



Upper
Mississippi River
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

October 25, 2010

Colonel Shawn P. McGinley
District Commander
U.S. Army Corps of Engineers
Rock Island District
Clock Tower Building, P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Colonel McGinley:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I am writing to express our five member states' joint perspectives regarding the sequence of lock construction under the Navigation and Ecosystem Sustainability Program (NESP). This letter comes in response to a recent call for comments on the question of lock sequencing from the NESP Program Manager, Mr. Chuck Spitzack.

Formed in 1981 by the Governors of Illinois, Iowa, Minnesota, Missouri, and Wisconsin, 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). Over the many years of the Navigation Feasibility Study and subsequent efforts to authorize and then fund NESP, UMRBA's member states have consistently advocated for an integrated approach to managing the UMRS navigation system and ecosystem. While the delay in obtaining construction funding for NESP has been very disappointing, we continue to believe that NESP offers great promise for providing the balanced management and investment necessary to ensure that the UMRS remains a nationally significant commercial navigation system and a nationally significant ecosystem well into the future.

On the question of lock sequence, we would obviously much prefer a funding scenario sufficiently robust to support simultaneous construction on multiple locks — i.e., more akin to the efficient implementation scenarios developed by Corps staff. However, we recognize that limitations within both the federal budget and the Inland Waterways Trust Fund make such an approach unlikely in the near-term. Thus, while we will continue to advocate strongly for elevating the UMRS's capital needs in the national context, we also understand that NESP's new locks will almost certainly be started individually, at least initially.

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In such a context, we see no compelling reason at present to revisit the UMRS lock construction order reflected in the Inland Marine Transportation System (IMTS) Team's 20-year Capital Plan — i.e., Locks 25, La Grange, 22, and 24, in that order, with small scale measures and mitigation timed accordingly and the remaining three authorized locks following in unspecified order. As we expressed in our July 2, 2010 letter to ASA(CW) Darcy and others (copy enclosed), we believe the IMTS Team did an admirable job overall addressing the complexity and urgency of the investment crisis on our inland navigation system. Moreover, and equally important, we believe your own NESP management team did fine work in exploring construction sequence implications and issues in its September 1, 2010 Lock Sequencing Status Report. Nothing from either group gives the states reason to believe another sequence would be more efficient or otherwise preferable.

The states certainly acknowledge that unforeseen developments, new information, or lessons learned during early construction, may warrant revisiting the sequence of locks later in the construction order. But currently we support initiating construction at Lock and Dam 25 first. Furthermore, we encourage the Corps to make any necessary adjustments in its preconstruction engineering and design (PED) efforts to ensure that it is ready to move to construction on Lock 25 at the earliest possible opportunity.

Thank you for the opportunity to offer our perspectives. We deeply appreciate the Corps' ongoing commitment to partnership in implementing NESP and its many other projects and programs on the UMRS and throughout the basin.

Sincerely,



Barbara L. Naramore
UMRBA Executive Director

cc: MG Michael Walsh, MVD Commander
COL Thomas O'Hara, MVS Commander
COL Michael Price, MVP Commander
Chuck Spitzack, NESP Program Manager

Enclosure