



DEPARTMENT OF THE ARMY
NORTH ATLANTIC DIVISION, CORPS OF ENGINEERS
FORT HAMILTON MILITARY COMMUNITY
GENERAL LEE AVENUE, BLDG 301
BROOKLYN, NY 11252-6700

DEC 14 2012

DEC 14 2012

REPLY TO
ATTENTION OF:

CENAD-RBT

MEMORANDUM FOR Commander, New England District, ATTN: CENAN-EP (Mr. Mackos),
696 Virginia Road, Concord, MA 01742-2751

SUBJECT: Review Plan Approval for Non-Federal Hydroelectric Project, Townshend Dam,
Townshend, VT

1. References:

- a. Memorandum, CENAE-EP-PS, 28 Sep 12, subject: Review Plan for Non-Federal Hydroelectric Projects at Townshend Dam, Townshend, Vermont (FERC #P-13368)
- b. Memorandum, CECW-PN, 17 Nov 08, subject: Clarification Guidance on the Policy and Procedural Guidance for the Approval of Modifications and Alterations of Corps of Engineers Projects
- c. EC 1165-2-209 Change 1, Water Resources Policies and Authorities – Civil Works Review Policy, 31 Jan 12

2. The enclosed Review Plan for the Non-Federal Hydroelectric Project at Townshend Dam has been prepared in accordance with References 1.b and 1.c. The Non-Federal project will be constructed by a private developer under a FERC Order and License, and will consist of two turbine-generator arrays installed in existing slide gates. The project will also include installation of hoists; a control panel within the intake tower; an equipment area containing a pre-fabricated control building, switch gear, transformers, and other equipment; and appurtenant facilities.

3. NAD Business Technical Division is the Review Management Organization (RMO) for the Agency Technical Review (ATR). The Review Plan includes Independent External Peer Review which will be performed at the developer's expense. The IEPR will include critical facilities that will be modified as part of the hydroelectric project to ensure that the project is fully compatible with existing facilities and operations.

4. The Review Plan for the Non-Federal Hydroelectric Project at Townshend Dam is approved. The Review Plan is subject to change as circumstances require, consistent with study development under the Project Management Business Process. Subsequent revisions to this Review Plan or its execution will require new written approval from this office.

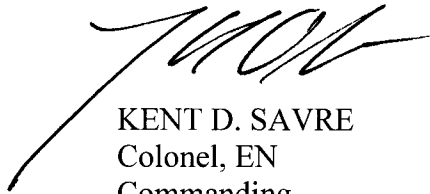
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5. In accordance with Reference 1.c, Appendix B, Paragraph 5, this approved Review Plan shall be posted on your district website for public review and comment.

6. The Point of Contact in Business Technical Division for this action is Daniel Rodriguez, 347-370-7095 or Daniel.J.Rodriguez@usace.army.mil.

Encl
as



KENT D. SAVRE
Colonel, EN
Commanding

CF (w/ encl):
CEMP-NAD (C. Shuman)
CENAD-PD-PP (L. Cocchieri)

**Review Plan
For
Non-Federal Hydroelectric Project**

**Townshend Dam, Townshend, Vermont
(FERC # P-13368)**

New England District

October 2012



**US Army Corps
of Engineers®**

**Review Plan
For
Non-Federal Hydro Project**

Townshend Dam, Townshend, Vermont

TABLE OF CONTENTS

I. PURPOSE AND REQUIREMENTS	1
II. PROJECT INFORMATION	3
III. ROLES AND RESPONSIBILITIES.....	5
IV. AGENCY TECHNICAL REVIEW (ATR)	5
V. INDEPENDENT EXTERNAL PEER REVIEW (IEPR).....	7
VI. MODEL CERTIFICATION AND APPROVAL.....	8
VII. REVIEW SCHEDULE & COSTS.....	8
VIII. PUBLIC PARTICIPATION.....	8
IX. PCX COORDINATION.....	8
X. MSC APPROVAL.....	9
XI. REVIEW PLAN POINTS OF CONTACT.....	9
ATTACHMENT A.....	10
ATTACHMENT B.....	10
ATTACHMENT C.....	11

I. PURPOSE AND REQUIREMENTS

A. Purpose. This Review Plan (RP) defines the scope and level of review for the Section 408 documentation to be completed during the post-licensing stage of the non-federal hydropower project at Townshend Dam in Townshend, Vermont (FERC Project #13368). This project consists of modifications to Townshend Dam to construct and operate a hydroelectric plant as proposed by Eagle Creek Renewable Energy (formerly known as Blue Heron Hydro), hereinafter referred to as “the developer”. Townshend Dam is a flood risk management project constructed, operated, and maintained by the U.S. Army Corps of Engineers (USACE), New England District. Consequently, the New England District, Chief of Engineering/Planning Division is responsible for the review of this project and will coordinate this review with the Chief of Operations Division.

B. References

1. Engineering Circular (EC) 1165-2-209, Civil Works Review Policy, 31 Jan 2010.
2. Engineering Regulation 1110-2-1462, 20 February 1991 Water Quality and Water Control Considerations for Non-Federal Hydropower Development at Corps of Engineers Projects.
3. Engineering Regulation 1110-2-1454, 15 July 1983 Engineering and Design-Corps Responsibilities for Non-Federal Hydroelectric Power Development under the Federal Power Act.
4. ER 1110-2-1150 31 Aug 1999 Engineering and Design for Civil Works Projects.
5. CECW-PB Memorandum, Policy and Procedural Guidance for the Approval of Modifications and Alterations of Corps of Engineers Projects [33 USC 408], 23 Oct 2006.
6. CECW-PB Memorandum for See Distribution, Clarification Guidance on the Policy and Procedural Guidance for the Approval of Modifications and Alterations of Corps of Engineers Projects, 17 Nov 2008.
7. CECW-P Document “Section 408 Submittal Package Guide, Final 11/12/08”.
8. CENAD-BTD/PSD Memorandum dated 4 March 2010, Interim Guidance for Providing Support to Non-Federal Hydropower Developers at Corps Facilities within NAD.

C. Requirements. This review plan was developed in accordance with EC 1165-2-209, which establishes an accountable comprehensive, life-cycle review strategy for Civil Works products. Hydroelectric power projects proposed by non-Federal entities are addressed by

paragraph 13. Special cases exist where non-Federal interests undertake the study, design or implementation of a Federal project or a modification to a USACE project. When a non-Federal interest undertakes a study, design or implementation of a Federal project, or requests permission to alter a Federal project, the non-Federal interest (the developer) is required to submit a Section 408 package documenting the District review and approval of the proposed hydroelectric power project.

The 33 U.S.C. Section 408 Approval process (Section 408) is required by the Rivers and Harbors Appropriation Act of 1899. Any proposed modification to a USACE project requires a review and determination by USACE that such proposed alteration or permanent occupation or use of a federal project is not injurious to the public interest, and will not impair the usefulness of such work. Townshend Dam is a USACE project that does not currently include hydropower. USACE must issue a Section 408 approval to the developer for hydropower to be constructed at Townshend Dam.

The Section 408 Package will be reviewed by USACE based on the following criteria:

1. The proposed project will not adversely affect the stability or structural integrity of the Federal project.
2. The proposed project will not adversely affect the operation of the Federal project for the authorized purposes (flood control, recreation, and environmental stewardship).
3. All environmental impacts have been adequately addressed.
4. FC 1165-2-209 outlines three levels of review, District Quality Control/ Quality Assurance, Agency Technical Review, and Independent External Peer Review (IEPR). In addition to these three levels of review, decision documents are subject to undergo policy and legal compliance review and, if applicable, model certification and approval.
5. 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). Since this is not a Corps design, the Quality Control (QC) review will be undertaken by the developer and or their consultants. Basic quality control tools include a Quality Management Plan providing for seamless review, quality checks and reviews including calculation checks, supervisory reviews, etc. New England District staff (who also comprise the Agency Technical Review team) will perform a Quality Assurance (QA) review of all submitted products. QA is a complete review of all documents submitted to assure the overall integrity of the products and to verify that the products have undergone QC reviews prior to submitting the product for Agency Technical Review.

D. Project Description - The Townshend Project will consist of: (1) two 5.9-foot-high, 11.3-foot-wide turbine-generator arrays, located in the openings for the existing left and right slide gates, each containing six horizontal mixed-flow Obermeyer turbines directly connected to six 77-kW submersible generator units for a total installed capacity of 924 kW; (2) two approximately 82-foot-high, 13.3-foot-wide turbine hoist structures located on top of the existing intake tower; (3) a 6-foot-wide, 8-foot-long control panel in the existing intake tower that will include controls for shutting down the project and operating the left and right slide gates during an emergency; (4) a 14-foot-wide, 20-foot-long equipment area containing an 8-foot-wide, 10-foot-long pre-fabricated control building, switch gear, transformers, and other electrical equipment; (5) twelve approximately 600-foot-long, 4.16-kilovolt (kV) generator leads interconnecting the generators in a conduit to a step-up transformer on a 7-foot-wide, 8-foot-long concrete pad; (6) an approximately 215-foot-long, 12.47-kV transmission line interconnecting the step-up transformer to Central Vermont Public Service's existing distribution line; and (7) appurtenant facilities.

The project will occupy approximately 2.86 acres of federal land under the jurisdiction of the Corps. The proposed project boundary will enclose the two turbine-generator arrays and hoists, the control panel, the conduit containing the generator leads, the pad for the step-up transformer, the equipment area, and the transmission line.

As described in this Review Plan, the District's intent is to insure that the proposed alteration of the Federal project is not injurious to the public interest and will not impair the usefulness of Townshend Dam. In order to provide assurance that their plans are technically correct and sufficient, the developer must submit enough information, data, calculations and drawings to substantially define those features of work that could impact the operation, safety, and stability of, or the Government's ability to control flow through, Townshend Dam.

Construction drawings and specifications may not need to be developed to the 100% level for the Section 408 submission, but sufficient detail must be provided to ensure the adequacy of the features/appurtenances provided. The New England District will consider a staged submittal process where less critical features of the project could be reviewed prior to the development of the Section 408 package. General discussion should be included on construction sequencing including access to the dam and the equipment to be installed there (temporary and permanent), in the reservoir, and elsewhere. Any deviations from normal dam operations required by the construction of the project should also be discussed. Critical aspects of plant operation that must be addressed in the submittal package include, but may not be limited to, plans for routine and emergency contacts and operations that require hydropower plant personnel to be available or on call to operate plant machinery at all times and an alert/alarm system in case of unexpected changes in this facility. More detailed operational aspects will be addressed in the Operations Memorandum of Agreement that will be developed after the Section 408 package is approved.

E. Factors Affecting the Scope and Level of Review. The proposed hydroelectric facility at Townshend Dam raises dam safety and operational concerns. Outcomes from the structural and operational issues may have impacts on design which could increase the number or length of the review periods. The other aspect that will affect the reviews is the timeliness of documents and correction of problems. Timeliness of submittals is not within the control of the

6. Agency Technical Review (ATR). The ATR will be a rigorous in-depth review conducted by a qualified team of New England District staff. The purpose of this review is to ensure the proper application of clearly established criteria, regulations, laws, codes, principles and professional practices. The main charge to the ATR team will be to verify that the modifications to Townshend Dam are done in a professional manner, safely, and will not adversely affect the operation of the project. If lacking the appropriate expertise, the district will supplement their staff with outside subject matter experts. The district will utilize vertical team coordination to assure technical requirements are met throughout the process. The ATR will be documented in DrChecks.
7. Policy and Legal Compliance Review. The New England District Office of Counsel will perform the policy and legal compliance review of the Section 408 package and certify legal sufficiency.

II. PROJECT INFORMATION

A. Project Authority. Townshend Dam was authorized by the Flood Control Act of 1944, as amended; under Public Law 78-534 and Public Law 83-780.

B. Description. The designs and technical documents to be reviewed have not been created by Corps personnel. The documents to be reviewed were developed by Eagle Creek Renewable Energy, the company that holds the FERC license to pursue hydroelectric development at Townshend Dam. The USACE, New England District, is tasked with reviewing the proposed project to ensure it will not adversely affect the operational or structural integrity of the Corps flood risk management project. The Corps will review all products related to this FERC license for compliance with the Corps' ability to maintain our missions and authorized purposes, including life and dam safety, operational requirements, and environmental concerns. The review will also be conducted to determine the technical soundness and environmental acceptability of the proposed project.

C. Background. Townshend Dam is part of a system of 14 dams that are operated to provide flood protection for the numerous communities along the Connecticut River. In addition to flood control, the Corps operates Townshend Dam and Lake for fish and wildlife enhancement and recreation.

On November 1, 2010, Blue Heron Hydro, LLC, filed pursuant to Part I of the Federal Power Act (FPA), an application for an original license to construct, operate, and maintain its proposed Townshend Dam Hydroelectric Project No. 13368. The FERC issued its Order and License on March 29, 2012, FERC Project No. 13368-002. Subsequent to the issuance of the FERC Order and License, Blue Heron Hydro LLC, including all rights to that license, was bought by Eagle Creek Renewable Energy Morristown, New Jersey. 33 USC 408 requires Eagle Creek Renewable Energy to obtain approval from the Corps before construction can begin.

Government. Eagle Creek has proposed an aggressive schedule for submittals and review of documents. Maintaining the proposed schedule is dependent on Eagle Creek's ability to submit complete packages, respond in a timely manner, and provide satisfactory responses to all comments.

III. ROLES AND RESPONSIBILITIES

The following describes the roles and responsibilities for reviewing the proposed project.

A. Developer Responsibilities - Prepare and submit a Type II Independent External Peer Review Plan (a.k.a. Safety Assurance Review, SAR). Coordinate comments and resolutions. Coordinate Section 408 application requirements in addition to FERC license requirements. Submit a full 408 application package to the USACE, New England District, with resolution of all SAR/ATR comments included.

B. District Responsibilities - Review SAR package as prepared by developer and submit to North Atlantic Division (NAD) for review. Coordinate comments from NAD with the developer. Prepare and submit a district RP for the District's role and description of the developer's role. Coordinate the RP with the NAD for endorsement/approval. Conduct an ATR of the developer's 408 package; providing the developer with timely review comments. Ensure that all ATR comments are adequately resolved. Prepare and submit the 408 package to NAD for endorsement.

C. Risk Management Center (RMC) Responsibilities - Currently the RMC has described their role as limited due to status of the RMC and lack of adequate resources to work Section 408 Non-Federal development proposals. However there have been position changes within the RMC since, and the District must verify RMC intent and role in this project. It is NAD's position that the proposed scope of this project is completely appropriate for RMC to be the RMO (Risk Management Office) or at a minimum endorse the plans and products when they are submitted for approval.

D. NAD Responsibilities - Review RP prepared by District and provide comments. Review SAR as prepared by developer and provide comments to District for coordination. When SAR plan is formally submitted, coordinate review and approve proposed reviewers for IEPR II/SAR ensuring qualifications/independence from the project. Coordinate the 408 application package when formally submitted via the District. The complete package is the approved District RP, the developer SAR plan, and the full 408 application/proposal materials. NAD may either deny the application package, endorse and forward it to USACE for their action, or forward the package to USACE unendorsed.

IV. AGENCY TECHNICAL REVIEW (ATR)

The USACE requirements for approval of non-Federal hydroelectric projects are generally described in the referenced policy memorandums and in paragraph 14.a and Appendix A of

reference iii. Item (3) of paragraph 14 a. is particularly pertinent to this review plan. It states that "Design, construction, and operation of all power facilities which would affect the structural integrity and operational adequacy of the Federal dam, including construction sequence and procedures, must be approved by USACE." According to the EC 1165-2-209 SharePoint Site, Frequently Asked Question 2.d, states that these types of activities (modifications of existing Federal Projects to incorporate non-federal hydropower) are not a USACE product and the ATR requirements in the EC do not apply. However, following CECW-PB Policy Memorandum "Clarification Guidance on the Policy and Procedural Guidance for the Approval of Modifications and Alterations of Corps of Engineers Projects," dated 17 Nov 2008 the New England District will perform an in-house ATR on the developer's design and plans.

The developer will document his design in a Design Documentation Report (DDR) following the guidance in ER 1110-2-1150 31 Aug 1999, Engineering and Design for Civil Works Projects. The District PDT believes this is necessary to provide the level of confidence needed in the project modifications to recommend approval to the District Commander. The District Commander's approval is required for the 33 USC 408 submission to the Chief of Engineers. The District will also review all environmental documentation prepared by the Federal Energy Regulatory Commission in conjunction with the issued license.

The New England District will perform the ATR. Dr Checks review software will be used to document ATR comments and aid in the preparation of the Review Report. The New England District Review team will prepare a Review Report that will accompany the 408 submittal for the project and shall:

- Disclose the names of the reviewers, their organizational affiliations, and include a short description of the credentials and relevant experiences of each reviewer.
- Describe the nature of their review and their findings and conclusions.
- Include a verbatim copy of each reviewer's comments along with their resolution.

The New England District will have the USACE Center of Expertise for Hydroelectric Design (Portland District) review the turbine design.

The ATR team is responsible for a complete reading of the 408 report and technical appendices to assure the overall integrity of the report and the recommendations before approval by the District Commander. Products requiring ATR include but are not limited to: 40%, 60%, 90% and 100% versions of the 408 submittal, as well as any design manual, construction sequencing plan, and operations and maintenance manual. The review will focus on dam safety and Corps project operability. The "charge" to reviewers is to:

- Review the proposed project to ensure it will not adversely affect the operation or maintenance of Townshend Dam including structural integrity, dam safety, operational security and force protection requirements.

- Determine the technical soundness and environmental acceptability of the proposed project.
- Ensure the project is designed in accordance with published guidance, including ER's, EC's, manuals, engineering technical letters, and bulletins, focusing specifically on dam safety, operation and maintenance, and environmental concerns.
- Review the proposed project to ensure it will not affect flood control, recreation, and environmental stewardship.

The Section 408 Report will contain materials prepared by the developer, who is required to prepare a technical analysis and adequacy of design, including geotechnical analysis, structural components, hydraulics and hydrology, and operational and maintenance requirements; real estate analysis; discussion of residual risk; discussion on Executive Order 11988 (floodplains); and environmental protection compliance, including a NEPA analysis that addresses the ESA, FWCA, Marine Protection, Research, and Sanctuaries Act, Wild and Scenic Rivers Act, Coastal Zone Management Act, Clean Air Act, HTRW, NHPA, and Noise Control Act. The developer is also responsible for updating water control and O&M manuals, as necessary. The New England District will prepare its determination of technical soundness and environmental acceptability to include a policy and legal analysis. A list of the ATR team members can be found in Attachment A.

V. INDEPENDENT EXTERNAL PEER REVIEW (IEPR)

An IEPR may or may not be required to be performed for non-Federal hydropower development proposals at USACE dams. The IEPR must be funded by the developer.

A. Decision on IEPR - The requirement for an IEPR is found in EC 1165-2-209, Paragraph 13. "Special Cases". Based on vertical team discussion, a Type II IEPR, also known as a Safety Assurance Review, applies to this proposed modification. This SAR review needs to assure the USACE that proposed project does not elevate risk to human life over that which is inherent in the existing project. The IEPR plan needs to address the review of critical facilities and will provide an added assurance that the proposed hydropower project will be fully compatible with the existing facilities and operations. It is envisioned that the SAR will include drawings and supporting report information documenting the design of these facilities. The report of the IEPR of the hydroelectric project will be documented in the Section 408 Package.

B. Products for Review - The New England District and developer will list any critical facilities and the documents which cover the design of these facilities for this project. In addition, the IEPR may include environmental considerations.

C. Required IEPR Expertise - The IEPR panel should consist of at least a three to five person panel with expertise in the following areas: a) structural analysis; b) geotechnical engineering; c) dam safety; d) mechanical engineering; e) turbine design, and; f) fisheries as it relates to hydroelectric design. The developer is required to use the National Academies of

Science (NAS) policy for selecting reviewers and is encouraged to use an Outside Eligible Organization (OEO) for management of the effort. EC 1165-2-209, Appendix E provides information on the selection of panel members. The names and brief synopses of experience for reviewers shall be submitted to the New England District for approval.

D. Documentation of IEPR - Dr Checks review software will be used to document IEPR comments and aid in the preparation of the Review Report. The IEPR team will prepare a Review Report that will accompany the 408 submittal for the project and shall:

- Disclose the names of the reviewers, their organizational affiliations, and include a short paragraph on both the credentials and relevant experiences of each reviewer;
- Include the charge to the reviewers;
- Describe the nature of their review and their findings and conclusions; and
- Include a verbatim copy of each reviewer's comments along with their resolution.

VI. MODEL CERTIFICATION AND APPROVAL

It is not anticipated at this time that the developer will utilize any engineering models in the design and evaluation of the power plant facilities that will require separate approval. Nor will any environmental models be used to assess the impact of power plant operation on the lake or river downstream.

VII. REVIEW SCHEDULE & COSTS

District review of the project is estimated to cost less than \$100,000 to be funded by USACE. Refer to Attachment B for the review schedule. The cost and schedule of the Type II IEPR is the responsibility of the developer.

VIII. PUBLIC PARTICIPATION

The public and Governmental agencies have been offered an opportunity to comment on the hydroelectric proposal through the FERC permitting and licensing process. Documentation of that participation can be found on the FERC website.

IX. PCX COORDINATION

The lead PCX for this study is the Risk Management Center.
U.S. Army Corps of Engineers
13 JR Lake Hydropower Review Plan

Baltimore District May 2012

X. MSC APPROVAL

The Major Subordinate Command (MSC) that oversees the home district is responsible for approving the RP. For New England District, the MSC is the North Atlantic Division. Approval is provided by the MSC Commander. The commander's approval should reflect vertical team input (involving District, MSC, PCX, and HQUSACE members) as to the appropriate scope and level of review for the decision document. Like the PMP, the RP is a living document and may change as the project progresses. Changes to the RP should be approved by following the process used for initially approving the plan. In all cases the MSCs will review the decision on the level of review and any changes made in updates to the project.

XI. REVIEW PLAN POINTS OF CONTACT

Questions and/or comments on this Review Plan can be directed to the following employees of USACE, New England District:

Kimberly Russell (District Hydropower Coordinator) Ph. 978-318-8779

E-mail Kimberly.a.russell@usace.army.mil

Christopher Hatfield (Section 408 Project Manager) Ph. 978-318-8520

E-mail Christopher.l.hatfield@usace.army.mil

Attachment A

ATR Team Roster (complete when team members are identified).

Name	Discipline/Role	Organization	Phone
Chris Hatfield	Section 408 Manager	CENAE-EP-P	978-318-8520
Maruti Wagle	Structural Engineer	CENAE-EP-DG	978-318-8044
Alex Garneau	Mechanical Engineer	CENAE-EP-WG	978-318-8389
Angela Frisino	Mechanical Engineer	CENWP-EP-DG	978-318-8085
Jeanine Cline	Electrical Engineer	CENAE-EP-DG	978-318-8143
Townsend Barker	Hydraulic Engineer	CENAE-EP-WM	978-318-8621
William Lawrence	Geotechnical Engineer	CENAE-EP-WG	978-318-8786
Ben Piteo	Civil Engineer	CENAE-EP-DC	978-318-8424
Kirk Bargerhuff	Environmental Scientist	CENAE-EP-VE	978-318-8029
Anastasia Papadopoulos	Dam Safety Coordinator	CENAE-EP-WG	978-318-8107
Joseph Redlinger	Real Estate Specialist	CENAE-RE	978-318-8585
Bruce Williams	Operations Manager	CENAE-OD	978-318-8168
Kimberly Russell	Hydropower Coordinator	CENAE-OD	978-318-8779
Mark Wilmes	CT River Basin Manager	CENAE-OD-UC	978-318-8441
Joseph Mcinerny	District Counsel	CENAE-OC	978-318-8247
Brent Mahan	Hydroelectric Design Center	CENWP-HDC	503-808-4200

Attachment B

Table 2. ATR Schedule. Instruction: Complete project specific milestone, products and dates.

Review Milestone	Review Products	Date Planned
40% ATR review	P&S/DDR/O&M Manual	October 2012 to November 2012
40% backcheck	30 days from end of review	
60% ATR review	P&S/DDR/O&M Manual	January 2013 to February 2013
60% backcheck	30 days from end of review	
90% ATR review		March 2013 to May 2013
90% backcheck	30 days from end of review	
100% ATR review		June 2013 to July 2013
100% backcheck	30 days from end of review	
ATR Certification		August 2013

ATTACHMENT C

COMPLETION OF AGENCY TECHNICAL REVIEW

The Agency Technical Review (ATR) has been completed for the **Non-Federal Hydroelectric Project at Townshend Dam, Townshend, Vermont**. The ATR was conducted as defined in the project's Review Plan to comply with the requirements of EC 1165-2-209. During the ATR, compliance with established policy principles and procedures, utilizing justified and valid assumptions, was verified. This included review of: assumptions, methods, procedures, and material used in analyses, alternatives evaluated, the appropriateness of data used and level obtained, and reasonableness of the results, including whether the product meets the customer's needs consistent with law and existing U.S. Army Corps of Engineers policy. The ATR also assessed the Developer's District Quality Control (DQC) documentation and made the determination that the DQC activities employed appear to be appropriate and effective. All comments resulting from the ATR have been resolved and the comments have been closed in DrCheckssm.

SIGNATURE

Name
ATR Team Leader
Office Symbol/Company

Date

SIGNATURE

Name
Project Manager
Office Symbol

Date

SIGNATURE

Name
Architect Engineer Project Manager¹
Company, location

Date

SIGNATURE

Name
Review Management Office Representative
Office Symbol

Date

CERTIFICATION OF AGENCY TECHNICAL REVIEW

Significant concerns and the explanation of the resolution are as follows: Describe the major technical concerns and their resolution.

As noted above, all concerns resulting from the ATR of the project have been fully resolved.

SIGNATURE

Name
Chief, Engineering/Planning Division
Office Symbol

Date

SIGNATURE

Name
Chief, Operations Division
Office Symbol

Date

¹ Only needed if some portion of the ATR was contracted