



Upper Mississippi River Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

April 21, 2015

Major General Michael Wehr
Division Commander
U.S. Army Corps of Engineers
Mississippi Valley Division
Box 80
Vicksburg, Mississippi 39181-0080

Dear General Wehr:

The Upper Mississippi River System (UMRS) serves as a vitally important commercial transportation corridor, and channel maintenance is critical to ensuring that the System can reliably and efficiently transport the Midwest's exports and imports. However, insufficient investment in the river's channel maintenance has made it difficult for Corps District staff to address immediate dredging and disposal management needs, while also planning for longer term solutions. Over the past few decades, channel maintenance has faced increased challenges including escalating severity of flood and drought conditions, sedimentation, and costs, as well as fewer available disposal sites for placing dredging material. While District staff have done a tremendous job of working within these constraints to maintain a safe and reliable navigation system, the UMRS states are concerned with the Corps' ability to continue to do so in the near- and long-term. On behalf of the Upper Mississippi River Basin Association (UMRBA), I am writing to express our five member states' concerns regarding channel maintenance on the UMRS and to respectfully request that the UMRS Corps Districts are provided with the necessary resources to perform channel maintenance and properly dispose of dredged material as part of their operations and maintenance obligations. This includes prioritizing adequate resources to support the development of new, or renewed, comprehensive long-term channel maintenance management strategies for dredging and dredged material management that are sustainable, cost-effective, and environmentally friendly.

Challenges to the Upper Mississippi River System channel maintenance management have been showcased publicly in recent years, but have been building for decades. For example, in late 2012, the Corps had to initiate emergency measures in order to maintain the navigation channel during significant and prolonged drought conditions that exposed rock pinnacles and threatened to close areas of the unimpounded Upper Mississippi River to commercial navigation. Even though the river was kept open, reduced water levels caused several groundings and lessened the carrying capacity of individual barges. And, in 2014, heavy rainfall in spring and early summer immediately followed by drought conditions resulted in significant sediment loads that settled into the navigation channel, quickly clogging the river with material that exceeded placement capacity and halting commercial navigation traffic in the St. Paul District for 25 days. While the states' commend the Corps' efforts to identify and act on solutions, these events highlight the need to develop, or renew existing, channel maintenance management strategies. As flood and drought extremes become more common, these emergency situations are likely to occur again in the near future. In these recent cases, the states were left in a difficult reactive position of having to expedite environmental reviews in order to issue the required permits. Thus, the states would like to work with the Corps to proactively address these issues, rather than under a reactive emergency response mode. In addition, there are other issues that need to be addressed, such as capacity constraints for the placement of dredged material and adequate site management to meet agreed-upon standards. For example, dredge placement sites frequently have eroding faces that contribute sediment into adjacent backwaters.

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We applaud the tremendous efforts of District staff who work quickly and often under significant pressure to ensure a safe, reliable nine-foot inland navigation channel. We support the Corps' balanced approach to channel management. The Corps seeks to minimize dredging frequency, depth, quantity, and costs to ensure both the safety and reliability of the navigation system and the river system's ecological health and resilience. We further acknowledge, appreciate, and seek to build on the existing partner-based dialogue and consultation that informs channel maintenance management on the UMRS. We also understand the difficulties of working within constrained budgets and forecasting flood pulses, droughts, and other events that create emergency situations. But that is precisely the reason that having an up-to-date, proactive management strategy is so important. We believe that all three UMR Districts would benefit from comprehensive, strategic channel maintenance planning that is tailored to each District's unique features and needs.

Since the last development of Upper Mississippi River System channel maintenance management strategies in mid-1970s to early 1980s, changes in climate, land-use throughout the watershed, and riverine structures and processes have resulted in modified hydrologic conditions and sedimentation patterns. Therefore, those strategies are outdated in many instances. Thoughtful, deliberative dialogue is required to determine efficient, effective, sustainable solutions. We respectfully request that the three Districts work through their existing coordination groups to develop, or renew their existing, comprehensive long-term channel maintenance management strategies for dredging and dredged material management. The strategies should address issues associated with dredged material placement planning, including beneficial use planning; real estate acquisition; increasing sedimentation (dredging volumes); and escalating costs of doing business. In addition, we ask that the Districts commit to working with their respective state and federal agency partners as closely as possible to implement the strategies.

Formed by the Governors of Illinois, Iowa, Minnesota, Missouri, and Wisconsin in 1981, UMRBA represents its member states' common water resource interests and works collaboratively with both state and federal agencies that have management responsibilities on the Upper Mississippi River System. UMRBA's member states have a vital interest in protecting and enhancing the River's tremendous regional and national benefits, including those related to commercial navigation, water supply, tourism, and recreation. As such, we have a strong commitment to ensuring that the Upper Mississippi River System continues to function as a vital part of a healthy inland navigation system *and* as a healthy and resilient ecosystem.

Please feel free to contact me at dbuntin@umrba.org or 651-224-2880 to discuss the states' request further and how we might work collaboratively and proactively in strategically planning for future channel maintenance needs. We appreciate your consideration of our request to identify comprehensive long-term channel maintenance management strategies for dredging and disposal. And, again, we greatly appreciate the hard work and dedication of the District staff directly involved in the Upper Mississippi River System's channel maintenance.

Sincerely,



Dru Buntin
Executive Director

cc: Col. Dan Koprowski, MVP Commander
Col. Mark Deschenes, MVR Commander
Col. Anthony Mitchell, MVS Commander
UMRBA Board Members