



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NORTH ATLANTIC DIVISION
FORT HAMILTON MILITARY COMMUNITY
302 GENERAL LEE AVENUE
BROOKLYN NY 11252-6700

CENAD-PD-P (1200A-1105-2-10c)

23 SEP 2021

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, New England District, 696 Virginia Road Concord, MA 01742-2751

SUBJECT: Review Plan Approval for the Bridgeport and Black Rock Harbors, CT, Dredged Material Management Plan (DMMP) (P2 No. 107600)

1. References:

a. Memorandum, CENAE-PD dated 12 August 2021, Submission of the Review Plan for the Bridgeport and Black Rock Harbors, CT, Dredged Material Management Plan (DMMP) (P2 No. 107600) for Approval.

b. Memorandum, CESAM-PD-D dated 24 May 2021, Review Plan (RP) Endorsement, Bridgeport and Black Rock Harbors, Connecticut, Dredged Material Management Plan (DMMP) and Environmental Assessment (EA).

2. The Deep Draft Navigation Planning Center of Expertise of the South Atlantic Division is the lead office to execute the referenced Review Plan. The Review Plan does not include Independent External Peer Review, as it is not required.

3. The enclosed Review Plan is approved for execution and is subject to change as study circumstances require, consistent with study development under the Project Delivery Business Process. Subsequent revisions to this Review Plan or its execution require new written approval from the NAD Commander.

4. The point of contact is Mr. Larry Cocchieri, NAD Planning Program Manager, 347-370-4571, Lawrence.J.Cocchieri@usace.army.mil.

Encl

A handwritten signature in black ink, appearing to read "T. Tickner", is positioned above the typed name.

THOMAS J. TICKNER
Brigadier General, USA
Commanding



DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS
NEW ENGLAND DISTRICT
696 VIRGINIA ROAD
CONCORD MA 01742-2751

CENAE-PD

12 August 2021

MEMORANDUM FOR Commander, USACE North Atlantic Division, (CENAD-PD-X
Larry Cocchieri), 301 General Lee Avenue, Fort Hamilton Military Community,
Brooklyn, New York 11252

SUBJECT: Submission of the Review Plan for the Bridgeport and Black Rock Harbors,
CT, Dredged Material Management Plan (DMMP) (P2 No. 107600) for Approval.

1. References: ER 1165-2-217, Review Policy for Civil Works, 1 May 2021.
2. Background: The New England District developed the enclosed Review Plan dated May 2021 for the Bridgeport and Black Rock Harbors, CT, DMMP. The Review Plan has been reviewed for technical sufficiency and policy compliance by the Deep Draft Navigation Center of Expertise. The PCX's endorsement of the Review Plan is provided in the enclosed memorandum dated 24 May 2021.
3. Request: The New England District requests that the North Atlantic Division approve the attached Review Plan.
4. Point of Contact: Questions should be directed to Mr. Michael Walsh, Navigation Project Manager. He can be reached at 978-318-8586.

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JOHN A. ATILANO II
COL, EN
Commanding



REPLY TO
ATTENTION OF

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

CESAM-PD-D

24 May 2021

MEMORANDUM FOR Ms. Barbara Blumeris, CENAE-PDP, U.S. Army Corps of Engineers, New England District, 696 Virginia Road, Concord, Massachusetts 01742

SUBJECT: Review Plan (RP) Endorsement, Bridgeport and Black Rock Harbors, Connecticut, Dredged Material Management Plan (DMMP) and Environmental Assessment (EA)

1. References.

a. Director of Civil Works Memorandum, 5 April 2019, Interim Guidance on Streamlining Independent External Peer Review (IEPR) for Improved Civil Works Product Delivery

b. Engineer Circular 1165-2-217, 20 February 2018, Review Policy for Civil Works

2. The subject document (Enclosure 1) has been presented to the Deep Draft Navigation Planning Center of Expertise (DDNPCX) for its review and endorsement in accordance with References 1.a. and 1.b.

3. The DMMP will document the USACE formulation, evaluation, comparison, and selection of the least-cost dredged material placement plan that is consistent with sound engineering practices and is environmentally acceptable. A range of alternatives are being considered for placement of dredged material: unconfined open water placement, contained aqueous disposal cells, and beneficial use. An EA will be prepared.

4. The DDNPCX concurs with the level and scope of review identified and supported in the RP, including the determination that Type I IEPR is not warranted. As documented, the project does not meet any of the mandatory triggers requiring Type I IEPR: the estimated total project cost is less than \$200 million, the Governor of Connecticut has not requested peer review by independent experts, and the Chief of Engineers has not determined that the project study is controversial due to significant public dispute over the size, nature, effects, or environmental costs or benefits of the project. Further, the project is for an activity for which there is ample experience within USACE and the industry to treat the activity as routine, and the project has minimal life safety risk. The District's risk informed assessment leading to that conclusion is documented in RP Sections 5 and 6.E.

CESAM-PD-D

24 May 2021

SUBJECT: Review Plan (RP) Endorsement, Bridgeport and Black Rock Harbors, Connecticut, Dredged Material Management Plan (DMMP) and Environmental Assessment (EA)

5. The RP was reviewed for technical sufficiency and policy compliance by the undersigned. The RP checklist that documents that review is provided as Enclosure 2.

6. The DDNPCX recommends the RP for approval by the Major Subordinate Command (MSC) Commander. Following approval, please provide the DDNPCX with a copy of the MSC Commander's Approval Memorandum and a link to where the RP is posted on the District website. Prior to posting, the names of individuals identified in the RP should be removed (RP Attachment).

7. Thank you for the opportunity to assist in the preparation of the RP. Please coordinate any review related efforts outlined in the RP with the undersigned at (251) 694-3842.

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KIMBERLY P. OTTO
Review Manager, DDNPCX

CF:

CENAE-PDP (Kennelly)

CENAE-PPC (Walsh)

CESAD-PDP (Summa, Small)

Bridgeport & Black Rock Harbors, CT Federal Navigation Projects

Dredged Material Management Plan and Environmental Assessment REVIEW PLAN May 2021

1. OVERVIEW

This review plan (RP) defines the scope and level of peer review for the following study:

- **Study Name:** Bridgeport & Black Rock Harbors, CT Dredged Material Management Plan
- **Project Name:** Bridgeport & Black Rock Harbors, CT
- **P2 Number:** 107600
- **Decision Document Type:** Dredged Material Management Plan (DMMP) and Environmental Assessment (EA)
- **Congressional Approval Required:** No
- **Project Type:** Single-Purpose Deep Draft Navigation (DDN)
- **District:** New England District (NAE)
- **Major Subordinate Command (MSC):** North Atlantic Division (NAD)
- **Review Management Organization (RMO):** Deep Draft Navigation Planning Center of Expertise (DDNPCX)
- **Review Plan Contacts:**
 - **District Contact:** Planner, 978-318-8737
 - **MSC Contact:** Policy & Legal Compliance Review Manager, 347-370-4534
 - **RMO Contact:** Review Manager, 251-694-3842

2. KEY REVIEW PLAN DATES

Action	Date - Actual ¹
RMO Endorsement of RP	Pending
MSC Approval of RP	Pending
IEPR Exclusion Approval	Pending
Has RP changed since PCX endorsement?	N/A
Last RP revision ²	N/A
RP posted on District Website	Pending
Congressional notification ³	Pending

¹Date action occurred or 'pending' if not yet approved

²Enter 'none' if no updates have been made since approval

³Date RIT notified Congress of IEPR decisions

3. MILESTONE SCHEDULE FOR DMMP & EA

Action	Date - Scheduled	Date - Actual	Status - Complete?
Plan Selection	19 Jan 2022		No
Release Draft Report to Public	19 Feb 2022		No
Final Report Transmittal to MSC	28 Jul 2022		No
MSC Commander Approves DMMP	8 Sept 2022		No

4. BACKGROUND

- **Date of Background Information:** March 2021
- **RP References:**
 - Engineer Circular (EC) 1165-2-217, Review Policy for Civil Works (CW), 20 February 2018
 - EC 1105-2-412, Assuring Quality of Planning Models, 31 March 2011
 - Engineer Regulation (ER) 1105-2-100, Planning Guidance Notebook, Appendix H, Policy Compliance Review and Approval of Decision Documents, Amendment #1, 20 November 2007
 - Chief's Memorandum, Delegation of Authority in Section 2034(a)(5)(A) of the Water Resources Development Act of 2007 (WRDA 2007), as amended (33 U.S.C. 2343), 8 January 2018
 - Director's Policy Memorandum (DPM) CW Programs 2018-05, Improving Efficiency and Effectiveness in U.S. Army Corps of Engineers (USACE or Corps) CW Project Delivery (Planning Phase and Planning Activities), 3 May 2018
 - Director of Civil Works (DCW) Memorandum, Delegation of Model Certification, 11 May 2018
 - DCW Memorandum, Revised Delegation of Authority in Section 2034(a)(5)(A) of WRDA 2007, as amended (33 U.S.C. 2343), 7 June 2018
 - DPM 2019-01, Policy and Legal Compliance Review, 9 January 2019
 - DCW Memorandum, Revised Implementation Guidance for Section 1001 of the Water Resources Reform and Development Act of 2014, Vertical Integration and Acceleration of Studies as Amended by Section 1330(b) of WRDA 2018, 25 March 2019
 - DCW Memorandum, Interim Guidance on Streamlining IEPR for Improved CW Product Delivery, 5 April 2019
 - Final Dredged Material Management Plan and Final Programmatic Environmental Impact Statement for Long Island Sound, January 2016
 - Bridgeport and Black Rock Harbors Dredge Material Management Plan Project Management Plan (PMP), 4 January 2021
 - District/MSO Quality Management Plan, Pending
- **Federal Navigation Project (FNP) Authority:**
 - The Bridgeport Harbor FNP was originally authorized by the Act of 1836. The FNP had then been modified by the Act of 1852, the River & Harbor Acts (RHA) of 1871, 1872, 1875, 1878, 1882, 1888, 1890, 1892, 1894, 1896, 1899, 1907, 1910, 1919, 1930, 1937, 1945, 1946, Public Law (PL) 85-151, RHA 1958, the Act of 2 Nov 1979, WRDAs 1996, 1999, 2007, and PL 115-270.
 - The Black Rock Harbor FNP was originally authorized by the Act of 4 July 1836. The FNP had then been modified by the RHAs of 1884, 1894, 1899, 1910, 1919, 1930, 1937, PL 84-151, RHA 1958, and WRDA 1986.
- **Sponsor:** The State of Connecticut Port Authority and the City of Bridgeport Port Authority are the non-Federal sponsors for the Bridgeport and Black Rock Harbor FNPs and for the DMMP.

- **SMART Planning Status:** Not applicable to the DMMP and EA. This effort does not result in a decision document that could lead to a recommendation for project authorization or modification to a project authorization, including general re-evaluation studies, post authorization change reports, and other reports supporting project authorization or budget decisions that result in a Chiefs Report or Director's Report. PB 2018-01(S), CECW-P Issued: 26 September 2018.
- **Project Area:** The Bridgeport Harbor FNP consists of: A 35-foot main channel, 400 feet wide, extending from Long Island Sound to Tongue Point, then widening to approximately 600 feet at the bend opposite Cilco Terminal, and then narrowing to 300 feet at the lower end of the Pequonnock River Channel at a point 800 feet below the Stratford Avenue bridge; Two rubble mound stone breakwaters, one extending 900 feet westerly from a point near Fayerweather Island on the east side of the entrance to Black Rock Harbor, and the other one extending 650 feet southeasterly on the west side of the entrance; both breakwaters are classified as inactive; A 35 and 25-foot anchorage basin, totaling 23 acres, located east of the main channel and opposite Tongue Point; An 18-foot anchorage basin, totaling 29 acres, located west of the main channel and south of Tongue Point; A 35-foot turning basin located at the entrance of Johnsons River channel; A 2-acre anchorage with a depth of 6 feet at the head of Johnsons Creek; In Johnsons Creek, a 15-foot channel, generally 250 feet wide, extending from the 35-foot turning basin to a 6-foot anchorage basin, as well as two anchorages areas, 6 and 9 feet deep, located on the west side of the 15-foot channel; The construction and maintenance of shore protection on Fayerweather Island, including a seawall connecting the northerly and southerly portions of the island; In Pequonnock River, an 18-foot channel, 125 to 200 feet wide beginning the lower bridge to a point about 500 feet below the dam at Berkshire Avenue, a total length of about 1.1 miles; In Yellow Mill River, an 18-foot channel, 150 to 200 feet wide, from the 30-foot channel to a point about 370 feet from Crescent Avenue, a total length of about one mile.

The Black Rock Harbor FNP consists of: A main channel that is 18' deep by 200' wide and 1.8 Miles in length, thence narrowing to 150' wide for a length of 1,950 feet, thence splitting into two 18' deep by 100' wide branch channels, of which the East Branch channel is 830 feet in length, and the West Branch channel is 1,450 feet in length.

- **Problem Statement:** The Bridgeport and Black Rock Harbors channels are shoaled several feet above project depth. The shallow depths create operational inefficiencies for ships that use the harbors. Bridgeport Harbor has not been dredged since improvement dredging was completed in 1982 to expand an anchorage. Black Rock Harbor has not been dredged since 1982-1983. Efforts to initiate maintenance dredging began in the mid-2000s. Issues locating a dredged material placement site for shoaled material unsuitable for open water disposal led to the need to prepare a DMMP. The harbors have both continued to shoal, further restricting navigation while DMMP efforts have continued.
- **Study/Project Goals and Objectives:** The purpose of the decision document is to:
 - describe the existing conditions of the Bridgeport and Black Rock Harbor FNPs and document those project features for which continued maintenance is warranted;
 - describe and document the selection of a dredged materials management plan; and
 - serve as a decision document supporting the Project Partnership Agreement (PPA) for the maintenance project.

- **Description of Action:** NAE outlined the scope of the current DMMP, focusing the analysis around the existing federal navigation channels in the Bridgeport and Black Rock Harbors. The DMMP will document the USACE formulation, evaluation, comparison, and selection of the least-cost and environmentally acceptable plan for maintenance dredging of the FNPs. A range of alternatives are being considered for placement of dredged material. The study includes additional investigation of the suitability of the dredged material for unconfined open water disposal and identification of configurations of contained aqueous disposal (CAD) cells for material determined to be unsuitable for open water disposal ¹. Beneficial use of dredged material is also considered. The EA will be prepared to meet requirements of the National Environmental Policy Act (NEPA).
- **Federal Interest:** Navigation is one of the U.S. Army Corps of Engineers' primary mission areas. Per ER 1105-2-100, "The Federal interest in continued operation and maintenance of an existing navigation project is defined by that project of maximum scale and extent, within project authorization, for which continued maintenance is warranted in terms of vessel traffic and related factors." Channel utilization analysis conducted in 2020 by NAE with support from the DDNPCX showed that maintenance dredging in Bridgeport and Black Rock Harbors is warranted.
- **Risk Identification:** This project has relatively low to moderate risk, considering that the project would be completed in areas with existing navigation improvements including channels and anchorages. This study risk is primarily associated with identifying dredged material placement options sufficient to allow for maintenance dredging of the FNP channels.
 - Results of bio-testing of the Entrance channel sediments could reveal that there is insufficient capacity beneath the Federal channel and above the underlying bedrock to receive all of the unsuitable material in CAD cells. In this case additional funds would be needed to perform additional sub-surface explorations and identify locations where CAD cells could be located with sufficient capacity for the anticipated unsuitable material.
 - Remaining capacity in the existing CAD cells may be insufficient to receive all of the unsuitable surface material from the next set of CAD cells. In this case, additional CAD cell space and locations would need to be identified for creating a series of "Starter" cells. This risk impacts the project budget, but not the schedule.

These potential risks are similar to those found in other USACE navigation projects in New England harbors. Although the sampling and analysis can be costly and add additional time to a study, it is not expected to impact the successful completion of the project. The methodology is well documented and NAE has significant experience with sediment analysis and CAD cell identification, design, and construction. The project will not be justified by life

¹ Suitability of dredged material for open water disposal is based on evaluation and testing requirements of Section 103 of the Marine Protection, Research and Sanctuaries Act (MPRSA) and Section 404 of the Clean Water Act (CWA).

safety considerations and does not involve significant threat to human life. Further information on risks are identified in section 5.B. of this Review Plan.



Figure 1: Study Area

5. FACTORS AFFECTING THE LEVELS OF REVIEW

- A. Is it likely that part(s) of the study will be challenging (EC 1165-2-217, paragraph 7.a.(1))? No. It is not likely that the study will be challenging, as it is looking at maintenance dredging and dredged material placement for existing FNP channels. NAE has extensive experience with

maintenance dredging of similar harbors in New England. There is an abundance of existing information and prior reports available for use in this study effort. Maintenance dredging and placement will continue to follow established design and construction methods and standard, routine best management practices. Dredged material placement alternatives include methods used and documented in the past in New England including use of CAD cells at Boston and Providence Harbors. No significant technical, institutional, or social challenges were encountered in those actions. The non-federal sponsors have requested and fully support the study.

- B. Provide a preliminary assessment of where the project risks are likely to occur and assess the magnitude of those risks (EC 1165-2-217, paragraph 7.a.(1)). The study will take a risk-informed planning approach. This project has relatively low to moderate risk, consistent with the proposed project being in areas of the existing federal navigation project. All project and design risks not fully evaluated in the study will be further managed in Preconstruction Engineering and Design. Life safety is not a concern in this navigation study. This RP will be updated, as appropriate, should any of these assessments change during the course of the study.
- Environmental impacts and constraints vary among the dredged material management alternatives and may require mitigation. The resources most likely to be affected by the components of each alternative being considered and that could potentially require mitigation planning are shellfish beds; Essential Fish Habitat; water and sediment/dredged material quality; and air quality. Per mitigation guidance, resource agencies prefer any regulated aquatic habitat impacts be mitigated in-place and in-kind. If appropriate mitigation opportunities are unavailable, plans may not be environmentally acceptable. The study currently assumes an Environmental Assessment and Finding of No Significant Impact (FONSI) will be appropriate under NEPA. This is a low-risk assumption based on preliminary coordination with resource agencies that has occurred. It is likely environmental windows will be included in the implementation plan to avoid impacts; use of environmental windows for implementation is a practice commonly used for other projects in New England.
 - Existing bathymetric and geotechnical data are being used; use of existing data may impact the accuracy of design and cost estimates, specifically estimates for the CAD cell construction. This risk is low to moderate as existing data is specific to the project site and appropriate contingencies will be included in the cost estimate.
 - The project team is conducting thorough dredged material characterization and analysis as part of the study. Thus, the risk of unknowns regarding dredged material quality is low to moderate and appropriate contingencies will be included in the cost estimate.
- C. Is there a significant threat to human life associated with aspects of the study or with failure of the project or proposed project (Type I IEPR - EC 1165-2-217, paragraph 11.d(1)(a) and SAR - paragraph 12.h.)? No, there is no significant threat to human life associated with the study or with failure of the proposed project. The study is not looking to recommend a plan to reduce flooding or life safety risk. Channel maintenance will be determined through channel utilization analysis and will not be justified by life safety. There are no significant threats to human life associated with either construction of the proposed project, operation and maintenance (O&M), or with project failure. Should the project not perform as expected, the impact would be a lower than expected benefit to National Economic Development from the authorized project, which

does not impact human life and/or safety. Non-performance of the project would not affect the well-being of the general public and/or environment but may negatively affect transportation costs for commodities moving through area facilities. There is no residual risk to account for in this project due the fact that the project purpose does not address or directly affect human health and safety. This life safety assessment has been reviewed by the NAE Chief of Engineering and has his concurrence.

- D. Is the estimated total cost of the project greater than \$200 million (EC 1165-2-217, paragraph 11.d(1)(b))? Based upon best available information and professional judgement, the estimated total project cost will be less than \$200 million.
- E. Will the study/project require an environmental impact statement (EC 1165-2-217, paragraph 11.d(1)(b))? The project delivery team (PDT) is currently assuming an EA will be sufficient under NEPA. At this stage in the project, the PDT anticipates no significant impacts to regulated resources. Preliminary analysis indicates that impacts to fish and wildlife, including threatened and endangered species, are not expected to be significant. It is anticipated that proposed construction would utilize dredging windows to avoid and minimize potential impacts to biological resources. Project recommendations will be environmentally acceptable and in compliance with applicable environmental laws and regulations. The study is expected to result in an approved Finding of No Significant Impacts.
- F. Has the Governor of an affected state requested a peer review by independent experts (EC 1165-2-217, paragraph 11.d(1)(c))? There has not been a request for independent peer review by the Governor of Connecticut.
- G. Has the Chief of Engineers determined that the project study is controversial due to significant public dispute over the size, nature, or effects of the project or the economic or environmental costs or benefits of the project (EC 1165-2-217, paragraph 11.d(1)(d))? No, the study/project is not likely to involve significant public dispute as to its size, nature, or effects of the project or its economic or environmental costs or benefits as maintenance is proposed to an existing port/channel. The Bridgeport Harbor anchorage and navigation channel was authorized by the River and Harbor Act of 1958. The deepening of the FNP main ship channel to 35-feet was completed in 1963 without controversy. Maintenance of the channel has not been previously required due to low shoaling rates. The Black Rock Harbor-Cedar Creek navigation channel was authorized by the River and Harbor Act of 1930. Maintenance dredging is also proposed for the Black Rock Harbor FNP. Black Rock Harbor FNP was last dredged in 1982 to 1983 and materials were placed in the Central Long Island Disposal Site without controversy.
- H. Is the study/project likely to involve significant public dispute as to the project's size, nature, or effects (EC 1165-2-217, paragraph 11.d(1)(e))? The study/project is not likely to involve significant public dispute as to its size, nature, or effects of the project due to the fact that federally authorized project channels are in place where work is proposed. The plans being considered would only be recommended if economically justified, environmentally acceptable, and technically feasible.
- I. Is the study/project likely to involve significant public dispute as to the economic or environmental cost or benefit of the project (EC 1165-2-217, paragraph 11.d(1)(f))?

The study/project is not likely to involve significant public dispute as to the economic cost or benefit of the project. The non-federal sponsor and the maritime community support the project as project maintenance would support the economic efficiency of vessel/port operations thus providing benefits to the nation. USACE expects interest from agencies and the public regarding environmental considerations; through early and often communication, USACE expects concerns will be minimized. The dredged material management plans being considered would only be recommended if economically justified, environmentally acceptable, and technically feasible.

- J. Is the information in the decision document or anticipated project design likely to contain influential scientific information or be a highly influential scientific assessment – i.e., be based on novel methods, involve innovative materials or techniques, present complex challenges for interpretation, contain precedent-setting methods or/ models, or present conclusions that are likely to change prevailing practices (Type I IEPR - EC 1165-2-217, paragraph 11.d(1)(g); SAR paragraph 12.i(1); and paragraph 15.d)? No; the evaluation of dredged material management alternatives is not likely to be based on novel methods, involve the use of innovative materials or techniques, present complex challenges for interpretation, contain precedent-setting methods or models, or present conclusions that are likely to change prevailing practices. The project will involve traditional methods of dredging and placement of dredged material. Standard engineering, economic, and environmental information and analyses will be used.
- K. Does/will the study/project have significant interagency interest (EC 1165-2-217, paragraph 7.f(1))? The project is expected to have typical interagency interest. During development of the NEPA document and in accordance with the requirements of all applicable Federal environmental laws, NAE will coordinate with relevant state and federal resource agencies to address such interest.
- L. Are there any other circumstances that would lead the Chief of Engineers to determine Type I IEPR is warranted (EC 1165-2-217, paragraph 11.d(1)(h))? No. There are no other circumstances that would lead the Chief of Engineers to determine that Type I IEPR is warranted.
- M. Is the project expected to have more than negligible adverse impacts on scarce or unique tribal, cultural, or historic resources (EC 1165-2-217, paragraph 11.d(4)(a))? The project is not currently expected to have more than negligible adverse impacts on scarce or unique tribal, cultural, or historic resources. The existing federal project has been in continuous use for more than 50 years. No cultural resources have been reported within the federal channel and the immediately surrounding areas where CAD cell construction may occur. Adverse effects to National Register eligible properties, if present in the area of potential effects (APE), will be mitigated in accordance with the National Historic Preservation Act. The plans being considered would only be recommended if economically justified, environmentally acceptable, and technically feasible. The recommended plan would be coordinated with appropriate agencies and tribes.
- N. Is the project expected to have substantial adverse impacts on fish and wildlife species and their habitat prior to the implementation of mitigation measures (EC 1165-2-217, paragraph 11.d(4)(a))? No. The project is unlikely to have substantial adverse impacts on fish and wildlife species and their habitat prior to the implementation of mitigation measures. The harbors are in

heavily urbanized areas. Preliminary analysis indicates that impacts to fish and wildlife, including their habitat, are expected to be less than significant. Based on meetings with natural resource agencies, the Corps will complete an EA to document the environmental effects of the proposed plan, unless the analysis reveals a significant impact which would warrant an EIS.

- O. Is the project expected to have, before mitigation measures, more than a negligible adverse impact on an endangered or threatened species or their designated critical habitat (EC 1165-2-217, paragraph 11.d(4)(a))? The project is unlikely to have more than a negligible adverse impact on a species listed as endangered or threatened species or their designated critical habitat prior to the implementation of mitigation measures. There are no known Federally threatened or endangered species listed by NOAA Fisheries Service (NOAA) or USFWS in the project area. The New York Bight Distinct Population Segment (NYB DPS) for Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) is listed as endangered under the Endangered Species Act and may occur in Long Island Sound and may transit Long Island Sound for seasonal migration or forage. The proposed project areas are not expected to contain concentrations of Atlantic sturgeon. Any recommendation made will be environmentally acceptable and ensure compliance with environmental laws and regulations.
- P. Does the project study pertain to an activity for which there is ample experience within the USACE and industry to treat the activity as being routine (EC 1165-2-217, paragraph 11.d(4)(b))? Yes, the final DMMP and supporting documentation will contain standard engineering, economic, and environmental analyses and information. The proposed project is for dredging and will include the Federal Standard, or least cost, environmentally acceptable, technically feasible dredged material placement plan including CAD cells and unconfined open water placement. Novel methods will not be utilized, and methods, models, or conclusions will not be precedent setting or likely to change policy decisions.
- Q. Does the project study have minimal life safety risk (EC 1165-2-217, paragraph 11.d(4)(b))? The project will not be justified by life safety considerations and does not involve a significant threat to human life. The project involves negligible life safety risk; standard dredging techniques are proposed consistent with those used for channel maintenance for projects in New England. No unique or special equipment that would introduce uncertainties or additional risk to life safety is needed to complete proposed project construction.
- R. Does the project design require redundancy, resiliency, and/or robustness (EC 1165-2-217, paragraph 12.i.(2))? The project design is not anticipated to require redundancy, resiliency and/or robustness, unique construction sequencing, or a reduced or overlapping design construction schedule as project design will follow standard dredging and placement techniques used throughout USACE and industry.
- S. Will the project have unique construction sequencing or a reduced or overlapping design construction schedule (e.g., significant project features will be accomplished using the Design-Build or Early Contractor Involvement delivery systems) (EC 1165-2-217, paragraph 12.i.(3))? No. The project design will follow standard dredging and placement methodologies typically conducted by the District for navigation projects. As such the project design is not anticipated to require unique construction sequencing or a reduced or overlapping design construction schedule.

6. REVIEW EXECUTION PLAN

This RP section provides a general description of each level of review. Sub-sections that follow identify the reviews anticipated for this study.

A. Types of Review

- 1) **District Quality Control (DQC).** DQC is an internal review process of basic science and engineering work products focused on fulfilling the project quality requirements of the PMP. All decision documents (including data, analyses, environmental compliance documents, etc.) undergo DQC review.
- 2) **Agency Technical Review (ATR).** ATR is performed to assess whether study/project analyses are technically correct and comply with USACE guidance and whether documentation explains the analyses and results in a clear manner. Further, the ATR team will ensure that proper and effective DQC has been performed (as assessment of which will be documented in the ATR report) and will ensure that the product is consistent with established criteria, guidance, procedures, and policy. If significant life safety issues are involved in a study or project, a safety assurance review should be conducted during ATR. At a minimum, ATR of the draft and final decision documents and supporting analyses is required (EC 1165-2-217, paragraph 9.i.(3)); however, targeted reviews may be scheduled as needed.
- 3) **Independent External Peer Review.** Type I 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 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 is made as to whether Type I IEPR is appropriate. If the District anticipates requesting an exclusion from Type I IEPR, that effort should be coordinated with the RMO for assessment prior to submitting to the MSC for approval. Should IEPR be required, the RMO should be contacted at least three months in advance of the anticipated start of the concurrent review period to allow sufficient time to obtain contract services. If required, Type I IEPR will be managed by an Outside Eligible Organization, external to USACE. Neither the public nor scientific or professional societies would be asked to nominate potential external peer reviewers. Contract costs for IEPR are 100 percent Federal cost; costs for the DDNPCX RMO, Contracting Officer Representative, and USACE contract administration are cost shared.
- 4) **Cost Engineering Review.** All decision documents will be coordinated with the Cost Engineering Mandatory Center of Expertise (MCX). The MCX will provide the cost engineering expertise needed on the ATR team and will provide certification of cost estimates. The RMO is responsible for coordinating with the MCX for cost reviews. Cost reviews may occur as part of the draft/final report ATRs, but the schedule for specific reviews may vary. Accordingly, the PDT should coordinate review related needs with both the MCX and RMO.
- 5) **Model Review and Approval/Certification.** EC 1105-2-412 established the process and requirements for ensuring the quality of planning models. The EC mandates use of certified or approved planning models for all planning activities to ensure that planning products are technically and theoretically sound, compliant with USACE policy, computationally accurate,

and based on reasonable assumptions regarding the availability of data, transparent, and described in sufficient detail to address any limitations of the model or its use.

- 6) **Policy and Legal Compliance Reviews (P&LCRs).** All decision documents will be reviewed throughout the study process for compliance with law and policy. ER 1105-2-100, Appendix H, and DPM CW/DCW memos, provide guidance on policy and legal compliance reviews. These reviews culminate in determination whether report recommendations, supporting analyses, and coordination comply with law and policy and whether the decision document warrants approval or further recommendation to higher authority by the home MSC Commander.
- 7) **Public Review.** The home District will post the RMO endorsed and MSC approved RP on the District's public website. Internet posting of the RP provides opportunity for the public to comment on that document. It is not considered a formal comment period, and there is no set timeframe for public comment. The PDT should consider any comments received and determine if RP revisions are necessary. During the public comment period, the public will also be provided with the opportunity to review and comment on the draft and final reports. Should IEPR be required, public comments will be provided to the IEPR panel for consideration.

B. Anticipated Project Reviews and Estimated Costs

Table 1 provides the estimated schedules and costs for reviews anticipated for this study.

Table 1: Bridgeport & Black Rock Harbors, CT Dredge Material Management Plan – Anticipated Reviews

Products to undergo Review	Review Level	Start Date	End Date	Cost	Complete
Draft DMMP and EA ²	DQC	19 Jan 2022	17 Feb 2022	\$15,000	No
	ATR	18 Feb 2022	4 Apr 2022	\$49,000	No
	Type I IEPR	N/A	N/A	N/A	N/A
	P&LCR	22 Feb 2022	22 Mar 2022	N/A	No
Final DMMP and EA ³	DQC	6 Jun 2022	17 Jun 2022	\$10,000	No
	ATR	20 Jun 2022	20 Jul 2022	\$38,000	No
	P&LCR	02 Aug 2022	31 Aug 2022	N/A	No
In-kind Products ⁴	N/A	-	-	-	-

² Estimated cost for Draft and Final Report ATRs does not include the cost of ATR Team Lead participation in vertical team meetings or other engagement/coordination beyond that directly related with those ATRs. The estimated cost for ATR of the Draft Report is based upon the following assumptions. It is noted these are estimated costs and could be higher or lower depending upon many factors including quality of documents submitted for review, reviewer grade, etc.:

- ATR Team Lead – 32 hours, \$125/hour
- ATR Team – 10 Technical Disciplines, 32 hours/discipline, average \$125/hour
- RMO – 32 hours, \$151/hour

³ The estimated cost for ATR of the Final Report is based upon the following assumptions:

- ATR Team Lead – 24 hours, \$125/hour
- ATR Team – 10 Technical Disciplines, 24 hours/discipline, average \$125/hour
- RMO – 32 hours, \$151/hour

⁴ Products and analyses provided by non-Federal sponsors as in-kind services are subject to DQC, ATR, and IEPR; however, no in-kind products or analyses are anticipated for this project. Should such change, the PDT will review these products before they are sent to DQC, ATR, and IEPR.

C. District Quality Control

The home district shall manage DQC and will appoint a DQC Lead to manage the local review (see EC 1165-2-217, section 8.a.1).

1) **Review Team Expertise.** Table 2 identifies the required expertise for the DQC team.

Table 2: Required DQC Expertise

DQC Team Disciplines	Expertise Required
DQC Lead	A senior professional with extensive experience preparing Civil Works decision documents and conducting DQC. The lead may also serve as a reviewer for a specific discipline (e.g., planning, economics, etc.).
Plan Formulator	The plan formulator reviewer should be a senior water resources planner with experience in formulation of DDN studies and evaluation of dredged material placement requirements.
Economics ⁵	The economics reviewer should be an economist with experience in DDN studies, general study requirements, and the plan formulation process.
Environmental Resources and Cultural Resources	The environmental reviewer should have expertise in the environmental and cultural impacts associated with navigation projects and dredging as well as knowledge of estuarine and coastal ecology. The reviewer should also be familiar with the environmental coordination and NEPA requirements for DDN projects, dredged material sampling and testing, and dredged material placement analyses.
Civil/Design Engineering	The civil/design engineering reviewer should be an expert in the field of channel design and have experience in DDN studies/projects and dredged material placement requirements.
Geology/Geotechnical Engineering	The geology/geotechnical engineering reviewer should be an expert in the field and have an understanding of site characterization, material management, slope stability, and have experience in DDN studies/projects, dredged material placement.
Cost Engineering	The cost engineering reviewer should be an expert in the field, be certified by the Cost Engineering MCX, and have experience in DDN studies/projects and the cost engineering models identified in Table 6.
Real Estate	The real estate reviewer should have expertise in the real estate requirements of DDN projects.

2) **Documentation of DQC.** Quality Control should be performed continuously throughout the study. A specific certification of DQC completion is required at the draft and final report stages. Documentation of DQC should follow the District Quality Manual and the MSC Quality Management Plan. DrChecks software will be used to document DQC review comments, responses, and issue resolution. An example DQC Certification statement is provided in EC 1165-2-217.

Documentation of completed DQC will be provided to the MSC, RMO and ATR Team leader prior to initiating ATR. The ATR team will examine DQC records and comment in the ATR report on the adequacy of the DQC effort. Missing or inadequate DQC documentation can result in delays to the start of other reviews (EC 1165-2-217, Section 9).

⁵ The economics DQC team member will be identified by the DDNPCX (OPORD 2012-15).

D. Agency Technical Review

ATR will be performed on the draft and final decision documents and supporting analyses (EC 1165-2-217, paragraph 9.i.(3)). The RMO will manage the ATR. ATR will be performed by a qualified team from outside the home district that is not involved in the day-to-day production of the project/product. ATR will be performed by a team whose members are certified or approved by their respective Communities of Practice (CoPs) to perform reviews. The RMO will identify an ATR lead and ATR team members. Neither the home District nor the MSC will nominate review team members. The ATR team lead will be from outside the home MSC. The ATR team lead is expected to participate in the study's milestone meetings (PB 2018-01), the cost of which is not included in the estimates provided in Table 1. Targeted ATR or review of interim products is not anticipated at this time. Should such be needed, the RP will be updated, as appropriate.

- 1) **Review Team Expertise.** Table 3 identifies the disciplines and ATR team expertise required for study efforts. Multiple disciplines may be covered by one reviewer.

Table 3: Required ATR Team Expertise

ATR Team Disciplines	Expertise Required
ATR Lead	The ATR Lead will be a senior professional with extensive experience preparing Civil Works decision documents and conducting ATR. The lead should have the skills to manage a virtual team through an ATR. The lead may also serve as a reviewer for a specific discipline (e.g., planning, economics, etc.).
Plan Formulator	The plan formulator reviewer should be a senior water resources planner with experience in leading a team through a DDN channel maintenance study and analysis of dredged material placement requirements.
Economics	The economics reviewer should be a senior DDN economist with experience in performing economic evaluations for channel maintenance projects and performing channel utilization analyses.
Environmental Resources	The environmental reviewer should have expertise in assessing the environmental impacts associated with navigation projects and dredging as well as knowledge of estuarine and coastal ecology. The reviewer should also be familiar with the environmental coordination and NEPA requirements for DDN channel maintenance projects; dredged material sampling and testing for open water placement; and dredge material placement analyses.
Cultural Resources	The cultural resources reviewer should have expertise in evaluating the impacts associated with DDN channel dredging projects as well as knowledge of underwater archaeology. The reviewer should also be familiar with the environmental coordination and NEPA/ NHPA requirements for DDN projects.
Civil/Hydrology, Hydraulics, & Coastal (HH&C) Engineering	The Civil/HH&C engineering reviewer should be an expert in the field and have a thorough understanding of open channel dynamics, channel design, and dredged material placement requirements. The reviewer must be familiar with the application of USACE risk and uncertainty analyses and sea level rise, sedimentation, and water quality evaluations.
Geology/Geotechnical Engineer	The reviewer should be an expert in the field and DDN channel maintenance projects, including site characterization, material management, slope stability, channel design, and CAD cell design.

Cost Engineering	The cost engineering reviewer identified by the MCX should be an expert in the field, certified by the Cost Engineering MCX, experienced in DDN studies/projects and dredged material placement requirements, and expertise with the cost engineering models identified in Table 6.
Operations	The operations reviewer should have expertise in the design, construction, and O&M of DDN studies/projects, including dredged material placement sites.
Real Estate	The real estate reviewer should have expertise in the real estate requirements of DDN projects.
Climate Preparedness and Resilience CoP/HH&C Climate Reviewer	A member of the Climate Preparedness and Resiliency CoP or an HH&C Climate certified reviewer will participate in the ATR review. This member may also serve as a reviewer for Coastal (HH&C) Engineering.

- 2) **Documentation of ATR.** DrChecks will be used to document all ATR comments, responses, and resolutions. Comments should be limited to those needed to ensure product adequacy. If a concern cannot be resolved by the ATR team and PDT, it will be elevated to the vertical team for resolution using the EC 1165-2-217 issue resolution process. Concerns can be closed in DrChecks by noting the concern has been elevated for resolution. The ATR Lead will prepare a Statement of Technical Review (EC 1165-2-217, Section 9), for the draft and final reports, certifying that review issues have been resolved or elevated. ATR may be certified when all concerns are resolved or referred to the vertical team and the ATR documentation is complete.

E. Independent External Peer Review

- 1) **Decision on Type I IEPR.** Type I IEPR is managed outside of the USACE and conducted on studies. Type I IEPR panels assess the adequacy and acceptability of the economic and environmental assumptions and projections, project evaluation data, economic analysis, environmental analyses, engineering analyses, formulation of alternative plans, methods for integrating risk and uncertainty, models used in the evaluation of environmental impacts of proposed projects, and biological opinions of the project study.

Based upon best available information and professional judgement, the PDT has assessed this single purpose navigation project and determined that it DOES NOT meet the criteria for conducting Type I IEPR according to DCW Memorandum, Interim Guidance on Streamlining IEPR for Improved CW Product Delivery (5 April 2019) and EC 1165-2-217:

- *When the estimated total cost of the project, including mitigation costs, is greater than \$200 million.*
Based upon best available information and professional judgement, the estimated total project cost is assumed to be less than \$200 million.
- *When the Governor of an affected State requests a peer review by independent experts.*
There has not been a request for independent peer review by the Governor of Connecticut.
- *When the Chief of Engineers determines the project study is controversial due to significant public dispute over the size, nature, or effects of the project or the economic or environmental costs or benefits of the project.*
The project study has not been deemed controversial by the Chief of Engineers. The study/project is not likely to involve significant public dispute as to its size, nature, or

effects of the project or its economic or environmental costs or benefits as project is proposed to an existing port/channel and the NEPA document being prepared for this study is an EA.

In addition to not meeting any of the mandatory triggers requiring IEPR, the project study also meets exclusion option “b” as provided by Section 2034 of WRDA 2007 and the DCW memorandum for streamlining IEPR:

- *Is for an activity for which there is ample experience within USACE and the industry to treat the activity as being routine.*

This project is for an activity (dredging and placement) for which there is ample experience within USACE and industry to be considered routine. There is little risk of any unique technical challenges arising in the design and implementation of this project.

- *Has minimal life safety risk*

The project will not be justified by life safety and does not involve significant threat to human life/safety assurance. There are no significant threats to human life associated with either construction of the proposed project, O&M of the proposed project, or with project failure.

- 2) **Decision on Type II IEPR.** Type II IEPR, Safety Assurance Review, is managed outside of the USACE and is performed on design and construction activities for any project where potential hazards pose a significant threat to human life. For Type II IEPRs, a panel is convened to review the design and construction activities before construction begins and periodically thereafter until construction activities are completed.

As documented in Section 5 of this RP, the PDT has assessed this single purpose navigation project and determined that it DOES NOT meet the criteria for conducting Type II IEPR:

- The Federal action is not justified by life safety and failure of the project will not pose a significant threat to human life.
- The project does not involve the use of innovative materials or techniques where the engineering is based on novel methods; it does not present complex challenges for interpretations; it does not contain precedent-setting methods or models; and it does not present conclusions that are likely to change prevailing practices. Proposed maintenance is for an existing Federal navigation project. Construction and maintenance techniques have been standardized and no new techniques are expected to be utilized for design and construction activities.
- The project design does not require redundancy, resiliency, or robustness as the design will be based upon previously developed and utilized construction techniques which do not require redundancy, resiliency, and/or robustness.
- The project does not have unique construction sequencing or a reduced or overlapping design construction schedule.

F. Model Certification Or 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 are any models and analytical tools used 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 a planning product. The selection and application of the model and the input and output data is the responsibility of the users and is subject to DQC, ATR, and IEPR.

The following planning models may be used to develop the decision document.

Table 5: Planning Models

Model Name and Version	Brief Model Description and How It Will Be Used in the Study	Certification / Approval Status
Not applicable	No Planning Models required. Federal interest in the continued maintenance of the Federal channels will be based on channel utilization analysis performed using ERDC's Channel Portfolio Tool.	Not applicable

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. The professional practice of documenting the application of the software and modeling results will be followed. The USACE Scientific and Engineering Technology Initiative has identified many engineering models as preferred or acceptable for use in studies. These models should be used when appropriate. The selection and application of the model and the input and output data is still the responsibility of the users and is subject to DQC, ATR, and IEPR. The following models may be used to develop the decision document.

Table 6: Engineering Models

Model Name and Version	Brief Model Description and How It Will Be Used in the Study	Approval Status
Microcomputer Aided Cost Engineering System (MCACES), MII (Cost Engineering)	MCACES is the cost estimating software program tools used by cost engineering to develop and prepare Class 3 CW cost estimates.	CW Cost Engineering MCX mandatory
Cost Schedule Risk Analysis (CSRA) (Cost Engineering)	Cost risk analyses identify the amount of contingency that must be added to a project cost estimate and define the high-risk drivers. The analyses will include a narrative identifying the risks or uncertainties. During the alternatives evaluation, the PDT will assist the cost engineer in defining confidence/risk levels associated with the project features within the abbreviated risk analysis. For the Class 3 estimate, an evaluation of risk will be performed using Crystal Ball CSRA.	CW Cost Engineering MCX mandatory
Total Project Cost Summary (TPCS)	The TPCS is the required cost estimated document that will be submitted for either division or Headquarters, USACE	CW Cost Engineering

(Cost Engineering)	(HQUSACE) approval. The total project cost for each CW project includes all Federal and authorized non-Federal costs represented by the CW Work Breakdown Structure features and respective estimates and schedules, including the lands and damages, relocations, project construction cost, construction schedules, construction contingencies, planning and engineering costs, design contingencies, construction management costs, and management contingencies.	MCX mandatory
Corps of Engineers Dredge Estimating Program (CEDEP) (Cost Engineering)	CEDEP is the required software program that will be used for dredging estimates using floating plants. CEDEP contains a narrative documenting reasons for decisions and sections made by the cost engineer. Software distribution is restricted as it is considered proprietary to the Government.	CW Cost Engineering MCX mandatory

G. Policy And Legal Compliance Reviews

In accordance with DPM CW 2018-05, P&LCRs for draft and final planning decision documents are delegated to the MSC responsible for the execution of the study.

With input from MSC and HQUSACE functional leaders and through collaboration with the Chief of Office of Water Project Review (OWPR), the MSC Chief of Planning and Policy is responsible for establishing a competent interdisciplinary P&LCR team (DPM 2019-01). The composition of the policy review team will be drawn from HQUSACE, the MSC, the Planning Center of Expertise (PCX), and other review resources as needed. The identification of Counsel Members will follow the procedures set forth by the HQUSACE Chief Counsel, as coordinated by HQUSACE and MSC Counsel functional leaders. The MSC Chief of Planning and Policy and the Chief of OWPR will collaborate to identify and endorse a P&LCR Manager from among the P&LCR team identified for the study. The manager may be a MSC, PCX, or HQUSACE employee. The team is identified in Attachment 1 of this RP.

The P&LCR team will:

- Provide advice and support to the PDT and decision makers at the District, MSC, HQUSACE, and Assistant Secretary of the Army for CW levels.
- Engage at both the MSC and HQUSACE levels, ensuring that the vertical teaming aspect of SMART planning is maintained.
- Help guide PDTs through project development and the completion of policy and legally compliant documents, identifying policy and legal issues as early as possible such that issues can be addressed while minimizing impacts to study and project costs and schedules.
- Provide impartial and unbiased recommendations, advice, and support to decision makers.

ATTACHMENT 1: TEAM ROSTERS

PROJECT DELIVERY TEAM			
Name	Position	Office	Phone Number
Mark Cutter	Program Manager	NAE	(978) 318-8776
Michael Walsh	Project Manager	NAE	(978) 318-8586
Barbara Blumeris	Lead Planner	NAE	(978) 318-8737
Todd Randall	Environmental Res. Specialist	NAE	(978) 318-8518
Ben Loyd	Sediment Evaluation	NAE	(978) 318-8048
Aaron Hopkins	Suitability Determination	NAE	(978) 318-8973
Kate Atwood	Cultural Resources	NAE	(978) 318-8537
Andrew LeBlanc	Economics	NAE	(978) 318-8694
TBD	H&H/C Engineer, Climate Preparedness and Resilience	NAE	
Mark Godfrey	Civil/Design Engineer	NAE	(978) 318-8689
Steve Potts	Geologist	NAE	(978) 318-8311
Jeff Gaeta	Cost Engineer	NAE	(978) 318-8438
Scott Flanagan	CADD	NAE	(978) 218-8899
Kate Chibbaro	Survey	NAE	(978) 318-8783
TBD	Real Estate	NAE	
TBD	Office of Counsel	NAE	

DISTRICT QUALITY CONTROL TEAM (to be assigned)			
Name	Position	Office	Phone Number
TBD	DQC Lead/Plan Formulator	NAE	
TBD	Environmental and Cultural Resources	NAE	
TBD	Economics	NAE	
TBD	Civil/Design Engineering	NAE	
TBD	Geologist	NAE	
TBD	Cost Engineering	NAE	
TBD	Real Estate	NAE	

AGENCY TECHNICAL REVIEW TEAM			
Name	Position	Office	Phone Number
Samantha Borer	ATR Lead	CESAJ	904-571-4893
TBD	Plan Formulation		
TBD	Economics (report and Channel Utilization Tool analysis)		
TBD	Environmental Resources		
TBD	Cultural Resources		
TBD	Civil or HH&C Design Engineer		
TBD	Geologist/Geotechnical Engineering		
TBD	Cost Engineering		
TBD	Construction/Operations		
TBD	Real Estate		
TBD	Climate Preparedness and Resilience CoP/HH&C Climate Reviewer		

VERTICAL TEAM			
Name	Position	Office	Phone Number
Douglas Stamper	Operations Program Manager	NAD	347-370-4608
Joseph Vietri	Chief of Planning and Policy	NAD	347-370-4570
Kim Gavigan	Deputy Chief NAD RIT	HQUSACE	202-761-1371

POLICY AND LEGAL COMPLIANCE REVIEW TEAM			
Name	Position	Office	Phone Number
Christopher Ricciardi	DST- Review Manager	NAD	347-370-4534
TBD	Plan Formulation		
Naomi Frankel	Economics	NAD	917-359-2819
Valarie Cappola	Environmental	NAD	347-370-4557
Ralph LaMoglia	Engineering	NAD	347-370-4599
Patricia Bolton	Cost Engineering	NAD	347-370-4682
Carlos Gonzalez	Real Estate	NAD	347-370-4529
Nancy Bethurem	Office of Counsel	NAD	479-586-4895