Watershed Rehabilitation Plan-EE Template (Word Version) Training Webinar Transcript
October 4, 2016

Thank you my name is Jan Surface and I'm a watershed planning specialist at the National Water Management Center in Little Rock, Arkansas. The National Water Management Center provides watershed planning guidance and we review all watershed plans for technical accuracy and compliance with NRCS policy.

I'll be fielding questions for our presenter at the end of his presentation, so I would like to introduce George Townsley. George is an economist on our team in Little Rock. George has put a lot of work into developing this watershed rehabilitation Plan-EE template. Today's presentation will walk you through the latest Microsoft Word version of that template.

So George if you're ready to go?

Thank you.

This is our second try here with this latest Microsoft Word version. In 2015, we prepared one in Microsoft Excel and while it was a nice template and a nice tool to work with, it did have problems. One of those was making comments and responses. When you send a plan into the National Water Management Center, we make comments in the margins of the plan, then you provide responses and make changes at which time the plan goes to headquarters for review. In the Microsoft Excel format, it was very difficult to get that to work well.

We sent out and worked on upgrading it by moving it into Word but still had some of those embedded Excel functions to help us get through this. That's what we will go over today.

Slide 2

Real quick you can see out of part D of the National Watershed Program Manual Section 501 we do combine watershed plans and environmental documents as recommended by NEPA and the Economic and Environmental Principles and Guidelines and there are so many parts as you can see from this slide.

Slide 3

We don't have to do all of those parts if we go to a plan-EE because the evaluation is done if they fit under these CEs; categorical exclusions.

The plan-environmental evaluation, it's really more of an abbreviated supplemental watershed plan-environmental document. This is done primarily here in this template for the rehab program, we are doing rehabilitation of existing dams.

When we first started trying to use the categorical exclusions, a lot of times people were just adding in the CPA-52 to the plan document and they ended up being sometimes 90 pages. The use of a template will focus the questions and answers so it will be less documentation and a lot less volume of documents. Categorical exclusions are basically the categories of activity that have been previously preapproved by the Council of Environmental Quality (CEQ), saying they have minor impact, therefore not requiring an environmental assessment or environmental impact statement.

Slide 4

What had happened is we brought a lot of our EAs and other documents to CEQ and they decided that certain activities that were being done might be categorically excluded. Out of that, we could use more abbreviated documentation.

When we look at categorical exclusions, we have to look at the entirety of the work. All of the actions described in the plan have to fit under these categorical exclusions.

If you have anything outside such as you have dredging, then you will have to move to an EA/EIS depending on the impact. There are currently 21 categorical exclusions, about six of them will fit into the rehab program. If you want to read more about the categorical exclusions in more detail, you go to Title 7 of the Code of Federal Regulations Part 650.6D (7CFR650.6D). There's a hyperlink to get you to the site. You can read the sideboards and information to properly apply these categorical exclusions in your plan.

Slide 5

Here's a listing of the categorical exclusions: For example you can see item 6, remove and relocate buildings in 100-year floodplain. You're looking at nonstructural work here when you apply this categorical exclusion. We also have repair and maintenance principles spillway, preparing and improve existing auxiliary spillways, increasing freeboard by raising the top of the dam. When you look at more detail on the Code of Federal Regulations which I have pointed out, there are more sideboards and issues such as you working within the footprint of the dam. You are not to go way outside the abutment of the existing dam. We have to look at what's there at present, not what was in place 50 years ago when we put the dam in, but what we are maintaining when we try to apply these categorical exclusions.

Slide 6

What is the difference between a plan-EE and other environmental documents? One is the level of documentation should be less for a plan-EE. The template tries to focus on answering the questions and to prepare to make sure you are within the limits of the law and the limits within our categorical exclusions and get everything documented in a lot less space than a traditional EA/EIS. As far as analysis, there should be a little bit of difference in analysis but not a lot of difference in your planning, maybe just one less public meeting. Also, if you're doing a categorical exclusion, it will not likely have compensatory mitigation. Compensatory mitigation and the marginal work of the economist, engineer, and biologist on figuring out what goes into the mitigation work, what's the cost, what's the impact. Things like that shouldn't be in a categorical exclusion in most instances. You should be looking more at mitigating through avoidance and minimization of impacts.

Slide 7

We had a plan format earlier on slide two, you can see on the left side of this slide what goes into a project plan for our document. On the right hand side you see we have a plan-EE column. First the cover will be a separate document and the watershed agreement would be separate (still required). The purpose and need are built into the template. The scope of the EA/EIS, that scoping portion, is built into the CPA-52 itself along with the affected environment. The detailed description of alternatives and alternative formulation process, description of reasonable alternatives, all of that is built into the template. We have a section in there that covers those very nicely. Then we have a summary and comparison of alternative tables. The summary and comparison looks at the national economic development (NED) account which is from P&G, EQ account which is the environmental quality account, other social effects, and regional economic development account. Other social effects and EQ accounts, the predominance of those are covered in the CPA-52 but we do have in this template additional lines required either by law, by policy, or by the Economic and Environmental Principles and Guidelines (P&G) added into the template for those sections of the summary and comparison table. Environmental consequence for the most part will be covered in the CPA-52. The consultation and public participation is in both the CPA-52 and the template because there is normally more coordination with watershed projects. They are larger in size and scope than many of our other activities within the agency. The identification of the preferred alternative is in the CPA-52 but we also identify it in the template. After that we have the list of preparers and then of course we will have appendices which are attached to the template as placeholders with instructions for you where to put your data.

Slide 8

Back in August National Bulletin 390-16-3 went out saying that as of August 16, 2016 there is a new template out there to use. That doesn't mean that you cannot use this new template on earlier work. The template is an improvement over the Excel template. You can supplement in this template and we really recommend you use this instead of the Excel file. The tool is the accessible from the watershed rehabilitation SharePoint site under “templates and forms”. You'll see a hyperlink there much easier. When using this template or tool, we request that you check that site and get the latest version when you're finalizing your plan-EE. You can tell by looking at all of the templates, they will have a file “plan-EE rehabilitation template: with a “v” for version and the “date”. That's the date of the latest one and, the SharePoint site should have the latest version on the site.

Slide 9

Here are the links. There is also a link to the file under National Watershed Management Center’s webpage under “publications” as well. If you have contractors and they don't have access to SharePoint, you might provide them this link to the National Watershed Management Center to get access to those documents. If you are needing access to the SharePoint site, please contact Jesse Wilson, he is the National Watershed Rehabilitation Program Coordinator there and he can get you access to SharePoint.

Slide 10

Now we will go through the template itself and show you some of the highlights. One thing about the previous template in Excel, a lot of things were built-in such as instructions and a checklist. They are separate files now. There has been a lot more moving of other things in the template that were separate previously. You will see that as we go along.

Viewing "Checklist" file - Real quick on the checklist, this checklist used to be 10 items and now if you look at it, you need a separate cover, watershed supplemental agreement, then after that the CPA-52 and the template itself. It cut down on putting other things into the file.

Viewing "Instructions" file - The instructions, they are pretty detailed as previously in an Excel file. The first is the section on the introduction, then we get into the header which you will see on the file and after that it will go section by section, part of which will be, authority and program criteria, so kind of a check that it's a legal project, so forth and so on. This hasn't changed very much in our instructions.

Viewing "Rehabilitation Template" file (hyperlinked to "Forward" button) - I'll bring up a copy of the new document. As I was telling, you the header right here where it was previously, we see that we have this yellow color background, when you see yellow you want to type in information. Anything that's in white with lettering is usually locked so you can't put anything in there. Once we get out of the header, it's a running header and it will be on every page. Once you put that in, that's good and you are covered. If you come down to the authority, we still are using a drop-down menu so when you see this in gray, there's going to be a drop-down menu. You click on the drop-down and select original program authority, let's say it's PL- 566, you make that selection and then it populates that for you. Current program authority Section 14 is the only way you can do rehabilitation so that is locked in there and you won't be able to change that. We also have other drop-down such as dates and anything you see a drop-down you will see in gray. The only other color you'll see will be a blue for calculations that will be in some embedded Excel files later.

Viewing "Rehabilitation Template Example" file (hyperlinked to "Backup" button) **–** Now we go over to an example file. It will be on the SharePoint site. As you can see here, in the "header", you place in who is your sponsoring local organizations, over in this section is the watershed, County, state, your hydrologic unit code, which should be anywhere from 8 to 14 digits depending on the smallest unit that fits around your dam that you're trying to work on.

Then again as you get into **Section A** with the authority, the status of operation that needs to be added in. Another entry point is your sedimentation rate. You look at your originally planned versus your future, and those are documented as required. Another thing we have is, if you are needing to put notes or add more information, there is a section L. It starts in this document on page 9, this file is populated so it may be page 10 or 11 here. Anytime you need to add a note for additional information, for example in this plan they did not have land rights to the top of the dam, they have to add in section L, the rationale why they didn't have land rights to document that reason. That's a requirement.

>> **Section B**, fill in the blank with the purpose of why we are you doing rehabilitation on the structure and what are the needs for this work.

>> **Section C,** as we were discussing about the alternatives formulation, that has been located right here under part C. You can see the alternatives, the description of the major features, the cost, and your determination if it is a reasonable alternative for further analysis and the rationale for them being reasonable. If not reasonable they are documented in this section. This is a much more efficient system of documenting your project alternative formulation process.

>> You see the size of the text here, we have put it in right now as Times New Roman 10. We chose that because this is a proportional spaced font, versus others that are monospaced. Monospaced fonts such as Arial, generally take more space than proportional space fonts to cover materials. If the words here had been in Arial, you would see a larger area being taken. Also these are set at 10 initially, we hope that you do not go below 10 because we have to read this. These do adjust, you can adjust the size of these easier than with Excel. If you do need additional areas, go to section L and we can go ahead and read under item L any additional notes needed.

>> **Section D -** I told you earlier about the embedded Excel tables. This is what's really nice. We still have tables in the template to do mathematical functions to help us document information much easier. A lot of Economic tables, one, four, five, and six are basically put into the NED account of this section. And in order to keep them open, we use an embedded Excel function in the Word file which has worked out nice. In order to use this, you right-click and this section, then select worksheet, object, and open. That's what you do to open the file up and you will see a little Excel work file. Then you have access and you can go ahead into the sections here such as the tan colored cells, type the numbers in such as project investment here, no action, there is zero for federal, because this not a federal action. Then this is the local cost for that project. Also then you have others like the decommissioning. You put the pointer in the cell that is here and type the header. Then it will populate down in the same table, the same with rehab right here. Those links are still there just like in the old Excel template so this is an extension of Excel with this embedded file.

Just as before, everything with the NED account, table 6 portion, they are all here. One of the improvement here is we have other purposes. We have multipurpose dams out there and in order to document those you would say for this other purpose that you had recreation, so recreational pool. You come down here in this section below the viewable table, starting on line 42 and state recreation and then put in the benefits. This will be benefit of those are recorded up higher. That is $10,000 average annual and then the record appears. When you're done with this section, this table, exit out, and it goes back to the Word section. You can go on working on the document. We have the RED account, we don't put anything here because it's not required under P&G. We have social effects as I stated earlier, there is some "other social effects" that are not covered under the CPA-52. They will be listed here in white, if they are not covered by CPA-52 and required by P&G or by policy or PL 83-566. Just like in the CPA-52 you can say, there is "no effect" or "may affect", so then you can describe why it "may affect".

>> There are things that might come up during your scoping that aren't covered and that's why you have a section like this under "other" and then you record what it is. Is it a "may affect" or "no effect" and then describe that. Here we had one for soil resources and sedimentation and

erosion. Between the no action and the decommission alternatives, both remove the pool of the flood storage and had similar effects versus the rehab. You can see the write-up response on sedimentation and erosion. You can add these as needed. There is another one for "other-water bodies" placed in this example.

Section G, its consequences of dam failure, you can type in information as needed and then do a rating of low, high, medium. Then below in the "comments" of the table you have your section here on the consequences to provide the reasoning for potential failure rating. Here we're talking about stability as low and then you have documentation of that, hydrologic is high, you see here. You have your reasoning right here as your backup for your potential failure rating.

Section H, We talked about earlier, "consultation, coordination and public participation", which is in CPA-52 but we put more detail here and so as you come to here talk about agency participation, there are drop downs here for the type of meeting or contact. The date, or is there a site visit and then you say yes for a site visit or no response, as here they asked for a site visit but no one responded. If you did have a response and site visit you could complete a date by using the calendar function.

>> Down here you can see they had two public meetings, one in August 2013 and then another one in December 2014 probably right before the final was published in 2014. There is a section for notes, so you can explain any issues and if additional space is necessary other than this area, go to item L starting on page 9 of this template. Document what you were going to be discussing here in this area and that way we can go find those additional in Section L as needed. Another subsection is cultural resources, we put a list out there to make sure when they did pedestrian surveys, when the contacts were made, and all of that was added in your any other notes necessary to describe resource issues.

Section I, Land use in Drainage Area - We put this into an Excel format because we wanted to be able to have the numbers add up for us. That would help preparation as goes through writing the plan and make sure the numbers add up. As you can see here, they do have a total area, all of this never changes. You see this enter alternative name, we have the decommission alternative here or rehab, or whatever we need. We show the effect from the existing condition, the no action in the long-term over the evaluated life of the project, versus the other federal action alternatives. When we are done documenting that, we exit out and add to the notes. The notes section is at the bottom.

Section J, Risk and Uncertainty - is from P&G. You have open entry here so we can put notes as needed. In the example, they wanted to put most of the risk and uncertainty notes in the investigation analysis which is fine, but you can also put something here. The economic analysis they discussed, some of the issues, risk and uncertainties because of how they did their analysis and that's also all right to do here.

Section K, List of Preparers - It is set up so you can populate this much easier than previously.

Section L, Additional Notes and comments - Here's an example we talked about where they didn't go to the top of the dam so they provided rationale here as required.

Table 2 – Estimate Cost Distribution - One of the improvements is previously we had a separate table for cost computation prepared and attached. That has been changed as this is embedded in this template for us. As you open this table, you can come to the center line table here and you put your information in about any technical assistance, by NRCS or sponsors, land rights, relocation, all the costs incurred by providing the alternative. That populates your watershed agreement table which you will need, and then table 2. When you're done here you closeout and we can clearly see your table right here. Showing the portion, federal cost and the local nonfederal cost needed. That was a nice improvement there and it's all right there for you.

Table A – Comparison of Structural Options - Another one is we normally used structural table 3, but that's only for the preferred alternative. The improved comparison of alternatives, we decided to do something different. We took summary comparison and structural alternatives table out of the handbook and made it requirement here. In order to make sure it works like table 3 out of the manual, we let you identify which is preferred alternative with the radio button. We know your preferred alternative, then you can document the existing structure. What the structure looks like at present, the controlled drainage, all of that. The no action, here you see that no action was basically a decommissioning of that structure so there is no dam. The rehab is a rehabilitation of the structure so you get to see the control area, the total drainage, and everything under structural table 3. Another thing this table is, if you have multiple options of doing something, say you want to rehab with a different auxiliary spillway versus something else, you can show those here as part of that documentation. You can see it's a long table.

Appendices A-E>> As we get out of that portion of the template, we've put placeholders in here so you can put in appendix information.

Appendix A - Under Appendix A later on you will receive your comments and responses of the public, or agencies. Use Appendix A to append those letters right here for any documentation you have on comments and responses.

Appendix B - Placeholder here for project map from Appendix B. We have instructions here.

Appendix C - Support maps as appropriate from Appendix C. We have that information here any support maps you may need. One additional is a layout map. We would like to see some layout map of the existing structure and where the new structure will be. This will assist in making sure your plan EE is appropriately within the footprint of the dam or not.

Appendix D - The Investigation and Analysis. Here are the instructions on putting in the Investigation and Analysis report in this area.

Appendix E - Supporting information. Once you get to this point and you attach the CPA-52, your plan is done. So we go through the checklist which we covered earlier, the CPA-52, the agreement and attach that with all of the appendices as necessary. Your plan is done and should be a lot less than 90 pages.

Slide 11

As we said earlier, we're using proportional space font no smaller than 10 point. We hope you continue to do that so you can minimize the space for some of your documentation and also still be legible for us to read.

Multiple sites. Any time that you have multiple sites funded for rehabilitation in a single watershed, please put them in one document, it will save you time and documentation. Marginal time in items like public meetings and elsewhere. Anytime you can put multiple sites together, do that. How would you do it here? You would append one site behind each other and have a different name so we will know which ones they are. You can append a CPA-52 and a plan-EE template into your major document. We've had that happened once before and it was fine. One review saves time for us and you and time on other resources. We recommend that when possible.

The comment system in this Word template will be much easier. As we normally do with Word files, you can build comments and responses easier than in Excel. This is an improvement for us, but this template is still for P&G. We will have to make modifications for new PR&G. It's just getting finalized as a part a Departmental Manual which we will be moving into making changes to our watershed manual and other training later on to do that. Part of that would be updating this template for PR&G. For the most part, PR&G may only be required at present for a couple of projects that have been funded already. For everyone else you will be using this template prepared under P&G.

Questions

>> Any questions? While getting questions together, I would like to thank Holli Kuykendall and Jan Surface for helping with this webinar. For the conversion from Excel to Word, I had a lot of help from Leigh Nelson who did a great job. Thanks to all y'all.

>> We've had a few questions come in. I typed responses but I'll go over those.

Question 1 - The first question was, how does NRCS define the footprint of the dam? Is that the extent of the toe part? Is the extent of the plunge pool described as part of the footprint, and yes the existing plunge pool would be considered part of the footprint of the dam. Then a follow-up to that, is the area between the auxiliary spillway existing to the point where it flows into the downstream water body also part of the original footprint? And that would be no. It would not be considered. There was a question asking what the latest version date is, and its August 29 as the latest version of the template. That's what's on the watershed rehab SharePoint. (NOTE: New October 4, 2016 version was uploaded after this webinar).

Question 2 - Next question, is there NRCS policy to require multiple sites in one plan? We found this to be problematic and very tough administratively. George, do you want to address that?

>> We have no policy saying there has to be one plan that I know of. We have reviewed those as one plan of multiple sites. We got all three here, it's much easier for us to review because they

were all together. We had one letter replying back, one person to contact, and not three of us involved in doing the coordination processes. It helps us. It also helps the review at headquarters as they have one plan and don't have to review three different ones. As far as policy, not that I do not know.

>> I've got David Heffington sitting in with me, he's an ecologist on our staff and watershed team leader.

>> As you recall, the issue with multiple dams is that it's a requirement to address the dams in series, and when we are doing a plan-EA it makes sense to plan them together because of the requirement to address those dams in series. You would be better suited to answer George how well you can address that particular requirement in the plan-EE template. Is there a place where you can do that more easily?

>> That would be nice to have them together because we need to see effects of the dams in series. They are almost acting like one at some point. If you get them separately, then document that in Section L. You may have to provide information there. I can't think of anywhere else where we would talk about doing sites in series in our information here. We will look at that as a potential improvement. This plan-EE template is nowhere near perfect, so that could be one thing to do to improve it.

Question 3 - Next question: regarding the project footprint, can relatively minor extensions of the dam and auxiliary spillway area be considered the same footprint?

>> This is David. When we were negotiating these, with CEQ, they were really looking at truly minor impacts associated with our dams. This is a great tool and it will save you some time, but if there are questions about whether or not it fits within the categorical exclusion, our recommendation would be to do an EA but regarding the relatively minor extensions, I would look at that and see if it was within the intensively managed area.

What's a minor extension? Is it 20 feet, or 30 feet? I would say that would be relative minor. Especially if it were within extensively managed mowed area of the dam. Not all of our rehab projects are going to fit under these categorical exclusions. There are some actions that, like sediment removal. If you have sediment removal associated with your rehab, you want to do a plan-EA. If you have to extend the length of the dam, you want to do a Plan-EA. One thing that we've seen, in some cases, folks will do a plan-EE and they will have things in there that aren't categorically excluded, so that causes a problem and delay for everyone. That would be my guidance or recommendation on that particular action.

Question 4 - The National Watershed Program Manual Section 502.21 states that have categorical exclusions apply to the preferred alternatives, then the extent of public participation is at the discretion of the state conservationist. In this instance, will the public participation plan be required?

>> That's an excellent question, and we clarify that in the new manual. The public participation plan is a requirement of PL 83-566 and for watershed plans. A public participation plan is

required for all watershed activities, regardless if they are categorically excluded. The categorical exclusions only apply to NEPA so it's not even a big savings, but it is a savings. On a plan-EE you don't have to do a finding of no significant impact which is required for a plan-EA. That's one of the places PR&G still applies and our 7CFR650, which includes the public participation requirements, it still applies.

Question 5 - The categorical exclusions for raising the top of dam, how do you keep that in the same footprint of the existing dam?

>> That's a good question. When we were talking to CEQ about these we talked about parapet walls and I think I addressed a little bit before about going beyond the toe of the slope. They (CEQ) are supposed to review our categorical exclusions every seven years and so we want to avoid situations where we won't be able to pass the red-faced test on these. There is some leeway on the interpretation of these. I would just say, just be aware that they were developed to be conservative.

Question 6 - If there are multiple rehab alternatives beyond the two allotted spaces in section B, where would you document those other alternatives? in section L?

>> Let's say you had five reasonable alternatives, then you would just add another template. You would add another template and just show the no action and then the comparison of additional alternatives. Then we would tell because it would be an alternative number. Because you would have alternative rehab 1 or rehab 2, things like that. We will know that. You will use another template, CPA-52 as well as part of your documentation.

Questions 7 - Dave is asking, when a plan-EA is required, expanding the footprint or extraordinary circumstances, do we recommend we use the plan-EE template and then expand by adding appropriate sections from a plan-EA?

>> I would say no, just do the plan-EA. The template is specifically for when everything falls in its entirety under a CatEx. Just go straight Plan-EA and don't complicate matters.

Question 8 - If the preferred alternative includes lowering the elevation of the principal outlet to change hazard class to a lower level, and all other construction disturbances are covered by CatEx, can we still use the plan-EE template if we will affect surface area of impoundment? Perhaps also modifying area of wetlands? Any concern if it's a multipurpose dam that includes recreation, and wildlife habitat?

>> The CatEx principal spillway modifications talk about maintaining or repairing, and we have used some for replacing if there is no significant change. The CatExs also talk about “there is no major change in reservoir downstream operations”. That would be a major change. If you are changing the pool size or wetlands, my recommendation would be to go ahead and do the plan-EA. That would be one where it's an excellent question and our recommendation is to go ahead and do a plan-EA so we can disclose those impacts properly and there's not a question about whether it's a major change or a minor impact.

>> Any other questions? I don't have anything in the queue.

Slide 12

>> I'll do at last call. Not seeing anything else, so I think you're good George if you want to close up.

The last slide is going to be your contact information for the people in the watershed planning team. If you have general comments or questions on the plan-EE template, I'm the contact for that. If you need assistance, contact us.

>> [Event concluded]

>>