



**CERP
PIR Streamlining –
Specific
Recommendations**

South Florida Ecosystem Restoration
Task Force

11 December 2008

Problem Statement

- Everglades ecosystem health continues to decline
 - Greater Everglades Ecosystem Restoration Conference (July 2008)
 - National Academies of Sciences Report (September 2008)
- CERP implementation is slower than anticipated
 - 3 PIRs complete and projects authorized (\$1.82 B)
 - *Picayune Strand construction scheduled in 2009*
 - 2 more PIRs complete, awaiting approval (HQUSACE, ASA-CW, OMB) and authorization
 - 8 PIRs currently underway
 - *Including major “restoration” projects (Decomp, Seepage Management)*
 - Future PIRs not yet underway
 - *MISP Band 2/3 projects*
- Decision Documents (PIRs) take too long to complete

Task Force: What can be done to simplify and reduce the amount of time required to complete PIRs?

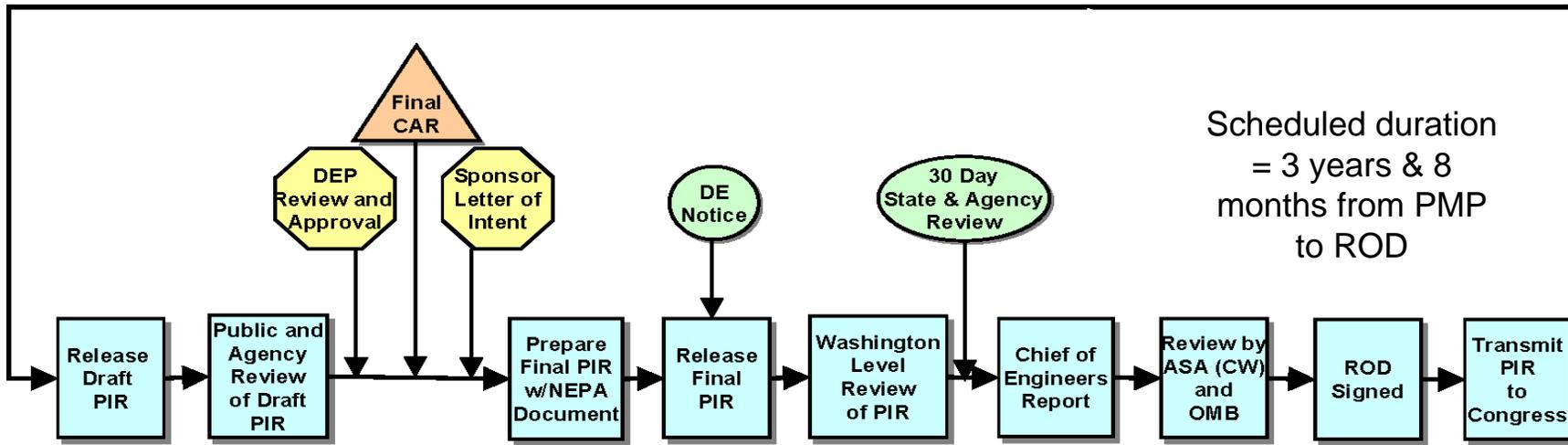
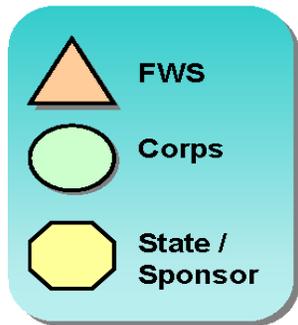
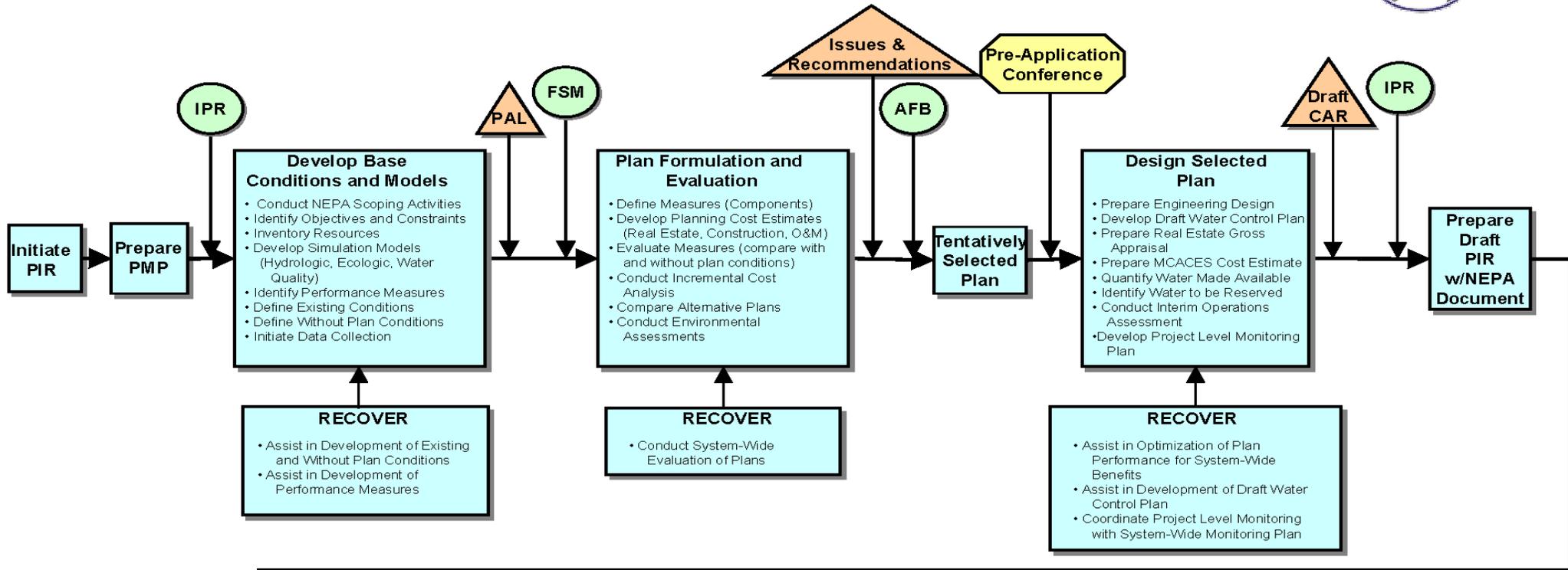
PIR Streamlining

Completed and Proposed Actions

- July Working Group/Science Coordination Group Meeting
 - Overview, initial briefing and discussion
- August Working Group/Science Coordination Group Call
 - Reviewed draft presentation based on discussions in July
- September Task Force Meeting
 - Task Force accepted the conceptual recommendations, asked for more specific actions and timelines
- October Working Group Meeting
 - Outlined specific recommendations and concept for an inter-agency streamlining team
- December Task Force Meeting
 - Seeking direction and approval to establish streamlining team to coordinate with Programmatic Regulations review process



TYPICAL PIR PROCESS



Scheduled duration
= 3 years & 8
months from PMP
to ROD

PIRs must comply with . . .

- USACE Engineering Regulations
- CERP Programmatic Regulations
- CERP Program-Level Guidance Memoranda
 1. Project Implementation Reports (content and format)
 2. Formulation and Evaluation
 3. Savings Clause Requirements
 4. Identifying Water Made Available
 5. Operating Manuals
 6. Adaptive Management
- F.S. 373.026, .1501, .4592., .470, Florida Admin Code, etc.
- NEPA, CWA, CAA, ESA, MMPA, EFA . . .

C-111 SC PIR

ROD

Internal management
Agency Policy
ProRegs

Leadership revisit their uncertainties
Le de
PDT directed to determine fair market value for real estate and re-evaluate alternatives
Aug 08

ROD

PIR

published,
draft GMs made available
Late 2004

PIR

AFB

PDT developed hydro data, baseline and FWOP conditions, performance measures, identified 3D H&H model and began model setup
Apr 02 – Oct 04

AFB

Draft PIR*
Sep 09

FSM

FSM

Ongoing model calibration problems, leadership directs PDT to explore opportunities to direct flows westward towards Taylor Slough without diminishing performance of original project objectives
Oct 06
Jan 06

PMP

PMP

PDT develops final array of alternatives for western component
Feb 07 – July 07

Apr-01

Apr-02

Apr-03

Apr-04

Apr-05

Apr-06

Apr-07

Apr-08

Apr-09

Apr-10

Recommendations Matrix

Recommendation	Change Mechanism		
	Programmatic Regulations	Policy Directive	Internal Management
Improve CERP planning, review, and approval process	X	X	X
Simplify plan formulation and selection procedures; eliminate “Next-Added Increment” <u>justification</u> requirement (reverse CERP Darwinism)	X		
Simplify Project Assurances analysis methods	X	X	
Reduce number of required baseline conditions to evaluate	X		
Reduce Engineering and Design level of detail in PIRs		X	X
Project sequencing and bundling (Integrated Delivery Schedule)		X	
Use hydrologic surrogates instead of “Habitat Units”		X	
Utilize existing operational/simplified models			X
Improved higher-level issue/policy resolution practices			X
Empowered Design Coordination Team (lower-level issue resolution)			X
Improved training / staff development			X
More reliance on scientific and engineering judgment in lieu of detailed modeling			X

Proposed Change Mechanisms

- Revisions to the Programmatic Regulations and Guidance Memoranda
 - Task Force recommendations to the process
- Revisions to USACE Planning Policy Requirements and State Policies
 - Letter to USACE Director of Civil Works with Task Force recommendations
 - Review State permitting and approval requirements with FDEP
- Internal Management
 - USACE, SFWMD, DOI

Programmatic Regulations Revision Tentative Schedule

- Initial Meetings with Agencies Nov 08
- WG/SCG & TF Briefings*: WG Jan 28/29; TF Feb 25/26
- Agency/Stakeholder Meetings May 09 – July 09
- Initial Pre-Publication Draft Oct 09
- Agency/Stakeholder Meetings Oct 09 – Dec 09
- WG/SCG & TF Briefings* TF Sep 23/24; WG Oct 21/22
- Publish Draft Rule in Federal Register Jan/Feb 10
- Respond to Comments/Prepare Final Rule Mar – May 10
- Publish Final Rule in Federal Register Jun 10

* *WG/SCG & TF, WRAC, SFWMD GB, FDEP/Gov's Office, HQUSACE, ASA-CW, OMB, CEQ, others as required*

Simplify Plan Formulation and Selection Procedures

1. Use Integrated Delivery Schedule and Master Implementation Sequencing Plan as implementation framework
 - Eliminate next-added incremental justification analysis
 - IDS answers "Why here, why now?" questions
2. Use Yellow Book plan as starting point, develop array of plans, compare each to no-action (without CERP) plan
 - Typical NEPA-type analysis; DOT planning model
 - Eliminate system formulation/comparison for plan selection
3. Select plan based on cost-effectiveness and ecosystem effects
 - WRDA 2000 and State of FL requirement
 - Use hydrologic surrogates when appropriate for cost-effectiveness
 - Use performance measures to evaluate ecosystem effects
4. After best plan is selected, evaluate system-wide effects
 - RECOVER

Simplify Project Assurances Analysis

1. Use same numeric modeling used in plan selection
 - Fewer baseline conditions to evaluate
 - Presently: Pre-CERP Baseline, Existing Condition, Initial Operating Regime, Next-Added Increment, Without CERP
2. Fewer “mandated” evaluations
 - 10 basins for natural system
 - 9 basins for other water related needs
3. Simplify information to be displayed
 - Volume probability curves
 - Exceedance probability summary tables

Improve CERP Planning, Review, and Approval Process

1. CERP liaison at HQUSACE and DOI
 - Enhanced coordination between Washington and Florida
 - Serve as technical expert/resource on CERP and other S FL ecosystem restoration projects
 - Coordinate Washington-level Review and preparation of transmittal documents
2. Expedited policy issue resolution
3. Programmatic Feasibility Scoping Meeting

Recommended Revisions

Planning and Policy Requirements

1. Use of hydrologic surrogates as metrics for plan comparison instead of habitat units
2. Reduce engineering and design level of detail in a PIR
3. Sequence and bundle projects using the IDS to obtain more benefits sooner

Recommended Revisions

Planning and Policy Requirements, cont.

1. Use of hydrologic surrogates instead of habitat units
 - Calculate performance of alternatives toward achieving hydrologic targets
 - Seasonal flow rates or ranges
 - *e.g. MFL for Caloosahatchee River*
 - Acre-feet of water stored, delivered, retained
 - Acres of wetlands rehydrated
 - Establish performance measures to evaluate and describe ecosystem response, impacts on water supply & flood protection, etc

Recommended Revisions

Planning and Policy Requirements, cont.

2. Reduce the engineering and design level of detail contained in a PIR
 - Requirements for level of detail increased due to A8 program efforts
 - Achieve the level of detail required in a standard USACE feasibility report (ER 1105-2-100)
 - Detailed design efforts follow approval of Chief's Report
 - Coordinate with HQUSACE, DOI, WRAC, etc (expectation management)
 - Coordinate with FDEP re sufficient detail to address 373.026, 373.1501, 373.470 F. S.

Recommended Revisions

Planning and Policy Requirements, cont.

3. Sequence and bundle projects in the IDS to obtain more benefits sooner
 - e.g. – L-30 Seepage Management Pilot, DECOMP and ENP SM full-scale PIR
 - Fewer PIRs, but much higher cost estimates to be authorized
 - Example: Kissimmee River Restoration Project
 - Implementation plan based on expected funding should be included in PIR

Internal Management Initiatives

- Less dependence on model-generated output
 - Application of scientific and technical judgment
 - Risk aversion
 - Litigation
- Model streamlining – continue Interagency Modeling Center initiatives
- High-level Policy Resolution Procedures (QRB/other)
- Lower-level Issue Resolution Procedures
 - Empowered Design Coordination Team with broader agency participation
- Staff Training
- Cross-Agency Training & more co-location of staff
 - USACE CERP liaison in Washington D.C.
 - USACE in Vero Beach
 - USACE environmental lead @ ENP

PIR Streamlining

Project-specific Opportunities

- Decompartmentalization PIRs 1, 2 and 3
- Eliminate system formulation and NAI analyses
 - Utilize hydrologic surrogates
 - Reduce level of detail
- Candidate PIRs
 - Decompartmentalization PIRs 1, 2, and 3
 - ENP Seepage Management
 - North Palm Beach County
 - Broward County Water Preserve Areas (reformulation)
 - Caloosahatchee Watershed
 - Lake Okeechobee Watershed
 - C-111 Spreader Canal PIR 2
 - Biscayne Bay Coastal Wetlands PIR 2

Recommended Actions

- December Task Force Meeting
 - Outline specific recommendations for PIR streamlining by category (done)
 - Seek representatives for an inter-agency working team (SFWMD, USACE, USDOJ, FDEP) to prepare Task Force recommendations for Programmatic Regulations
 - *Statement of Guiding Principles for CERF Execution*

Thank You

