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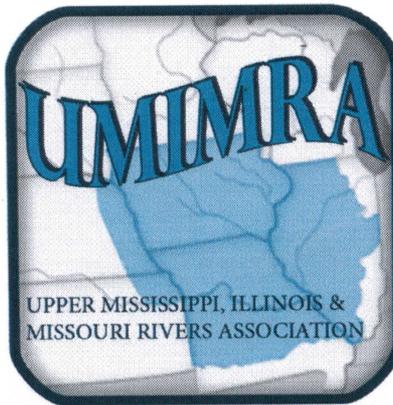
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Director, Illinois

November 26, 2014

U.S. Army Corps of Engineers
Attn: CECW-CE (Lisa Keifel)
441 G Street NW
Washington, DC 20314-1000

RE: Section 7001 of the Water Resources Reform and Development Act of 2014

Dear Ms. Keifel,

Established in 1954, UMIMRA is a grassroots stakeholder organization advocating for a stronger Upper Mississippi Valley through flood control. Reliable flood control leads to a more reliable navigation channel, economic development, and a better way of life for the communities along the river. UMIMRA works closely with local, state, and federal legislators, the U.S. Army Corps of Engineers, and other agencies to ensure our members concerns are heard.

UMIMRA sends this letter of support for the modification of the Upper Mississippi River Comprehensive Plan, an authorized USACE project. UMIMRA proposes the following modification to Sec. 459 of the 1999 Water Resources Development Act. In subsection (a) strike the word "develop" and replace with the word "implement."

From an economic perspective, the Upper Mississippi River Comprehensive Plan will play a large role in mid-west economic development. According to the Tennessee Valley Authority Study, improving our flood control system in the Upper Valley can return 5 dollars for every one dollar invested in Regional Economic Development. Also, employment could increase by more than 20,000 jobs annually in the five-state Upper Mississippi Valley Region resulting from upgraded levee protection provided by the full implementation of a comprehensive plan.

From a humanitarian perspective the UMRCP is necessary to ensure that the naturally fertile soils of the Upper Mississippi Valley are protected to produce food for a growing world population. One acre of corn, yielding 150 bushel, produces enough kilo-calories to feed 10 people for an entire year. The Upper Mississippi Comprehensive Plan Levees protect over 853,000 acres of prime farm land. Therefore, these levees protect

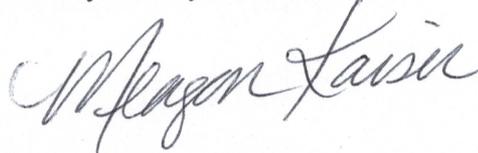
the land that feeds more than 8.5 million people for an entire year.

From a transportation perspective, cost brought on by a major flood event is dominated by the cost of diversion detours. The Comprehensive Plan found a four-bridge diversion cost of \$478.1million (\$2008), or \$510.0 million (\$2012). The Corps estimate of \$510 million increases by \$454 million when diversion costs found at the remaining bridges are added to the total cost. Rail diversion costs are also significant. According to the Center for Transportation Research at the University of Tennessee (CTR) train diversion costs incurred roughly \$3 million per day and total roughly \$60 million for a 30 day period. In combination, the diversion costs for highway and rail transportation total \$1.024 billion, assuming the flooding event occurs in the current year. Additionally, the estimated total costs of the detour and repairs to highways and rail tracks are \$1.027 billion.

From a local perspective, the UMRCP is necessary to ensure the safety of human life and alleviate the stress of knowing where the water will go in a high water event. According to the American Geophysical Union, Mississippi river discharge is projected to greatly increase during 2011-2099, attributing to hydrologic intensification, meaning that the Upper Mississippi Valley can expect more recurring issues over the coming years.

There is much to gain by implementing the Upper Mississippi River Comprehensive Plan for the people of Missouri, Illinois, and Iowa who are working to improve flood protection, stimulate the economy and feed the hungry.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Meagan Kaiser". The signature is written in dark ink and is positioned below the typed name.

Meagan Kaiser, Executive Director
Upper Mississippi, Illinois, & Missouri
Rivers Association

Non-Federal Interest: The sponsor for regional coordination is the Upper Mississippi, Illinois & Missouri Rivers Association (UMIMRA). Federal implementation planning for responsible Federal and non-Federal entities will be by the USACE under existing authorization. Construction responsibilities will be by the responsible Federal and non-Federal entities (local district, municipality, or political subdivision of its respective state, and/or state funded).

Proposed Project: This proposal is a modification to an authorized USACE project. UMIMRA proposes the following modification to Sec.459 of the 1999 Water Resources Development Act. In subsection (a) strike the word “develop” and replace with the word “implement.” So that it reads as follows:

SEC. 459. UPPER MISSISSIPPI RIVER COMPREHENSIVE PLAN.

(a) DEVELOPMENT.—The Secretary shall ~~develop~~ **(implement)** a plan to address water resource and related land resource problems and opportunities in the upper Mississippi and Illinois River basins, from Cairo, Illinois, to the headwaters of the Mississippi River, in the interest of systemic flood damage reduction by means of—

- (1) structural and nonstructural flood control and floodplain management strategies;
- (2) continued maintenance of the navigation project;
- (3) management of bank caving and erosion;
- (4) watershed nutrient and sediment management;
- (5) habitat management;
- (6) recreation needs; and
- (7) other related purposes.

(b) CONTENTS.—The plan under subsection (a) shall—

- (1) contain recommendations on management plans and actions to be carried out by the responsible Federal and non-Federal entities;
- (2) specifically address recommendations to authorize construction of a systemic flood control project for the upper Mississippi River; and
- (3) include recommendations for Federal action where appropriate and recommendations for follow-on studies for problem areas for which data or current technology does not allow immediate solutions.

(c) CONSULTATION AND USE OF EXISTING DATA.—In carrying out this section, the Secretary shall—

- (1) consult with appropriate Federal and State agencies; and
- (2) make maximum use of data in existence on the date of enactment of this Act and ongoing programs and efforts of Federal agencies and States in developing the plan under subsection (a).

(d) COST SHARING.—

(1) DEVELOPMENT.—Development of the plan under sub-section (a) shall be at Federal expense.

(2) FEASIBILITY STUDIES.—Feasibility studies resulting from development of the plan shall be subject to cost sharing under section 105 of the Water Resources Development Act of 1986 (33 U.S.C. 2215).

(e) REPORT.—Not later than 3 years after the date of enactment of this Act, the Secretary shall submit to the Committee on Transportation and Infrastructure of the House of Representatives and the Committee on Environment and Public Works of the Senate a report that includes the plan under subsection (a).

Project Purpose: To implement a systemic approach that reduces cumulative flood risk costs and annual flood damages, while simultaneously providing long term improvements to other system values and uses (ecological, economic, recreation, transportation, etc.)

Project Estimate: The USACE Rock Island District estimates that the completion of the modification to Sec. 459 of WRDA 1999 will require 2.5 million over the next 3 years. This modification will require additions to the hydrology and hydraulic study, fine tuning of the working plan in the Pike, Lincoln and St. Charles area, additional public meetings, development of crop insurance and/or flood easements in those areas unable or electing not to improve, implementing an elevated pump station authority under PL 84-99, and enacting an upland passive storage funding plan (similar to the Iowa Watershed Project) for all five (5) Upper River States.

The USACE Rock Island District estimates construction cost in range of \$4.0 billion for Plan H, to \$6.2 billion for Plan M (2008 dollars). Lower costs would be anticipated if built by the local sponsors.

Project Benefits: Implementation of a large, systemic flood risk reduction plan would result in significant regional economic benefits. The Tennessee Valley Authority estimated that every dollar spent on comprehensive flood risk reduction (i.e., 500-year level of risk reduction for urban areas and 100-year or greater level of risk reduction for agricultural areas - Plans A, B, D, G, H or M) would generate as much as \$5 in increased gross regional product for every dollar expended. According to the “Detour and Transportation Infrastructure Costs Due to a Major Flood Event on the Upper Mississippi and Illinois Rivers”, Center of Transportation Research, University of Tennessee, July 5, 2012 report, the total costs of detour and repairs to highways and rail tracks are \$1.027 billion, and if no improvement, by year 30, the diversion costs of the 10 bridges of the Upper Mississippi becomes \$3.1 billion.

Employment could increase by more than 20,000 jobs annually in the five-state Upper Mississippi Valley Region resulting from upgraded levee protection provided by the full implementation of a comprehensive flood risk reduction plan. Other Social Effects (OSE) benefits for public health and safety and displacement would occur if a systemic alternative plan were implemented.

From a stakeholder view, the results of applying the Risked Informed Decision Framework (RIDF) indicated a preference for a comprehensive plan with a high level of risk reduction, for the entire Upper Mississippi River System.

Project Support: During the planning process of the Comprehensive Plan, all three governors of the primary impacted states of Illinois, Missouri and Iowa showed support for a systemic, high level of protection plan. UMIMRA (NGO) has been the lead on local coordination. The additional public and state meetings will assist in fine tuning the Mississippi River Commission recommendations, who also support implementation.

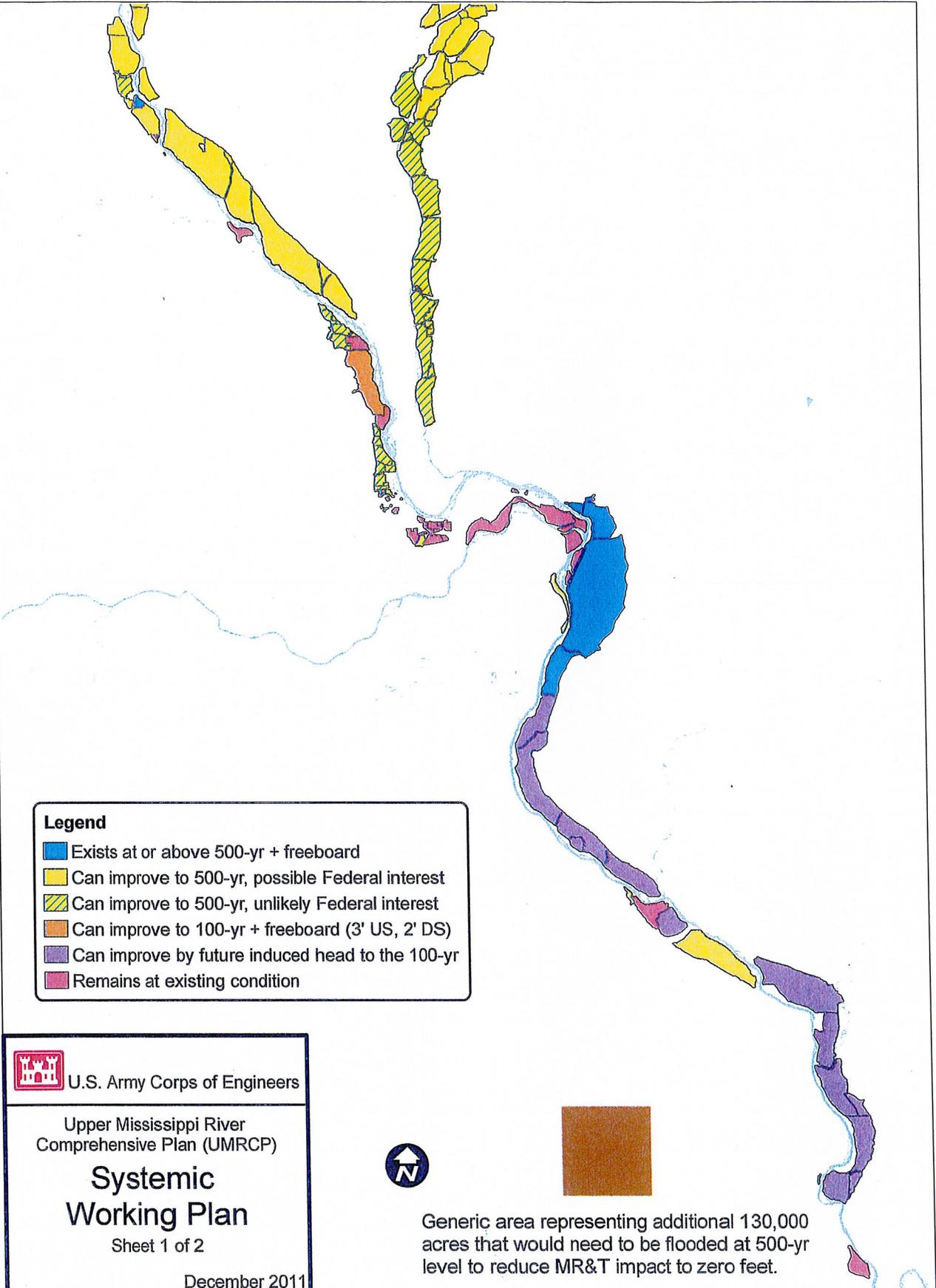
Project Cost Share: Plans B, G, H and M are all similar in providing a high level of flood risk reduction. Plan H includes a cost comparison. For Plan H, the construction cost of increasing the system height (typically raising a levee) is compared to the cost acquiring of the district, and the cost effective option (either the levee raise or acquisition) then becomes a part of Plan H for that site. Any district could choose not to be a part of the plan and the district would stay "as is" or find other resources to improve the existing level of protection. Of the existing flood damage reduction systems, 37 systems should be further evaluated using a cost comparison methodology.

Additional input as a result of the Mississippi River Commission, August 14, 2008, to modify Plan H to further reduce induced head on the MR&T system and additional public meetings in the Pike, Lincoln, and St. Charles, Missouri area is shown as the Working Plan, as attached.

Most of the Levee districts, if no Federal funds are available, could proceed over time with local assessments or state support.

For areas not improved, assurance for crop insurance or flood easements will be necessary to fully implement the plan. These districts may be eligible for Federal funding.

Project Letter of Support: See letters of support from UMIMRA, Illinois, Missouri and Iowa.



- Legend**
- Exists at or above 500-yr + freeboard
 - Can improve to 500-yr, possible Federal interest
 - Can improve to 500-yr, unlikely Federal interest
 - Can improve to 100-yr + freeboard (3' US, 2' DS)
 - Can improve by future induced head to the 100-yr
 - Remains at existing condition



U.S. Army Corps of Engineers

Upper Mississippi River
Comprehensive Plan (UMRCP)

Systemic Working Plan

Sheet 1 of 2

December 2011

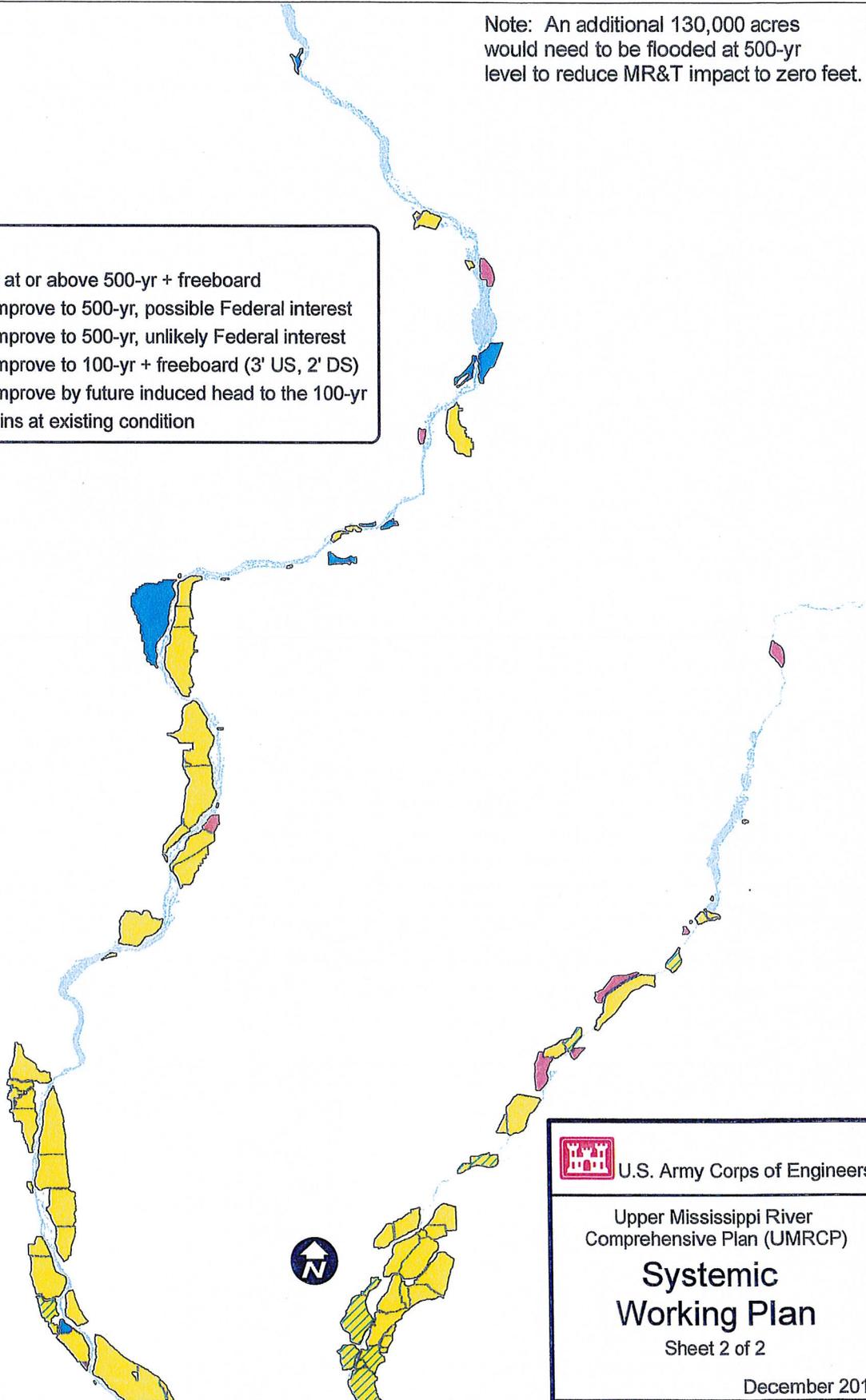


Generic area representing additional 130,000 acres that would need to be flooded at 500-yr level to reduce MR&T impact to zero feet.

Note: An additional 130,000 acres would need to be flooded at 500-yr level to reduce MR&T impact to zero feet.

Legend

-  Exists at or above 500-yr + freeboard
-  Can improve to 500-yr, possible Federal interest
-  Can improve to 500-yr, unlikely Federal interest
-  Can improve to 100-yr + freeboard (3' US, 2' DS)
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U.S. Army Corps of Engineers

Upper Mississippi River
Comprehensive Plan (UMRCP)

Systemic Working Plan

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December 2011