

**Minutes of the
88th Quarterly Meeting
of the
Upper Mississippi River Basin Association**

**November 19, 2003
La Crosse, Wisconsin**

The meeting was called to order at 9:05 a.m. by UMRBA Chair Mike Wells. The following State Representatives and Alternates and Federal Liaison Representatives were present:

Gary Clark	Illinois Alternate (IL DNR)
John Hey	Iowa Representative (IA DOT)
Kevin Szcodronski	Iowa Representative (IA DNR)
Diane Ford-Shivvers	Iowa (IA DNR)
Mark Holsten	Minnesota Alternate (MN DNR)
Steve Johnson	Minnesota Alternate (MN DNR)
Dick Lambert	Minnesota Alternate (MN DOT)
Mike Wells	Missouri Alternate (MO DNR)
Chuck Ledin	Wisconsin (WI DNR)
Gretchen Benjamin	Wisconsin (WI DNR)
Greg Ruff	U.S. Army Corps of Engineers (MVD)
Larry Shepard	U.S. Environmental Protection Agency (Region 7)
Bill Franz	U.S. Environmental Protection Agency (Region 5)
Leslie Holland-Bartels	U.S. Geological Survey (UMESC)
Don Hultman	U.S. Fish and Wildlife Service (Upper Miss Refuge)
Gary Wooten	Natural Resources Conservation Service (MW Region)

Others in attendance:

Norman Senjem	Minnesota PCA
Scott Stuewe	Illinois DNR
Janet Sternburg	Missouri DOC
Rich Worthington	U.S. Army Corps of Engineers (HQ)
Denny Lundberg	U.S. Army Corps of Engineers (MVR)
Ken Barr	U.S. Army Corps of Engineers (MVR)
Scott Whitney	U.S. Army Corps of Engineers (MVR)
Hank DeHaan	U.S. Army Corps of Engineers (MVR)
Roger Perk	U.S. Army Corps of Engineers (MVR)
Marvin Hubbell	U.S. Army Corps of Engineers (MVR)
Dan Stinnett	U.S. Fish and Wildlife Service (Twin Cities Field Office)
Sharonne Baylor	U.S. Fish and Wildlife Service (Upper Miss Refuge)
Rick Nelson	U.S. Fish and Wildlife Service (Rock Island Field Office)

Gary Wege	U.S. Fish and Wildlife Service
Barry Johnson	U.S. Geological Survey (UMESC)
Ken Lubinski	U.S. Geological Survey/The Nature Conservancy
Catherine McCalvin	The Nature Conservancy
Meredith Cornett	The Nature Conservancy
Michael Reuter	The Nature Conservancy
Rick Moore	Izaak Walton League
Mark Beorkrem	Illinois Stewardship Alliance
Steve Morse	University of Minnesota
William Howe	Mississippi River Citizen Commission
Dan McGuinness	Audubon
Matt Nikolay	Senator Feingold's Office
Dick Hegle	St. Mary's University (UMBSN)
Barb Naramore	Upper Mississippi River Basin Association
Holly Stoerker	Upper Mississippi River Basin Association

Meeting Minutes

Gretchen Benjamin moved and Kevin Szcodronsni seconded a motion to approve the minutes of the August 6, 2003 meeting as drafted. The motion was approved by consensus.

Executive Director's Report

Holly Stoerker reported that she had been invited to make a presentation to the National Research Council (NRC) panel convened to review the restructured navigation study. The presentation focused on the states' perspectives on the study, including the issue of cost sharing.

Stoerker said that UMRBA staff is continuing to assist in preparation of the EMP Report to Congress. In addition, a \$28,000 contract with the Corps of Engineers for FY 04 EMP-CC staff services is forthcoming. An extension of the EPA cooperative agreement for spills planning and mapping was recently executed. This agreement will provide an additional \$50,000 through federal FY 04.

UMRBA staff will participate in an interagency steering committee to assist the Coast Guard and EPA in planning a pilot Net Environmental Benefits Analysis (NEBA) on the Upper Mississippi River. In addition UMRBA staff has been assisting the Minnesota PCA in planning the emergency response portion of its February 24-26 Air, Water, and Waste Conference.

On September 23, UMRBA staff testified in support of H.R. 961, the Upper Mississippi River Basin Protection Act, at a Senate Energy and Natural Resources subcommittee hearing in Washington, D.C. This is the fourth hearing since 2000 at which UMRBA has testified on this sediment and nutrient monitoring bill.

On October 9, UMRBA convened a conference call of the UMR Floodway Group to receive updates on the status of the floodway computations being done by the Corps of Engineers, under contract to FEMA. The next call is scheduled for January 29, 2004.

Interstate Water Quality Coordination

Holly Stoerker reported that the round-robin signing process for the Interstate Reach MOU was initiated on September 2. Four states have signed thus far and the agreement is currently at Minnesota PCA awaiting signature.

Over the next few weeks, UMRBA staff will be revising the draft report from the water quality coordination project and preparing to publish the final report. The comment period ended October 7.

Chuck Ledin expressed support for the continuing work of the UMRBA Water Quality Task Force. He suggested that the Task Force meet in January or February 2004 to discuss how the new interstate river reaches will be utilized in the upcoming 305(b) assessments and 303(d) listings.

Ledin commented that the basin states may wish to consider submitting a joint proposal for funding under EPA's Watershed Initiative. One of this year's priorities for this \$21 million grant program is the reduction of nutrient loadings to the Gulf of Mexico. Multi-state projects are looked upon favorably and require at least one Governor to take the lead in submitting the grant proposal. Multi-state projects do not count against the limit of 2 proposals from each state. The deadline for submittal of proposals is January 15.

Holly Stoerker commented that the work of the UMRBA Water Quality Task Force may not qualify for a Watershed Initiative grant because EPA has indicated that it will not use that program to fund any activities mandated in the Clean Water Act. However, the states may want to consider a multi-state proposal related more directly to nutrient reduction. Ledin suggested that a coordinated water quality monitoring effort on the river may be a good candidate for a grant proposal.

UMR-IWW Navigation Study

Mike Wells explained that the states met yesterday to develop consensus preliminary perspectives on the restructured navigation study. He distributed copies of a one-page outline of specific points (attached), noting that the recommendations are not comprehensive and that the states still have considerable internal coordination work to do.

Wells reviewed each of the major points, beginning with the need for balance and a mechanism to link progress on navigation improvements and ecosystem restoration. Greg Ruff noted that the Corps is currently considering ways in which the navigation and ecosystem restoration components of the plan could be linked, including language for accomplishing that linkage in the authorization legislation. He cautioned, however, that there is a need to maintain flexibility, particularly with regard to funding, for purposes of efficiency. Rich Worthington encouraged the states to offer specific suggestions for mechanisms to achieve balance and linkage. He explained that the Corps anticipates there

will be a single line item appropriation for the dual authority, which includes both navigation and ecosystem improvements. However, that appropriation would be based on an annual budget submission from the Corps that identifies specific measures and costs for both navigation improvements and ecosystem restoration. He asked if the states are proposing that a specific funding formula or percentage be used to allocate funds, cautioning that such an approach may have legal implications.

Gary Clark and Kevin Sczodronski acknowledged the need for flexibility, but expressed concern that implementation of one part of the plan not outpace the other. A mechanism that can ensure progress on both is needed.

Rich Worthington asked what was meant by the states' recommendation that the dual authority be "operationally defined." Holly Stoerker explained that the mechanism for ensuring linkage and balanced implementation is an example of how the dual authority should be defined in legislation. Mark Beorkrem asked if establishing an institutional arrangement for funding decisions is an example of "operationally defining" the dual authority. Mike Wells clarified that was not the states' intent. Robin Grawe asked whether the EMP authority offered an example of how funding balance could be achieved in legislation. Holly Stoerker explained that the EMP funding ratio of 1/3 for long term monitoring and 2/3 for habitat restoration is not specified in either the authorizing legislation or annual appropriations. Rather, EMP funds are appropriated annually in a single line item, the distribution of which is implied by the ratio of the authorized appropriations.

In response to questions of whether the states' definition of "balance" implies equal funding, Mike Wells said the states are still considering the most appropriate way to define balance. Consensus will be important in making that determination.

Mike Wells described the states' perspective on the range of alternatives, noting that there is interest in having some of the alternatives revised slightly. In particular, Gary Clark indicated that Illinois has requested additional evaluation of Alternative 6 with advanced timing of the Illinois River improvements. Gretchen Benjamin commented that ecosystem Alternative E will likely cost more than the Corps has estimated and Wisconsin will be recommending expanding that alternative. Mike Wells indicated that Missouri would like to have additional ecosystem restoration on the Open River included. Denny Lundberg explained that the Corps is doing an NED evaluation on a number of additional navigation alternatives, but does not have an RED or social effects evaluation completed for those added alternatives.

Mike Wells described the third point of the states' perspectives document related to adaptive management, noting that the states had just learned yesterday that an adaptive management approach to navigation improvement is being considered. Gary Clark noted that changing the timing of the navigation improvements essentially creates "new" alternatives, which the states will need time to evaluate and consider. In addition, the states are requesting a cost breakdown of individual measures and additional information regarding the scheduling of the navigation improvements in Alternatives 4, 5, and 6.

Mike Wells said that the states endorse cost sharing Option C, but are requesting additional information regarding cost breakdowns by state, nonfederal O&M costs, and repair/replacement/rehabilitation responsibilities. Ken Barr said it would be possible to

provide cost breakdowns by state, but cautioned that such costs would be rule-based rather than site-driven. With regard to repair and rehabilitation costs, Rich Worthington explained that, in general, such costs are a nonfederal responsibility. However, he acknowledged that, given the nature of UMR ecosystem projects, it may be possible to explore cost sharing on rehabilitation related to flood damages. Rick Nelson noted that the Fish and Wildlife Service is also a cost sharing partner with regard to O&M. He asked that the states consult with the Service as they consider O&M issues.

Rich Worthington asked if the states intend to submit an “official” letter endorsing cost sharing Option C. He commented that such a letter may be very helpful, given that cost sharing is a particular concern for the Administration. Kevin Sczodronski suggested that UMRBA send a letter to the Corps, addressing the full range of issues in which the states have an interest, rather than focusing exclusively on cost sharing. Gary Clark and Gretchen Benjamin expressed a preference for a letter that addresses only cost sharing, given that the states’ individual positions may vary slightly on other issues. Gary Clark moved and Mark Holsten seconded a motion directing staff to transmit a letter from UMRBA to the Corps of Engineers, endorsing cost sharing Option C. Chuck Ledin expressed some reservations about “endorsing” any of the options and questioned whether such endorsement is necessary. Gary Clark said that endorsement of cost sharing Option C is consistent with UMRBA’s previous comments on cost sharing. Holly Stoerker suggested that staff draft a letter for UMRBA state representatives to review and schedule a conference call to discuss the draft if necessary. Clark’s motion was amended to reflect Stoerker’s suggested approach. The motion passed unanimously.

Finally, with regard to the planning process, Mike Wells explained that the states are advising that individual state briefings not be scheduled until the Corps has a tentative recommended plan that it can present. Wells also noted that it is unlikely that the states will be prepared to present official position statements at the Alternative Formulation Briefing (AFB). Greg Ruff explained that the AFB offers an opportunity for the Corps Headquarters and the Assistant Secretary’s office to work out key policy issues prior to public release of the tentative plan. In that regard, the states are encouraged to participate fully.

Kevin Sczodronski commented that the timing of the Fish and Wildlife Coordination Act report will be important because the state natural resource agencies will be asked to provide letters on that report as well. Ken Barr said that the relationship between the Coordination Act report and release of the tentative plan may be problematic. The Fish and Wildlife Service would like to know what the tentative plan is prior to submitting its Coordination Act Report. However, the Corps would like to have the Coordination Act Report prior to release of the tentative plan.

Recognition of UMRBA State Representatives

Mike Wells presented certificates of appreciation and UMRBA T-shirts to Steve Morse and Kevin Sczodronski. Steve Morse, who is now a Senior Fellow and Endowed Chair in Agricultural Systems at the University of Minnesota, was appointed as Minnesota’s UMRBA representative in 1999. Morse served as Minnesota DNR’s Deputy Commissioner during the Ventura Administration and was previously a member of the Minnesota State Senate. Sczodronski, who was recently appointed as Director of Iowa DNR’s Parks Division, has

represented the State of Iowa on UMRBA since 1986. Sczodronski began his career with the Iowa Conservation Commission in 1978 and has served as Iowa DNR's Big Rivers Coordinator for many years.

Louisiana Coastal Area Ecosystem Restoration

In Steve Cobb's absence, Greg Ruff presented an overview of the Louisiana Coastal Area (LCA) ecosystem restoration plan, which the Corps of Engineers is developing. Ruff explained that there are similarities between the LCA plan and the restructured navigation study on the Upper Mississippi River. In particular, both will cost billions of dollars, have phased implementation strategies, and will be considered for authorization in the 2004 Water Resources Development Act. Ruff explained that the national interest in the LCA ecosystem restoration plan involves loss of habitat, the economic impacts on the fish and seafood industry, and the impact of subsidence on oil and gas production. In response to a question, Rich Worthington explained that, similar to the UMR plan, the LCA plan is related to environmental degradation caused by Corps projects. However, there are other causes of degradation in the LCA, just as there are on the UMR.

The Nature Conservancy's Upper Mississippi River Project

Michael Reuter described the history of the Nature Conservancy (TNC) and its relatively new focus on the Upper Mississippi River. TNC's Upper Mississippi River project was inspired by a 1992 National Research Council report, which identified the Illinois and Mississippi Rivers as two of only three large floodplain rivers remaining in the United States where the opportunity still exists to restore ecological processes. To help direct TNC resources to the most important areas of the basin, an ecoregional planning process was used to identify areas of greatest freshwater biodiversity significance and identify the greatest threats. As a result, TNC developed three key strategies: promoting compatible forestry and agricultural practices in the basin, naturalizing flow regimes in the navigation pools, and restoring critical bluff-to-bluff landscapes. Examples of watersheds where TNC anticipates working include the Lower Cedar, Upper Des Moines, Sugar/Pecatonica, Whitewater, Root, Zumbro, Meramec, and Mackinaw Rivers.

Reuter described the Emiquon project, which is an example of the type of floodplain restoration that TNC is promoting. Emiquon involves 7,000 floodplain acres along the Illinois River, much of which was purchased by TNC, in combination with lands from the U.S. Fish and Wildlife Service and Illinois DNR. Current efforts are underway to model water level fluctuations, sedimentation, and vegetation response, to determine the most effective means of restoring Emiquon.

In response to a question regarding the relationship of TNC's Upper Mississippi River Project to the MOU between TNC and the Corps of Engineers, Reuter explained that the MOU provides the basis for TNC's work with the Corps on reservoir management at 12 sites nationwide. In addition, TNC is exploring the possibility of another MOU with the Corps to implement the Upper Mississippi River project, in particular.

Citing TNC's fundraising success, Gretchen Benjamin asked if TNC had considered an Upper Mississippi River fundraising campaign. Reuter explained that TNC's strength lies in its organizational structure linking individual chapters, national office, and international offices.

Green Lands, Blue Waters Initiative

Steve Morse described changes in agricultural technology and productivity that have increased reliance on annual row crops such as corn and soybeans, at the expense of perennial crops such as alfalfa. The result, as Morse explained, is less protective ground cover, increased erosion, and increased water problems from nutrients. Morse is studying diversification of agricultural landscape systems, which would offer a variety of benefits, including benefits to bird populations. Morse described ways in which his project seeks to increase the production of perennials in the Upper Mississippi River Basin by developing viable new markets and uses for perennials. The focus will initially be on two strategic watersheds per state, working with a coalition of stakeholders, government agencies, land grant institutions, and NGOs. Morse explained that both environmental performance and economic diversity will be increased, while working lands remain in production. Ten-year outcomes include reducing nitrogen loading to the Mississippi River by 30 percent and increasing migratory waterfowl and neotropical bird populations. Morse said the cost is estimated to be \$205 million over 10 years, including \$100 million for Long Term Ecological Research.

Morse indicated that he would be meeting with USDA and EPA next week to discuss the proposed project and will be convening a meeting of NGOs and land grant institutions on December 10. Morse invited suggestions regarding how state agencies could become more actively involved.

Southeast Minnesota Water Quality Initiatives

Norman Senjem described the Basin Alliance for the Lower Mississippi in Minnesota (BALMM), a partnership of local, state, and federal agencies and NGOs, working to address water quality problems in southeastern Minnesota. BALMM's major focus is on problems associated with turbidity and fecal coliform. Many of the initiatives BALMM is undertaking will be used to achieve the 52-65 percent reductions called for in the regional fecal coliform TMDL recently developed by Minnesota PCA. Strategies include feedlot runoff reduction, improvements in unsewered small communities and individual sewage treatment systems, and rotational grazing strategies. Development of a turbidity TMDL for Minnesota's Lower Mississippi Basin is scheduled to begin in 2004.

Senjem also described Minnesota's Conservation Reserve Enhancement Program (CREP) proposal, which includes 100,000 acres statewide, 42,500 of which are in southeast Minnesota. Priority areas in southeast Minnesota include highly erodible land, riparian zones, wetland restoration sites, and groundwater protection zones. Easements will be limited to 120 acres with a choice of 15-year, 35-year, or perpetual easements, depending on the type of practice being employed. Senjem said that landowners have expressed concern that too many contracts will be perpetual.

In response to a question regarding the level of landowner interest, Senjem explained that there is a backlog in both the Wetlands Restoration Program (WRP) and Reinvest in Minnesota (RIM). With regard to feedlot improvements, there are incentives provided to increase compliance with Minnesota's state rules. According to Senjem, Wisconsin is considering target performance standards.

Upper Mississippi River Spill Response

Barb Naramore provided an update on the status of the UMR Spill Plan, which the UMRBA's Spill Group originally published in 1991. The Plan includes a series of protocols, addressing such issues as notification and vessel detainment, and extensive resource appendices, with information regarding such things as water intakes and the availability of response equipment. Signatories to the plan include the five state emergency response agencies, Corps of Engineers, Fish and Wildlife Service, EPA, and Coast Guard.

Given that there have been a variety of changes since 1991 and implementation of the Plan's protocols has not been consistent, the UMR Spills Group decided to survey users of the Plan. The survey was designed to determine how the Plan is being used, what parts are most and least useful, and how the Plan might be modified to enhance its utility. The survey results revealed that, although there continues to be support for maintaining a UMR-specific Spills Plan, user needs vary considerably. Meeting this variety of uses and expectations has contributed to the complexity and size of the plan, thus limiting its usefulness for some. Specific suggestions for enhancements include simplifying the document, keeping it current, and improving the digital version. A subcommittee of the UMR Spills Group has been assigned the task of reviewing the Plan's content and format, and recommending modifications. In addition, an unannounced exercise of the notification protocol is being planned.

Naramore also described the ongoing work related to establishment of a UMR Early Warning Monitoring Network. The Network would be designed to both detect sudden contamination events and provide timely alert to intake operators and others. The Scoping Group, composed of state and federal agency staff and intake operators, has selected Lock and Dam 15 as the site for a pilot station. Both the Corps of Engineers and City of Rock Island are playing key roles. Equipment includes a multi-parameter probe and a fluorescence detector. The field test will last approximately 12 months. Next steps include installing the fluorescence detector, gaining operating experience, scoping the notification mechanism, and determining the requirements for establishing and operating a full network of stations.

In response to a question from Leslie Holland-Bartels, Naramore explained that there has been some experience with early warning monitoring networks on other rivers, including the Ohio River and the Delaware and Schuylkill Rivers.

Gary Clark commented that UMRBA should be proud of its work on spill response planning and monitoring, demonstrating that the organization's interests and capabilities extend beyond policy issues.

USACE 2012: Corps of Engineers Reorganization

Greg Ruff provided an overview of the Corps of Engineers' new organizational plan, USACE 2012, which focuses on the Headquarters and Division structure. The plan will move the agency from a hierarchical structure to a matrix organization, focusing on business lines and eliminating stove pipes. Regional Business Centers will be established at the Division level, drawing on the best regional expertise within the Corps. Ruff compared the new approach to how the Navigation Study has been structured for the past few years, utilizing the economic modeling talents of the New Orleans District.

Ruff explained that there will be Regional Integration Teams established at Headquarters to maintain the involvement of all levels throughout a study process. He cited Rich Worthington's involvement from Corps Headquarters as an example of how the system is intended to work. Bill Dawson will head up the MVD Regional Integration Team.

In addition, MVD will be establishing District Support Teams. There will likely be three such teams, with a separate one for MR&T. The Support Team for the Upper Mississippi River has not yet been formed. MVD will also be reorganizing into a Business Directorate and a Programs Directorate. Dan Hitchings will head the Business Directorate. The Programs Directorate position has yet to be filled. Following Headquarters approval, the new plan is scheduled for implementation in April 2004.

Ruff also explained that one of the process changes identified in the reorganization plan is transition to a budget that is structured along business lines. In particular, the Corps' FY 2005 budget will be organized and defended along nine business lines, including flood damage reduction, navigation, and ecosystem restoration.

In response to a question from Kevin Sczodronski, Ruff emphasized that the Corps District offices will remain in close contact with the states. The reorganization is designed to enhance Headquarters and Division support for the role of the Districts.

Sczodronski asked how budgeting according to business lines will affect the dual project authority being considered as part of the Navigation Study. Rich Worthington explained that the current uncertainty regarding how to handle the linkage between UMR navigation and ecosystem improvements is related to legal questions and not the new budgeting approach. He noted, however, that the budgeting question is a good one and promised to explore it further.

In response to a question from Barb Naramore, Worthington said it is unclear whether the change to Regional Business Centers will affect the way in which the Corps' Mississippi River O&M funding is appropriated by District.

NRCS Accomplishments Report

Gary Wooten distributed copies of the Natural Resources Conservation Service (NRCS) Accomplishments Report for FY 2003. He explained that NRCS is also reorganizing. Regional offices are being eliminated, but centers of technical expertise will be retained.

NRCS is also increasing its reliance on certified contractors, rather than NRCS employees, to provide technical services for conservation programs.

Corps of Engineers' Activity Report

Roger Perk explained that, for many years, the Corps of Engineers has been preparing UMR Activity Reports, which are distributed with the UMRBA and EMP-CC meeting materials. Those reports provide an overview of the status of each District's river-related projects and activities, including EMP, Section 1135, channel maintenance, and lock and dam rehabilitation. Perk requested feedback on the utility of these reports. Steve Johnson and Gary Clark commented that the reports are helpful, but that they typically get the same information from other sources first. Mark Beorkrem commented that the Activity Reports are the primary source of information for many members of the public. Holly Stoerker suggested that, if the reports are continued, they be posted on the Corps' website to increase their accessibility and distribution. The sense of the group was that, although the Activity Reports have been useful, they need not be continued, given how time-consuming they are to prepare and update. Gary Clark thanked the Corps for providing the UMR Activity Reports over the years.

Future Meetings

Holly Stoerker announced that the next quarterly meetings of the UMRBA and EMP-CC will be held February 25-26, 2004 in St. Louis, Missouri. The UMRBA will meet jointly with the Missouri River Basin Association. There will be no GLC meeting during that week, because the Navigation Study AFB is scheduled for earlier in the month. [Note: The AFB was subsequently rescheduled for February 24.]

The spring meetings of GLC, UMRBA, and EMP-CC will be held May 18-20, 2004 in St. Paul, Minnesota. It was agreed that the summer meetings will be held August 10-12, 2004 in the Quad Cities.

With no further business, the meeting was adjourned at 2:55 pm.

States' Preliminary Perspectives on the UMR-IWW Restructured Navigation Study

(Adopted and presented at November 19, 2003 UMRBA Meeting)

Balance/Equity/Linkage

- Identifying a “balanced” plan is critical. Defining a mechanism to link progress on navigation improvements and ecosystem investment is crucial.
- A dual authority is conceptually attractive, but must be operationally defined.

Range of Alternatives

The states are not inclined to recommend broadening the range of navigation or ecosystem alternatives identified. However, the states will likely want to have some of the existing alternatives revised slightly. Examples:

- Illinois' request for advancing the timing of Illinois River improvements in Alternative 6
- Minnesota and Wisconsin will be offering revised versions of Alternative E

Adaptive Management

Adaptive management approaches for navigation efficiency may hold promise, but are essentially “new” navigation alternatives. More information and evaluation is required.

Navigation Improvements

The states request the following information regarding the navigation improvement alternatives:

- schedule/timing of navigation improvements in Alternatives 4, 5, and 6
- breakdown of costs of individual measures in the alternatives, similar to the ecosystem alternatives

Cost Sharing

The states endorse Option C, but request the following additional information:

- breakdown of nonfederal cost by state, with a general sense of timing of investment
- information regarding nonfederal (as opposed to non-Corps) O&M costs
- clarification of repair/replacement/rehabilitation responsibilities

Planning Process

- Individual state briefings should be scheduled prior to the Alternative Formulation Briefing (AFB), but not until the Corps has its tentative recommended plan.
- States are unlikely to have official statements/positions at the AFB.