



Upper  
Mississippi River  
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

August 22, 2002

Mr. Jerry Skalak  
U.S. Army Corps of Engineers  
Rock Island District  
Clock Tower Building  
P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Mr. Skalak:

Thank you for providing an opportunity for members of the Upper Mississippi River Basin Association (UMRBA) to review the draft Project Management Plan (PMP) for the Upper Mississippi River Comprehensive Plan (UMRCP). While individual state agencies may submit their own specific comments, the following general comments reflect issues of long-standing concern to UMRBA.

Study Scope

UMRBA concurs with the scope outlined for the UMRCP in the draft PMP. In particular, the primary focus of the study should be the identification and evaluation of flood damage reduction alternatives. Furthermore, in UMRBA's opinion, such a scope is consistent with the study's authorization language in Section 459 of the Water Resources Development Act of 1999. While Section 459 identifies a wide range of water resource problems and opportunities, including navigation project maintenance, bank caving and erosion, watershed nutrient and sediment management, habitat management, and recreation, it also clearly directs that the authorized plan be developed "in the interest of systemic flood damage reduction ...."

Despite the focus on flood damage reduction, it is recognized that this study will also be considering other related floodplain uses and management opportunities. Maintaining a balanced and integrated approach, while still producing a useful flood damage reduction plan that can serve as the basis for subsequent feasibility studies, will be a challenge. In that regard, UMRBA would encourage the Corps' Product Delivery Team (PDT) to critically evaluate the tasks and products identified in the environmental and recreation components of the draft PMP to ensure that they do not unnecessarily duplicate efforts underway in other studies and that they are indeed essential to this study's objectives. For example, the development of a "regional trails assessment/plan" (PMP Section 6.5.3)

415 HAMM BUILDING  
408 ST. PETER STREET  
ST. PAUL, MINNESOTA 55102  
TELEPHONE: 651-224-2880  
FACSIMILE: 651-223-5815

appears to be beyond what this study can reasonably expect to produce within the time and funding constraints. Similarly, the scope of the environmental component should be carefully targeted on opportunities of most direct relationship to the primary objective of flood damage reduction, i.e., floodplain connectivity and floodplain habitat restoration. Environmental tasks related to sediment and nutrients; point source permits; nonpoint pollution sources; and hazardous, toxic, and radioactive waste (HTRW) may be beyond what this study can reasonably address (Section 6.4).

### Flood Routing Plan

In the UMRBA states' view, one of the UMRCP products that could be potentially quite valuable is a flood routing plan. Such a plan would presumably identify an operational strategy(ies) for conveying flood waters during major flood events, including strategic levee breaches and levee raises. Addressing questions associated with flood response, such as when and where "flood-fighting" efforts should be focused, would be extremely helpful prior to a major flood event. As evidenced during the 1993 flood, flood-fighting can be expensive, dangerous, and cause unintended and unanticipated effects. Given the interstate character of the river and the regulatory implications of these actions, flood response activities are of particular interest to the states.

While the UMRBA states support development of a flood routing plan, it is not entirely clear if such a plan will, in fact, be developed as part of the UMRCP. The PMP indicates that "the study will investigate a systemic flood routing plan" (Section 2.5.2) and that one of the study's "additional products" will be an "investigation of the potential for an existing conditions flood routing plan" (Section 6.10). The UMRBA urges that one of the alternatives evaluated in the UMRCP be a flood routing plan, as described above.

### State Involvement


The basin states appreciate the Corps' efforts to date to involve the states, both individually and through the UMRBA, in developing the PMP for the UMRCP. Many of the issues to be addressed in this study are of keen interest to the states, and the states are eager to remain involved as the study proceeds. As the PMP acknowledges the various existing coordination groups do not "optimally align with the proposed goals and objectives of this study" (Section 3.1). Thus, the PMP proposes creation of a new Collaboration Team for the UMRCP (Section 4.3.1). As the Corps seeks state representation on this Team, the UMRBA recommends that the involvement of state floodplain managers be sought. In particular, the participation of those individuals who have been serving for the past few years on the Flow Frequency Study Task Force should be solicited. While the UMRCP will address issues beyond the hydrology and hydraulics work undertaken in the Flow Frequency Study, such modeling and analysis will

Page 3  
August 22, 2002

undoubtedly serve as the foundation for the UMRCP. In addition, the UMRBA is committed to maintaining its involvement in the UMRCP and would welcome opportunities, as the study progresses, to offer input and receive briefings at key study milestones.

Thank you again for the opportunity to review the PMP. We look forward to working with the Corps, other federal agencies, and the public on the Upper Mississippi River Comprehensive Plan.

Sincerely,



Holly Stoerker  
Executive Director

HS:mld