



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CHARLESTON DISTRICT, CORPS OF ENGINEERS
69A HAGOOD AVENUE
CHARLESTON, SOUTH CAROLINA 29403-5107

CESAC-PM

24 March 2011

MEMORANDUM FOR Commander, South Atlantic Division, (CESAD-PDS/Stratton), 60 Forsyth Street, S.W., Room 10M15, Atlanta, Georgia 30303-8801

SUBJECT: Folly Beach Shore Protection Project, City of Folly Beach, South Carolina
Limited Reevaluation Report Review Plan


1. The attached Review Plan (RP) for the subject study was prepared in accordance with EC 1165-2-209 and has been reviewed by the National Planning Center of Expertise for Coastal Storm Damage Reduction (PCX-CSDR). The supporting memorandum provides concurrence from the PCX-CSDR that the RP complies with the requirements contained in the EC and indicates that the PCX has no objection to approval of the RP by the Commander, South Atlantic Division.
2. The Charleston District emphasizes that the attached RP recommends that neither Type I nor Type II IEPR be conducted for the Folly Beach Limited Reevaluation Report (LRR). The scope, nature, and impact of the LRR are not significant enough to meet the benefit and need of Type I IEPR. The LRR does **not** meet any of the mandatory triggers for Type I IEPR described in Paragraph 11.d(1) and Appendix D of EC 1165-2-209. The Folly Beach project has been initially constructed and has undergone periodic renourishment once before and no changes have been made to the project purpose, scope, footprint, or construction methodology since the 1991 District Engineer's Post Authorization Change Report. In addition, the LRR does not contain influential scientific information and the project performance is, by definition, subject to the uncertainty of the frequency and severity of the hurricanes, nor'easters, and other erosive storm events that impact the project area during the interval between periodic renourishments. Finally, neither the Folly Beach Shore Protection Project nor the LRR being reviewed are considered controversial, have substantial adverse impacts on fish and wildlife species and their habitat prior to implementation of mitigation measures, or include an EIS. Type II IEPR is **not** considered appropriate because storm damage reduction projects typically do not involve a project attempting to eliminate storm damage such that project failure would result in a catastrophe or significant threat to human life. Rather, they reduce the amount of expected damages from smaller magnitude, more frequent storms. The Folly Beach Shore Protection Project is classified as providing protection from a 5-year return interval storm event. This magnitude of storm cannot be considered severe enough to represent a significant threat to human life.

CESAC-PM

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Limited Reevaluation Report Review Plan

3. The District has been coordinating with SAD staff on the Review Plan submittal and respectfully requests review and approval of the Review Plan by April 18, 2011 so we can maintain our current project schedule. Any questions regarding the review plan should be directed to Mr. Brian Williams at (843)329-8153.

Atch



LISA METHENEY
Assistant Chief, Programs and Project
Management Division

CF:

Patrick O'Donnell (CESAC-PM-PL)



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69A Hagood Ave
CHARLESTON, SOUTH CAROLINA 29403-5107

CESAC-PM-P

MEMORANDUM FOR Commander, South Atlantic Division, (CESAD-PDS-P/Wilbert Paynes), 60 Forsyth Street, S.W., Room 10M15, Atlanta, Georgia 30303-8801

SUBJECT: Folly Beach Shore Protection Project, City of Folly Beach, South Carolina, Limited Reevaluation Report Review Plan

1. Reference memorandum, CESAD-PDS-P, subject: Folly Beach Shore Protection Limited Reevaluation Report (LRR) Review Plan (RP), 2 June 2011, providing comment on the project RP.
2. SAC requests that SAD conditionally approve the subject review plan and submit an exclusion recommendation/request for waiver from Type I IEPR to HQ as soon as possible.
3. SAC has concurred with and taken appropriate action on the comments provided by SAD in the reference memorandum.
4. The project manager, Mr. Brian Williams may be contacted at 843-329-8153 for further information.

A handwritten signature in black ink, appearing to read "PEOD" followed by a stylized flourish.

Patrick E. O'Donnell, Chief
Planning and Environmental Branch

Enclosures:

Folly Beach Shore Protection Project Review Plan

REVIEW PLAN

**Folly Beach Shore Protection, City of Folly Beach, South Carolina
Limited Reevaluation Report**

Charleston District

MSC Approval Date: Pending

Last Revision Date: None



**US Army Corps
of Engineers**®

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

REVIEW PLAN

**Folly Beach Shore Protection, City of Folly Beach, South Carolina
Limited Reevaluation Report**

TABLE OF CONTENTS

1. PURPOSE AND REQUIREMENTS..... 1

2. REVIEW MANAGEMENT ORGANIZATION (RMO) COORDINATION..... 3

3. STUDY INFORMATION 3

4. DISTRICT QUALITY CONTROL (DQC) 6

5. AGENCY TECHNICAL REVIEW (ATR)..... 7

6. INDEPENDENT EXTERNAL PEER REVIEW (IEPR) 8

7. MODEL CERTIFICATION AND APPROVAL10

8. REVIEW SCHEDULES AND COSTS10

9. PUBLIC PARTICIPATION10

10. REVIEW PLAN APPROVAL AND UPDATES.....11

11. REVIEW PLAN POINTS OF CONTACT11

ATTACHMENT 1: TEAM ROSTERS12

ATTACHMENT 2: PCX-CSDR REVIEW AND CONCURRENCE OF REVIEW PLAN13

ATTACHMENT 3: ATR CERTIFICATION.....15

ATTACHMENT 4: REVIEW PLAN REVISIONS.....18

ATTACHMENT 5: ACRONYMS AND ABBREVIATIONS19

1. PURPOSE AND REQUIREMENTS

a. **Purpose.** This Review Plan defines the scope and level of peer review for the Limited Reevaluation Report (LRR) for the Folly Beach Shore Protection project for the City of Folly Beach, South Carolina.

b. References

- (1) Engineering Circular (EC) 1165-2-209, Civil Works Review Policy, 31 Jan 2010
- (2) EC 1105-2-412, Assuring Quality of Planning Models, 30 Dec 2009
- (3) Engineering Regulation (ER) 1110-1-12, Quality Management, 30 Sep 2006
- (4) ER 1105-2-100, Planning Guidance Notebook, Appendix H, Policy Compliance Review and Approval of Decision Documents, Amendment #1, 20 Nov 2007
- (5) PMP for Folly Beach Shore Protection Project
- (6) MSC and/or District Quality Management Plan(s)

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 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 outlines four general levels of review: District Quality Control/Quality Assurance (DQC), Agency Technical Review (ATR), Independent External Peer Review (IEPR), and Policy and Legal Compliance Review. In addition to these levels of review, decision documents are subject to cost engineering review and certification (per EC 1165-2-209) and planning model certification/approval (per EC 1105-2-412).

- (1) District Quality Control/Quality Assurance (DQC). All **decision documents** (including supporting data, analyses, environmental compliance documents, etc.) shall undergo DQC. DQC is an internal review process of basic science and engineering work products focused on fulfilling the project quality requirements defined in the Project Management Plan (PMP). The home district shall manage DQC. Documentation of DQC activities is required and should be in accordance with the Quality Manual of the District and the home Major Subordinate Command (MSC).
- (2) Agency Technical Review (ATR). ATR is mandatory for all **decision documents** (including supporting data, analyses, environmental compliance documents, etc.). The objective of ATR is to ensure consistency with established criteria, guidance, procedures, and policy. The ATR will assess whether the analyses presented are technically correct and comply with published US Army Corps of Engineers (USACE) guidance, and that the document explains the analyses and results in a reasonably clear manner for the public and decision makers. ATR is managed within USACE by a designated Risk Management Organization (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 are comprised of senior USACE personnel and may be supplemented by outside experts as appropriate. To assure independence, ATR team leads are usually from outside the home MSC. The ATR for this project was initiated in February 2011 and completed in March 2011.
- (3) 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 is generally for decision documents and Type II is generally for implementation products.

- (a) 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 an biological opinions of the project study. Type I IEPR will cover the entire decision document or action and will address all the 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.
 - (b) 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. Due to the fact that this Review Plan pertains only to the LLR, it is anticipated that Type II IEPR will not be needed, however, this determination will be made prior to project implementation.
- (4) 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 Chief of Engineers. 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.
 - (5) Cost Engineering Review and Certification. All **decision documents** shall be coordinated with the Cost Engineering Directory of Expertise (DX), located in the Walla Walla District. The DX, or in some circumstances regional cost personnel that are pre-certified by the DX, will conduct the cost ATR. The DX will provide certification of the final total project cost.

- (6) Model Certification/Approval. EC 1105-2-412 mandates the use of certified or approved models for all planning activities to ensure the models are technically and theoretically sound, compliant with USACE policy, computationally accurate, and based on reasonable assumptions. Planning models, for the purposes of the EC, are defined as any models and analytical tools that planners use to define water resources management problems and opportunities, to formulate potential alternatives to address the problems and take advantage of the opportunities, to evaluate potential effects of alternatives and to support decision making. The use of a certified/approved planning model does not constitute technical review of the planning product. 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. EC 1105-2-412 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. Use of engineering models is also subject to DQC, ATR, and IEPR.

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 decision documents is typically either a Planning Center of Expertise (PCX) or the Risk Management Center (RMC), depending on the primary purpose of the decision document. The RMO for the peer review effort described in this Review Plan is the National Planning Center of Expertise for Coastal Storm Damage Reduction (North Atlantic Division, NAD).

The RMO will coordinate with the Cost Engineering Directory of Expertise (DX) to conduct ATR of cost estimates, construction schedules and contingencies.

3. STUDY INFORMATION

- a. **Decision Document.** The decision document to be reviewed in accordance with this review plan is the Limited Reevaluation Report (LRR) for the Folly Beach Shore Protection project in the City of Folly Beach, South Carolina. The purpose of this LRR is to evaluate the project under current policies, criteria, and guidelines and to document economic justification and environmental acceptability of renourishing the Federal project and protecting existing structures (both public and private) within the Town of Folly Beach. The scope of this LRR is specifically limited to the tasks necessary to update the economics to verify and support budgeting of the next renourishment cycle and also to check the authorized maximum cost of projects. Section 902 of the Water Resources Development Act of 1986 (WRDA 1986), as amended, protects against cost overruns for projects authorized in WRDA 1986 and all projects authorized after the date WRDA 1986 was enacted. Water resources development and conservation projects may not exceed their authorization limit by more than 20 percent except for changes in construction costs applied to unconstructed features as indicated by engineering and other appropriate cost indexes and additional studies, modification and actions authorized by WRDA 1986 or any later law or required by changes in Federal law. Projects to which this limitation applies and for which increases in costs exceed the limitations established by Section 902, as amended, will require further authorization by Congress raising the maximum cost established for the project. For the Folly Beach Shore Protection project, Section 902 applies only to the portions of the project authorized after the passage of WRDA 1986. The LRR will be approved by the MSC, South Atlantic Division, and will not require Congressional authorization.

New National Environmental Policy Act (NEPA) documentation will not be prepared in conjunction with the LRR.

- b. Study/Project Description.** The City of Folly Beach, the non-Federal sponsor, is located about 12 miles south of Charleston, South Carolina on Folly Island. Kiawah Island lays to the south of Folly Island and Morris Island to the north. The south end of the island and Kiawah Island are separated by Stono Inlet while the north end of the island is bordered by Lighthouse Creek. The northwestern boundary to the island is Folly River while the Atlantic Ocean covers the southeastern side. Folly Island is 6.1 miles in length, of which 5.34 miles are included in the Federal shore protection project initially constructed in 1993 under a Local Cooperation Agreement (LCA), the limits of which are shown on the project map in Figure 1 below. Nine groins north of the Holiday Inn (Station 0+00) were also authorized for rehabilitation as this effort reduced the quantity of material to be placed on the beach. The design berm with a width of 15 feet and at an elevation of 9 feet + optimizes the annual storm damage reduction net benefits estimated at \$ 1.865 million in 1991 price levels and an interest rate of 8 3/4 percent. The total annual benefits at 1991 price levels are \$ 3.268 million from storm damage reduction and recreation benefits. As part of the renourishment effort under the FY04 Supplemental Appropriation for beach rehabilitation the Folly Beach Shore Protection Project was re-stationed with Station 0+00 (formerly 107+00S) being on the southwest end of the project and Station 289+00 (formerly 175+00N) being on the northeast end of the project. This project was designed to provide protection against historical storms experienced in the area and to match the natural berm height of the beach. The berm elevation of 9.0 feet protects against a 5-year storm surge elevation. The amount of advance nourishment placed in front of the design berm allows for 8 years of protection for the design berm from average annual erosion losses; thus allowing the design berm to function as protection for the upland development.

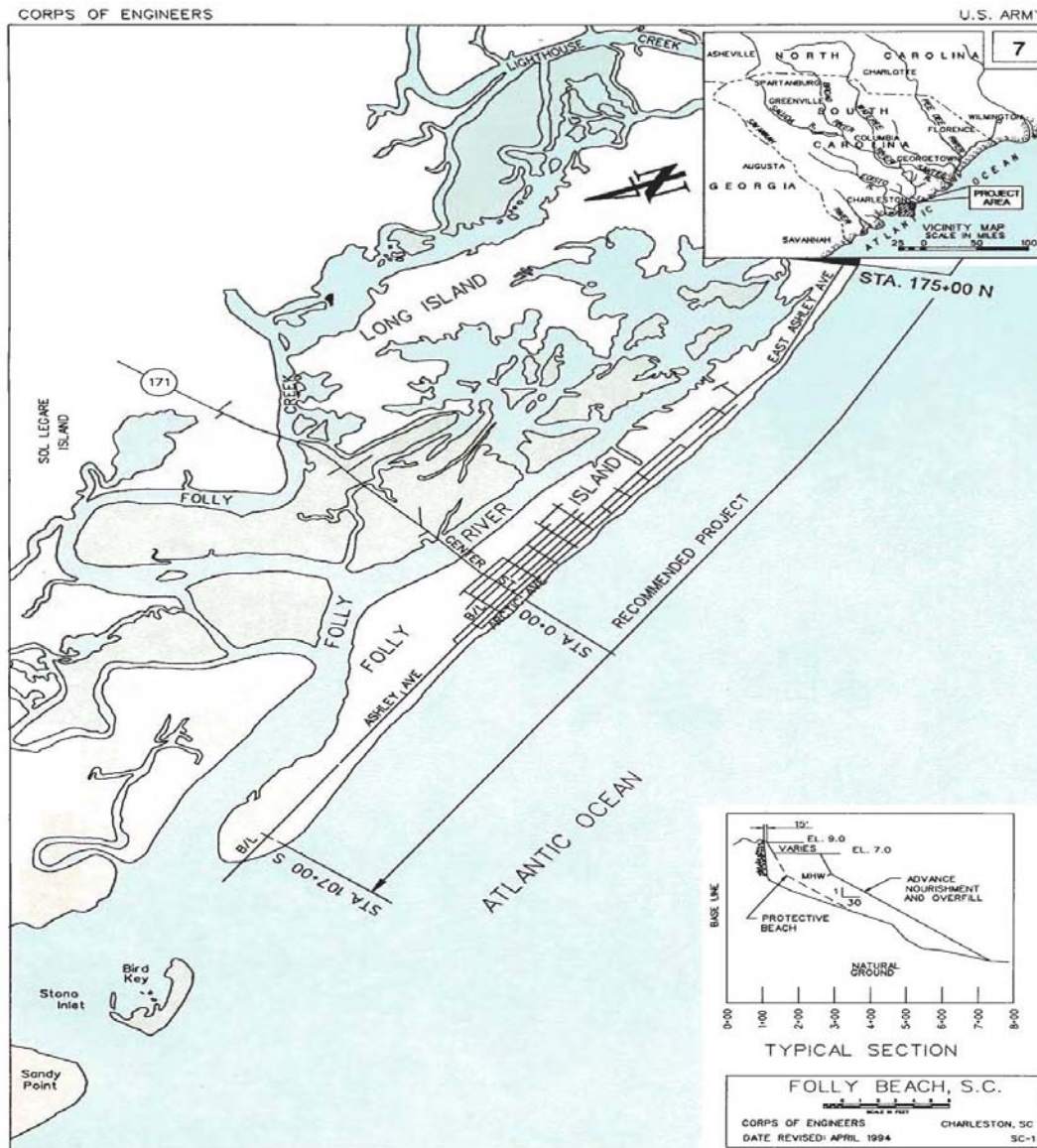
The Folly Beach Shore Protection project was authorized by Section 501 of Public Law 99-662 (WRDA86) and modified by Public Law 102-104 (WRDA92). The authorized project provides for restoration of approximately 5.34 linear miles of beach on Folly Island between Station 175+00N and Station 107+00S. The original authorizing language, as presented in Public Law 99-662 (WRDA 1986) read as follows:

SEC. 501(a). The project for shoreline protection, Folly Beach, South Carolina: Report of the Chief of Engineers, dated March 17, 1981, at a total cost of \$7,040,000, with an estimated first Federal cost of \$3,870,000 and an estimated first non-Federal cost of \$3,170,000.

The amended authorizing language, as presented in Public Law 102-104 (WRDA 1992) reads as follows:

SEC. 105. The project for shoreline protection for Folly Beach, South Carolina, authorized by section 501(a) of the Water Resources Development Act of 1986 (Public Law 99-662; 100 Stat. 4136), is modified to authorize the Secretary to construct hurricane and storm protection measures based on the Charleston District Engineer's Post Authorization Change Report dated May 1991, at an estimated total initial cost of \$15,283,000, with an estimated Federal cost of \$12,990,000 and an estimated non-Federal cost of \$2,293,000, and an annual cost of \$647,000 for periodic beach nourishment over the life of the project, with an estimated annual Federal cost of \$550,000 and an estimated non-Federal annual cost of \$97,000.

A 1987 Section 111 Study determined that approximately 57 percent of the erosion of Folly Beach was due to the construction and continued operation of the Charleston Harbor Federal navigation project. As a result of this determination, the cost sharing percentages have been adjusted to 85 percent federal versus 15 percent non-federal. In addition, 57 percent of the federal cost for periodic renourishment is provided by the Navigation business line, while the remaining 43 percent of the Federal cost is provided by the Flood Risk Management business line.



Project Location Map for Folly Beach, South Carolina

c. **Factors Affecting the Scope and Level of Review.** Some of the factors influencing the scope and level of review are listed below:

- The Folly Beach Shore Protection project is an authorized project that has already completed both initial construction and periodic renourishment. As such, project risks and

their magnitude are minimal. The District has ample experience with construction and monitoring of this project.

- The project at Folly Beach does not have significant economic, environmental, and social effects on the nation. The scale, type, and location of the project has not resulted in substantial adverse impacts to cultural, historic, or tribal resources, threatened or endangered species, or critical habitat.
- As stated in paragraph 3.a above, the purpose of the decision document (LRR) being reviewed under this review plan is to evaluate the project under current policies, criteria, and guidelines and to document economic justification of renourishing the Federal project. Because the scope of the LRR is specifically limited to the tasks necessary to update the economics to verify and support budgeting of the next renourishment cycle and does not meet the level of a General Reevaluation Report or Reformulation, it is not anticipated that any part of the LRR will present a significant challenge.
- This project does not involve a significant threat to human life. Storm damage reduction projects typically do not involve a project attempting to eliminate storm damage such that project failure would result in a catastrophe. Rather, they reduce the amount of expected damages from smaller magnitude, more frequent storms.
- Beyond the standard requirements for resource agency coordination for NEPA, this project does not have significant interagency interest. It does not affect or conflict with any other agency project.
- This project is not highly controversial, it implements standard storm damage reduction alternatives using standard construction methodologies and has not resulted in substantial adverse impacts.
- It is highly unlikely that the LRR will contain influential scientific information. The feasibility study report for the project was completed approximately 20 years ago and the LRR does not update the scientific methodologies implemented since the General Design Memorandum that was completed in 1991.

d. In-Kind Contributions. Products and analyses provided by non-Federal sponsors as in-kind services are subject to DQC, ATR, and IEPR. The non-Federal sponsor has not contributed in-kind products and/or analyses for the LRR.

4. DISTRICT QUALITY CONTROL (DQC)

a. Documentation of DQC. DQC will include review by the PDT of all documents, supporting appendices and data. In addition, quality checks will be performed by staff responsible for the work products, such as supervisors, work leaders, team leaders, designated individuals from the senior staff, or other qualified personnel, as long as these staff did not perform the original work, including managing/reviewing the work in the case of contracted efforts. DQC will be documented in hard copy format and provided to the ATR team.

a. Products to Undergo DQC. Products subject to DQC for the LRR include the draft report, the associated appendices, and supporting data. Due to the limited scope of the LRR, the products are limited with regards to number and their level of complexity.

b. Required DQC Expertise. Expertise needed for DQC includes but is not limited to civil/coastal engineering, cost engineering, economics, environmental resources, and plan formulation.

5. AGENCY TECHNICAL REVIEW (ATR)

- a. Products to Undergo ATR.** The Folly Beach Shore Protection Project Limited Reevaluation Report will be the specific product to undergo ATR. All supporting information and technical products relating to the LRR can and will be provided to the ATR Team for their review.
- b. Required ATR Team Expertise.** This section provides an estimate of the number of ATR team members and briefly describes the types of expertise that should be represented on the ATR team. The National Planning Center of Expertise for Coastal Storm Damage Reduction (North Atlantic Division, NAD), in cooperation with the PDT and vertical team, will determine the final make-up of the ATR team. The following table provides examples of the types of disciplines that will be considered for inclusion on the ATR team and some sample descriptions of the expertise required.

ATR Team Members/Disciplines	Expertise Required
ATR Lead/Plan Formulator	The ATR Lead/Plan Formulator should be a senior professional with extensive experience in preparing Civil Works decision documents and conducting ATR. This individual should also have the necessary skills and experience to lead a virtual team through the ATR process. In addition, this reviewer should be a water resources planner with experience in coastal storm damage reduction projects.
Economics	The Economics reviewer should be a senior economist with experience relating to 902(b) analyses and benefit/cost determinations for coastal storm damage reduction projects.
Environmental Resources	The Environmental Resources reviewer should be a biologist (or similar) with experience in NEPA coordination related to coastal storm damage reduction projects.
Coastal Engineering	The Coastal Engineering reviewer should have experience with designing and/or monitoring of beach nourishment projects and be familiar with the use of ocean borrow sites and sediment compatibility.
Cost Engineering	The Cost Engineering reviewer should have experience with the development of cost estimates for coastal storm damage reduction projects, more specifically, with the estimation of costs when utilizing offshore borrow sites and dredging plants.

- 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. The four key parts of a quality review comment will normally include:

- (1) The review concern – identify the product’s information deficiency or incorrect application of policy, guidance, or procedures;
- (2) The basis for the concern – cite the appropriate law, policy, guidance, or procedure that has not be properly followed;
- (3) The significance of the concern – indicate the importance of the concern with regard to its potential impact on the plan selection, recommended plan components, efficiency (cost),

effectiveness (function/outputs), implementation responsibilities, safety, Federal interest, or public acceptability; and

- (4) The probable specific action needed to resolve the concern – identify the action(s) that the reporting officers must take to resolve the concern.

In some situations, especially addressing incomplete or unclear information, comments may seek clarification in order to then assess whether further specific concerns may exist.

The ATR documentation in DrChecks will include the text of each ATR concern, the PDT response, a brief summary of the pertinent points in any discussion, including any vertical team coordination (the vertical team includes the district, RMO, MSC, and HQUSACE), and the agreed upon resolution. 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 1110-1-12 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.

At the conclusion of each ATR effort, the ATR team will prepare a Review Report summarizing the review. Review Reports will be considered an integral part of the ATR documentation and shall:

- Identify the document(s) reviewed and the purpose of the review;
- 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;
- Identify and summarize each unresolved issue (if any); and
- Include a verbatim copy of each reviewer's comments (either with or without specific attributions), or represent the views of the group as a whole, including any disparate and dissenting views.

ATR may be certified when all ATR concerns are either resolved or referred to the vertical team for resolution and the ATR documentation is complete. The ATR Lead will prepare a Statement of Technical Review certifying that the issues raised by the ATR team have been resolved (or elevated to the vertical team). A Statement of Technical Review should be completed, based on work reviewed to date, for the AFB, draft report, and final report. A sample Statement of Technical Review is included in Attachment 2.

6. INDEPENDENT EXTERNAL PEER REVIEW (IEPR)

- a. **Decision on IEPR.** Type I IEPR will **not** be conducted for the Folly Beach Shore Protection Project Limited Reevaluation Report. The scope of the Folly Beach LRR is limited to the tasks necessary to update the economics to verify and support budgeting of the next renourishment cycle and also to check the authorized maximum cost of projects. The impact of the decision document is not considered significant due to the fact that the project has been initially constructed and has undergone periodic renourishment once before. In addition, no changes have been made to the project purpose, scope, footprint, or construction methodology since the 1991 District Engineer's Post Authorization Change Report. The decision document subject to review does not meet any of

the following mandatory triggers for Type I IEPR described in Paragraph 11.d.(1) and Appendix D of EC 1165-2-20:

- (1) **Significant Threat to Human Life:** The project poses no threat to human life.
- (2) **Total Project Cost > \$45 Million:** Total Cost is estimated to be \$ 17,300,300
- (3) **Requested by State Governor of Affected State:** No request has been made
- (4) **Requested by the Head of a Federal or State Agency Charged with Reviewing the Project Study:** No request has been made
- (5) **Significant Dispute as to Size, Nature or Effects of the Project:** No disputes are evident.
- (6) **Significant Public Dispute as to the Economic or Environmental Cost or Benefit of the Project:** No Disputes are evident.
- (7) **Cases where Information is based on novel methods, presents complex challenges for interpretation, contains precedent setting methods or models, or presents conclusions that are likely to change prevailing practices:** This is a renourishment of an existing project, no new or novel methods or models are being incorporated. None of the conclusions presented will alter any prevailing practices.
- (8) **A circumstance where the Chief of Engineers determines a Type I IEPR is warranted:** The Chief of Engineers has made no such determination.

In addition, the proposed project is subject to the uncertainty of the frequency and severity of the hurricanes, nor'easters, and other erosive storm events that impact the project area during the interval between periodic renourishments. Neither the Folly Beach Shore Protection Project nor the LRR being reviewed are considered controversial, have substantial adverse impacts on fish and wildlife species and their habitat prior to implementation of mitigation measures, or include an EIS. Given the information provided above and that there is not a need to reformulate the project, HQUSACE has confirmed that this report is not subject to Type I IEPR. This decision is consistent with previous findings for Limited Reevaluation Reports for Coastal Storm Damage Reduction Projects, such as Martin County, Florida. Therefore, Type I IEPR is not proposed for this project.

Although this Review Plan pertains only to the LRR, it is anticipated that Type II IEPR will **not** be considered appropriate because storm damage reduction projects typically do not involve a project attempting to eliminate storm damage such that project failure would result in a catastrophe or significant threat to human life. Rather, they reduce the amount of expected damages from smaller magnitude, more frequent storms. The Folly Beach Shore Protection Project is classified as providing protection from a 5-year return interval storm event. This magnitude of storm cannot be considered severe enough to represent a significant threat to human life. The determination of whether Type II IEPR will be required will be made prior to the implementation phase of this renourishment effort.

- b. **Products to Undergo Type I IEPR.** Not-Applicable
- c. **Required Type I IEPR Panel Expertise.** Not-Applicable
- d. **Documentation of Type I IEPR.** Not-Applicable

7. MODEL CERTIFICATION AND APPROVAL

a. Planning Models. The following planning models are anticipated to be used in the development of the decision document: None.

Model Name and Version	Brief Description of the Model and How It Will Be Applied in the Study	Certification / Approval Status
None	Not-Applicable	N/A

b. Engineering Models. The following engineering models are anticipated to be used in the development of the decision document: None.

Model Name and Version	Brief Description of the Model and How It Will Be Applied in the Study
None	Not-Applicable

8. REVIEW SCHEDULES AND COSTS

a. ATR Schedule and Cost.

ATR for the LRR was completed on 29-April-2011. DrChecks was used to manage and track comments by the ATR team and evaluations of comments by the PDT. The estimated duration for ATR was approximately 3 weeks and the ATR was completed in approximately 2 months.

Schedule of Agency Technical Review:

- Feb. 21 - PDT completes LRR
- Feb. 23 – Submitted LRR to PCX-CSDR and Cost DX for ATR
- Apr. 29 – ATR of LRR completed
- May 6 – LRR submitted to SAD for review and approval
- August 30 – Final LRR approved by SAD

Costs for the ATR totaled \$16,500 and included \$11,500 for the review team from the PCX and \$5,000 for the Cost Engineering DX. Project delivery team member required approximately \$8,000 to evaluate and address comments from the PCX and Cost DX ATR team members.

b. Type I IEPR Schedule and Cost. Not-Applicable as SAC as indicated that they will request an IEPR waiver.

c. Model Certification/Approval Schedule and Cost. Not-Applicable.

9. PUBLIC PARTICIPATION

Due to the limited scope of the Folly Beach LRR and the project phase, second periodic renourishment after initial construction, the public will not be given an opportunity to comment on the development of the LRR. Prior to construction, NEPA coordination will take place and the public will have an opportunity for comment during that timeframe. The final decision document will be posted on the District’s public web site for viewing and download by the public.

10. REVIEW PLAN APPROVAL AND UPDATES

The South Atlantic Division Commander is responsible for approving this Review Plan. However, the Commander has the option to delegate review and approval. In SAD, review and approval authority has been delegated to Chief Planning and Program Division (Type I IEPR) and the Chief of Business Technical Division (Type II IEPR). The Commander's approval reflects vertical team input (involving district, MSC, RMO, and HQUSACE members) as to the appropriate scope and level of review for the decision document. Like the PMP, 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 MSC Commander approval are documented in Attachment 3. Significant changes to the Review Plan (such as changes to the scope and/or level of review) should 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, should be posted on the Home District's webpage. The latest Review Plan should also be provided to the RMO and home MSC.

11. REVIEW PLAN POINTS OF CONTACT

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

- *Charleston District Project Manager, (843) 329-8153*
- *South Atlantic Division Economist, (404) 562-5228*
- *North Atlantic Division PCX-CSDR, (347) 370-4571*

ATTACHMENT 1: TEAM ROSTERS

Project Delivery Team (PDT) Members:

- Project Manager – (843) 329-8153
- Planning Chief – (843) 329-8050
- Plan Formulator – (843) 329-8051
- Economist – (843) 329-8068
- Biologist – (843) 329-8162
- Cost Engineer – (843) 329-8147
- Civil Engineer – (843) 329-8132
- Geotechnical Engineer – (910) 251-4449
- CADD/GIS – (843) 329-8192

Agency Technical Review (ATR) Team Members:

- ATR Lead/Plan Formulator – (757) 201-7195
- Economics – (978) 318-8235
- Environmental Resources – (978) 318-8231
- Coastal Engineering – (917) 790-8396
- Cost Engineer – (409) 766-3053
- Cost Engineer – (509) 527-7332

ATTACHMENT 2: PCX-CSDR REVIEW AND CONCURRENCE OF REVIEW PLAN



DEPARTMENT OF THE ARMY
NORTH ATLANTIC DIVISION, CORPS OF ENGINEERS
FORT HAMILTON MILITARY COMMUNITY
BROOKLYN, NY 11252-6700

REPLY TO
ATTENTION OF

CEPCX-CSDR

MAR 23 2011

MEMORANDUM FOR: Chief, CESAC-PM-P, Attention: Mr. Brian Williams

SUBJECT: Folly Beach Shore Protection, City of Folly Beach, South Carolina
Limited Reevaluation Report

1. The National Planning Center of Expertise for Coastal Storm Damage Reduction (PCX-CSDR) has reviewed the Review Plan (RP) for the subject study and concurs that the RP complies with current peer review policy requirements contained in EC 1165-2-209, entitled "Civil Works Review Policy".
2. The review was performed by Mr. Larry Cocchieri, Deputy, PCX-CSDR.
3. PCX-CSDR has no objection to RP approval by the Commander, South Atlantic Division. Upon approval of the RP, please provide a copy of the approved RP, a copy of the SAD Commander approval memorandum and the link to where the RP is posted on the SAC or SAD website to Mr. Cocchieri.
4. Thank you for the opportunity to assist in the preparation of the RP. PCX-CSDR is prepared to continue to lead the Agency Technical Review for the subject study and will continue to coordinate with the PDT. For further information, please contact me at (917) 613-3873 or Mr. Cocchieri at 347-370-4571.

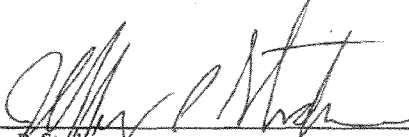
for

JOSEPH R. VIETRI
Director, National Planning Center of
Expertise for Coastal Storm Damage
Reduction

ATTACHMENT 3: ATR CERTIFICATION


COMPLETION OF AGENCY TECHNICAL REVIEW

The Agency Technical Review (ATR) has been completed for the Folly Beach Shore Protection, City of Folly Beach, South Carolina, Limited Reevaluation Report. 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 US Army Corps of Engineers policy. The ATR also assessed the 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 closed in DrChecksSM and all comments have been closed with three having outstanding concerns. The remaining three comments will be coordinated with the MSC.




Jeffery P. Sullivan
ATR Team Lead
CENAO-WR-PR

29 April 2011
Date



Brian P. Williams
Project Manager
CESAC-PD-FP

5/1/11
Date


LARRY COLCHIERI
DEPUTY, NATIONAL PCX for Coastal Storm Damage Reduction
for Joseph R. Vietri
Director, National PCX for Coastal Storm Damage Reduction
CENAD-PD-P

4/29/11
Date

CERTIFICATION OF AGENCY TECHNICAL REVIEW

Significant concerns and the explanation of the resolution are as follows: Documentation of Agency Technical Review, including major technical concerns and their resolution, are provided in the submittal package.

As noted above, all but three comments resulting from the ATR of the project have been fully resolved and those will be coordinated with the MSC.



Carole A. Works
Chief, Engineering Branch
CESAC-TS-EN

5/3/11

Date



Patrick E. O'Donnell
Chief, Planning and Environmental Branch
CESAC-PM-PL

5/3/11

Date

ATTACHMENT 4: REVIEW PLAN REVISIONS

Revision Date	Description of Change	Page / Paragraph Number

ATTACHMENT 5: ACRONYMS AND ABBREVIATIONS

Term	Definition	Term	Definition
AFB	Alternative Formulation Briefing	NED	National Economic Development
ASA(CW)	Assistant Secretary of the Army for Civil Works	NER	National Ecosystem Restoration
ATR	Agency Technical Review	NEPA	National Environmental Policy Act
CSDR	Coastal Storm Damage Reduction	O&M	Operation and maintenance
DPR	Detailed Project Report	OMB	Office and Management and Budget
DQC	District Quality Control/Quality Assurance	OMRR&R	Operation, Maintenance, Repair, Replacement and Rehabilitation
DX	Directory of Expertise	OEO	Outside Eligible Organization
EA	Environmental Assessment	OSE	Other Social Effects
EC	Engineer Circular	PCX	Planning Center of Expertise
EIS	Environmental Impact Statement	PDT	Project Delivery Team
EO	Executive Order	PAC	Post Authorization Change
ER	Ecosystem Restoration	PMP	Project Management Plan
FDR	Flood Damage Reduction	PL	Public Law
FEMA	Federal Emergency Management Agency	QMP	Quality Management Plan
FRM	Flood Risk Management	QA	Quality Assurance
FSM	Feasibility Scoping Meeting	QC	Quality Control
GRR	General Reevaluation Report	RED	Regional Economic Development
HQUSACE	Headquarters, U.S. Army Corps of Engineers	RMC	Risk Management Center
IEPR	Independent External Peer Review	RMO	Review Management Organization
ITR	Independent Technical Review	RTS	Regional Technical Specialist
LRR	Limited Reevaluation Report	SAR	Safety Assurance Review
MSC	Major Subordinate Command	USACE	U.S. Army Corps of Engineers
		WRDA	Water Resources Development Act



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
SOUTH ATLANTIC DIVISION, CORPS OF ENGINEERS
ROOM 10M15, 60 FORSYTH ST., S.W.
ATLANTA GA 30303-8801

JUN -9 2011

CESAD-PDS-P

2 June 2011

MEMORANDUM FOR COMMANDER, Charleston District (CESAC-PD)

SUBJECT: Folly Beach Shore Protection Limited Reevaluation Report (LLR) Review Plan (RP)

1. Reference memorandum, CESAC-PM, subject: Folly Beach Shore Protection Project, City of Folly Beach, South Carolina Limited Reevaluation Review Plan (RP), 24 March 2011, submitting the project RP.
2. The subject peer review plan has been reviewed and comments are enclosed for your action. Based on the information provided, SAD concurs that Type 1 IEPR should not be required and will forward a request to headquarters for an exemption.
3. If you have any questions, please do not hesitate to contact Mr. Terry Stratton or Ms. Vechev V. Lampley of my staff at (404) 562-5228 or (404) 562-5227 respectively.

FOR THE COMMANDER:

WILBERT V. PAYNES
Chief, Planning and Policy
Community of Practice

Encl

CF: CECW-SAD-RIT (Brown)

South Atlantic Division Policy Review Comments
Folly Beach Shore Protection Limited Reevaluation Report (LLR)
Review Plan (RP)

1. General Comment: Cover Page: MSC Approval Date needs to be changed to South Atlantic Division Approval Date.

Cover Page: The following watermark must be included on cover page (Bottom Center above the Corps Castle), per HQUSACE instructions:

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

2. General Comment: Although this RP is for the LRR (decision document) only, it also attempts to address other phases (such as implementation document phase) by discussing why a Type II IEPR is not considered appropriate.

Action: The RP should be corrected to (1) more clearly address that it is for the LRR only and indicate that it is anticipated that a Type II IEPR will not be needed but that this determination will be made prior to the implementation phase of this re-nourishment effort, or (2) more completely address the implementation phase (design and construction). [i.e. Is ATR is planned for the design phase and what will be reviewed? What expertise is need by the ATR Team members for the implementation phase? What Engineering Models (if any) are to be used? Who will be the RMO for the implementation phase? etc.)

3. Paragraph 3.b states, "The next periodic re-nourishment is estimated to cost approximately \$15.7 million." Is this information appropriate for a document that will be posted on a web site and made available to the public?

Action: If not, suggest deleting this sentence.

4. Paragraph 5.b states, "The National Planning Center of Expertise for Coastal Storm Damage Reduction (North Atlantic Division, NAD) or RMC, in cooperation with the PDT and vertical team, will determine the final make-up of the ATR team."

Action: Since the paragraph 2 states that the RMO is NAD, delete "or RMC from this sentence.

5. In paragraph 5.b; last sentence. This statement should be more direct.

Action: Change "might be" to "needs to be".

6. The schedule presented in paragraph 8.a either is out of date or the ATR has been completed. However, this RP is not written indicating that the ATR has been completed.

Action: Review the schedule and correct as needed or review the RP and correct as necessary.

7. Attachment 1 lists the ATR Team Members. Has the ATR been completed?

Action: See comment 6 above about ATR schedule and correct if necessary.

8. In the future SAD will seek to develop a policy and request a categorical exclusion for LRRs for "normal" re-nourishments on existing HSDR projects. But for now, we (SAC/SAD) will need to request a specific exclusion from Type I IEPR for the Folly Beach LRR.

Action: RP will need to be revised to address IEPR requirement and present a justification for why IEPR exclusion is appropriate. (Similar to what is presented in your 24 Mar 11 transmittal letter.) Based on what we know now, SAD will proceed to request an IEPR exclusion from HQ.

9. Cost sharing adjustments have not been reflected.

Action: Recommend including language that describes that due to construction and continued operation of the current Charleston Harbor channel, the cost sharing for re-nourishments for the project has been adjusted to xx% navigation with the remainder being cost shared xx% federal and xx% non-federal.

10. DQC, p. 6 - subparagraphs 4.a - c:

a) these subparagraphs appear to indicate that the PDT will perform all of the DQC – Attachment 1 identifies the members of the PDT - EC 1165-2-209, para. 8.b(1) requires that while "[q]uality checks may be performed by staff responsible for the work, such as supervisors, work leaders, team leaders, designated individuals from the senior staff, or other qualified personnel ... they should not be performed by the same people who performed the original work ..." - the PDT appears to include a number of individuals who will perform the original work and performance of DQC.

Action: The RP needs to acknowledge the requirement for DQC by listing individuals who are not performing any of the original work;

11. ATR, p. 6 - subparagraphs 4.a & 5.a indicate that the DQC documentation will be provided to the ATR team only "upon request" - DQC documentation is a mandatory part of the ATR review - EC 1165-2-209 requires that "[f]or each ... (ATR) event, the ATR

team will examine, as part of its ATR activities, relevant DQC records and provide written comment in the ATR report as to the apparent adequacy of the DQC effort for the associated product or service." - the ATR certificate (Attachment C-1 to the EC, and Attachment 2 to the RP) expressly states: "The ATR also assessed the District Quality Control (DQC) documentation and made the determination that the DQC activities employed appear to be appropriate and effective." - subparagraph 4.a in the template RP provided by the Planning-Policy PCX must include "what DQC documentation will be provided to the ATR team at each review".

Action: the RP needs to state that the DQC documentation will be provided to and will be reviewed by the ATR team.

12. IEPR, p. 8:

a) Any "decision document" that does not require a Type I IEPR requires an "exclusion" recommendation from the MSC and decision by HQ, and this recommendation and decision becomes part of the RP prior to RP approval by the MSC."

Action: SAD will request the IEPR waiver.

13. RP POCs, p. 10 – Includes names, as well as, title and phone number.

Action: Since these RPs are publicly posted, it is recommended to simply list the title and phone number (but not the name) of each POC - that's consistent w/ the template RP provided by the Planning-Policy PCX.

14. RP does not include HSDR PCX endorsing the Review Plan or stating they agree with the approach.

Action: Coordinate and seek HSDR PCX endorsement.

15. Item 3.a. – should read continued economic justification and environmental acceptability of re-nourishing The key is not just the cost of the re-nourishment, but also that the structures being protected from damage and the damages being prevented warrant to justify the continued re-nourishment and its expense. This includes access and parking.

Action: Restate.

16. PR does not include information of the operation of the navigation channel nor the impacts it has on the cost sharing for project re-nourishments.

Action: Include this discussion in Section 3.

From: [Lampley, Vechere V SAD](#)
To: [Williams, Brian P SAC](#)
Cc: [Stratton, Terry D SAD](#); [Paynes, Wilbert V SAD](#); [O'Donnell, Patrick E SAC](#); [Metheney, Lisa A SAC](#); [Jellema, Jonathan M HQ@SAD](#); [Truelove, James C SAD](#)
Subject: RE: Folly Beach LRR Review Plan - Revisions (UNCLASSIFIED)
Date: Thursday, July 28, 2011 2:15:07 PM

Classification: UNCLASSIFIED
Caveats: NONE

Brian,
Please see additional comments below on the revised subject review plan:

Page 6, Para. 4.a - This misunderstands comment 10 in the 2 June 11 CESAD-PDS-P Memorandum - Quality Checks is not the sole component of DQC (just as PDT review is not - that was the problem with the original). RPs need to include both in the DQC review.

Action: 4.a Add statement such as, "DQC will include both internal PDT review of the draft document, supporting appendices and data and "quality checks". These quality checks will be performed by staff responsible"

Page 8, Para. 6.a - We do not identify which Type I exclusion category in Para. 11.d(3) that we're invoking. It states some of the requirements for the first category of exclusion are met (no EIS, not controversial, no subst. impacts on F&W prior to mitigation), while we omit others (no > negligible impacts unique tribal/cultural/historic, no > negligible impacts endangered/threatened species or critical habitat).

Action: Address all categories of exclusions in Paragraph 6a. Use the 3-step approach for Type I IEPR exclusion in the RP and the exclusion request (1 - no mandatory triggers met, 2 - identify the exclusion category and how each of the requirements are met, and 3) document the deliberate, risk-informed recommendation since meeting the exclusion is not, in and of itself, sufficient)

Page 10, Para. 10 - The RP states approval must be made by the Commander - no reflection of the fact that there's a delegation to Chief Planning and Program Division (Type 1) and the Chief of Business Technical Division.

Action: Reflect that Commander delegated his approval authority to Chief Planning and Policy Division (Type 1) and the Chief of Business Technical Division (Type 2).

Please revise and we will try to get the approval letter to SAC quickly.

Thanks,
Vechere' V. Lampley
Senior Regional Environmental Specialist
South Atlantic Division, Corps of Engineers
404-562-5227

-----Original Message-----

From: Williams, Brian P SAC
Sent: Friday, July 01, 2011 1:31 PM
To: Lampley, Vechere V SAD
Cc: Stratton, Terry D SAD; Paynes, Wilbert V SAD; O'Donnell, Patrick E SAC
Subject: Folly Beach LRR Review Plan - Revisions (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Vechere,

As mentioned during our last phone conversation, the revised Review Plan (RP) for the Folly Beach Limited Reevaluation Report (LRR) is attached to this e-mail and on its way to SAD (5 copies) via postal mail. We believe that all comments received in the 2 June 2011 memo from SAD have been evaluated and incorporated into this version.

As I understand the process, SAD will need to issue conditional approval of the plan, submit a request for exemption from Type I IEPR, and receive confirmation of the exemption prior to the MSC approving the Review Plan. Please keep Pat O'Donnell and me as informed as possible of the progress of the RP through this process.

If you have any questions or issues, please do not hesitate to call or e-mail me. We are looking forward to receiving the LRR comments any day now.

Thanks,

Brian Williams
Civil Works Project Manager
Charleston District
69A Hagood Ave
Charleston, SC 29403
(O): 843.329.8153
(C): 843.670.4704

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

From: [Lampley, Vechere V SAD](#)
To: [Williams, Brian P SAC](#)
Cc: [Stratton, Terry D SAD](#); [Paynes, Wilbert V SAD](#)
Subject: FW: Foley Beach LRR Review Plan - IEPR (UNCLASSIFIED)
Date: Monday, August 08, 2011 10:57:34 PM

Classification: UNCLASSIFIED
Caveats: NONE

As indicated, please see HQ concurrence in not including Type 1 IEPR.

Vechere' V. Lampley
Senior Regional Environmental Specialist
South Atlantic Division, Corps of Engineers
404-562-5227

-----Original Message-----

From: Brown, Stacey E HQ02
Sent: Monday, July 18, 2011 11:42 AM
To: Lampley, Vechere V SAD; Schwichtenberg, Bradd R HQ02
Cc: Paynes, Wilbert V SAD; Stratton, Terry D SAD
Subject: RE: Foley Beach LRR Review Plan - IEPR (UNCLASSIFIED)

Vechere - HQUSACE concurs with the proposed path forward. Please include wording in the review plan that is consistent with the memo that was sent for Martin County.

Thanks.

Stacey E. Brown
U.S. Army Corps of Engineers
Deputy Chief (Civil Works)
South Atlantic Division
Regional Integration Team
(202) 761-4106 (voice)
(202) 689-9316 (cell)
(202) 761-1016 (fax)

-----Original Message-----

From: Lampley, Vechere V SAD
Sent: Monday, July 18, 2011 9:34 AM
To: Brown, Stacey E HQ02; Schwichtenberg, Bradd R HQ02
Cc: Paynes, Wilbert V SAD; Stratton, Terry D SAD
Subject: RE: Foley Beach LRR Review Plan - IEPR (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Thank you, Stacey. If you need any additional information, just let me know.

Vechere' V. Lampley
Senior Regional Environmental Specialist South Atlantic Division, Corps of Engineers
404-562-5227

-----Original Message-----

From: Brown, Stacey E HQ02

Sent: Monday, July 18, 2011 8:33 AM
To: Lampley, Veche V SAD; Schwichtenberg, Bradd R HQ02
Cc: Paynes, Wilbert V SAD; Stratton, Terry D SAD
Subject: RE: Foley Beach LRR Review Plan - IEPR (UNCLASSIFIED)

Veche V - I am coordinating this request within the HQUSACE and will get back to you.

Stacey E. Brown
U.S. Army Corps of Engineers
Deputy Chief (Civil Works)
South Atlantic Division
Regional Integration Team
(202) 761-4106 (voice)
(202) 689-9316 (cell)
(202) 761-1016 (fax)

-----Original Message-----

From: Lampley, Veche V SAD
Sent: Saturday, July 16, 2011 10:39 PM
To: Brown, Stacey E HQ02; Schwichtenberg, Bradd R HQ02
Cc: Paynes, Wilbert V SAD; Stratton, Terry D SAD
Subject: Foley Beach LRR Review Plan - IEPR (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Stacey,

Reference is made to your attached 15 February letter concerning any requirement for IEPR on the Martin County, Florida Limited Re-Evaluation Report (LRR).

SAC has submitted a revised Review Plan for Folly Beach LRR. The re-nourishment project does not meet any of the mandatory triggers in Paragraph 11.d (1) and Appendix D of EC 1165-2-209. The project purpose, scope, footprint or construction methodology are unchanged. Re-formulation does not appear to be necessary. Further, SAC has concluded that the re-nourishment does not have substantial adverse environmental impacts. Based on the referenced letter and this information, it is our intent to proceed with an endorsement of the review plan, which does not include Type 1 IEPR.

SAD would appreciate your thoughts on our pathway forward.

Respectfully,

Veche V. Lampley

Senior Regional Environmental Specialist

South Atlantic Division, Corps of Engineers

404-562-5227

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE

Classification: UNCLASSIFIED
Caveats: NONE