



Upper
Mississippi River
Basin Association

ILLINOIS. IOWA. MINNESOTA. MISSOURI. WISCONSIN

May 3, 2011

Mr. Marvin Hubbell, EMP Regional Manager
Mr. Chuck Spitzack, NESP Regional Manager
U.S. Army Corps of Engineers, Rock Island District
Clock Tower Building, P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Mr. ^{Marv}Hubbell and Mr. ^{Chuck}Spitzack:

I am writing on behalf of the state members of the Environmental Management Program Coordinating Committee (EMP-CC) and the Navigation Environmental Coordination Committee (NECC) regarding the first Upper Mississippi River System (UMRS) reach planning cycle, which spanned 2008 to 2010. Specifically, this letter is in response to the April 5, 2011 draft Reach Planning After Action Report (AAR). The AAR provides valuable insights regarding the first reach planning effort and includes several important recommendations for improving the process and outcomes for future planning cycles. We greatly appreciate the Corps' efforts to pursue process-improvements so that future reach planning will even more effectively guide partners' collective efforts to select the best habitat projects for improving the UMRS ecosystem.

We would like to offer the following state perspectives on the first reach planning cycle and the draft AAR's recommendations for improving the reach planning process and outcomes:

1. *Process complexity* — The first iteration of reach planning was overly complex, and was thus confusing to participants and unnecessarily difficult to implement. We strongly urge the Corps to significantly simplify the process relative to the first iteration. The process needs to be practical and accepted by partners. Among other benefits, this will enhance consistency among the Reach Planning Teams (RPTs), allowing partners to better integrate restoration strategies across districts. In simplifying the overall process, it will be important to explicitly outline the relationship between the system and reach plans.

We support the draft AAR's recommendations for addressing the overall complexity in the current reach planning framework, including the sixth recommendation regarding streamlined restoration proposals, the seventh recommendation regarding planning assumptions (i.e., sideboards), the ninth recommendation regarding consistency in planning across districts, and the sixteenth recommendation regarding communication and coordination among Corps staff and partners. We would also suggest refining the scope of the eleventh recommendation, or adding an additional recommendation, regarding the need to work with partners to refine the overall planning process.

2. *Direct connection between System and Reach Plans* — Although we are confident that all of the restoration projects identified and selected through reach planning will contribute in important ways to restoring the UMRS ecosystem, there is no clear articulation of how the projects relate directly to the system goals and objectives. We believe that having the System Report and the specialty system plans available when initiating objective-setting and planning at the geomorphic and floodplain levels would have significantly enhanced the reach planning

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effort. To improve future planning cycles, we suggest that the draft AAR include recommendations for partners to a) identify a straightforward process for relating the system goals and objectives, floodplain reach planning, and project selection and b) develop a project ranking system that accounts for projects' potential contributions to addressing system goals and objectives. As a part of suggestion a), we encourage the Corps to expand the sixth recommendation to also consider how the subarea restoration proposals will directly reflect the system and floodplain and geomorphic reach goals and objectives. While we recognize that administrative factors (e.g., location of public lands, USACE policy, funding, workload allocation, etc.) will also be considered in determining the final prioritization of projects, it is essential that those projects reflect partners' system- and reach-scale restoration priorities.

3. *Communication and clarity* — We suggest that the AAR include a recommendation for partners to address the development of a communications and coordination strategy for future planning efforts. The draft AAR describes the need to enhance communication and clarity in some specific ways; however, reach planning communication and coordination should be addressed more comprehensively. In order for reach planning to function effectively, partners need to be fully cognizant of the Corps' intentions, timelines, etc. It is important to provide a clearly articulated planning framework and schedule at the outset of reach planning and to readily and clearly communicate any modifications during implementation to partners. As an important step toward enhancing clarity, we support the draft AAR's first and second recommendations to further refine the definitions of reach planning and natural river processes.
4. *Independent facilitation* — We believe that providing an experienced, neutral facilitator to lead reach planning meetings would substantially enhance the process. Therefore, we support the draft AAR's ninth recommendation to provide an independent facilitator at key reach planning meetings. We encourage the Corps to coordinate with partners regarding which meetings or phases of the process would most benefit from independent facilitation.
5. *Overlapping geographic jurisdictions* — We fully support the use of geomorphic and floodplain reaches, rather than district boundaries, to evaluate restoration needs at a sub-system scale. However, since the district boundaries are different than the floodplain reaches, there are inherent challenges for considering projects within the overlapping geographic areas. In this first iteration of reach planning, the reach planning teams and technical-level district teams (i.e., Fish and Wildlife Work Group (FWWG), Fish and Wildlife Interagency Committee (FWIC), River Resources Action Team (RRAT)-Tech, and Illinois River Work Group (IRWG)) were not given adequate instruction or time to coordinate across districts, and thus the overlapping areas were not effectively addressed. We believe that including several coordination points for district teams that share floodplain reaches will help ensure that the overlapping reaches receive sufficient consideration throughout planning and project selection. Therefore, we support the draft AAR's sixteenth recommendation.
6. *Program neutrality* — We strongly encourage program neutral implementation of future reach planning. Page 1 of the draft AAR states that this first cycle of reach planning was conducted by NESP's RST, in cooperation with other programs and groups. In future cycles, EMP and NESP should co-lead system and reach planning. The System and Reach Planning Notebook, the Regional Support Team's (RST's) composition and focus, and the RPTs' focus on program-specific needs all reflect a lack of program neutrality in the first iteration of reach planning. With the exception of the St. Louis District, the District teams were focused on individual program needs when prioritizing projects. The RRAT-Exec considered projects in a program

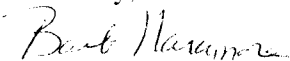
neutral framework, with final recommendations for each project to move forward under either EMP or NESP based on administrative factors. We encourage the other District teams to take an approach similar to the RRAT-Exec in future planning efforts. Before individual programmatic factors are considered, potential restoration opportunities should be identified based on ecosystem needs. While the draft AAR includes some specific suggestions for promoting program neutrality, we suggest including a more comprehensive program neutrality recommendation.

7. *Regional Support Team's role and composition* — We support the draft AAR's thirteenth and fifteenth recommendations to consider the RST's role and composition in guiding reach planning. However, we would suggest modifying the two recommendations to a) add that the RST will include both EMP and NESP staff and will report to both programs' management teams and b) emphasize that the RST and partners will regularly coordinate with the Science Panel, LTRMP Analysis Team, and Illinois Science Advisory Committee regarding science needs. During the first planning phase, the RST's management of the reach planning process and its program-specific composition did not always serve the process well. For example, the RST's guidance varied, resulting in inconsistencies across the four floodplain reaches. We suggest including language on how the RST will communicate and coordinate with partners to make the process transparent and understandable.

We would also like to express our sincere appreciation for the Corps' substantial efforts in organizing and facilitating the four floodplain RPTs. It is important that partners are directly engaged and actively participate throughout the entire reach planning process. Because of the collective commitment to such engagement in the first reach planning cycle, we believe the 2010 Floodplain Reach Plans and identified habitat projects reflect partners' input. However, the identified habitat projects' linkages to the partner-endorsed system goals and objectives remain to be articulated. In the near future, we urge that partners examine the System Objectives Report released on January 26, 2011 and the 2010 Floodplain Reach Plans to identify a systemic best-value implementation sequence. This will inform immediate and long-term project planning needs, by identifying how and where current projects address system goals and objectives.

Again, we greatly appreciate the efforts of the Corps and partners in implementing the first cycle of reach planning. This was a tremendous effort, and it produced valuable information about the system's habitat needs and restoration opportunities. Thank you for your consideration of our comments. Please contact UMRBA staff or any of the state EMP-CC or NECC members if you have questions regarding these joint comments.

Sincerely,



Barbara L. Naramore
Executive Director

cc: Charles Barton, U.S. Army Corps of Engineers, MVD
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Charlie Wooley, U.S. Fish and Wildlife Service, Region 3
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