REVIEW PLAN

AUG 2021

Project Name: Morehead, KY Water Supply Reallocation Feasibility Study at Cave Run Lake

P2 Number: 492967

Decision Document Type: Feasibility Report and Integrated Environmental Assessment

Project Type: Water Supply Reallocation

District: Louisville (LRL)

District Contact: [redacted]

Major Subordinate Command (MSC): Great Lakes and Ohio River Division (LRD)

MSC Contact: [redacted]

Review Management Organization (RMO): Water Management and Reallocation Studies PCX

RMO Contact: [redacted]

Key Review Plan Dates

Date of RMO Endorsement of Review Plan:	7 JUL 2021
Date of MSC Approval of Review Plan:	Pending
Date of IEPR Exclusion Approval:	Pending
Has the Review Plan changed since PCX Endorsement?	Yes
Date of Last Review Plan Revision:	None
Date of Review Plan Web Posting:	TBD
Date of Congressional Notifications:	N/A

Milestone Schedule

	Scheduled	Actual	Complete
Alternatives Milestone:	13 MAY 2021	(13 MAY 2021)	Yes
Tentatively Selected Plan:	31 AUG 2021	(enter date)	No
Release Draft Report to Public:	27 OCT 2021	(enter date)	No
Agency Decision Milestone:	09 FEB 2022	(enter date)	No
Final Report Transmittal:	15 APR 2022	(enter date)	No
Senior Leaders Briefing:	(enter date)	(enter date)	No
Director's Report:	15 JUN 2022	(enter date)	No

Project Fact Sheet
AUG 2021

Project Name: Morehead, KY Water Supply Reallocation Feasibility Study at Cave Run Lake

Location: Morehead, Kentucky is located along US 60 (the historic Midland Trail) and Interstate 64 in Rowan County, Kentucky.

Authority: Section 301 of the Water Supply Act of 1958, Pub. L. No. 85-500, § 301, 72 Stat. 319, 319 (1958) (codified as amended at 43 U.S.C. § 390b); Section 216 of the Flood Control Act of 1970 Pub. L. No. 91-611, § 216, 84 Stat. 1824, 1830 (1970)

Non-Federal Sponsor: Morehead Utility Plant Board (MUPB)

Type of Study: Integrated Feasibility Study and Environmental Assessment

SMART Planning Status: The study is 3x3x3 compliant

Project Area: Cave Run Lake maintains a minimum release into the Licking River and is located 5 river miles upstream of the Licking River's confluence with Triplett Creek. Morehead is located along Triplett Creek approximately 13 river miles upstream of Triplett Creek's confluence with the Licking River.

Problem Statement: Existing yields from water sources are not projected to meet the demands, given increased demand for water from population growth. The MUPB serves as the water, wastewater, and gas division of the City of Morehead. MUPB also serves wholesale drinking water to Rowan Water Inc. (RWI) and Bath County Water District (BCWD). The three utilities combined serve over 14,000 total customers and approximately 40,000 people. Water demand projections are based on population and industrial growth estimates. The data from the Water Demand Analysis show projections for an average daily demand of 7.09 MGD and a need of 9.42 MGD over the period of analysis (to 2070). Based on the system's current max day demands of over 7.0 MGD, MUPB exceeds the Kentucky Division of Water (KYDOW) permitted withdrawal rate of 6.5 MGD on the current Licking River source routinely. With population growth anticipated into the future and industrial use actively increasing, MUPB has an immediate need to pursue solutions to its water treatment needs including a newly permitted, reliable raw water source.

Federal Interest: Section 301(a) of Water Supply Act of 1958 states: "It is declared to be the policy of the Congress to recognize the primary responsibilities of the States and local interests in developing water supplies for domestic, municipal, industrial, and other purposes and that the Federal Government should participate and cooperate with States and local interests in developing such water supplies in connection with the construction, maintenance, and operation of Federal navigation, flood control, irrigation, or multiple purpose projects." This

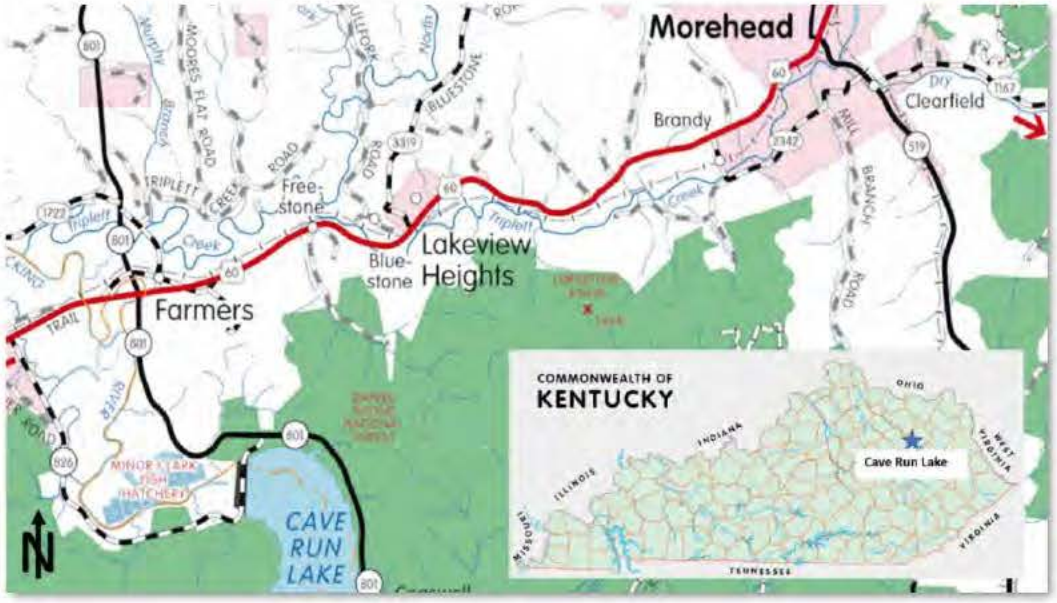
declaration establishes a Federal interest in cooperating with States and local interests in developing water supplies at USACE reservoirs in connection with other project purposes.

Future Without Project: For Water Supply Reallocation studies, this entails an action without Federal involvement. In coordination with the Non-Federal Sponsor, the non-federal alternative would chosen would be would require construction for an intake and pipeline to the Ohio River at Maysville, KY.

Risk Identification: The below is a summary of risks that were identified in the Risk Register. The PDT does not anticipate any life or safety risks that would occur during construction or in the event the project fails.

Water Demand Study	If population projections turn out to be different than the projection, it could affect the amount of water storage needed by the Non-Federal Sponsor
Recreational Impacts	There could be elevation changes to the summer pool during severe drought that could impact recreational activities.
Cultural Resources	Identification of historic properties during the development or implementation of the project may require the development of a Memorandum of Agreement (MOA) to mitigate the effects to those identified historic properties.

Figure 1. Cave run Lake and the City of Morehead Kentucky.



1. FACTORS AFFECTING THE LEVELS OF REVIEW

Scope of Review. This review plan for the Morehead, KY Water Supply Reallocation Feasibility Study at Cave Run Lake includes District Quality Control (DQC), Agency Technical Review (ATR), as well as Policy and Legal Compliance Reviews. The limited scope of this action, use of well-established criteria, minimal anticipated cultural resource, environmental and endangered species impacts before mitigation, and low uncertainty of all anticipated alternatives, are all indicative of an action that would benefit little from further review by IEPR. The Project Delivery Team, with endorsement from the Louisville District Chief of Engineers, has determined that an Independent External Peer Review (IEPR) will not be necessary.

- Will the study likely be challenging?
  No. This study does not involve novel, untested, or influential scientific information or methods and there is no significant threat to human life from the decision document. The study analyses, while complex, are within the typical scope of similar reallocation studies. Methodology and required data and analyses are well-established in USACE guidance for such studies. The primary tools for the analysis for this reallocation study will be HEC ResSIM and a spreadsheet to evaluate demand and supply.

- Provide a preliminary assessment of where the project risks are likely to occur and assess the magnitude of those risks.
  This project does not include construction of any impoundments, floodwalls, or levees. From a life safety perspective, there is minimum risk.

  Based on the June 2017 Periodic Assessment, Cave Run Lake is a Dam Safety Action Classifcation 5. Planning measures that include reallocation from the flood pool or pool raise were screened prior to the Alternatives Milestone Meeting.

- Is the project likely to be justified by life safety or is the study or project likely to involve significant life safety issues?
  No.

- Has the Governor of an affected state requested a peer review by independent experts?
  No.

- Will the project likely to involve significant public dispute as to the project's size, nature, or effects?
  No.

- Is the project/study likely to involve significant public dispute as to the economic or environmental cost or benefit of the project?
  No.

- Is the information in the decision document or anticipated project design likely to 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?
  No.

- Does the project design require redundancy, resiliency, and/or robustness, unique construction sequencing, or a reduced or overlapping design/construction schedule?
  No.

- Is the estimated total cost of the project greater than $200 million?
  No.

- Will an Environmental Impact Statement be prepared as part of the study?
  No.

- Is the project expected to have more than negligible adverse impacts on scarce or unique tribal, cultural, or historic resources?
  No.

- Is the project expected to have substantial adverse impacts on fish and wildlife species and their habitat prior to the implementation of mitigation measures?
  No.

- 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?
  No.

- Are In-kind contributions expected?
  No.

- Will site visits be required?
  No.

- How and when will there be opportunities for the public to comment on the study and when will significant and relevant public comments be provide to the reviewers?
  After DQC and ATR the draft report will be released for a 30-day public review through our Public Affairs Office (PAO) on the USACE website, Morehead local newspaper and all USACE social media sites. PAO will provide all comments received to the Project Manager who will distribute the comments to the Project Delivery Team to be addressed.

REVIEW EXECUTION PLAN

This section describes each level of review to be conducted. Based upon the factors discussed in Section 1, this study will undergo the following types of reviews:

District Quality Control. All decision documents (including data, analyses, environmental compliance documents, etc.) undergo DQC. This internal review process covers basic science and engineering work products. It fulfils the project quality requirements of the Project Management Plan.

Agency Technical Review. ATR is performed by a qualified team from outside the home district that is not involved in the day-to-day production of the project/product. These teams will be comprised of certified USACE personnel. The ATR team lead will be from outside the home MSC. If significant life safety issues are involved in a study or project a safety assurance review should be conducted during ATR. The lead PCX is responsible for identifying the ATR team members and indicate if candidates will be nominated by the home district/MSC.

Model Review and Approval/Certification. EC 1105-2-412 mandates the use of certified or approved models for all planning work to ensure the models are technically and theoretically sound, compliant with USACE policy, computationally accurate, and based on reasonable assumptions.

Policy and Legal Review. All decision documents will be reviewed for compliance with law and policy. ER 1105-2-100, Appendix H provides guidance on policy and legal compliance reviews. These reviews culminate in determinations that report recommendations and the supporting analyses and coordination comply with law and policy, and warrant approval or further recommendation to higher authority by the home MSC Commander. These reviews are not further detailed in this section of the Review Plan.

Table 1 provides the schedules and costs for reviews. The specific expertise required for the teams are identified in later subsections covering each review. These subsections also identify requirements, special reporting provisions, and sources of more information.

Table 1: Levels of Review

Product(s) to undergo Review	Review Level	Start Date	End Date	Cost	Complete
Planning Model Review (Demand Model)	Model Review (see EC 1105-2-412)	10 MAY 2021	28 MAY 2021	[redacted]	Yes
Draft Feasibility Report and Integrated EA	District Quality Control	15 SEP 2021	24 SEP 2021	[redacted]	No
Draft Feasibility Report and Integrated EA	Agency Technical Review	29 OCT 2021	12 NOV 2021	[redacted]	No
Draft Feasibility Report and Integrated EA	Policy and Legal Review	29 OCT 2021	12 NOV 2021	[redacted]	No
Final Feasibility Report and Integrated EA	District Quality Control	20 DEC 2021	07 JAN 2022	[redacted]	No
Final Feasibility Report and Integrated EA	Agency Technical Review	12 JAN 2022	18 JAN 2022	[redacted]	No
Final Feasibility Report and Integrated EA	Policy and Legal Review	12 JAN 2022	18 JAN 2022	[redacted]	No

a. DISTRICT QUALITY CONTROL

The home district shall manage DQC and will appoint a DQC Lead to manage the local review (see ER 1165-2-217, section 8.a.1). The DQC Lead should prepare a DQC Plan and provide it to the RMO and MSC prior to starting DQC reviews. 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 (such as planning, economics, environmental resources, etc).
Planning	The Planning reviewer should be a senior water resources planner with experience in formulation and evaluation of alternatives for water supply and/or reallocation, and assessment of the significance of impacts on other project purposes (e.g. flood risk mitigation, navigation, hydropower, recreation, water quality, fish and wildlife) at multi-purpose projects.
Economics	The economics reviewer should be a senior economist with experience in development of population and water use forecasts, cost allocation at multi-purpose projects, assessing financial feasibility of reallocation to M&I water supply, calculation of storage pricing based on updated cost of storage and benefits foregone methods, including reviewing a recreation analysis if necessary. The reviewer should also be able to evaluate Inputs into a spreadsheet model for water demand and supply. Lastly, the reviewer should also be able to provide expertise for water storage agreements
Environmental Resources	The environmental resources reviewer should be a senior NEPA practitioner who is able to review the combined report to confirm that all environmental and cultural resource statues are in compliance and that impact evaluation is adequate.
Cultural Resources	The cultural resources reviewer should be a senior archaeologist. Reviewer should also have expertise in both Pre-Contact/Post-Contact Archaeology, and geographic expertise in either the Great Plains or Southeast United States geographical areas
Hydrology & Hydraulic Engineering / Water Management	Thorough knowledge of hydrology and hydraulics as it pertains to downstream consequences for a project. The water management reviewer will be a senior engineer with expertise in water control manuals and operations of multipurpose

	projects and river basin systems, Climate Preparedness and Resilience, as well as an understanding of storage accounting. They should also have expertise in developing and running rules -based reservoir and river system simulation models including HEC-ResSim. The Reviewer will have experience with Water Supply and Reallocation related USACE Engineering Circulars, Manuals, Regulations, and Engineering Construction Bulletins, such as ECB 2019-13 Methods for Storage/Yield Analysis.
Real Estate	Reviewer will have knowledge and expertise regarding flowage easements and what amount of additional frequency of inundation may lead to land acquisition in fee
Operations	Operations Lake Manager who is a subject matter expert in the day to day operations of the lake will review the report for accuracy.

Documentation of DQC. DrChecks will be used to document all DQC comments, responses and resolutions. 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. An example DQC Certification statement is provided in ER 1165-2-217, on page 19 (see Figure F).

Documentation of completed DQC should be provided to the MSC, RMO and ATR Team leader prior to initiating an 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 (see ER 1165-2-217, section 9).

b. AGENCY TECHNICAL REVIEW

The ATR will assess whether the analyses are technically correct and comply with guidance, and that documents explain the analyses and results in a clear manner. An RMO manages ATR. The review is conducted by an ATR Team whose members are certified to perform reviews. Lists of certified reviewers are maintained by the various technical Communities of Practice (see ER 1165-2-217, section 9(h)(1)). Table 3 identifies the disciplines and required expertise for this ATR Team.

Table 3: Required ATR Team Expertise

ATR Team Disciplines	Expertise Required
ATR Lead	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 serve as a reviewer for a specific discipline (such as planning, economics or environmental).

Planning (May serve as the ATR Lead)	The Planning reviewer should be a senior water resources planner with experience in formulation and evaluation of alternatives for water supply and/or reallocation, and assessment of the significance of impacts on other project purposes (e.g. flood risk mitigation, navigation, hydropower, recreation, water quality, fish and wildlife) at multi-purpose projects.
Economics	The economics reviewer should be a senior economist with experience in development of population and water use forecasts, cost allocation at multi-purpose projects, assessing financial feasibility of reallocation to M&I water supply, calculation of storage pricing based on updated cost of storage and benefits foregone methods, including reviewing a recreation analysis if necessary. The reviewer should also be able to evaluate Inputs into a spreadsheet model for water demand and supply. Lastly, the reviewer should also be able to provide expertise for water storage agreements
Environmental and Cultural Resources	The environmental resources reviewer should be a senior NEPA practitioner who is able to review the combined report to confirm that all environmental and cultural resource statues are in compliance and that impact evaluation is adequate.
Water Management / Hydraulic Engineering	The water management reviewer will be a senior engineer with expertise in water control manuals and operations of multipurpose projects and river basin systems, including an understanding of storage accounting. They should also have expertise in developing and running rules-based reservoir and river system simulation models including HEC-ResSim. Thorough knowledge of hydrology and hydraulics as it pertains to downstream consequences for a project. The Reviewer will have experience with Water Supply and Reallocation related USACE Engineering Circulars, Manuals, Regulations, and Engineering Construction Bulletins, such as ECB 2019-13 Methods for Storage/Yield Analysis.
Climate Preparedness and Resilience CoP Reviewer	A member of the Climate Preparedness and Resiliency Community of Practice (CoP) will participate in the ATR review.
Real Estate	Reviewer will have knowledge and expertise regarding flowage easements and what amount of additional frequency of inundation may lead to land acquisition in fee

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 ER 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 (see ER 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.

c. INDEPENDENT EXTERNAL PEER REVIEW

Type I IEPR.

Decision on Type I IEPR. The PDT has used a risk-informed process to recommend that an Independent External Peer Review (IEPR) Type I review is not necessary. This decision is endorsed by the Louisville District Chief of Engineers (Attachment 2).

This recommendation is informed by the fact that none of the triggers described in the Water Resources Reform and Development Act (WRRDA) of 2014 Section 1044 or ER 1165-2-217 Section 11.d.1 requiring a mandatory IEPR are expected to be met. Also, it is not expected that the preferred plan would result in an increase in the conservation pool elevation of the reservoir. An increase in the conservation pool would require consideration by Headquarters USACE Dam Safety Officer (DSO) along with a review of the Potential Failure Mode Analysis for the dam as described in Chapter 24 of ER 1110-2-1156 Safety of Dams – Policy and Procedures. If any of these factors change during the development of the study, the need for IEPR will be re-evaluated.

Per guidance contained in Section 15.c of ER 1165-2-217, when a decision document does not trigger a mandatory Type I IEPR, a risk-informed recommendation will be developed. The process shall consider the consequences of non-performance on project economics, the environment, and social well-being (public safety and social justice), as well as indicate whether the product is likely to contain influential scientific information or be a highly influential scientific assessment, or involve other issues that provide a rationale for determine the appropriate level of review. Furthermore, the recommendation must make a case that the study is limited in scope that it would not significantly benefit from IEPR.

The following considerations were made by the PDT when making a risk-informed decision not to recommend a Type I IEPR:

- There is no significant threat to human life. Cave Run Lake Dam has a dam safety action class (DSAC) 5 rating. Based on preliminary information for previous studies, it is not expected that the preferred plan would result in an increase in the conservation pool elevation of the reservoir. As described in ER 1110-2-1156 Section 24.4.2.1 for dams with DSAC 5:

  > *Transfers and assignments of existing agreements and new agreements for the allocation of authorized, uncontracted water supply storage or the reallocation of storage from the existing conservation pool (or in some rare cases, the inactive pool or sediment reserve), are permitted, provided the reallocation report, if*

required, is approved, all other implementation requirements are complete, and the district commander had informed the non-Federal entity in writing, of the project's DSAC and the current status of the dam and reservoir; that the dam will be subject to elevated monitoring and evaluation; and that, upon execution of a water storage or surplus agreement, the non-Federal entity will be required to share in the costs of IRRM and other remediation consistent with current policy.

- It is not expected that any Governors of any affected states will request a peer review by independent experts;
- It is not expected that any heads of a Federal or state agency charged with reviewing the project will determine that the project is likely to have significant adverse impacts on any environmental, cultural, or other resources after implementation of any proposed mitigation.
- The study is not likely to involve significant public dispute as to the size, nature, or effects of the project;
- The study is not likely to involve significant public dispute as to the economic or environmental cost or benefit of the project;
- The information in the decision document is not 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; and
- There are no other circumstances where the Chief of Engineers has determined that a Type I IEPR is warranted.

The PDT has considered the criteria above in its recommendation to exclude this study from Type I IEPR. It is a standard reallocation study involving standardized methods and well-established criteria for determination of water supply demand, analysis of alternatives, and derivation of user costs. There is therefore minimal risk of substantial non-performance related to project economics. The project is not expected to result in any significant impacts, or non-compliance, to environmental or cultural resources. The analysis of environmental impacts does not involve a large degree of uncertainty or high risk. An environmental assessment is being prepared as part of the study to determine whether it is appropriate for a Finding of No Significant Impact (FONSI) to be prepared. Health and safety would not be impacted through the preferred plan. As discussed previously, the Cave Run Lake Dam has a DSAC rating of 5. The risk of non-performance with regard to matters pertaining to social well-being, including life and safety, and significant interagency interest is minimal.

This study does not involve novel, untested, or influential scientific information or methods. The study analyses, while complex, are within the typical scope of similar reallocation studies. Methodology and required data and analyses are well-established in USACE guidance for such studies. The primary tools for the analysis for this reallocation study will be HEC ResSIM and a spreadsheet to evaluate demand and supply.

Type II IEPR.

The second kind of IEPR is Type II IEPR. These Safety Assurance Reviews are managed outside of the USACE and are conducted on design and construction for hurricane, storm and flood risk management projects or other projects where existing and potential hazards pose a significant threat to human life. A Type II IEPR Panel will be convened to review the design and construction activities before construction begins, and until construction activities are completed, and periodically thereafter on a regular schedule.

Decision on Type II IEPR. Type II IEPR, the Safety Assurance Review, is conducted on design and construction activities for any hurricane and storm risk management and flood risk management projects, as well as other projects where existing and potential hazards pose a significant threat to human life. Reallocation of storage does not meet the criteria for Type II IEPR.

d. 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.

Table 5: Planning Models. The following models may be used to develop the decision document:

Model Name and Version	Brief Model Description and How It Will Be Used in the Study	Certification / Approval
MUPB Water Demand Analysis	Forecast of future Water demand projections are based on population and industrial growth estimates.	Pending

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.

Table 6: Engineering Models. These models may be used to develop the decision document:

Model Name and Version	Brief Model Description and How It Will Be Used in the Study	Approval Status
HEC-ResSim	This model aids engineers and planners in predicting the behavior of reservoirs. HEC-ResSim will be used to determine changes to reservoir operations under alternative reallocation plans.	HH&C CoP Preferred Model

e. POLICY AND LEGAL REVIEW

Policy and legal compliance reviews for draft and final planning decision documents are delegated to the MSC (see Director's Policy Memorandum 2018-05, paragraph 9).

(i) Policy Review.

The policy review team is identified through the collaboration of the MSC Chief of Planning and Policy and the HQUSACE Chief of the Office of Water Project Review. The team is identified in Attachment 1 of this Review Plan. The makeup of the Policy Review team will be drawn from Headquarters (HQUSACE), the MSC, the Planning Centers of Expertise, and other review resources as needed.

- The Policy Review Team will be invited to participate in key meetings during the development of decision documents as well as SMART Planning Milestone meetings. These engagements may include In-Progress Reviews, Issue Resolution Conferences or other vertical team meetings plus the milestone events.

- The input from the Policy Review team should be documented in a Memorandum for the Record (MFR) produced for each engagement with the team. The MFR should be distributed to all meeting participants.

- In addition, teams may choose to capture some of the policy review input in a risk register if appropriate. These items should be highlighted at future meetings until the issues are resolved. Any key decisions on how to address risk or other considerations should be documented in an MFR.

(ii) Legal Review.

Representatives from the Office of Counsel will be assigned to participate in reviews. Members may participate from the District, MSC and HQUSACE. The MSC Chief of Planning and Policy will coordinate membership and participation with the office chiefs.

- In some cases legal review input may be captured in the MFR for the particular meeting or milestone. In other cases, a separate legal memorandum may be used to document the input from the Office of Counsel.

- Each participating Office of Counsel will determine how to document legal review input.

ATTACHMENT 1: TEAM ROSTERS

Project Delivery Team

Role	Individual	Contact
Project Manager	[redacted]	[redacted]
Plan Formulation	[redacted]	[redacted]
Economist	[redacted]	[redacted]
H&H/Water Management	[redacted]	[redacted]
H&H/Water Management	[redacted]	[redacted]
Biologist/NEPA Specialist	[redacted]	[redacted]
Archaeologist	[redacted]	[redacted]
Real Estate	[redacted]	[redacted]
Office of Counsel	[redacted]	[redacted]

DQC Team

Role	Individual	Contact
Plan Formulation	[redacted]	[redacted]
Economist	[redacted]	[redacted]
H&H/Water Management	[redacted]	[redacted]
Biologist/NEPA Specialist	[redacted]	[redacted]
Archaeologist	[redacted]	[redacted]
Real Estate	[redacted]	[redacted]
Operations	TBD	

Agency Technical Review Team

Role	Individual	Contact
Lead / Formulation	[redacted]	[redacted]
Economics	[redacted]	[redacted]
Environmental and Cultural Resources	TBD	
Water Management / Hydraulic Engineering	[redacted]	[redacted]
Climate Preparedness and Resilience CoP Reviewer	TBD	
Real Estate	TBD	

Policy and Legal Compliance Review

Role	Individual	Contact
ATR Team Lead	[redacted]	
Plan Formulation		
Economics		
Environmental/NEPA		
H&H/Water Management		
Real Estate		
Climate Change		
RM		
MSC		
RIT		
Risk Informed Decision Making		
HQ Office of Counsel		

ATTACHMENT 2: TYPE I IEPR EXEMPTION

MOREHEAD, KY WATER SUPPLY REALLOCATION AT CAVE RUN LAKE

CERTIFICATION OF RISK INFORMED DECISION FOR TYPE I IEPR

This study does not involve novel, untested, or influential scientific information or methods and there is no significant threat to human life from the decision document. The study analyses, while complex, are within the typical scope of similar reallocation studies. Methodology and required data and analyses are well-established in USACE guidance for such studies. The primary tools for the analysis for this reallocation study will be HEC ResSIM and a spreadsheet to evaluate demand and supply.

The limited scope of this action, use of well-established criteria, minimal anticipated cultural resource, environmental and endangered species impacts before mitigation, and low uncertainty of all anticipated alternatives, are all indicative of an action that would benefit little from further review by IEPR. In accordance with EC 1165-2-217, I have determined that a Type I IEPR is not required for this project.

[redacted]

Chief, Engineering Division
CELRL-ED

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Date