



# Upper Mississippi River Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

September 17, 2010

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 Missouri River Authorized Purposes Study (MRAPS) scoping effort. Formed by the Governors of Illinois, Iowa, Minnesota, Missouri, and Wisconsin in 1981, UMRBA represents its member states' common water resource interests and works collaboratively with both state and federal agencies that have management responsibilities on the Upper Mississippi River System (UMRS). UMRBA's member states have a vital interest in protecting and enhancing the River'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, I should note that our five states have reservations regarding the value in undertaking 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. That being said, given that Congress has directed and funded MRAPS, UMRBA is prepared to do what it can to contribute to a successful and productive study effort. And we certainly appreciate the study team's efforts thus far to engage our states and the broader UMRS stakeholder community in MRAPS. This has included four scoping meetings held on the Mississippi River, other scoping meetings in three of our states, and regular briefings at UMRBA's quarterly public meetings.

As the U.S. Army Corps of Engineers (USACE) completes its MRAPS scoping efforts, UMRBA's five member states offer the following specific comments for consideration:

1. *Interconnectedness* — As a general principle, it critical for USACE, other federal agencies, and the states to recognize the interconnectedness of the Mississippi River Basin's major subwatersheds in executing their myriad water resource management responsibilities in the nation's heartland. Applying this principle to MRAPS, we thus urge USACE to fully consider the implications of Missouri River management for the entire Mississippi River. Areas of potential impact include, but are not limited to, commercial navigation, ecosystem management and restoration, management of endangered species such as the interior least tern and pallid sturgeon, flood damage reduction, recreation, water supply, and power production.

415 Hamm Building  
408 St. Peter Street  
St. Paul, Minnesota 55102  
Phone: 651-224-2880  
Fax: 651-223-5815  
[www.umrba.org](http://www.umrba.org)

2. *Middle Mississippi is a linchpin* — The Middle Mississippi, between St. Louis and Cairo, is a vital nexus on the nation's inland river system. There is a tremendous concentration of terminals on this stretch of river, and the Port of St. Louis serves as the nation's third largest inland port. As has been well-documented, flows from the Missouri River are critical to maintaining the 9-foot channel on the unimpounded Middle Mississippi during low water conditions. But the Missouri's flow is a key factor on the Middle Mississippi under a broad range of conditions. During more routine flows, water from the Missouri is often the difference that permits tow operators to load to greater than nine-foot depths, thereby significantly enhancing their operating efficiency, to the direct benefit of shippers throughout the region. Moreover, flows from the Missouri River have significant implications for water quality management, ecosystem restoration efforts, species protection and recovery, flood damage reduction, potential hydrokinetic development, and a host of other water resource management activities on the Middle Mississippi. These should be explicitly addressed in MRAPS' alternatives evaluation.
3. *Influence extends to entire UMRS* — While the Missouri River's influence may be most obvious and dramatic on the Middle Mississippi, the impacts of Missouri River management are not all downstream of the Missouri's confluence with the Mississippi. There are important connections and impacts on the rest of the Upper Mississippi River System as well. Among these are the approximately 120 million tons of cargo that ship on the UMRS annually and must transit the Middle Mississippi; farmers and other shippers throughout the basin who benefit from a reliable waterway transportation option; efforts to manage several endangered species and other migratory species shared between the Missouri and Mississippi Rivers; flood risk management efforts in the area immediately upstream of the confluence; and power consumers in portions of our basin who rely on hydropower generated at the Missouri River dams. USACE needs to identify and consider the full range of these impacts in MRAPS.
4. *Opportunities to enhance the UMRS* — Recognizing the rivers' interconnectedness, MRAPS should also consider ways in which Missouri River management might enhance conditions on the UMRS. It is not just a matter of minimizing negative impacts. Rather, there may be ways in which neutral or positive changes on the Missouri River could also improve/enhance commercial navigation, ecosystem restoration, water quality management, flood risk management, and other management efforts on the UMRS. UMRBA urges USACE to identify and evaluate such opportunities in MRAPS.
5. *Diversion issues* — UMRBA is on the record having expressing significant concern with past proposals to divert water outside of the Missouri River Basin. In a 1997 resolution on the subject, our states called for "Missouri River water ... [to] be kept flowing within its basin and available to make its contribution to the Mississippi River." We remain concerned with continued proposals for out-of-basin diversions. Such interbasin transfers would increase the potential for introducing non-native biota and encourage unsustainable development and water use. Any MRAPS analysis of diversion options must 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.

6. *Engage the states directly* — UMRBA's member states are already on the record with their expectation that USACE will consult and coordinate with them directly in conducting MRAPS. If USACE elects to form an Executive Council for MRAPS, as the Institute for Environmental Conflict Resolution (IECR) recommended in its Situation Assessment, then at least one of UMRBA's non-Missouri River Basin states should be asked to participate on the Council. This would, of course, be in addition to the three UMR states that also fall within the Missouri Basin and would thus automatically be offered representation on the Council under IECR's proposal. We also invite and encourage USACE to continue providing briefings at UMRBA's quarterly public meetings as the scoping phase concludes and study implementation gets underway.
7. *Engage Mississippi River Stakeholders* — It is also vital that USACE directly engage the full range of Mississippi River stakeholders in conducting MRAPS. The scoping meetings in Rock Island, St. Louis, Memphis, New Orleans, and several off-river locations in three UMR states were an important first step. We encourage USACE to continue these efforts and to use the rich network of existing forums and groups to reach these stakeholders.

Simply put, we all need to be managing the nation's great inland rivers as the interconnected system that they are, whether we are seeking solutions to the navigation system's long term capital needs, restoring aquatic ecosystem functions, responding to calls for a long-range vision for the entire Mississippi River Basin, or conducting the Missouri River Authorized Purposes Study. UMRBA's member states appreciate this opportunity to provide input for the Corps of Engineers' consideration as it completes the MRAPS scoping effort. We look forward to continuing to engage in the study, and I am pleased to renew UMRBA's offer to provide any assistance that might prove useful. Please contact UMRBA Executive Director Barb Naramore (651-224-2880) with any questions concerning our comments.

Sincerely,



Todd Ambs  
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