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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
WASHINGTON, D.C. 20314-1000

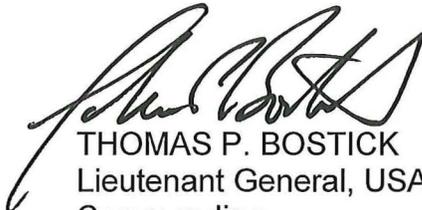
27 JAN 2015

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (CIVIL WORKS)
108 ARMY PENTAGON, WASHINGTON, DC 20310-0108

SUBJECT: Kansas Citys, Missouri and Kansas Flood Risk Management Project - Final
USACE Response to Independent External Peer Review

1. An Independent External Peer Review (IEPR) was conducted for the subject project in accordance with Section 2034 of the Water Resources Development Act of 2007, EC 1165-2-209, and the Office of Management and Budget's Final Information Quality Bulletin for Peer Review (2004).
2. The IEPR was conducted by Battelle Memorial Institute. The IEPR panel consisted of four panel members with technical expertise in hydraulic and hydrologic engineering, geotechnical/structural engineering; civil/construction engineering; biology/ecology; and Civil Works planning.
3. The final written responses to the IEPR are hereby approved. The enclosed document contains the final written responses of the Chief of Engineers to the issues raised and the recommendations contained in the IEPR report. The IEPR Report and the USACE responses have been coordinated with the vertical team and will be posted on the internet, as required in EC 1165-2-209.
4. If you have any questions on this matter, please contact me or have a member of your staff contact Mr. Steven A. Kopecky, Deputy Chief RIT, Northwestern Division and Pacific Ocean Division Directorate of Contingency Operations, at 202-761-4527.

Encl


THOMAS P. BOSTICK
Lieutenant General, USA
Commanding

**USACE Response to Independent External Peer Review
Kansas City, MO & KS, Final Feasibility Study
Kansas City, Missouri and Kansas
March 2014**

An Independent External Peer Review (IEPR) was initiated for the subject project in accordance with Department of the Army, USACE, guidance *Peer Review of Decision Documents* (EC 1105-2-410) dated August 22, 2008, and completed in accordance with USACE guidance *Civil Works Review Policy* (EC 1165-2-214), and the Office of Management and Budget's *Final Information Quality Bulletin for Peer Review* released December 16, 2004.

The goal of the U.S. Army Corps of Engineers (USACE) Civil Works program is to always provide scientifically sound, sustainable water resources solutions for the nation. The USACE review processes are essential to ensuring project safety and quality of the products USACE provides to the American people. Battelle Memorial Institute (Battelle), a non-profit science and technology organization with experience in establishing and administering peer review panels for the USACE, was engaged to conduct the subject IEPR.

This IEPR was conducted in two rounds. The first round of the IEPR began in September 2012 and officially ended in August 2013. This round involved the review of the Alternative Formulation Briefing (AFB) read-ahead material document, as well as several technical appendices. The second round of IEPR began in September 2013 and was completed in January 2014. This second round involved the review of the draft final feasibility report as well as several technical appendices.

The IEPR panel consisted of five individuals selected by Battelle with technical expertise in Civil Works planning, biology/ecology, hydrologic and hydraulic engineering, geotechnical/structural engineering, and civil engineering/construction engineering.

The Final Report from the IEPR was issued by Battelle on November 25, 2013. Overall, the report contained fourteen comments from the first phase of the review and seven comments from the second phase. Of the fourteen comments submitted in the first round, five were identified as having high significance, seven having medium significance, and one having low significance. The seven comments from the second round of the IEPR included one having high significance, two having medium significance, and four having low significance. All comments were resolved.

The following fourteen comments were submitted by the IEPR panel prior to the AFB portion of the USACE study process. The purpose of the AFB is to ensure that plans have been properly formulated, legal and policy issues have been identified and a consensus on resolution has been reached.

- 1. Comment - The closure system and its required processes lack detailed documentation and appear to exclude redundancy, which could affect reliability.**

Three recommendations were proposed for incorporation into the study at the study moved into its final stages of development. The focus of these recommendations sought clarity in the function and operation of the closures system.

USACE Response: Not Adopted

The design, operation, exercise, and inspection of the closure system and levee are part of the original functional levee. The information requested by the panel is contained in the operation manuals and is available upon request. Providing the data within the report would only serve to duplicate documents currently available for public consumption.

2. Comment - The Environmental Impact Statement contains information that is considered outdated by NEPA standards and does not fully consider the resources and impacts associated with Phase II of the project.

Four recommendations were provided for this first round of comments by the IEPR panel. At the time the first round of IEPR comments were received the Project Development Team (PDT) was still developing the EIS. A recommendation of the IEPR Panel was that the report include a supplemental NEPA document. Adopt statements represent those issues that were already occurring as part of the study process.

USACE Response: Adopted

Action Taken: No significant changes have occurred since the 2006 EIS documentation. However, a formal review of the EIS occurred to ensure that all information presented therein relevant to the Phase 2 units was still accurate. This review included site visits of the project area and borrow areas to document any changes from previously documented conditions. This review was documented in the Feasibility Report. Updated coordination letters have been provided to the relevant agencies in conjunction with the public notice and public comment period.

USACE Response: Not Adopted

No significant changes have occurred since the 2006 EIS. The recommendation for a supplemental NEPA document is not necessary.

3. Comment - Potential risks to the riverside impermeable blanket and levee embankments from tree roots, animal burrows, and man-made features (including scour associated with bridge piers) were not discussed.

Two recommendations were provided to enable the reader understand how USACE manages the potential risks noted in the comment. The IEPR Panel recommended including in the report some considerations on the risk and uncertainty associated with the comment subjects. An additional recommendation asked that the PDT consider the cost of mitigation measure for above risks.

USACE Response: Not Adopted

USACE manages the concerned risks with non-Federal sponsor operation and maintenance requirements are documented in annual and periodic inspection reports and are also assessed through the Levee Safety Action Classification screening and rating system. This information is available upon request and is not typically part of a feasibility report.

Measures and costs for modifications to the underseepage control system required as part of the proposed levee raise are already included in the Recommended Plan where needed. There are a number of locations in the Armourdale and CID Units where bridge piers are located in the embankment, or adjacent to the riverward levee toe. All of these locations are currently heavily armored with riprap to control scour during flood conditions. In accordance with their current O&M requirements, the sponsors have continuously maintained the riprap in good condition including control and removal of vegetation and adding new rock overlays as needed in response to normal weathering. There is a low risk of significant scour concerns in the existing condition.

Implementation of the recommended plan will have no effect on the existing condition related to scour concern. There are no riverward levee raises proposed that would affect piers currently in the embankment or introduce additional piers into the embankment. Scour risk will continue to be managed by monitoring the riprap condition, both by the sponsors and through our annual and periodic inspection processes, and sponsor maintenance and replacement actions. Additionally, penetrating utilities and potential piping failure is discussed in the response to Comment 4.

4. Comment - The risk and uncertainty associated with a number of project structural features are not fully described.

Five recommendations were provided by the panel to facilitate the development of the report's risk and uncertainty discussion. At this pre-AFB level, the report lacked some of the details desired by the IEPR panel.

USACE Response: Adopted

Action Taken: Six project structural features were noted by the IEPR panel that warranted specific attention in the feasibility design: pile inspection, potential impact of bridge failure, abandoned conduits, uplift on storm drains, piping risks, and uplift on utilities and manholes. Additional narrative has been added to the Engineering Appendix and Feasibility Report to describe the actions taken on these issues.

The IEPR panel recommended videotaping utilities. During levee inspections videotaping of utilities is conducted and those tapes will be reviewed during the design phase. Those utilities where inspection videos are not available during design will be videotaped.

USACE Response: Not Adopted

At the time of the pre-AFB IEPR review a cost estimate had not been prepared for partial replacement of the existing foundation piles as this measure was deemed to have significant

technical and constructability concerns. The current recommended plan transfers a significant portion of the flood load on the wall to the new concrete pile, but still relies on the existing three rows of timber piles for some continued support. A design based on replacement of existing piles would presumably maintain the current three-row configuration, thus to support the load of the raised wall the replacement piles would have to be significantly larger than the pile removed, requiring significant additional excavation within the existing foundation. The measure was eliminated for these concerns.

The panel requested the PDT consider ground penetrating radar (GPR) to ascertain the condition of levees to be left in place. The PDT's prior experience on other projects has not always been reliable in determining location and condition of buried structures. The excavation and physical in-place testing of the piles already conducted is considered by the PDT to be much more reliable than GPR.

5. Comment - The costs of providing easements and acquiring additional land are not well documented.

At the pre-AFB point in the study little real estate had been conducted for the study. The recommendation of the IEPR panel was to include detail real estate cost and information regarding the apportionment of the total project cost.

USACE Response: Adopted

Action Taken: The final Feasibility Report contains a Real Estate Plan detailing easement requirements and costs. An updated appraisal of land values is included in the Appendix when completed.

6. Comment - Documentation on public involvement could not be found in the review documents.

An early review of the study found that little public involvement had been conducted prior to the AFB point in the study. Two recommendations were suggested to document and initiated public involvement. As public release of the draft report is conducted after the AFB meeting the PDT could not provide public involvement as request in the IEPR panel's first recommendation.

USACE Response: Adopted

Action Taken: After approval from HQ-USACE for publication of the Draft Feasibility Report, a public notice was issued and a public comment period conducted. Comments received during the public comment period are responded to and included in the Final Feasibility Report.

USACE Response: Not Adopted

The first round of IEPR comments were conducted prior to the release of the draft report to the public. Since the public involvement had not been initiated by USACE the PDT could not provide any documentation on efforts to engage the public.

7. Comment - Potential impacts associated with HTRW have not been fully evaluated for the Armourdale and CID units.

Recommendations were provided that request more documentation on Hazardous, Toxic, Radioactive Waste (HTRW) investigations, risk evaluation, and reconsideration of preferred alternatives as a result of HTRW information.

USACE Response: Adopted

Additional HTRW assessment of the Armourdale and CID units was completed in 2007. This documentation was not provided as part of the pre-AFB review material but is included in the final Feasibility Report. Risks of and potential impacts of HTRW have been evaluated based on the 2007 documentation. Avoidance of the areas identified in the 2007 HTRW assessment was used as an evaluation criterion during the plan formulation process leading to the preferred alternative.

8. Comment - With no backup power for the pumping system, the assumed conditions for the outfall of the interior drainage might be different than FEMA's modeling assumptions.

Three recommendations were provided that requested consideration of FEMA's effective model for interior drainage modeling, time required to resolve any pump failures, and providing a remapping of Flood Insurance Rate Maps. Issues regarding particular FEMA mission areas, such as, impacts to FEMA's effective modeling results and Flood Insurance Rate Maps are at the discretion of the non-Federal sponsor.

USACE Response: Adopt

Action Taken: The non-Federal sponsors have a robust program for ensuring that the pump stations are adequately maintained and ready for operation. Should a pump station failure occur requiring immediate action, both the sponsor and the Kansas City District have personnel and equipment readily available to implement temporary measures.

USACE Response: Not Adopt

The non-Federal sponsors are independently pursuing 1% event certification pursuant to FEMA criteria, which may result in model changes or mapping at that level. Any such changes and potential impacts will be determined by the sponsors' engineer. This feasibility study is focused on the performance, costs, and benefits of the existing levee system at, or exceeding, the 0.2% flood event. Modeling assumptions at the 1% are unlikely to change the study recommendations.

9. Comment - No emergency action plan is described should a flood ever overtop the levees.

The panel's concern at this preliminary stage in the report is that study had not address the levee system's emergency action plan. The concern was twofold - the study needed to articulate what would be the non-federal sponsor's flood risk management plan and what situations would be triggers for evacuation. USACE adopted the recommendation regarding the emergency action plan since these discussions were already initiated with the non-federal sponsor. USACE did not adopt the recommendation regarding trigger levels as these have been defined by others.

USACE Response: Adopt

Action Taken: While this is typically the sponsors' responsibility, the Corps of Engineers can provide assistance to the sponsors in conducting these activities through the Feasibility Study process or other available cost-shared authorities and programs. Discussions have already begun with the sponsors regarding assisting them with planning and preparation of a Flood Risk Management plan. However, this effort and any resulting product will be separate from the Feasibility Report and provided only to the sponsors' for their future use, further development, and implementation.

USACE Response: Not Adopt

River elevations that prompt watches and warnings are maintained and acted upon by the National Weather Service as a part of their river forecasting responsibility. Evacuations are implemented and managed by the local levee sponsors, municipalities, and emergency authorities. Kansas City District already has in place plans and procedures for levee repair, and sandbag storage and distribution, through the PL 84-99 Emergency Assistance program managed by the Kansas City District's Emergency Management Branch.

10. Comment - The AFB documentation describing how the NED Plan was selected and how the benefits were evaluated appears to be incomplete and may contain inaccuracies.

The panel noted that further details on the NED Plan needed to be developed as part of the draft Feasibility Report. Four recommendations were provided to the PDT that focused on details for the Argentine, Armourdale, and CID units of the project. USACE adopted the recommendation to provided additional documentation on the NED benefits but did not adopt the remaining recommendations due to preliminary results presented in the AFB documents.

USACE Response: Adopted

Action Taken: Additional detail on the economic calculations is provided in Appendix B of the Feasibility Report.

USACE Response: Not Adopted

The economic analysis for Phase 2 was conducted for Armourdale and CID; Argentine information was added for reporting purposes only to reflect the system approach. The update of the 2006 screening analysis is shown in the Final Report in Table 4-4.

The NED screening conducted in 2006 was updated using current costs and benefit estimates for both units individually and the Kansas River as whole and included in the Report. In consultation with the project sponsors it was agreed that it was not desired to continue the analysis of larger plans to identify the NED. USACE policy allows for the selection of NED Plan that does not ultimately maximize net economic benefits but must have greater net economic benefits than smaller plans studied.

11. Comment - Recreational opportunities that provide access to the Kansas River have not been considered in depth.

Determination of the recreational opportunities for the project was not fully described in the AFB documentation. Three recommendations were provided to ensure that there is sufficient demand for recreational opportunities and consideration was given to providing recreation as a project component.

USACE Response: Not Adopted

Public access and/or the development of specific recreational facilities must be coordinated by local interests with the non-Federal levee owner/operators and a specific plan presented to the Corps for review before Federal involvement in recreation features can be considered. No such interest or demand for recreational opportunities has been presented to the Kansas City District.

Without a formal request by the project sponsors to assess recreational potential, this effort is outside the scope and authority of this Feasibility Study. The implementation of this project does not preclude future recreational development if agreed to or desired by the non-Federal sponsor.

12. Comment - It is unclear whether or not rapid drawdown is a condition to which the levees will be subjected, or if further assessment is required.

Two recommendations were provided by the panel to understand the issues associated with a rapid drawdown of the river. The first recommendation requested a clarification of whether there was an issue with the levee embankment stability associated with a rapid drawdown. If the PDT has determined that a rapid drawdown creates a stability issue the IEPR requests an assessment be completed for the report.

USACE Response: Adopted

Action Taken: Rapid drawdown stability of the embankment slopes is not considered a significant design issue as it is not expected to occur. The Kansas River is a generally slow rising/falling river. Additionally, water levels in the lower end of the Kansas River are often

affected by backwater from the Missouri River, which is typically slower than the Kansas to respond.

It is recognized that there is a remote risk of this condition occurring, but sufficient data on the existing soil conditions is not available for the analysis. It is expected that the data necessary will be gathered during the Pre Construction Engineering and Design (PED) phase and the analysis will be conducted at that time to verify that there is no impact. This explanation is provided in the Engineering Appendix. The PDT identified the risk of an impact to the project to be minimal and determined that it is reasonable to address the issue in design phase, rather than add the field data collection efforts to the feasibility study phase.

13. Comment - The project need has not been clearly stated with respect to the description of the 1993 flood event.

Two comments were provided to the PDT to assist in presenting a clear understand of the project need relative to the 1993 flood event. The first recommendation requested the read-ahead material be revised to include a clear characterization of the 1993 event and how the preferred alternative will handle the maximum flows. The second recommendation requested that the same or similar text be added to the supplemental EA/EIS.

USACE Response: Adopted

Action Taken: The Feasibility Report contains an expanded description of the 1993 and other flood events in section 3.2.3.2. The feasibility study risk and uncertainty analysis determined that the nominal 0.2% event (500-year flood) profile plus three feet profile ensured sufficient reliability and maximized net economic benefits across the system. The existing Kansas River units will not prevent overtopping or other breach failure of this design event in their current condition.

USACE Response: Not Adopted

Since the conditions and effects described in the 2006 EIS are still applicable, a supplemental ES/EIS is not necessary.

14. Comment - Information on upstream storage and the re-regulation of dams and reservoirs is not presented.

A single recommendation was presented that requested the inclusion of documentation that describes the consideration of upstream opportunities.

USACE Response: Not adopted

The authorized discharge of the Kansas River at Kansas City was established in 1962 in coordination with the Kansas River basin reservoir system, as authorized in 1954. This discharge is discussed in Section 3.4 of the Feasibility Report. The authorization is predicated on the need for a combination of levees and reservoirs on the Kansas River to provide the desired

protection. The Kansas River levee units at Kansas City currently cannot pass the authorized discharge.

Increasing the storage or modifying the operation of upstream reservoirs on the Kansas River would require significant changes to the authorization of each of the seven Federal reservoirs; would require high costs to expand the size of several of the dams and lakes; and could have significant impacts to other authorized purposes of the reservoir system.

There is a significant uncontrolled reach of the Kansas River between the nearest upstream reservoir and the Kansas City levee units. Even with reservoir control modification, the inflows from this reach could still pose a significant threat to the local levee system.

Flow conditions on the lower Kansas River are heavily influenced by the confluence with the Missouri River. The uncontrolled flow of the Missouri River below its upstream reservoir system vastly outweighs the Kansas River basin flows and would still pose a risk to the Kansas River levee units if left unmodified.

The following seven comments were submitted by the IEPR panel in November 2013 based on a review of the draft final feasibility report. The prior fourteen comments and the adopted recommendations were incorporated into the draft final feasibility report and reviewed once more by the IEPR panel.

1. Comment - It is not clear how the condition assessments of two levee units were reduced to lower return intervals, which has implications for project benefits.

Two recommendations were presented to the PDT that requested the inclusion of summary of the major deficiencies and description of the risk assessment methodology.

USACE Response: Adopted

Action Taken: A summary table (Table 3-12) and discussion of the structural and geotechnical analyses currently included in the Engineering Appendix (Appendix A) has been added to the Main Report (Section 3.8 "Assessment of Existing Levee Integrity"). This discussion includes greater description of the specific contributors to the overall probability of failure and why each is not reliable under existing conditions. Deficiencies in the Mill St. Pump Station, the 12th St Pump Station, and the 5th Ave Pump Station are the major contributors to the existing condition probability geotechnical/structural failure for the Armourdale Unit. For the CID Unit, it is structural gatewells, floodwalls, and stoplog gaps that contribute to a lesser, but still significant, probability of structural/geotechnical failure.

Probabilities of failure were calculated separately for different features and failure modes and combined by the HEC-FDA computer model. This model takes into account risk both from overtopping and geotechnical/structural failure to determine a combined overall level of performance for the unit. Summary tables presented in the report show "Conditional Exceedance Probability – Overtopping Only" (i.e. without taking levee breaches into account), as well as "Conditional Exceedance Probability – Overtop or Breach." (i.e. all potential failure modes). Both the Armourdale and CID units have some probability of breach under existing conditions, but the probability of breach is much greater for the Armourdale Unit. The description added to the report for Recommendation #1, combined with a greater description of how HEC-FDA can account for both types of exceedance probability (including discharge-probability and stage-discharge uncertainties), should make the reasons for the 29- and 250-year return intervals more clear.

2. Comment - The Kansas Citys project's administrative record to document compliance with several federal environmental laws is incomplete.

The IEPR Panel recommended four actions to resolve this comment. USACE adopted the four recommendations.

USACE Response: Adopted

Action Taken: This and the following three paragraphs provide the PDT's action to resolve the comment by addressing the four recommendations. A list of references is included in Section

10.0 of the Final Environmental Impact Statement. A citation to this location will be added to the Final Feasibility Report.

A formal reexamination of the 2006 EIS and its relevance to the Phase 2 levee units has been completed and documented in the Final Feasibility Report. This effort was supported by a field survey of the Phase 2 units that determined that the project recommendations and the existing environmental conditions of the Phase 2 units have not changed substantively since the publication of the EIS.

Review of the previous borrow area wetland determinations was conducted as part of the reexamination of the 2006 EIS and is documented in the Final Feasibility Report. A review of National Wetland Inventory mapped wetlands in the Phase 2 Units determined that the mapped wetland areas are outside the footprint of the proposed project implementation.

USFWS and USEPA final review and coordination occurred in conjunction with the public review comment period. All comments and suggestions received from these and other resource agencies during the public review comment period are documented in the Final Feasibility Report along with the Corps response in the Public Involvement appendix.

3. Comment - Coordination with non-Federal sponsors to ensure continuity and redundancy relative to the operation of the closure systems and other flood-fighting efforts has not been described, but is needed in order to confirm that the Federal project will function as designed.

Five recommendations were provided to resolve the concerns that arose in this comment. Recommendations requested the development and continued monitoring of components of the emergency action plan.

USACE Response: Not Adopted

As referenced in the Final Feasibility Report, the responsibilities of the non-Federal sponsor are detailed in CFR 33.II.208 and ER 1130-2-530. These requirements are also stated in each levee unit's O&M Manual which includes operational checklists. Sponsor and levee unit readiness is monitored and assessed by the Corps through established inspection programs. The details of these programs are too numerous to be fully described or included in the Feasibility Report.

Operations and Maintenance manuals for each levee unit that address these issues already exist. The existing manuals will be updated to reflect the new elevations and details of the modified project.

Training compliance is already a requirement established by the previously referenced existing manuals and regulations. Annual reporting and emergency action plan requirements are already established by the previously referenced manuals and regulations. Condition and readiness of the system is monitored by the Corps of Engineers' National Levee Safety Program and through the annual and periodic Inspection of Completed Works program activities. Section 3.5 references the guidance that governs the non-Federal sponsor's O&M responsibilities.

4. Comment - The engineering analysis does not describe whether cost contingencies have been included for existing timber piles that are determined to be in an unacceptable condition for resisting design loads.

A single recommendation was requested to describe the assumptions made in the cost estimation.

USACE Response: Adopted

Action Taken: The Executive Summary of the Cost Risk Analysis Report and the matrix showing all risk items and how they were considered in determining the range of possible project costs resulting from the Monte Carlo model are provided in the cost appendix of the Final Feasibility Report. In the project risk matrix, under the heading of “Confidence in scope, investigations, design, critical quantities – Floodwalls” the PDT identified the concern of “Not enough information to adequately formulate a design.” The discussion states “*Designers did not always use a conservative approach but rather used designer intuition for assumptions. In cases where no information was available extrapolation techniques were used. Additional subsurface investigations may be required resulting in the floodwalls needing to be replaced instead of raised. Floodwalls assume 5% will not need replacement and an additional 55% will need replacement. \$10.4M x -5% to \$10.4M x 55% for a range of -\$520K to \$5.72M.*” This risk item was modeled as “Likely” to occur and the impact was determined to be “Critical” placing this concern in the High Risk Level.

5. Comment - A detailed description on how upstream reservoirs will be operated before or during a flood event to minimize the water flowing into the Kansas City area has not been provided.

A single recommendation was requested to describe in detail how upstream reservoirs will be operated before or during a flood event.

USACE Response: Adopted

Action Taken: A summary of the operation plan for the COE Kansas River Basin Reservoirs, with respect to releases during times of flooding, is included in the Final Feasibility Report in section 3.6.1 and Table 3-8.

6. Comment - Information is not provided on how an ongoing scour protection study would be considered in the final design of the Kansas City levees.

A single recommendation was requested to describe how scour-related risk and cost issues will be addressed.

USACE Response: Not Adopted

Specific risks and costs of addressing bridge scour issues have not been addressed or included within the Kansas City Levees system study. As stated above (AFB comment #3), the levee system feasibility study assumes that the Bed Degradation Study will recommend and implement

future alternatives to address degradation and associated scour related issues. The results and recommendations of the degradation study will be monitored and incorporated into the actual design of future levee modifications as needed depending on the alternatives selected for implementation. The Final Report (Section 4.2) includes clarification that any risks and costs associated with degradation study recommendations, including any related to bridge scour, will be evaluated and addressed as part of that separate study effort.

7. Comment - Public concerns regarding Phase 2 of the Kansas Citys Levees project are not adequately described in the project documentation.

Three recommendations were presented to the PDT that requested details on Phase 2 public involvement.

USACE Response: Adopted

Action Taken: The Public Comment period had not been initiated at the time of review by the IEPR panel. A description of all public involvement activities is included in the Final Feasibility Report, along with the public comments received and their responses, in the Public Involvement appendix. A discussion of Phase 1 comments is not provided in this Report as their responses are already presented in the Interim Feasibility Report and Environmental Impact Statement published in 2006.

A 30-day public review comment period was conducted with mailed notices and press releases notifying the public of the website location where the report documents were available. Written public concerns received during the public comment period are responded to in the completed Final Report.

To answer the concern raised regarding revising the Draft FFR to cite the sources used to derive the conclusions in Sections VI.I, VI.J, and VI.K of the Draft FFR, the PDT cites the Sponsor's Letter of Intent, provided to HQ-USACE as part of the Final Report submittal. Other sections of the report were updated following the completion of the public comment period. Further information regarding public involvement can be found in Appendix G of the final Feasibility Report.