

Suggested Guidance for Reviewers of Draft EC 1165-2-217

USACE invites review from our partners, stakeholders, and all other interested parties on a draft Engineer Circular (EC) that details how the agency intends to implement Executive Order 11988 as amended by EO 13690. USACE invites reviewers to consider the following list of topics and issues as they review the draft document. While all comments and feedback will be welcome, comments and feedback related to these specific topic areas would be particularly helpful as this new policy is developed. To the extent possible, USACE recommends reviewers provide specific changes to the draft EC, and where that isn't possible, to organize general comments as noted below.

Clarity

USACE greatly appreciates comments related to the overall clarity of the draft EC and, in particular, suggestions to improve areas of the document that might be unclear. Where possible, reviewers are asked to identify specific areas within the draft EC that lack clarity thus making it difficult to comment, to articulate what makes the draft EC unclear, and provide specific recommendations for improving the clarity. Specifically, USACE is interested in ensuring the following aspects of the document are clear:

- The USACE Civil Works activities which will be affected when the revised process is implemented.
- How USACE intended to implement the requirements for EO 11988.
- How the requirements of EO 11988 will be implemented for those projects and activities already in progress when the EC becomes effective.
- The procedures to be used to identify the higher flood elevation and corresponding floodplain.
- The opportunities for public participation within the EO 11988 decision making process.

Level of Detail

USACE is also interested in obtaining feedback on the level of detail contained within the EC. Specifically, USACE is interested in suggestions as to:

- Any areas of the EC that contain the right level of detail and thus should be maintained.
- Any areas of the EC that contain too much detail that should instead be articulated in program-specific guidance.
- Any areas of the EC that contain a level of detail that should be removed from this document and not incorporated into revised program-specific guidance documents.
- Any areas of the EC that are not detailed enough and should be expanded upon within this EC.

Overall Strengths and Weaknesses

In general, USACE is also interested in perspectives on the overall strengths and weaknesses of the draft document. Specifically, USACE welcomes feedback on:

- Aspects of the draft EC that articulate strengths in the policy and why.
- Aspects of the draft EC that should be changed to address weaknesses in the policy and why, including suggestions for addressing the policy weaknesses identified.

Other

To the degree that comments do not fit well into any of the above general categories, please articulate the concern, why it is important, and propose ways to address it.