on **Increment 2** and **2019 SOM** are presented below.

**(2) Type I Independent External Peer Review (IEPR) Determination (Section 2034).** The following items were considered in making a determination as to whether or not a Type I IEPR is required:

**Increment 2:**

- (a) The project operating criteria do not pose a significant threat to human life.
- (b) The cost does not exceed \$200M.
- (c) No request has been made by the state for an IEPR. There is no request from either the local Native American Tribes or the Governor at this time.
- (d) **Increment 2** is a planned Field Test and is temporary in nature (proposed for a period between March 2018 and March 2019).
- (e) The operating criteria do not involve significant public dispute as to the size, nature, or effects of the Field Test. Although the SFWMD and FDEP expressed concerns with respect to water quality, the temporary nature of the project has alleviated major concerns. It is important to note that the potential for exceedance of water quality criteria also exists under the current and historic operations. Total phosphorus data collected at S-356 to date for the Increment 1.0 testing does not indicate a problem with the flow weighted mean (FWM) target for the Shark River Slough.

- (f) The Field Test does not involve significant public dispute as to the economic or environmental cost or benefit. There is a potential for environmental benefit because the temporary operating criteria will increase water deliveries to NESRS, a major goal of the MWD Project. During the 2016 Temporary Emergency Deviation and the subsequent recovery transition period, L-29 Canal stages were raised up to approximately 8.3 feet, NGVD and the G-3273 stage remained above 7.1 feet, NGVD for nearly 4 months (maximum stage 7.6 feet, NGVD); the SFWMD secured temporary flowage easements and provided mitigation for federally recognized tribes, landowners, and commercial interests along the Tamiami Trail and within the 8.5 SMA to accommodate the temporary increase in L-29 Canal stages. Prior to implementation of Increment 2 of the field test, acquisition of the required real estate interest and any associated improvements for the private ownership along Tamiami Trail and completion of the C-358 Canal with operation of S-357N (C-358 control structure) will be completed.
- (g) No hydrologic models are being used to assist with the development of **Increment 2**, as this is a temporary planned deviation and field test for a period between March 2018 and March 2019.

**2019 SOM:**

- (a) The operating criteria for **2019 SOM** will not pose a significant threat to human life.
- (b) The cost will not exceed \$200M.
- (c) No request has been made by the state for an IEPR. There is no request from either the local Native American tribes or the Governor at this time.
- (d) No request has been made by the head of a Federal or state agency charged with reviewing the project study for which they have determined to be likely to have a significant adverse impact on environmental, cultural or other resources under the jurisdiction of the agency after implementation of proposed mitigation plans.
- (e) The operating criteria for **2019 SOM** will likely garner significant public involvement considering the size, nature, or effects of operational changed. A high degree of stakeholder engagement has been evident during previous efforts to revise regional water management operations within the WCA-3A, ENP, and SDCS. Additionally, it is anticipated that the SFWMD and FDEP will express concerns with respect to water quality. It is important to note, however, that the potential for exceedance of water quality criteria also exists under the current and historic operations. Total phosphorus data collected at S-356 to date for the Increment 1.0 testing does not indicate a problem with the flow weighted mean (FWM) target for the Shark River Slough.
- (h) **2019 SOM** is not anticipated to involve significant public dispute as to the economic or environmental cost or benefit. With implementation of **2019 SOM**, there will be environmental benefit realized as a result of the increase in water deliveries to NESRS, a major goal of the MWD Project. Prior to implementation of **Increment 2** of the field test, completion of the C-358 Canal with operation of S-357N (C-358 control structure) will be completed or the previously installed

temporary bypass canal will remain in use until such time that construction is complete.

- (f) Hydrologic modeling is being used in conjunction with the field test data.

**(3) Type II Independent External Peer Review (IEPR) Determination (Section 2035).** The following items were considered in determining whether or not a Type II IEPR is required:

***Increment 2:***

- (a) The project purpose is not hurricane and storm risk management or flood risk management and the project does not have potential hazards that pose a significant threat to human life.
- (b) Innovative materials or novel engineering methods will not be used. Redundancy, resiliency, or robustness is not required.
- (c) The project has no unique construction sequencing or a reduced or overlapping design construction schedule.
- (d) The project does not include design or construction activities.
- (e) The ***Increment 2*** Field Test addresses water management operating criteria that do not impact a structure or feature whose performance involves potential life safety risks.

***2019 SOM:***

- (a) The project purpose is not hurricane and storm risk management or flood risk management and the project does not have potential hazards that pose a significant threat to human life.
- (b) Innovative materials or novel engineering methods will not be used. Redundancy, resiliency, or robustness is not required.
- (c) The project has no unique construction sequencing, or a reduced or overlapping design construction schedule.
- (d) The project does not include design or construction activities.
- (e) ***2019 SOM*** addresses water management operating criteria that do not impact a structure or feature whose performance involves potential life safety risks.

**(4) Decision on Type I and Type II IEPR.** In accordance with EC 1165-2-214, the District Chief of Engineering, as the Engineer-In-Responsible-Charge, does not recommend a Type I or Type II IEPR for ***Increment 2***, however, does recommend a Type I IEPR for ***2019 SOM***.

Based on the questions and answers presented in Section 4.b and information in 4.c above, the Jacksonville District has determined that there is no significant benefit or requirement to perform a Type I or Type II IEPR for the ***Increment 2*** Operational Strategy and supporting EA work products. If something changes rendering this assessment invalid, reconsideration of this determination will be made and an IEPR will be performed, if necessary.

Based on the questions and answers presented in Section 4.b and information in 4.c above, the Jacksonville District has determined that there is significant benefit or requirement to perform a Type I IEPR for **2019 SOM** and the supporting EIS work products. The Type I was determined beneficial considering the requirement of an EIS and the anticipated controversial nature of the operational changes anticipated in **2019 SOM**.

## **5. MODEL CERTIFICATION AND APPROVAL**

Modeling tool certification and approval is not applicable for the **Increment 2** Field Test or the supporting EA. **Increment 2** is a field test which is being performed in lieu of modeling in order to obtain real-time data that will ultimately aide in the development of the modification to the WCP (**2019 SOM**). Hydrologic modeling is anticipated to be used in conjunction with the field test data to evaluate and make informed decisions regarding changes to operations under **2019 SOM**. Hydrologic modeling performed will be reviewed and plan selection will be based on application of hydrologic modeling tools validated through the engineering software validation process administered by the USACE Hydrologic, Hydrologic, and Coastal Community of Practice (HH&C CoP). The hydrologic modeling is expected to include application of the Regional Simulation Model (RSM), which has been previously approved for use in South Florida, and the new Miami-Dade Regional Simulation Model (MD-RSM). HH&C CoP validation review of the new MD-RSM model will be required, and the USACE will pursue this review pending completion of ongoing model development and calibration efforts by the SFWMD (anticipated by late 2017). Any planning models that may be used for a socio economic analysis for the **2019 SOM** operational modifications will be the CE/ICA tool and the IWR plan which are certified Corps models. No additional certification requirements are anticipated at this time.

## **6. BUDGET AND SCHEDULE**

The schedule for the 2018-2019 Field Test (**Increment 2**) is as follows:

- (1) SAD approval of Review Plan – completed by 30 October 2017
- (2) Operational Strategy and EA DQC review – completed by 30 October 2017
- (3) NEPA documentation – completed by 6 November 2017
- (4) SAD approval of the **Increment 2** – completed by 26 February 2018

The schedule for the **2019 SOM** including approval for the Record of Decision (ROD) is as follows:

- (1) SAD approval of Review Plan – completed by 30 October 2017
- (2) Draft SOM and EA DQC review – completed by 14 January 2019
- (3) Draft NEPA documentation – posted by 4 May 2019
- (4) Final SOM and EA DQC review – completed by 15 August 2019
- (5) Final NEPA documentation – completed by 30 September 2019
- (6) SAD approval of the **2019 SOM** and ROD – completed by 31 December 2019

## **7. PUBLIC PARTICIPATION**

The review plan will be posted on website and the District will evaluate comments as received. Additionally, the EA/EIS and Operational Strategy/Operating Plan will be available for public review and comment. A public meeting is not required for implementation of **Increment 2**, however, will likely be required prior to the implementation of **2019 SOM**. Public meetings will be held for **2019 SOM**.

## **8. REVIEW PLAN APPROVAL AND UPDATES**

The South Atlantic Division Commander is responsible for approving this Review Plan. The Commander's approval reflects vertical team input (involving district, MSC, RMO, and HQUSACE members, as appropriate) as to the appropriate scope and level of review. Like the PMP, the Review Plan is a living document and may change as the work effort progresses. Jacksonville District is responsible for keeping the Review Plan up to date. All significant changes to the Review Plan (such as changes to the scope and/or level of review) shall be re-approved by the MSC Commander following the process used for initially approving the plan. The latest version of the Review Plan, along with the Commanders' approval memorandum, will be posted on the Jacksonville District's webpage at <http://www.saj.usace.army.mil/Missions/Environmental/Ecosystem-Restoration/G-3273-and-S-356-Pump-Station-Field-Test/>.

## **9. REVIEW PLAN POINTS OF CONTACT**

Questions/comments on this Review Plan can be directed to the following points of contact:

- [REDACTED]
- [REDACTED]