



Upper  
Mississippi River  
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

September 20, 2007

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

Dear Colonel Sinkler:

Thank you for providing an opportunity for comment on the August 14, 2007 draft Interim Report of the "Re-evaluation of the Recommended Plan: UMR-IWW System Navigation Study," which was requested by the Assistant Secretary of the Army for Civil Works, John P. Woodley.

The Upper Mississippi River Basin Association (UMRBA) and the five basin states have been supportive of the recommended plan since its release in 2004. Nothing in this 2007 reevaluation report suggests that the original plan is not still a viable and needed investment. The 2007 reevaluation provides traditional economic analysis, based upon updated forecasting and transportation models, and also offers nontraditional multi-modal considerations and context. Both suggest that that the original recommended plan should be endorsed. Thus, UMRBA reaffirms its support for the recommended dual purpose plan, including both the navigation improvements and ecosystem restoration actions.

In July 2004, the Governors of the five basin states issued a Joint Statement on the Navigation Feasibility Study (copy enclosed) expressing their support for the navigation improvements, including mooring facilities, switchboats, seven new locks, and related mitigation. They also called for the long-term plan to be implemented incrementally and adaptively, including an initial investment in seven new locks, coupled with development of new economic models and evaluation reports and checkpoints during the first 15 years to refine further future investments. While the recent reevaluation's focus on developing improved economic models, traffic forecasts, and rate data is commendable, the initial investment in the first increment navigation improvements must also proceed. As the Governors observed in 2004, "imperfect information should not keep us from moving forward now, with a reasonable and flexible plan for the future."

The States continue to support the 2004 recommended plan for navigation improvements and ecosystem restoration on the Upper Mississippi and Illinois River system and urge the Bush Administration as well to support authorization and to budget for this dual purpose plan.

Sincerely,

Michael D. Wells, UMRBA Chair

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# Joint Governors' Statement on the Upper Mississippi River-Illinois Waterway System Navigation Feasibility Study July 2004

The Upper Mississippi River is a national and regional treasure. Its ecological and economic significance extends far beyond its waters and shoreline communities. Our region's prosperity and quality of life depend upon the river's continuing viability as a commercial transportation system, a rich and diverse ecosystem, a source of water supply, and a recreational resource.

Thus, we, the Governors of the Upper Mississippi River Basin states, are committed to the principles of sustainability and multi-purpose use as the foundation of Upper Mississippi River management. Achieving these management objectives requires the pursuit of unified economic and environmental policies and collaboration among all units of government.

Consistent with these principles, the U.S. Army Corps of Engineers has developed a "dual purpose integrated plan" to guide its management responsibilities on the Upper Mississippi River over the next 50 years. As Governors of the five states that share stewardship of this nationally significant resource with the federal government, we jointly endorse the Corps of Engineers' proposed Plan, as set forth in the April 29, 2004 draft Integrated Feasibility Report and Programmatic Environmental Impact Statement for the UMR-IWW System Navigation Feasibility Study. In particular, we support:

- Navigation improvements, including mooring facilities, switchboats, seven new locks, and related mitigation, within the framework of a \$2.4 billion plan, with an initial investment totaling \$1.671 billion and further investments contingent upon an updated feasibility report.
- Ecosystem restoration actions, including island building, fish passage at dams, floodplain restoration, water level management, backwater and side channel restoration, wing dam and dike alterations, island and shoreline protection, improvements to topographic diversity, and switching to dam point control, within the framework of a \$5.3 billion 50-year plan, with an initial investment increment of \$1.462 billion.

Implementation of these recommendations must be integrated, balanced, adaptive, collaborative, and fairly funded.

*Integrated* — Ecosystem restoration should be added as a federally authorized project purpose on the Upper Mississippi River, thus providing a dual authority and mandating integrated planning and management by the Corps of Engineers.

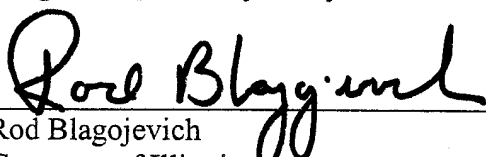
*Balanced* — Ecosystem restoration and navigation improvements should move forward in tandem, so that measurable and substantial progress can be made toward both goals.

*Adaptive* — The long-term (50-year) Plan should be implemented incrementally and adaptively to accommodate dynamic natural and economic conditions, risk and uncertainty, and future advances in technology. This will require developing new economic and ecological models, in addition to monitoring ecological processes, river traffic, and market conditions. However, imperfect information should not keep us from moving forward now, with a reasonable and flexible plan for the future. In particular, evaluation reports and checkpoints in the first 15 years will be critical in defining the scope of future investments.

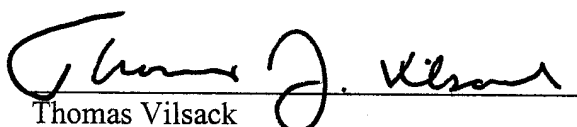
*Collaborative* — The Corps of Engineers must implement the Plan in collaboration with the basin states and other federal agencies having river-related responsibilities. Consultation and coordination on scientific, technical, and policy issues should utilize existing institutions, adapting them as necessary, but avoiding the establishment of new and potentially redundant bureaucracies.


*Fairly Funded* — Consistent with existing law, half the costs of the navigation improvements must be borne by the commercial navigation industry through the Inland Waterway Trust Fund. Cost-sharing of ecosystem restoration must recognize the Federal government's unique responsibility on the Upper Mississippi River. In particular, the Federal government's construction, operation, and maintenance of the navigation system has had long-term cumulative environmental effects. Moreover, the Federal government is the largest single floodplain landowner, including over 285,000 acres of national refuges along the river system. While our states are willing to share a portion of the ecosystem restoration costs, the following ecosystem restoration costs must be fully federally funded: modifications to navigation structures or operations, measures on Corps project lands or national refuges, and measures in the main channel or directly connected backwaters below the ordinary high water mark.

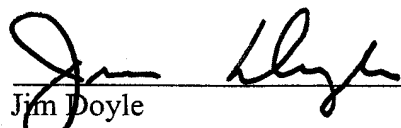
We add our voice to the declaration Congress made in 1986 that the Upper Mississippi River is both "a nationally significant ecosystem and a nationally significant commercial navigation system" and "shall be administered and regulated in recognition of its several purposes." We now urge Congress to make that balance a reality by providing a dual purpose mandate for managing the Upper Mississippi River and Illinois Waterway, including authorization of navigation improvements and ecosystem restoration consistent with the recommendations from the Corps of Engineers' Navigation Feasibility Study.

  
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Rod Blagojevich  
Governor of Illinois

  
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Tim Pawlenty  
Governor of Minnesota

  
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Thomas Vilsack  
Governor of Iowa

  
\_\_\_\_\_  
Bob Holden  
Governor of Missouri

  
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Jim Doyle  
Governor of Wisconsin