

RHODE ISLAND COASTLINE COASTAL STORM RISK MANAGEMENT

Draft Integrated Feasibility Study & Environmental Assessment



**US Army Corps
of Engineers®**
New England District

JANUARY 31, 2022

RHODE ISLAND COASTLINE COASTAL STORM RISK MANAGEMENT

DRAFT FEASIBILITY REPORT Executive Summary

Introduction

The U.S. Army Corps of Engineers (USACE), New England District is conducting the feasibility study for the Rhode Island Coastline (RIC), Coastal Storm Risk Management (CSRMC) Feasibility Study and prepared the attached Integrated Feasibility Report and Environmental Assessment (IFR/EA). This IFR/EA documents the study process and identifies a Tentatively Selected Plan (TSP). This plan would address flood risk “along the shoreline and coastal tributaries of southeastern Rhode Island from Narragansett Bay to the Massachusetts border” (**Figure ES-1**).

The Non-Federal Sponsor (NFS) for this study is the state of Rhode Island, Coastal Resource Management Council (RICRMC). On March 28, 2019, the USACE and the RICRMC executed a Feasibility Study Agreement (FCSA). The feasibility study was performed with a project cost share of 50 percent Federal funding and 50 percent contributed by the NFS.

As a result of Superstorm Sandy, Congress authorized the USACE to undertake the North Atlantic Coast Comprehensive (NACCS) to address flood risks of vulnerable coastal populations in areas affected by the storm. This culminated with the January 2015 completion of the NACCS final report, which identified high-risk focus areas in the North Atlantic region for additional analyses to address coastal flood risk, including the development of strategies to manage risk associated with relative sea level change (RSLC). The RIC study area is one (1) of two (2) high-risk focus areas within the state of Rhode Island that was identified by the NACCS.

The study area for the RIC Project runs from Point Judith eastward to the Massachusetts State line, including the majority of Narragansett Bay, which is a major feature of the state’s topography. The RIC study area also includes Block Island, which is not located in Narragansett Bay. The area covers more than 457 miles of coastline as shown in **Figure ES-1**. All or part of 19 municipalities are included in the study area, with more than 650,000 people currently residing within the study boundaries.

The period of analysis for the study is a 50-year period, from 2030 through 2079. Project implementation is expected to begin in the year 2025 and last 5 years. The base year is considered the year the alternatives have been implemented and begin to accrue benefits. The base year for this project is assumed to be 2030.

The total estimated value of structures and content for structures located within the 100-year floodplain is approximately \$3.6 Billion.

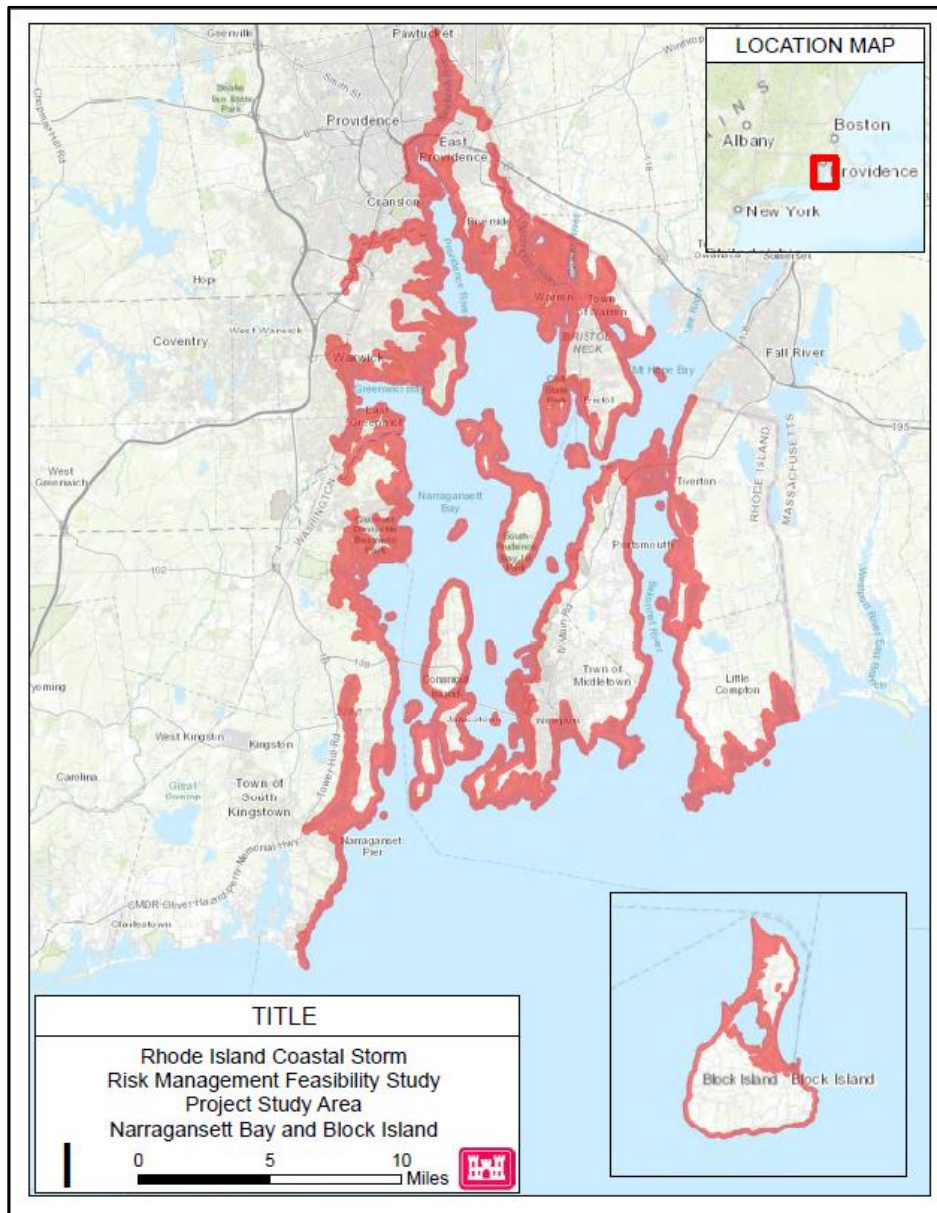


Figure ES-1: The coastline included in the study area

Purpose and Need

The purpose of the NACCS study was to encourage action by all to implement CSRM strategies in order to reduce the risk from, and make the North Atlantic region more resilient to future storms and impacts of sea level change (SLC). The RIC study is aligned with the NACCS goals and purpose towards the completion of a systems analysis to better understand and manage coastal risk. The RIC study is a targeted investigation to identify a plan to reduce the risk of coastal storm damage along the large portion of the Rhode Island coastline, while contributing to the resilience of communities, important infrastructure, and the natural environment. The study area includes significant critical infrastructure at risk of damage from future flooding and

coastal storms including police, fire and emergency support service facilities; schools; energy production facilities; water and wastewater facilities; and nursing homes and assisted living facilities.

The study is needed because the study area experiences frequent flooding from high tides, spring tides, and coastal storms; is considered at high risk of coastal storm flooding with an associated threat to life safety; and is susceptible to relative sea level change (RSLC). The effects of inundation are anticipated to increase due to future sea level rise.

In present value terms, accumulated damages to 2079 was estimated up to \$1.3 billion for the entire study. Damages per structure are estimated to be highest in Block Island, Providence, and Newport modeled areas where damages per structure were estimated to be as much as \$500,000 to over \$1 million per structure.

Plan Formulation

Early in the planning process, scoping meetings were held with the NFS and with representatives from 19 municipalities located within the study area. The NFS, with the assistance of stakeholders, identified eleven key focused study areas within the regional study area, which are shown in **Figure ES-2**. A series of problems and opportunities were developed during these early coordination meetings. Using the information obtained during the early stakeholder meetings, the Project Development Team (PDT) focused on developing solutions for the focused study areas. Structural measures (storm surge barriers, beach nourishment, breakwaters/groins, levees/floodwalls/seawalls and tidal gates), nonstructural measures (structure elevations, floodproofing, relocations, buy-and outs/acquisitions) and natural or nature-based features (living shorelines and reefs) were considered. Additionally, nonstructural measures were considered for the entire study area (i.e., the shoreline from Point Judith to the Massachusetts state line).

Initial Screening of Measures. The list of measures that would address coastal storm risk were developed and each measure was assessed on whether it would meet a series of criteria. First the measures were compared against the two (2) study objectives. In order for a measure to be carried forward for further analysis it had to meet both study objectives. Next, the feasibility of each measure was considered. A measure was carried forward only if it was determined to be constructable and if, without completing a full economic analysis, it was estimated to be economically justified. Finally, a measure was eliminated from consideration if it would have a significant negative impact on coastal access or use, the environment or existing storm protection measures.

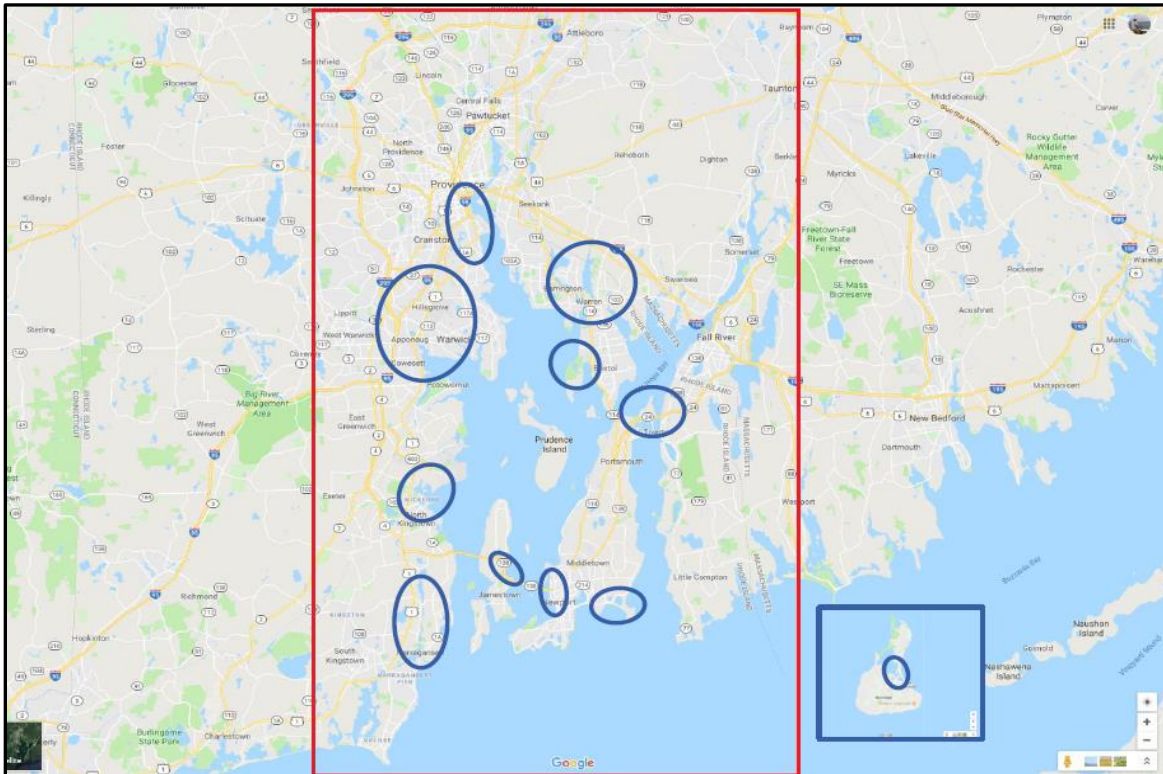


Figure ES-2: Focused study areas

Second Screening Iteration. The second screening iteration involved a quantitative analysis in which measures were combined into a basic initial array of alternatives. Rough costs and benefits were developed for the measures that were brought forward from the initial screening. NACCS parametric costs were used to develop project costs and National Structure Inventory structure data was used to develop rough Benefit/Cost Ratios (BCRs). Alternatives were removed from further consideration if their BCR was significantly lower than 1.0, while alternatives with BCRs greater than 1.0 were carried forward to the next round of screenings. For a number of alternatives, the Project Development Team (PDT) did not have sufficient information to develop accurate BCRs at that point in the study. These alternatives were also carried forward into the next screening iteration, allowing the PDT to continue to develop the designs, costs and benefits of each alternative.

Third Screening Iteration. During the third screening iteration, all alternatives carried through from the previous screening iterations and the NAA were evaluated against the P&G criteria of completeness, effectiveness, efficiency, and acceptability. Additionally, the PDT took a more in-depth look at the remaining alternatives; again, considering constructability, design, and environmental impacts. The team again reached out to the municipalities and stakeholders to assess interest in the alternatives that had been developed to date.

The following alternatives were included in the focused array of alternatives:

No Action Alternative - The NAA assumes that no actions would be taken by the Federal Government to address the problems identified by the study. Consequently, the NAA would not reduce damages from coastal storm surge inundation.

Barrington/Warren Upper Surge Barrier - A hurricane barrier system was considered for the upper reach of the Warren River. Alignments for the 500-year storm (0.2% chance) was developed. This system, utilizing a combination of existing infrastructure and the construction of new structures, would result in a structure that would extend for 6,350 feet (1.2 miles) between Barrington and Warren. The closure structure built in the waterway channel. One section of the barrier could be opened to allow the daily passing of marine traffic. At the time when protection was needed, the barrier could be closed to prevent flood waters from flowing upstream.

Warren/Barrington Lower Surge Barrier - A lower surge barrier was also considered to protect the Warren/Barrington study area. This barrier would include 1,000 linear feet (LF) of in-water structures and a 2,000 LF approach levee. As with the upper surge barrier, the alignment design was analyzed for a 500-year storm event. The barrier would extend across the Warren River and include a 150 foot-wide double-leaf steel sector gates that, when opened, would provide minimal obstructions to the waterway, allowing commercial and recreational navigation. Vehicle barriers, which would be closed only during storm events, would be integrated into each floodwall in Barrington and Warren. A tide gate would be built into the floodwall along Bourne Lane to maintain tidal flows to the surrounding wetlands.

Narragansett Middle Bridge Barrier - A flood protection system for the area would consist of a floodwall to either side of the Narrow River Bridge and a stop log structure underneath the existing bridge. The in-water structure would be approximately 500 LF in length, with 2,000 LF of on-land approach levees. The structure would be built into the existing bridge and contain slots to install stop logs during storm events. The width of the opening would be approximately 30 feet in order to maintain marine traffic.

Newport - Wellington Levee/Floodwall - Wellington Avenue is located in the Fifth Ward neighborhood in Newport, Rhode Island. This densely developed residential neighborhood is within walking distance to downtown Newport Area. A 2100 LF concrete floodwall and earthen levee system located along the westbound side of Wellington Avenue was designed to reduce coastal storm risk in this area. The structure was designed to the 100-year water level and includes storm surge and SLC for the end of the 50-year period of economic analysis (i.e., 2079). The concrete floodwall would range in height of five (5) to eight (8) feet above ground, with the majority of the earthen levee having a crest height of eight (8) feet above ground.

Providence – Port of Providence: The Port of Providence is one of New England's largest and busiest deep-water port; strategically located as a distribution center to move goods and materials throughout the region. The PDT began the planning process, however the team discovered early in the process that the port area is an extremely complicated system with diverse facilities and stakeholders. It is a

recommendation of this study that Port of Providences should be the subject of its own study.

Entire Project Area – Nonstructural Alternatives - The investigation of nonstructural measures included the entire study area and was not limited to the eleven focused study areas. Initially the structures located within the 100-year floodplain were aggregated into an initial inventory, which included approximately 12,000 buildings. Because the initial inventory was so large, the PDT chose to further aggregate these structures by considering Common Flood Consequences to identify structures that experience relatively high flood damages. Structures that had experienced \$125,000 or more overall damages was used as a threshold to determine if a property would be considered for inclusion in the investigation or would be removed from consideration. This threshold resulted in the inclusion of 1033 structures (757 residential and 276 non-residential) with 1st floors that experience frequent flood damages.

Structures included in the baseline inventory were divided into thirty-two community groups using three (3) criteria: town boundaries, modeling area and groups of structures. These groups were used to create three (3) nonstructural plans for this analysis. For each plan, the estimated present value damages for the Future with Project (FWP) condition were subtracted from the estimated present value damages for the FWOP to determine the total present value benefits for each community group. These were compared to the total estimated costs for each community group for the corresponding plan. Typically, a benefit-to-cost ratio is a comparison of average annual values, including the cost of interest during construction (IDC). However, since nonstructural cost estimates only include first costs and minimal IDC, the total present value compared to total costs results in a comparable BCR for decision making at the community group level. The present value benefits and total cost information presented in this section is later aggregated for the community groups chosen to be included in each nonstructural plan, then annualized for evaluation and comparison of each alternative.

Plan NS-A. For the first plan, costs and benefits for elevations for residential properties and floodproofing for non-residential floodproofing were developed for each community group. A contingency of 30% was used to on this analysis. Fourteen community groups had a BCR >0.9, while the remaining community groups had a BCR <0.9. The groups with a BCR >0.9 were used create Plan NS-A. The plan includes 494 total structures – 313 residential recommended for elevation and 181 non-residential recommended for floodproofing.

Plan NS-B – Vulnerable Communities. Plan NS-B addresses socially vulnerable populations within the RIC study area using the Social Vulnerability Index (SVI), that was developed by the Centers for Disease Control (CDC) to identify social vulnerability within communities. The CDC SVI ranks each census tract on 15 social factors, including poverty, lack of vehicle access, and crowded housing, and groups them into four (4) related themes, which are Socioeconomic status, Household Composition, Race/Ethnicity/Language and Housing and Transportation. A numerical ranking is

assigned to each tract for each of the themes, in addition to an overall ranking. For the RIC Study, the overall ranking was used to identify socially vulnerable communities.

Plan NS-A was used as the baseline for Plan NS-B. First, social vulnerability community groups were identified using the CDC SVI. The PDT found four (4) community groups are located in vulnerable communities. Two (2) of these communities (Quonset Airport & Fort Ave) had a BCR greater than 0.9, so were already included in Plan NS-A. However, the other two (2) communities (Oakland Beach & Port of Providence 1) were not included in the Plan NS-A, because their BCR was below 0.9. Oakland Beach and Port of Providence 1 were included in the Plan NS-C, adding 28 residential properties and 37 non-residential properties into the plan.

The second step in the creation of Plan NS-B involved the Initial Inventory. The PDT reevaluate the approximately 12,000 structures included in the Initial Inventory to identify structures in vulnerable communities that weren't included in the Baseline Inventory. Only areas identified by the CDC SVI value over .75 were evaluated. 51 additional structures, not included in the community groups, were found. These properties were divided into three (3) additional community groups (Port of Providence 2, Newport NE & Quonset Airport 2) and added into the plan. These new community groups were also included in Plan NS-B. Plan NS-B includes 348 residential properties that will be recommended for elevations and 262 non-residential properties that will be recommended for floodproofing.

Plan C – Flooded and Isolated Structures. Plan NS-C considered Health and Safety of the residents living within the study area by assessing structures that would be cut off from essential services and utilities due to future flooding caused by SLR and storm flooding. This was done by modeling inundation levels at Mean Higher High Water plus 1.5ft (King tide) using the USACE intermediate SLC model. Residential structures that were predicted to be inundated at this future flood level were recommended for acquisition, instead of elevations. Additionally, there are residential properties that would be cut off from essential services and utilities because all access (i.e., roads and bridges) would be inundated at this future flood level. The structures on these properties were also included for buy-outs. This element of Plan NS-C's rationale was that private properties experiencing consistent flooding would no longer be safe to inhabit because they would be cut off from essential services and utilities. Therefore, moving the buildings out of the floodplain, instead of elevating them, would reduce repetitive flooding, promote safety and increase community resiliency. The final element of Plan NS-C addressed non-residential structures. All non-residential structures that would be inundated at this future flood level would not be included in the plan. Because these properties would regularly experience flooding (at every King Tide), floodproofing measures would be insufficient to stop property damage. The state and property owners would have to consider other measures to address these properties.

Because the cost of acquisition is so much higher than elevations, all but seven (7) community groups had a BCR<0.9, resulting in a much smaller plan. Plan NS-C includes 21 elevations, five (5) acquisitions and 41 floodproofings.

Critical Infrastructure. Flood risk management measures for critical infrastructure were analyzed as part of this study. A list of facilities, initially developed from the Rhode Island Emergency Management Office, the Department of the Interior, as well as various Rhode Island localities, were preliminarily identified as critical infrastructure. The list was also provided to the NFS for their concurrence. This included airports, communication sites, electrical substations, emergency facilities (EMS and fire stations, hospitals, police stations), hazardous material facilities (e.g., wastewater treatment plants), nursing homes, and schools. There 73 facilities preliminarily identified as critical within the designated 100-year floodplain. The list was refined down to 51 facilities and/or sites to be considered for flood risk management measures. The formulation strategy was to provide flood risk management measures for critical infrastructure as part of the nonstructural component of the alternative plan selected for recommendation, regardless of whether or not the critical infrastructure is located in a community group that is otherwise economically justified. As such, critical infrastructure could be incorporated throughout the study area, including those areas where no other nonstructural action is recommended.

Preliminary costs and benefits for providing flood risk management for critical infrastructure was developed for those facilities identified to have associated buildings that could potentially be protected by dry floodproofing. From the refined list off 51 discussed previously, there were 43 critical infrastructure sites that had identified buildings on the premises. The preliminary costs associated with those 43 structures totaled \$18.9 million. The total present value benefit based on damage to a general commercial building was estimated to be \$4.9 million. Due to the individualized characteristics associated with critical infrastructure, further investigation on both the costs and benefits is necessary prior to making a decision regarding inclusion in the recommended plan for this study. A summary of the number and types of critical infrastructure considered in the analysis can be seen in the following table.

Plan Evaluation. An economic analysis was completed on all of the structural and nonstructural alternatives that were included in the final array. None of the structural alternatives had BCRs above 1.0 and were ultimately eliminated from consideration. **Table ES-1** presents that economic analysis for the final array of structural alternatives, while **Table ES-2** provides the results of the cost/benefit analysis for the three (3) non-structural plans. **Table ES-3** is a summary of the components that makes up each plan. All of the nonstructural plans have a BCR above 1.0. Plan NS-A maximizes Net Benefits and is therefore the NED Plan.

Table ES-1: Economic analysis of the final array of structural alternatives
(Fiscal Year 2021 price levels and 2.5% discount rate)

	Lower Barrier (Barrington/ Warren)	Upper Barrier (Barrington/ Warren)	Middle Bridge (Narraganset)	Wellington Ave (Newport Downtown)
Initial Construction	\$496,112,000	\$546,295,000	\$100,166,000	\$36,640,000
Total Mitigation ²	\$72,098,933	\$68,335,940	\$30,800,406	\$0.00
Total First Cost	\$568,210,933	\$614,630,940	\$130,966,406	\$36,640,000
Total Maintenance ¹	\$70,287,000	\$110,935,000	\$10,382,000	\$0.00
Average Annual Cost	\$24,142,000	\$27,276,000	\$5,138,245	\$1,305,000
FWOP Present Value Damages	\$483,330,000	\$483,330,000	\$35,407,132	\$542,150,960
FWP Present Value Damages	\$58,547,000	\$107,651,000	\$4,910,711	\$517,684,386
Average Annual Benefits	\$14,977,023	\$13,245,712	\$1,075,245	\$862,644
Average Annual Net Benefit	-\$9,164,977	-\$14,030,288	-\$4,063,000	-\$442,356
Benefit-to-Cost Ratio	0.6	0.5	0.2	0.7

Table ES-2: Economic summary of the nonstructural plans
(Fiscal Year 2021 price levels and 2.25% discount rate)

Plan	Total Project First Costs (\$)	Annual Average Benefit (\$)	Annual Average Cost (\$)	Net Benefits (\$)	BCR
NS-A	188,000,000	9,730,000	6,770,000	2,960,000	1.4
NS-B	237,000,000	10,360,000	8,530,000	1,830,000	1.2
NS-C	30,000,000	1,170,000	1,070,000	100,000	1.1

Table ES-3: Summary of measures for the nonstructural plans

Plan	Elevations	Floodproofings	Acquisitions	Total Structures
NS-A	313	181	0	494
NS-B	348	262	0	610
NS-C	21	41	5	67

Tentatively Selected Plan

Plan Refinement. To be as inclusive as possible and reduces the greatest amount of flood risk in the study area, two (2) refinements were made to Plan NS-A. These refinements resulted in the inclusion of an additional 39 structures to the TSP. This plan will be referred to as NS-A.1. The first refinement added non-residential structures

from four (4) community groups (Barrington, Bristol Downtown, Narragansett and Shawomet). Although these groups had an overall BCR less than 0.9 when both elevations and floodproofing were considered, the BCR for non-residential floodproofing alone was greater than 1.0. As a result of this refinement, twenty-five non-residential properties were added in Plan NS-A.1.

The second refinement included the addition of certain outlier properties. As previously described, 74 structures were not located near any other structures, and, therefore, were not part of any community group. These “outliers” were initially removed from consideration. Of the 74 outliers, 14 had a BCR greater than 0.9. These 14 structures were added to the TSP plan.

Plan Components. The TSP is an entirely nonstructural plan that includes 533 total structures – 323 residential recommended for elevation and 210 non-residential recommended for floodproofing (Table ES-4). There are five (5) facilities that are identified a critical infrastructure currently included in the TSP (2 schools, 2 fire/police, and 1 building at an electric power station).

Table ES-4: The Tentatively Selected Plan

Community Group Name	Total Costs (\$)	Residential Structures (Elevations)	Non-Residential Structures (Floodproofing)	Total Structures
PLAN NS-A				
Block Island	4,384,340	2	10	12
Downtown Warwick	6,467,902	5	12	17
East Greenwich	3,737,150	0	10	10
Fort Ave	4,113,303	9	3	12
Newport Downtown	47,593,332	85	38	123
Newport North	4,678,317	3	8	11
Potowomut	1,591,669	5	0	5
Quonset Airport	4,498,113	0	9	9
Sakonnet	1,747,901	3	2	5
Sakonnet North	2,775,778	8	0	8
Shore Acres	2,542,409	7	0	7
Warren	42,055,525	64	49	113
West Passage	3,187,718	9	0	9
Wickford	51,653,408	113	40	153
Refinement - Floodproofing only				
Barrington	5,454,351	0	11	11
Bristol Downtown	2,989,720	0	8	8
Narragansett	1,121,145	0	3	3
Shawomet	1,121,145	0	3	3
Refinement - OUTLIERS				
Outliers		10	4	14
TOTAL		323	210	533

ES-10

Cost Estimate. Total project first costs of the TSP at FY 2021 price levels are approximately \$197 million (**Table ES-5**). The total fully funded cost of the project, with escalation through the mid-point of construction, is approximately \$247 million. Nonstructural costs were developed using information from FEMA and nonstructural projects recently completed in vicinity of the study area.

Table ES-5: Economic summary of the Tentatively Selected Plan
(Fiscal Year 2021 price levels and 2.25% discount rate)

Federal discount rate FY22 ¹ = 2.25%, OCT 2020 Price Levels, 50-Year Period of Analysis, Figures in \$ Except BCR	
<i>Project First Costs</i>	
Construction ²	120,130,000
Preconstruction Engineering & Design (PED)	20,254,000
Construction Management (CM)	5,480,000
Real Estate	6,120,000
Environmental Mitigation	0
Cultural Resource Mitigation	0
Contingency	44,983,000
Project First Costs Total²	196,967,000
<i>Average Annual Costs</i>	
Annualized First Costs ²	7,060,000
Interest During Construction (IDC)	20,000
Total Average Annual Cost (AAC)	7,080,000
Average Annual Benefits (AAB)	10,420,000
Net Benefits	3,340,000
Benefit-Cost Ratio (BCR)	1.5

Significant Resources/Environmental Considerations

There are significant historic and archeological resources located in the 19 towns within the project area. Because USACE cannot fully determine how the project may affect historic properties prior to finalization of this feasibility study, a Programmatic Agreement (PA) (36 CFR 800.14(b)(3)) will be prepared that will outline the process to identify and evaluate historic properties and avoid, minimize, and where possible, mitigate for any adverse impacts in accordance with Section 106 of the NHPA and implementing regulations 36 CFR 800. The PA will allow the USACE to complete the necessary historic and archaeological surveys during the follow-on PED phase of the project, once the nonstructural measures and identified properties have been confirmed.

The PA is in development and currently being reviewed; when complete, it will be submitted to the Rhode Island State Historic Preservation Officer (RI SHPO), along with any other consulting parties, for review and concurrence.

Plan Implementation

In accordance with the cost share provisions in Section 103 of the Water Resources Development Act of 1986, as amended (33 U.S.C. 2213), project design and implementation are cost shared 65 percent Federal and 35 percent non-Federal. The non-Federal costs include credit for the value of LERRDs. Total LERRDs are estimated to be \$6,120,000. The cost share apportionments for the Project First Costs and Total Project Costs are provided in **Tables ES-6** and **ES-7** respectively.

Table ES-6: Project first cost (constant dollar basis) apportionment
(Fiscal Year 2021 price levels and 2.25% discount rate)

Project First Cost (Constant Dollar Basis)	\$196,967,000
Federal Share (65%)	\$128,000,000
Non-Federal Share (35%)	\$69,000,000
Less: LERRD Credit	\$4,920,000
Non-Federal Cash Contribution	\$64,080,000

Table ES-7: Total project cost (fully funded) apportionment
(Fiscal Year 2021 price levels and 2.25% discount rate)

Total Project Cost (Fully Funded)	\$254,236,000
Federal Share (65%)	\$165,000,000
Non-Federal Share (35%)	\$89,000,000

Before design and construction may be initiated, the USACE Chief of Engineers must approve the recommended project. Then the Chief's Report and approved IFR/EA are provided to Office of the Assistant Secretary of the Army (Civil Works) and Office of Management and Budget for review, before transmittal to Congress for authorization. The project requires Congressional authorization to receive Federal construction funding. In some cases, funding for design may be available prior to Congressional authorization. Project implementation is currently expected to begin in the year 2025. The following provides the current estimated schedule for the project.

Table ES-8: Estimated Design and Construction Schedule

Action	Estimated Start Date
Agency Decision Milestone	Apr-22
Integrated Final Feasibility Report/EA to Higher Authority for Approval	Oct-22
Sign Chief's Report and Chief's Report submitted to ASA (CW)	Mar-23
ASA (CW) Integrated Final Feasibility Report/EIS Approval	May-23
ASA (CW) submits report to OMB	May-23
Final Report to Congress	May-23
Start Plans and Specifications (Design Phase)	Dec-23
Execute PPA with Non-Federal Sponsor	Dec-23
Finalize Plans and Specifications for Contract	Dec-25
Real Estate Certification for Contract	Jan-26
Ready to Advertise Contract	Mar-26
Award Construction Contract with Notice to Proceed	Mar-27

Views of the Public, agencies, Stakeholders, and Tribes

During the TSP milestone meeting, which was held on November 17, 2021, the RI CRMC, project's NFS, expressed support for the TSP and continuation of the feasibility analysis.

An initial virtual site visit was held with representative from the resource agencies on March 2020. The New England District provided information on the project and the alternatives that were being considered. The representatives from the resource agencies provided comments and advise. They were all supportive of the study. Additional information will be added to this discussion once the Agency review, which is scheduled to begin in February 2022, has been completed.

The views of the public, stakeholders and Tribes will be updated as coordination and public review is completed.

Reviews

This section will be updated as the reviews of the decision document are completed.

Unresolved Issues/Areas of Controversy

There are currently no unresolved issues or areas of controversy associated with the TSP.

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