



Upper
Mississippi River
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

July 14, 2006

Mr. Richard Astrack
U.S. Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, Missouri 63103-2833

Dear Mr. Astrack:

Thank you for the opportunity to provide comments on the Public Review Draft of the *Upper Mississippi River Comprehensive Plan*, dated May 2006. The Upper Mississippi River Basin Association (UMRBA) has been following this study since it was authorized in 1999. In addition, UMRBA staff has participated in the Collaboration Team formed in 2002 to help the Corps of Engineers gain input from other government agencies and stakeholder groups. The following comments reflect the shared views of the five basin States, as reflected by the Governors' appointees to the UMRBA. Individual States may submit additional comments on aspects of the draft Plan of particular interest to them.

Hydrologic Data and Modeling

Despite the fact that an economically-justified systemic flood damage reduction plan did not result from this study effort, a useful body of hydrologic data and modeling tools was developed. UMRBA strongly supports conclusion #1 regarding follow-on studies, on page 92 of the draft main report. In particular, "the hydrologic modeling for the Upper Mississippi River System should be maintained and updated as changes occur and new data is available." The States agree with the observation on page 91 that the systemic modeling tools developed under the authority of the Comprehensive Plan and Flow Frequency Study would be a "useable product for the future" to help determine the "systemwide hydrologic impacts of actual and proposed changes."

Emergency Action Scenarios

UMRBA greatly appreciates the Corps of Engineers' efforts, as part of the Comprehensive Plan, to evaluate a series of Emergency Action Scenarios. In May 2003, the Upper Mississippi River Basin Association (UMRBA) recommended that the Comprehensive Plan explore the development of an "emergency action plan" (EAP). UMRBA envisioned the EAP as being a "systemwide operational strategy for conveying floodwaters during

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major flood events.” In general, it was assumed that such an EAP could be the basis for answering questions associated with when and where “floodfighting” should be focused.

Toward that end, the Comprehensive Plan developed and evaluated a series of four “emergency action scenarios,” reflecting successively higher levels of systemic floodfighting. The evaluation of these scenarios, including their hydrologic impacts (i.e., maximum induced stage frequency increases) and benefits (i.e., reduced residual annual damages), provides important new information and insights. Simply having such analysis available is a valued contribution to future floodplain management decisions. Of note, the analysis has demonstrated that:

- induced damages of floodfighting are not of particular concern for emergency response efforts north of Keokuk, Iowa;
- induced rises resulting from emergency protection efforts in urban and industrial areas are not significant; and
- induced damages are thus of general concern only for systemic agricultural levee raises in river reaches between the confluence with the Ohio River and Keokuk, Iowa.

UMRBA believes that further efforts to build upon the scenario analysis to formulate an actual Emergency Action Plan are beyond the scope of the Comprehensive Plan. In particular, consistent with the statement on page 87 of the draft main report, the States acknowledge that further development of a plan would require agreement on:

- criteria for successive protection (i.e., prioritized order of what areas are to be protected), including a systemic definition of critical infrastructure;
- definition of high damage potential in agricultural areas; and
- definition of significant hydraulic impact (water surface rise).

Reconstruction Authority

UMRBA supports the recommendation on page 95 of the draft main report that an authority to undertake reconstruction analyses be established for the Upper Mississippi and Illinois Rivers drainage and levee districts. As described on pages 87-88 of the report, such a reconstruction study authority would help assess whether existing flood control projects have degraded and need rehabilitation to continue to perform as intended. Reconstruction analyses would address deficiencies caused by long term degradation, but would not recommend repairs that may be required as a result of improper operation and maintenance by the non-federal sponsor. Nor would the reconstruction authority address design or construction deficiencies. The originally authorized scope, function, and purpose of the project would not change. Upon completion of the reconstruction analysis for a particular levee, specific Congressional authorization would be required before the Corps of Engineers could proceed with any actual reconstruction work.

Other Follow-On Studies

Conclusion #2 on page 92 of the draft main report suggests that a variety of follow-on studies and monitoring efforts be undertaken, including "GIS-based computer modeling, a second generation Habitat Needs Assessment, long-term sediment monitoring, and pilot projects for evaluating wetlands creation as a management tool for nutrients control." While many of these endeavors may have merit, they were not the focus of the Comprehensive Plan's flood damage reduction analysis, the Main Report contains no substantiating material related to them, and the Collaboration Team members did not address them in their deliberations. Furthermore, none of the background material contained in the environmental appendices associated with these topics has, to our knowledge, been critically reviewed by State natural resource and/or environmental protection agencies and judged to be consistent with their policies and programs. Thus, consideration should be given to eliminating this conclusion from the report.

Thank you again for the opportunity to comment. We look forward to helping bring this study to a successful conclusion.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Holsten". The signature is written in a cursive style with a large, stylized initial "M".

Mark Holsten
UMRBA Chair