



Upper
Mississippi River
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

January 3, 2014

Ms. Vivian Daub, Director, Planning Staff
Office of Planning, Analysis, and Accountability (Mail Code 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 Draft *FY 2014-2018 EPA Strategic Plan*

Dear Ms. Daub:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I am offering this letter of comment on the draft *FY 2014-2018 EPA Strategic Plan*. 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. Among its areas of focus, UMRBA acts to aid coordinated implementation of the Clean Water Act (CWA) on the Upper Mississippi River (UMR). As such, UMRBA's comments here focus primarily on Mississippi River water quality issues, though our member states may choose to submit individual comments in addition to this correspondence. We very much appreciate the opportunity to offer comment on the draft *Strategic Plan*.

Mississippi River Overlooked as a Key Geographic Area

The *Strategic Plan*'s Goal 2: Protecting America's Waters references "key geographic areas" as identified in EPA's annual *National Water Program Guidance*. These key geographic areas are listed as the Chesapeake Bay, the Great Lakes, the Gulf of Mexico, the U.S.-Mexico Border region, the Pacific Islands, Long Island Sound, the South Florida Ecosystem, the Puget Sound Basin, the Columbia River Basin, and the San Francisco Bay Delta Estuary. Our states continue to be disappointed by EPA's failure to include the Mississippi River, America's great river, on this list in its own right. While the Gulf of Mexico appears here, and its health is certainly connected to the Mississippi River, our states emphasize that the River must be considered as much more than a conduit to the Gulf, but rather as its own vibrant, critical ecosystem worthy attention and investment commensurate to that in other nationally significant waterbodies. In fact, Congress has designated the Upper Mississippi River as a "nationally significant ecosystem and a nationally significant commercial navigation system" (Section 1103 of the Water Resources Development Act of 1986, P.L. 99-662). Further, stakeholder interest in the Mississippi River is clearly growing as evidenced by the recent emergence of entities such as the Mississippi River Cities and Towns Initiative and America's Watershed Initiative. Our states therefore request that the Mississippi River be specifically named in Goal 2 of the *Strategic Plan*. Suggested text to provide for inclusion of the Mississippi River is attached.

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Importance of Including the Mississippi River

While we assert that strong state leadership is essential for Mississippi River water quality improvement, the states cannot succeed alone in protecting the country's largest interstate river system. As such, the states view inclusion of the Mississippi River in the *Strategic Plan* as facilitating the Agency's partnership with the states in three important ways:

1) Providing Necessary Resources

While the states recognize that EPA is operating in a resource-constrained environment, we also assert that the Mississippi River has never received federal water quality investment commensurate, or even of the same order of magnitude, as that provided to other nationally-significant waterbodies. Our states have, and will continue to focus their resources on the River to the greatest extent possible. However, as regulatory pressures and public expectations continue to grow, the Mississippi River continues to be excluded from the federal investment needed to ensure successful water quality management. We therefore ask the Agency to consider the establishment of dedicated funding in its budget for the Mississippi River alongside its inclusion in the *Strategic Plan*.

2) Aiding the Collection of Data Needed to Improve Management and Measure Progress

One specific area in which federal investment can greatly assist state-led efforts is the collection of critical water quality information. The states recognize EPA's desire to define measurable outcomes when including waterbodies in its *National Water Program Guidance* and *Strategic Plan*. We agree that the ability to measure progress is central to effective environmental management, and add the observation that a necessary component of measurement is a robust, ongoing monitoring system. This is one of the primary reasons our states are designing a coordinated UMR CWA monitoring strategy. The proposed strategy incorporates existing data sets, builds on research conducted through efforts including EPA's Environmental Monitoring and Assessment Program, and provides for temporal and spatial detail not available through periodic, national surveys such as the National Rivers and Streams Assessment.

While the proposed strategy maximizes efficiency by incorporating existing data to the greatest degree possible, there is still a need for investment of additional, dedicated resources in order for implementation to succeed. The states ask the Agency to consider how it may be able to assist strategy implementation; keeping in mind that coordinated monitoring is more likely to be cost-effective and efficient than independent efforts. Further, coordinated monitoring leads to compatible, consistent data which is more readily shared and more easily understood by the public, an outcome which is certainly in keeping with the draft *Strategic Plan's* emphasis on improved information-sharing and transparency. Moreover, data acquired under the strategy can help track the success of the states' nutrient and nonpoint source pollution reduction efforts such as their nutrient reduction strategies, as well as the updated CWA Section 319 programs described in the *Strategic Plan*.

3) Enhancing EPA Focus and Collaboration

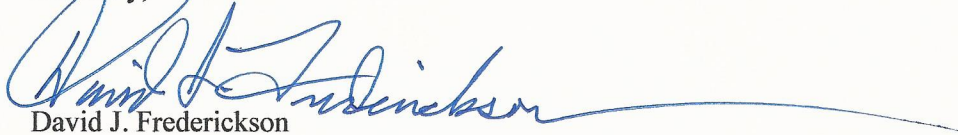
While including the Mississippi River in its *Strategic Plan* is a highly visible symbol of the Agency's commitment, the states also seek ongoing, substantive engagement by EPA in interagency work on the River. To date, we have benefited from participation by EPA Region 5 and Region 7 in UMRBA's collaborative efforts, but the Regions have at times struggled to

maintain a presence due to limited resources and competing demands. As such, the states ask EPA leadership to elevate the Agency's priority and focus on the Mississippi River in order to best support Regional engagement, as well as participation by other EPA offices, in our collaborative efforts. We see this as a tangible way in which EPA can implement its cross-cutting fundamental strategy of Launching a New Era of State, Tribal, Local, and International Partnerships, including its emphasis on "consulting, collaborating, cooperating, and accountability." Again, we emphasize that this focus be on the River in its own right and as such it would not duplicate or conflict with existing work aimed at the Gulf of Mexico. Rather, a River focus in coordination with each of the state's nutrient reduction strategies would complement and provide benefit to EPA's stated Gulf efforts.

In sum, the states ask EPA to both include the Mississippi River in its *Strategic Plan* and to act on that symbolic commitment through enhanced support of the states' ongoing work and by participation in collaborative efforts such as those led by UMRBA.

Thank you again for the opportunity to provide this input. We look forward to the continuation of our partnership with EPA. Should you or your staff have any questions, please do not hesitate to contact me or UMRBA's Executive Director Dru Buntin.

Sincerely,



David J. Frederickson
Chair
Upper Mississippi River Basin Association

Attachment

cc: Susan Hedman, Regional Administrator, Region 5
Karl Brooks, Regional Administrator, Region 7
Tinka Hyde, Director, Water Division, Region 5
Timothy Henry, Associate Director, Water Division, Region 5
Karen Flournoy, Director, Wetlands, Watersheds, and Pesticides Division, Region 7
Wayne Gieselman, Deputy Director, Water, Wetlands and Pesticides Division, Region 7

Suggested Text Regarding the Inclusion of the Mississippi River in the *FY 2014-2018 EPA Strategic Plan*

(Note: **Bold** text indicates suggested addition.)

Page 17, third paragraph:

We will assess the status of and changes in water quality through the National Aquatic Resource Surveys, strengthen the protection of our aquatic ecosystems, improve watershed-based approaches to reduce pollution, implement innovative technologies, implement comprehensive approaches to help maintain healthy watersheds, focus efforts in key geographic areas [3] **including the Mississippi River**, and take measures to incorporate climate change considerations into clean water and drinking water program planning and implementation.

Page 21, second paragraph:

EPA will also lead efforts to restore and protect aquatic ecosystems and wetlands, particularly in key geographic areas [3] **including the Mississippi River**, to address complex and cross-boundary challenges.

Page 23, end notes:

[3] Key geographic areas in the national water program include the Chesapeake Bay, the Great Lakes, the Gulf of Mexico, the U.S.-Mexico Border region, the Pacific Islands, Long Island Sound, the South Florida Ecosystem, the Puget Sound Basin, the Columbia River Basin, and the San Francisco Bay Delta Estuary. For more information on these programs and their performance measures, see the annual National Water Program Guidance, available at <http://www.epa.gov/water/waterplan/index.html>. **EPA intends to pursue the addition of the Mississippi River to the Program Guidance list and, for the purposes of the FY 2014-18 strategic planning, will consider the Mississippi River as a key geographic area.**