



Upper
Mississippi River
Basin Association

ILLINOIS. IOWA. MINNESOTA. MISSOURI. WISCONSIN

April 5, 2011

Mr. Marvin Hubbell, EMP Regional Manager
Mr. Chuck Spitzack, NESP Regional Manager
U.S. Army Corps of Engineers, Rock Island District
Clock Tower Building, P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Mr. Hubbell and Mr. Spitzack:

Marvin + Chuck

I am writing on behalf of the state members of the Environmental Management Program Coordinating Committee (EMP-CC) and the Navigation Environmental Coordination Committee (NECC) regarding the System Objectives Report released on January 26, 2011 and the 2010 Floodplain Reach Plans for ecosystem restoration on the Upper Mississippi River System (UMRS). We greatly appreciate the considerable efforts of the Corps and all other partners in developing these critical documents. The System Objectives Report includes important information about the UMRS's characteristics, habitat and ecosystem needs, and potential restoration opportunities. It also establishes a strong foundation for selecting future habitat projects that will significantly enhance our collective efforts to restore the UMRS's ecosystem.

We generally support the System Objectives Report's recommendations for addressing the partnership's identified system goals and objectives. However, the report lacks important guidance for implementing these recommendations. In addition, because a draft System Objectives Report was not available until February 2010, when the reach planning teams were already prioritizing areas for potential restoration, the system goals were not as explicitly and fully considered in the reach project selection process as they might have been. We believe that the floodplain reach plans would have significantly benefited if this System Report was available when objective-setting and planning at the geomorphic and floodplain levels were initiated. In addition, it is unfortunate that the specialty system plans (e.g., systemic floodplain restoration plan) were not fully available to help guide the reach planning process.

The state members are encouraged that there is much more of a program neutral emphasis in this final System Objectives Report than in the previous draft. However, the state members do not completely agree with the Report's conclusion that reach planning was conducted in a program neutral fashion. Of note, MVS did a particularly good job of considering projects in a program neutral framework, and then recommending each project move forward under either EMP or NESP based on administrative factors. However, the other district teams were more focused on individual program needs when identifying and prioritizing projects. Moving forward, we hope that Corps staff will implement reach planning in a truly program neutral manner.

415 Hamm Building
408 St. Peter Street
St. Paul, Minnesota 55102
Phone: 651 224 2880
Fax: 651 223 5815
www.umba.org

The state members acknowledge that this is the first iteration of reach planning and therefore areas needing process improvement are bound to emerge. Addressing these areas through the Reach Planning After Action Report should result in key improvements to the future process and outcomes. The states strongly believe that future iterations of reach planning need to be significantly simplified and more clearly defined at their outset. The process in this first iteration was overly complex, and was thus confusing to participants and unnecessarily difficult to implement. In the future, the reach planning teams should receive more detailed instruction to enhance consistency among the reach plans. The state members intend to provide more detailed input on the implementation of the first reach planning cycle and recommendations for improving future cycles in comments regarding the draft After Action Report.

Finally, in the near term, we urge that partners examine the System Objectives Report and Floodplain Reach Plans comprehensively to help identify a systemic best-value implementation sequence. This will both serve immediate project planning needs and provide an important foundation for the next iteration of reach planning. To inform future reach planning, it will also be important to understand where and to what extent current projects address system goals and objectives.

Thank you for your consideration of our comments on the System Objectives Report and Floodplain Reach Plans. These joint comments are supplemental to any comments that the states may submit individually. Please contact UMRBA staff or any of the state EMP-CC or NECC members if you have questions regarding these joint comments.

Sincerely,



Barbara L. Naramore
Executive Director

cc: Charles Barton, U.S. Army Corps of Engineers, MVD
Ken Barr, U.S. Army Corps of Engineers, MVR
Charlie Wooley, U.S. Fish and Wildlife Service, Region 3
Rick Nelson, U.S. Fish and Wildlife Service, Ecological Services
Mike Jawson, U.S. Geological Survey, UMESC
Kathy Kowal, U.S. Environmental Protection Agency, Region 5
Bill Franz, U.S. Environmental Protection Agency, Region 5