



Upper Mississippi River Basin Association

ILLINOIS. IOWA. MINNESOTA. MISSOURI. WISCONSIN

November 26, 2008

Ms. Vivian Daub, Director, Planning Staff
Office of Planning, Analysis and Accountability (MC 2723A)
Office of the Chief Financial Officer
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: UMRBA Comments on 2009-2014 EPA Strategic Plan Change Document

Dear Ms. Daub:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I am offering this letter of comment on the 2009-2014 EPA Strategic Plan Change Document. By way of background, UMRBA is the Governor-established forum for interstate water resource planning and management on the Upper Mississippi River, representing its member states of Illinois, Iowa, Minnesota, Missouri, and Wisconsin.

UMRBA Supports Inclusion of the Upper Mississippi River Basin in the Strategic Plan

UMRBA is quite pleased to note that the Upper Mississippi River (UMR) Basin is specifically mentioned in the Strategic Plan update, as part of the EPA's "Healthy Communities and Ecosystems" strategic goal. The UMRBA states also strongly share the Agency's goal of protecting "water quality while ensuring continued agricultural viability," as it is expressed in the language regarding the UMR Basin. Including the UMR in the EPA Strategic Plan is an important step forward in the evolving cooperative efforts to improve water quality on the Mississippi River. We therefore enthusiastically endorse the Agency's decision to include specific reference to the UMR Basin in its 2009-2014 Strategic Plan.

UMRBA Recommends Measures Regarding Designated Uses and Biological Indicators

UMRBA and its member states are actively engaged in efforts to "establish and achieve shared ecosystem health objectives for the river," including work to examine aquatic life use designations and potential applications of biological indicators on the river. The states certainly appreciate EPA's engagement in these efforts, including valuable assistance anticipated via a pending intergovernmental personnel agreement. In light of these important collaborative projects, and EPA's demonstrated interest in increasing its water quality focus in the Basin, UMRBA believes it is appropriate to consider expanding the proposed UMR-specific language to include strategic measures related to these ongoing efforts. Possible text for expressing these measures within the Strategic Plan is attached.

Thank you for the opportunity to provide comment. We look forward to continuation of our successful partnership with the EPA and view the inclusion of the UMR Basin in EPA's 2009-2014 Strategic Plan as a very significant and welcome development. Should you or your staff have any questions, please contact UMRBA Executive Director Barb Naramore at 651-224-2880.

Sincerely,

Martin Konrad, UMRBA Chair

cc: Timothy Henry, Associate Director, Water Division, Region 5
William A. Spratlin, Director, Wetlands, Watersheds, and
Pesticides Division, Region 7

Enclosure

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Suggested Text for EPA 2009-2014 Strategic Plan Regarding Designated Uses and Biological Indicators for the Upper Mississippi River

Objective 4.3 Restore and Protect Critical Ecosystems

Sub-objective 4.3.x Improve the Health of the Upper Mississippi River

By 2014, participate in a multi-agency effort (including state partners) to develop refined, ecosystem-informed designated uses for the Upper Mississippi River that the states will then consider for adoption into their water quality standards.

By 2014, participate in a multi-agency effort (including state partners) to develop biological indices to assess the attainment of designated uses on the Upper Mississippi River that the states will then consider for adoption in to their water quality standards.

Collaborate with multiple federal, state, and tribal agencies and nongovernmental organizations, across program areas, so that ecosystem health objectives are shared to the greatest extent possible with ecosystem restoration and other efforts on the Upper Mississippi River.