



**CERP  
PIR Streamlining  
Analysis**

**Working Group**

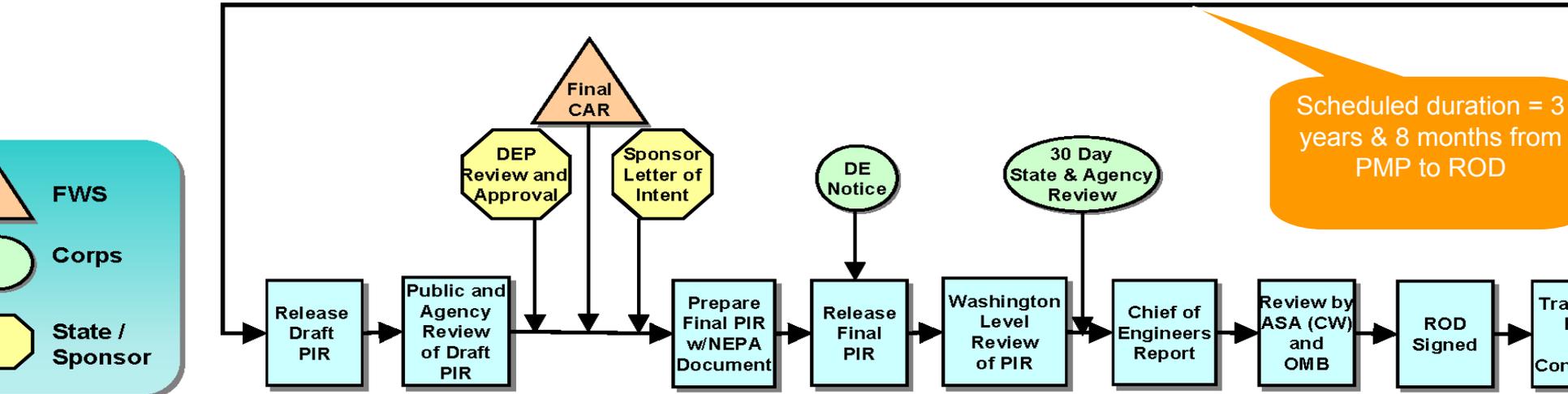
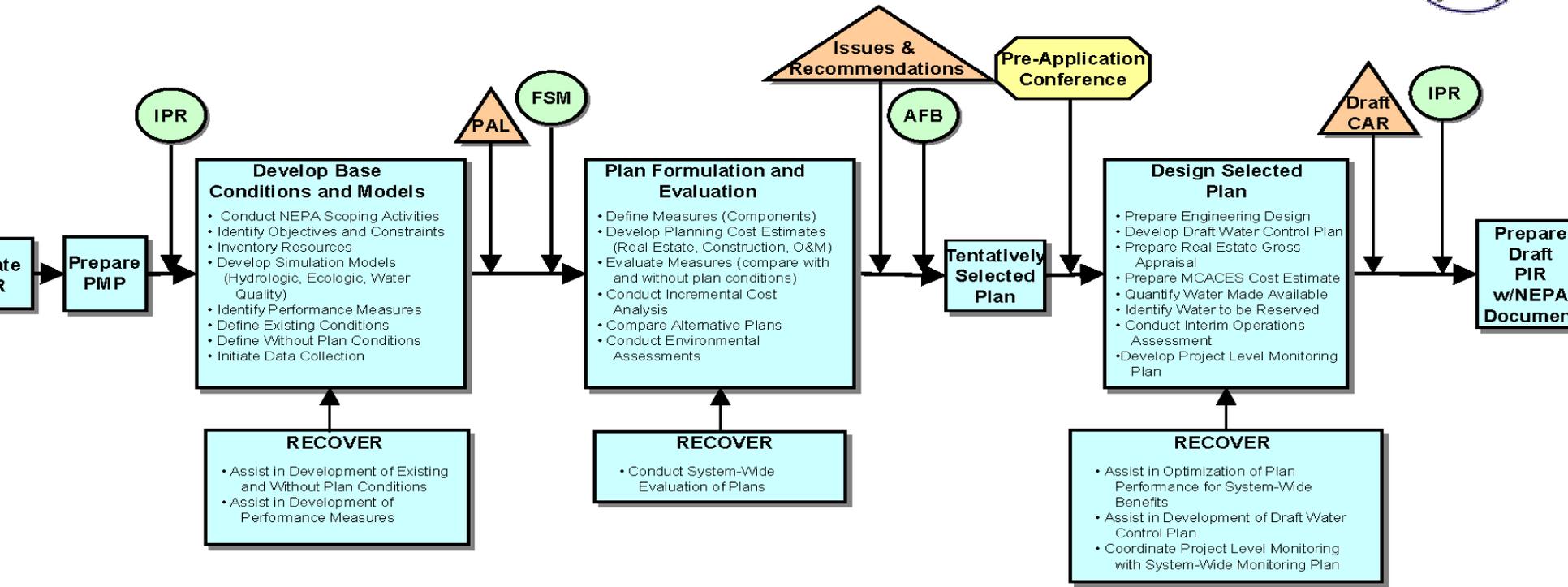
**16 July 2008**

# PIR Streamlining Analysis

- Review the PIR template
  - Standard activities and durations
- Discuss PIR case studies
  - Everglades Agricultural Area Reservoir
  - C-43 Basin Storage Reservoir
- Discuss impediments to PIR completion



# TYPICAL PIR PROCESS



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



# PIR Template 14 - Activities List:

Activity ID	Activity Name	Duration	Start	Finish	Activity Count
XX-H1080	Respond to Public Comments on Draft PIR/NEPA	29d	12-Aug-04	22-Sep-04	1
XX-H1110	Assemble Final Draft PIR/NEPA for Internal Review	21d	26-Aug-04	24-Sep-04	1
XX-H2200	In-House Review of Final PIR/NEPA	14d	27-Sep-04	15-Oct-04	1
XX-H1150	ITR/Legal Review of Final PIR/NEPA	21d	18-Oct-04	16-Nov-04	1
XX-H1160	NFS Letter of Support and Financial Capability Statement	9d	17-Nov-04	30-Nov-04	1
XX-L375	Sponsor's Letter of Intent Received (L375)	1d		30-Nov-04	1
XX-H1320	Prepare CWRB Report and DE's Transmittal Letter	9d	01-Dec-04	13-Dec-04	1
XX-H165	Submit Final PIR/NEPA Report to MSC (165)	1d		13-Dec-04	1
XX-H1170	Prepare Final PIR/NEPA for Submittal to MSC	9d	01-Dec-04	13-Dec-04	1
XX-H1322	DE Transmittal Letter	1d		13-Dec-04	1
XX-H1180	CWRB Briefing with DE and MSC	4d	14-Dec-04	17-Dec-04	1
XX-H1190	State and Agency Letters Signed and Received by District	4d	20-Dec-04	23-Dec-04	1
XX-H1200	Mail Letters and Draft Final Report	3d	27-Dec-04	29-Dec-04	1
XX-L385	Final PIR/NEPA Report Published in the Federal Register (L385)	1d		12-Jan-05	1
XX-H1210	Publish in Federal Register	9d	30-Dec-04	12-Jan-05	1
XX-H180	Washington Level Agency Review/Public Review Complete	1d		11-Feb-05	1
XX-H1220	State, Agency and Public Review	21d	13-Jan-05	11-Feb-05	1
XX-H1230	Respond to State, Agency and Public Comments	19d	14-Feb-05	11-Mar-05	1
XX-H1240	HQ/MSD Review Conference	4d	08-Mar-05	11-Mar-05	1
XX-H1250	Policy Review Documentation	6d	14-Mar-05	21-Mar-05	1
XX-H2240	Filing of Final PIR/NEPA Document	4d	22-Mar-05	25-Mar-05	1
XX-H3170	Filing of Final EIS (310)	1d		25-Mar-05	1
XX-H1260	Chiefs Report	4d	28-Mar-05	31-Mar-05	1
XX-H3090	Chiefs Report (190)	1d		31-Mar-05	1
<b>State Approval Process</b>		<b>240d</b>	<b>02-Sep-03</b>	<b>23-Aug-04</b>	<b>12</b>
XX-H1830	PIR/FS 1501 Pre-Application Meeting (Reasonable Certainty)	1d	02-Sep-03	02-Sep-03	1
XX-L245	PIR/FS 1501 Pre-Application Meeting Complete (L245)	1d		02-Sep-03	1
XX-H3050	Preparation of 1501 Pre App Mtg Summary	9d	03-Sep-03	15-Sep-03	1
XX-H1840	1501 Pre App Mtg Summary Reviewed by FDEP	9d	16-Sep-03	26-Sep-03	1
XX-L250	PIR/FS 1501 Pre-Application Concurrence Received from FDEP (L250)	1d		26-Sep-03	1
XX-H3200	Assemble 1501 Submittal	9d	03-May-04	13-May-04	1
XX-L295	Submittal Briefing with FDEP Complete (L295)	1d		07-Jun-04	1
XX-H1850	Submittal Briefing with FDEP (Reasonable Certainty)	1d	07-Jun-04	07-Jun-04	1
XX-L350	FS 1501 Submittal to FDEP (L350)	1d		10-Jun-04	1
XX-H1130	State 1501 Review & Approval (Reasonable Certainty)	42d	11-Jun-04	10-Aug-04	1
XX-L380	FS 1501 FDEP Approval (L380)	1d		10-Aug-04	1
XX-H1140	Incorporate State 1501 Comments	9d	11-Aug-04	23-Aug-04	1

Initiate PIR to Chief's Report

# PIR Activities

## PMP Complete to FSM Complete

Total Duration: 1 Year, 3 Months

- Goals and Objectives
  - Duration: 1 Month
- Existing and Future Conditions
  - Duration: 1 Year, 2 Months
  - Milestone: Project Performance Measures Complete
- Alternative Plan Formulation
  - Duration: 11 Months
  - Milestones:
    - Preliminary Screening of Alternatives Complete
    - Final Screening Complete
    - Submit FSM Material
    - FSM
    - FSM Guidance Memorandum Received

# PIR Activities

## FSM Complete to AFB Complete

Total Duration: 5 Months

- Alternative Plan Evaluation
  - Duration: 3 Months
  - Milestone: RECOVER Evaluation of Alternatives Complete
- Alternative Plan Comparison
  - Duration: 4 Months
  - Milestones:
    - Submit AFB Material
    - AFB
    - AFB Guidance Memorandum Received

# **PIR Activities**

## **AFB Complete to Final PIR**

Total Duration: 1 Year and 4 months

- Design Selected Plan
- Prepare Draft PIR and release for public and agency review
- Sponsors Letter of Intent
- DE Notice
- Release Final PIR

# **PIR Activities**

## **Concurrent Activities**

- Project Assurances Determinations
- NEPA Compliance
- Recreation Resources Appendix
- USFWS Coordination
- Socio-Economic Analysis Appendix
- Real Estate Analysis Appendix
- State Approval Process
- WRAC/Working Group/Task Force Consultation

# **PIR Activities**

## **Final PIR to Record of Decision**

Total Duration: 8 months

- Washington Level Review of PIR
- State and Agency Review
- Chief's Report
- Civil Works Review Board
- OMB
- ROD

# **PIR Activities**

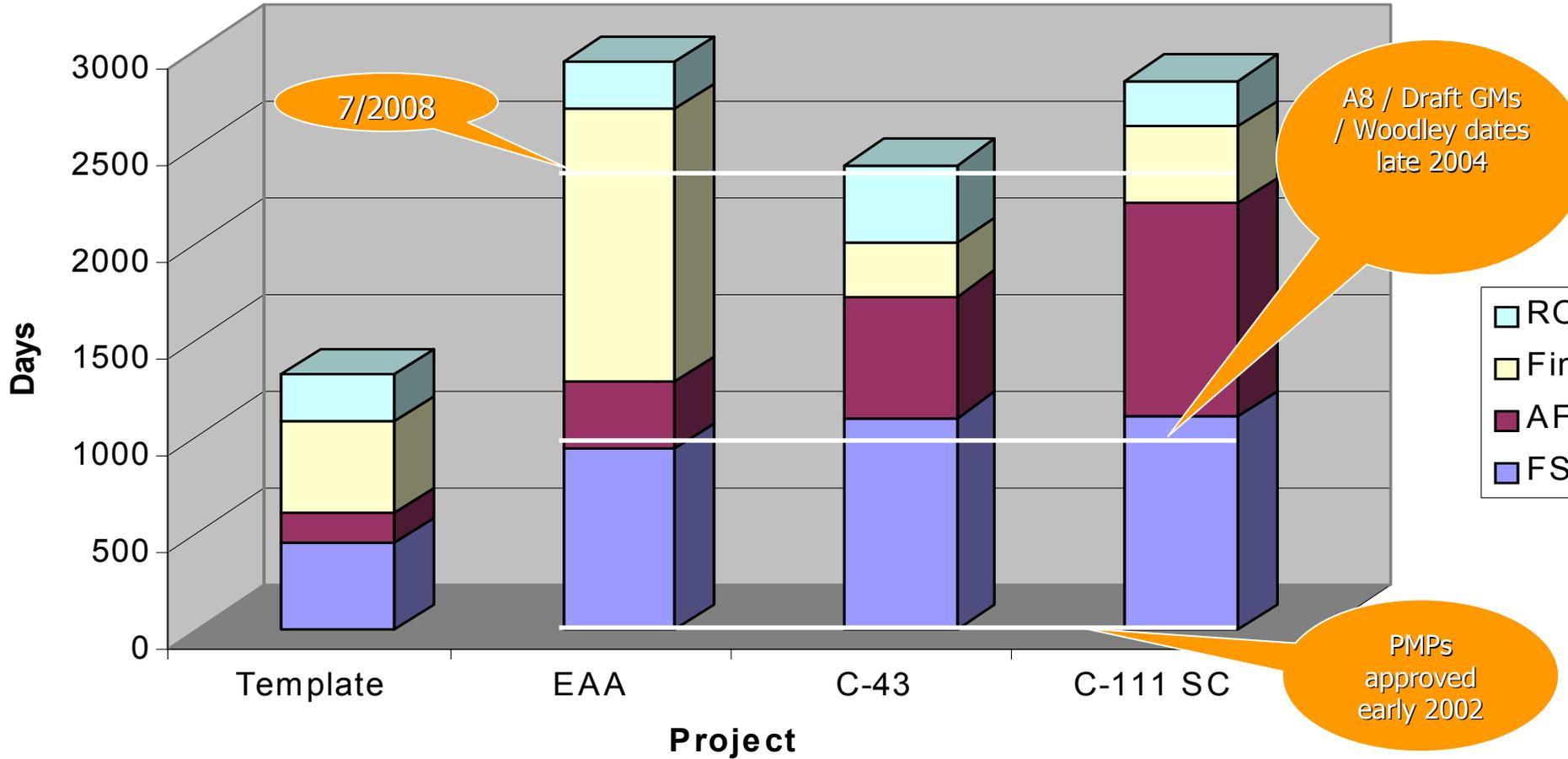
## **Post ROD Activities**

- Congressional Review/Authorization
- Water Reservations
- Plans and Specifications
- PCA
- Real Estate
- Construction
- Close-Out

# Durations to PIR milestones (months)

Project	FSM	AFB	Final PIR	Chief's Report
<b>PIR Template</b>	15	5	16	8
<b>EAA</b>	31	12	47 (ongoing + projected)	8 (projected)
<b>C- 43</b>	37	21	9	14* (awaiting resolution of land crediting)
<b>C-111 SC</b>	37	37	13 (ongoing + projected)	8 (projected)

# PIR Template vs Project Durations



ROD

AFB

FSM

PMP

PMP Completed & SFWMD takes lead on PIR Jan 02

PIR Phase Initiated Dec 01

SFWMD agreed Comp B

Concept of "Reaffirmation of Yellow Book" created as part of GMs - Team moves forward with 360k as TSP Dec 04

Allbright Letter directs PDTs to support Acceler8 Oct 04

2050B3 adopted baseline for modeling

EAA PIR

New 2x2 modeling

FDACS raises concerns on use of WSE vs. LORS and 80/20 split Feb 08

PIR

AFB

FSM

HQ-USACE requests justification for 190k

Leadership directs team to split up regulation approach into 1 and 2 (IAR and MAS recommendation) Dec 07

State announces deal to buy out U.S. Sugar Jun 08

Team releases 2nd DPIR (360k plan with 190k increment & vs. Earthen

Team completes NAI modeling using 2050B4 as proposed suggests Jan 07

Team directed to use Regional Feasibility Study for options for

Preliminary modeling results completed (LORS sensitivity run & removal of 80/20 intent) Jun 08

Apr-01

Apr-02

Apr-03

Apr-04

Apr-05

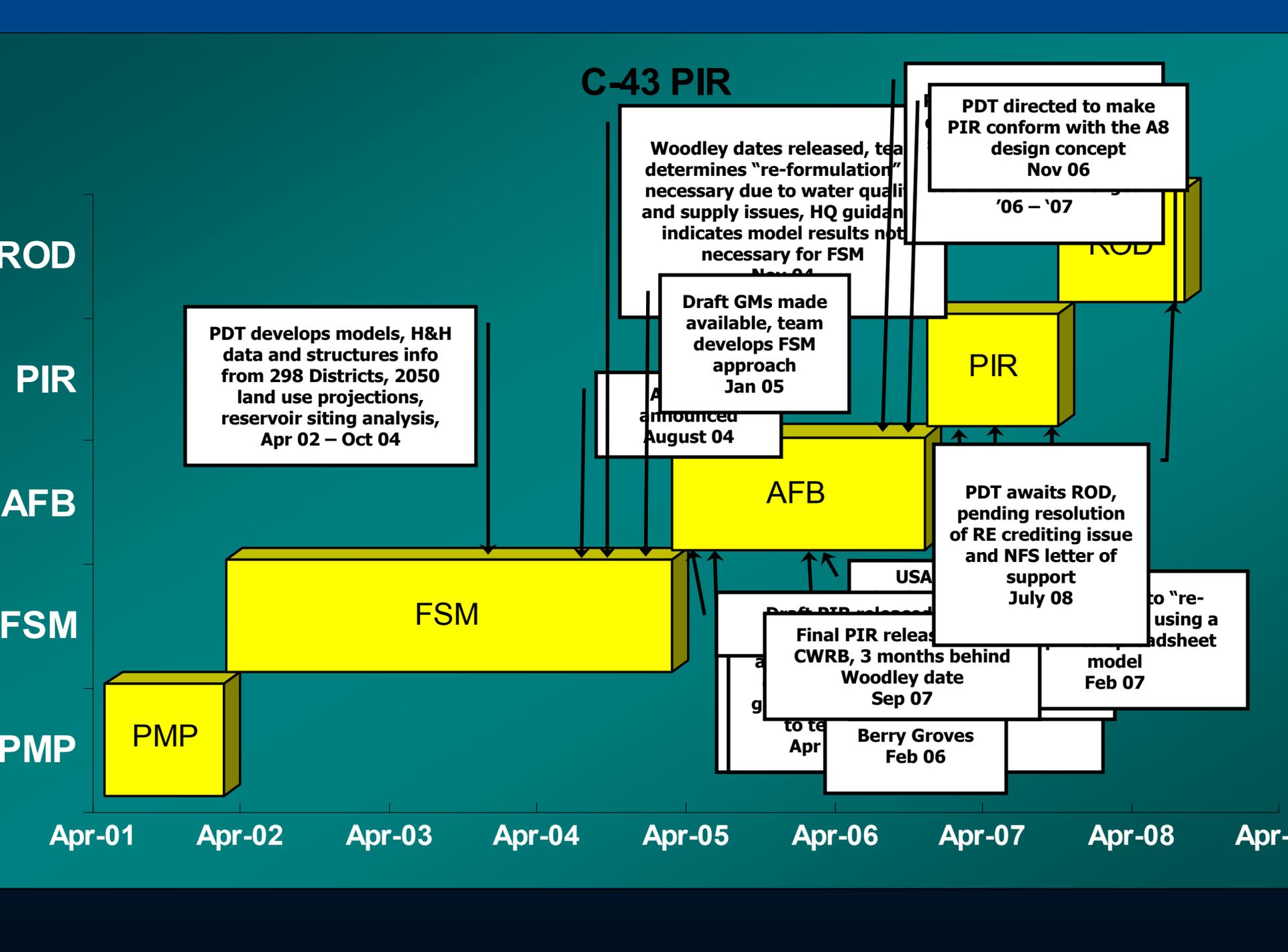
Apr-06

Apr-07

Apr-08

Apr-09

Apr-10



# Impediments to PIR Completion

- QRB 2006: Detailed investigation of delays and inefficiencies
  - “Systemic; No silver bullet”
- WRDA 2000 and Programmatic Regulations established important requirements to satisfy diverse stakeholder interests
- Project-specific applications require highly detailed work
  - Model development and application
  - Interpretation of results
    - “Counter-intuitive”

# Impediments (continued)

- Federal Water Resources Project Development Process (or, *“How to get a decision document to Congress”*)
  - Principles and Guidelines
  - USACE Regulations
- Analytical procedures unique to CERP
  - 5 baseline conditions to be evaluated/compared
    - Formulation, comparison, selection (w/ & w/out CERP)
    - Justification (NAI)
    - Savings Clause (PCB and Existing Condition)
    - Water Reservations/Ops Manuals (IOR)

# Impediments (continued)

- Emerging policy issues
  - Civil Works Review Board (corporate deliberation)
  - Risk-based cost-analysis (Katrina)
  - Peer review (Corps reform)
  - Model review (Katrina, Upper Miss economics)
  - Valuation of Real Estate for crediting
- Expedited projects/Acceler8
  - Detailed design during planning (consistency)
  - Planning document supporting permit applications
    - Wetlands and mitigation
    - Cultural resources
- Compliance with Endangered Species Act
  - Biological Assessment, Biological Opinion, Monitoring
    - Picayune Strand
    - C-111 Spreader Canal

## Impediments (continued)

- Competing Priorities and Human Resources
  - Limited number of experienced planners, modelers, environmental scientists, etc.
- C&SF → MISP → Acceler8 → Expedited Projects  
Northern Everglades → Southern Everglades →  
HHD → US Sugar → Next?

## Impediments – Lessons Learned

- Money is a constraint
  - Develop reasonably sized (i.e., costed) projects
- Reduce the # of PDTs working concurrently
  - Optimize availability of veteran staff resources for key projects
- Engage IMC early to identify the most appropriate modeling tools
  - Strive for the simplest tool that can address the questions at hand, but nothing simpler
- Seek quick resolution of policy hang-ups via elevation of issues, but avoid policy do-loops

# Next Steps

- September Task Force Meeting
  - Present findings on potential PIR time savings from streamlining recommendations

**Thank You**

