



Upper
Mississippi River
Basin Association

ILLINOIS. IOWA. MINNESOTA. MISSOURI. WISCONSIN

April 27, 2011

Brigadier General John R. McMahon
Division Commander
U.S. Army Corps of Engineers
Northwestern Division
P.O. Box 2870
Portland, Oregon 97208-2870

Dear General McMahon:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I am writing to offer our five member states' comments regarding the March 4, 2011 Missouri River Authorized Purposes Study (MRAPS) draft Scoping Summary Report. As described in our September 17, 2010 scoping comments, UMRBA's member states (i.e., Illinois, Iowa, Minnesota, Missouri, and Wisconsin) have a vital interest in protecting and enhancing the Upper Mississippi River System's tremendous regional and national benefits, including those related to commercial navigation, natural resources, water supply, renewable energy, tourism, recreation, and other ecosystem services. As such, we have a strong commitment to ensuring that MRAPS fully considers the implications of Missouri River management for the entire Mississippi River.

First, it is fair to say that our states still have reservations about the value of MRAPS, given the thorough examination of many of these same issues during the lengthy Master Manual review process and the existing forums and mechanisms for addressing outstanding issues on the Missouri River. Despite these reservations, UMRBA remains prepared to do what it can to contribute to a successful and productive study effort. We very much appreciate the study team's excellent efforts to engage the Upper Mississippi River states and stakeholders thus far through scoping meetings, newsletters, and presentations at UMRBA's quarterly meetings. We also appreciate the study team's substantial efforts in developing the draft Scoping Report, especially given the volume and diversity of comments received.

We are pleased to find that the draft Report addresses several of UMRBA's September 17, 2010 comments. Regarding the draft Report's treatment of some of the issues we raised, we would like to offer the following additional perspectives for your consideration:

1. *Looking beyond the Missouri River Basin* — The draft Scoping Report describes the U.S. Army Corps of Engineers' (USACE's) plans for the two-phase study process. Phase One will identify problems and opportunities and inventory and forecast conditions on the Missouri and Middle Mississippi Rivers. If the study proceeds to Phase Two, with its alternatives formulation and evaluation, then the study's geographic focus will expand to include additional areas that experience direct and indirect impacts from the Missouri River management alternatives under evaluation. We are pleased that the geographic scope for Phase One includes the Middle Mississippi River, which is a vital nexus on the nation's inland river

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system and is very directly influenced by Missouri River management. The draft Report (p. 46) indicates that USACE will examine the initial Phase One findings to determine whether additional work is warranted on portions of the Lower Mississippi River. However, we would strongly encourage USACE to similarly consider the initial Phase One study results to determine if additional study is warranted on other reaches of the Upper Mississippi and Illinois Rivers, particularly the reach immediately upstream of the Middle Mississippi.

2. *Range of Considerations* — As we stated in our September 17 comments, Missouri River management has significant implications for commercial navigation on the Mississippi River, as well as for water quality management, ecosystem restoration efforts, species protection and recovery, flood risk management, potential hydrokinetic development, and a host of other water uses. This is particularly the case on the Middle Mississippi, but also extends elsewhere on the Mississippi and Illinois Rivers. Thus we fully support USACE's plans to evaluate navigation impacts on both the Missouri and Mississippi Rivers, as described on page 51 of the draft Report. However, the draft Report is somewhat less clear regarding MRAPS' consideration of how Missouri River management affects other critical water resource management efforts on the Mississippi River. We want to underscore the importance of considering the complete range of water resource connections between the Missouri and Mississippi Rivers as appropriate in both Phases One and Two, recognizing that the two phases have different purposes and spatial extents.
3. *Diversion Issues* — On page 176 of the draft Report, USACE states its intention to review the Garrison Diversion Unit (GDU) and determine whether the GDU and related issues fall under the MRAPS scope. As we referenced in our September 17 comments, a 1997 UMRBA resolution calls for "Missouri River water ... [to] be kept flowing within its basin and available to make its contribution to the Mississippi River." The Upper Mississippi River (UMR) states are particularly concerned with the potential of out-of-basin diversions to introduce non-native biota and encourage unsustainable development and water use. We want to emphasize that any MRAPS analysis of diversion options will need to thoroughly evaluate all dimensions of these complex issues and detail what further study would be required for full compliance with the National Environmental Policy Act.
4. *Engaging the states and stakeholders* — As we stated above, we greatly appreciate the study team's efforts thus far to engage the UMR states in scoping MRAPS, and we look forward to our continued involvement throughout the study's implementation. We concur with the draft Report's conclusion that establishing MRAPS Executive Councils would be time- and resource-intensive without necessarily significantly enhancing engagement. The five-part engagement strategy outlined in the draft Report appears to offer a reasonable and sufficient alternative. Consistent with our September 17 comments, we would urge that all UMR states be invited to participate on the Cooperating Agency Team (CAT) at the outset — i.e., do not limit the CAT to Missouri River and Middle Mississippi River states in Phase One. Rather, allow states to self-select based on their interests and capacities. We also invite and encourage the study team to continue using UMRBA's quarterly public meetings as a forum for the routine briefings envisioned as part of MRAPS's engagement strategy. Given ongoing budget constraints in all sectors, we believe the use of webinars to supplement in-person meetings will be an important means of ensuring broad access to the study process. The webinars may be particularly helpful to the states and others as they review interim study products.

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Overall, the March 4 draft MRAPS Scoping Summary Report outlines a reasonable approach. We appreciate the study team's consideration of our September 17, 2010 comments, and we look forward to continuing to engage in the study. Please contact UMRBA Executive Director Barb Naramore (651-224-2880) with any questions concerning our comments or requests for assistance.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Wells".

Michael D. Wells,
UMRBA Chair

cc: Major General Michael J. Walsh, Commander, Mississippi Valley Division, USACE
Colonel Anthony J. Hofmann, Commander, Kansas City District, USACE
Colonel Robert J. Ruch, Commander, Omaha District, USACE
Colonel Shawn P. McGinley, Commander, Rock Island District, USACE
Colonel Thomas E. O'Hara, Commander, St. Louis District, USACE
Colonel Michael J. Price, Commander, St. Paul District, USACE