



Upper
Mississippi River
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

November 16, 2018

Major General Richard Kaiser
Division Commander
U.S. Army Corps of Engineers
Mississippi Valley Division
P.O. Box 80
Vicksburg, Mississippi 39181-0080

Dear MG Kaiser:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I would like to express the sincere appreciation of our member states for your leadership in resolving impediments to implementing environmental pool management on the Upper Mississippi River System. In follow-up to our September 6, 2018 conversation at the River Resources Action Team meeting and your October 24, 2018 letter, UMRBA has consulted with the UMRS Water Level Management Regional Coordinating Committee and would like to respectfully request:

1. Your approval of deviations within the authorized operating band to water control plans for Pools 9, 10, 12, 13, 18, and the entire length of the Illinois Waterway (corresponding with the planned major maintenance and repair work in 2020 and 2023), allowing for maintaining low water conditions during the growing season (i.e., environmental pool management).
2. FY 2019 funding be secured to develop overarching master water control manuals for the Upper Mississippi (i.e., encompassing the three existing District-based water control manuals) as well as the Illinois Waterway as a long-term solution for incorporating environmental principles in the management of the 9-foot navigation channel.

We understand that environmental pool management provides a cost-effective ecosystem restoration tool for mitigating degrading influences of prolonged inundation and sedimentation and for improving the quality and quantity of habitat available for fish and wildlife. The goal for implementing environmental pool management in each of the requested Upper Mississippi and Illinois River pools is to a) demonstrate the viability of maintaining a drawdown for at least 30 consecutive days in the growing season (i.e., May through October) while maintaining a safe and reliable 9-foot navigation channel and b) increase knowledge of environmental pool management as a tool for achieving a healthier and more resilient ecosystem.

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We acknowledge that environmental pool management is dependent on hydraulics and hydrology as well as sedimentation, and that the range of conditions required for implementation of a within-band deviation may not occur in a certain year. Therefore, we respectfully request that the timeframe for the deviation requests span 2019 to 2023. This also provides adequate time for planning and public outreach.

We believe that the Districts should hold the authority to incorporate environmental principles into their management of the navigation pools so long as the 9-foot navigation channel is not compromised and the appropriate environmental review is complete. The District water control managers and channel management personnel have the technical knowledge to determine if water level and channel conditions are within acceptable ranges to allow for flexible operations. Additionally, the Districts work collaboratively with the five states, other federal agencies with river authorities, and the navigation industry to make responsible decisions in maintaining the 9-foot navigation channel while adjusting water levels for river ecology. Language allowing for incorporating environmental principles into water level management will increase efficiency by removing an unnecessary hurdle of seeking a deviation approval for action already within the Corps authority. We would recommend creating an overarching document or policy allowing for environmental pool management (as appropriate and feasible) rather than modifying each individual water control plan given cost and other resource factors.

We applaud your commitment to reaching a long-term solution for integrating environmental principles into the U.S. Army Corps of Engineers' management of the Upper Mississippi River System navigation pools. Please feel free to contact me with any questions or to discuss this request in more detail.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kirsten Wallace", with a stylized flourish at the end.

Kirsten Wallace
UMRBA Executive Director

cc: Col. Sam Calkins, MVP Commander
Col. Steve Sattinger, MVR Commander
Col. Bryan Sizemore, MVS Commander