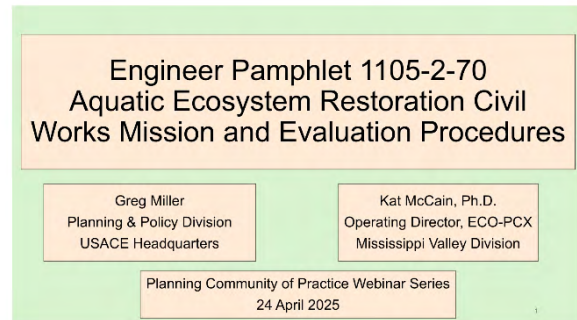


New Engineer Pamphlet 1105-2-70: Planning - Aquatic Ecosystem Restoration Civil Works Mission and Evaluation Procedures
24 April 2025
Q&A Summary

This PCoP webinar provided an overview of the new Engineer Pamphlet (EP) 1105-2-70, which covers the Aquatic Ecosystem Restoration Civil Works Mission and Evaluation Procedures. Presented by Greg Miller (HQUSACE Senior Policy Advisor) and Dr. Kat McCain (Operating Director, Ecosystem Restoration Planning Center of Expertise or ECO-PCX), the webinar highlighted the ECO-PCX's role in supporting teams as they apply the guidance to planning studies.



This summary of the Question/Answer session of the webinar is not a transcription; questions and responses have been edited and reordered for clarity.

Relevant Resources:

- [Engineer Pamphlet 1105-2-70: Aquatic Ecosystem Restoration Civil Works Mission and Evaluation Procedures](#)

Valuing Ecosystem Restoration Benefits

Why can't contingent valuation be used in ecosystem restoration planning?

The reasoning behind the policy disallowing the use of contingent valuation methods is that doing surveys to estimate non-use values tends to give unreliable results. The language in the new EP (which is the same as what was in Engineer Regulation 1105-2-100, the former Planning Guidance Notebook) says: "Contingent value procedures (survey techniques) for estimating existence, option, bequest, or other such non-use values must not be used due to several factors including the conjectural nature of estimated values and the high difficulty in controlling bias."

In practice, when this approach was used to produce estimates of non-use values for some very specific ecological resources, the values were far too large to be believed. If similar values were assigned to all ecological resources of similar significance within and outside of the region, it would have easily exceeded the U.S. gross domestic product. When someone is surveyed and asked to put a dollar value on a specific resource, they are likely to assume extremely high significance to that specific resource.

Can benefits expressed with a qualitative (rather than quantitative) value be considered and have a positive (or negative) impact on the recommended project's benefit-cost ratio (BCR)? For example, when considering comprehensive benefits, not all benefits are monetized.

For aquatic ecosystem restoration studies/projects, outputs from models (like habitat models) are generally non-monetary. Ecosystem restoration feasibility studies rely on CE/ICA (cost effectiveness and incremental cost analysis), not BCR, to evaluate and justify project plans. That said, ecosystem restoration studies inherently involve comparing environmental outputs (like habitat units) to project costs. Are the non-monetized aquatic ecosystem restoration benefits worth more than the extra dollars that would have to be paid for them? It will be a judgment call based on the significance of the habitat units in question, which can vary from study to study.

How should a study team determine federal interest in an ecosystem restoration project if there is no BCR?

Federal interest for aquatic ecosystem restoration projects is assessed using resource significance criteria. These may include technical, public, and institutional significance, regional priorities, or qualitative assessments such as impacts and output efficiencies. The EP provides a detailed discussion on how to apply these significance criteria in evaluating project alternatives.

Applying EP 1105-2-70 in Practice

In applying the policy regarding responsibility for operation and maintenance, is planting native vegetation considered a structural feature in ecosystem restoration?

In the context of ecosystem restoration projects, planting native vegetation is not considered a structural feature. The non-federal sponsor's operation and maintenance (O&M) responsibilities will continue for ten years beyond when "ecological success" is achieved. Ten years after ecological success is achieved, the non-federal sponsor's obligations for O&M of the project will cease.

Does EP 1105-2-70 apply to mitigation planning?

While some of the planning concepts in EP 1105-2-70 can apply to mitigation projects, such as ecosystem modeling and construction techniques, the procedures and requirements are distinct. Civil Works mitigation planning policies are currently detailed in [ER 1105-2-100, Appendix C](#). Mitigation projects often have different reasons behind why the project is occurring, and planners should pay special attention to the environmental compliance requirements and the Clean Water Act obligations for mitigation planning.

Working with Partners and Agencies

Who on the study team is responsible for coordinating with the Federal Aviation Administration (FAA)?

Responsibility may vary by district, and it depends on the composition of the team. If the FAA is a participating or cooperating agency under the National Environmental Policy Act (which would be reasonable), the team's NEPA lead may take the lead role. The important thing is that someone on the team is tracking FAA involvement, especially if the study area is near an airport or aviation-related facility. Delays in engaging the FAA have, in the past, caused significant complications late in project development.

What should planners do when they struggle to obtain vertical team alignment when incorporating Indigenous Knowledge in a feasibility study?

Consideration of Indigenous Knowledge remains supported in Civil Works project development, especially regarding longstanding legal requirements for nation-to-nation consultation when a project is within tribal lands or is of cultural interest/significance. If there are internal challenges to incorporating Indigenous Knowledge in the study analysis and decision making, the Tribal Nations Technical Center of Expertise or Tribal Nations Community of Practice can be a resource to the team.