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ASSOCIATION

October 27, 2006

U.S. Army Corps of Engineers  
Northwestern Division  
12565 West Center Road  
Omaha, NE 68144

Email: [Missouri.Water.Management@nwd02.usace.army.mil](mailto:Missouri.Water.Management@nwd02.usace.army.mil)

RE: Proposed Framework for Establishing the Missouri River Recovery Implementation Committee (MRRIC)

Dear U.S. Army Corps of Engineers – Northwestern Division:

The following comments are on behalf of the Iowa Corn Growers Association (ICGA), and our 6000 farmer-members from across the state of Iowa. We first thank you for the opportunity to comment on the “Proposed Framework for Establishing the Missouri River Recovery Implementation Committee.” ICGA would like to associate ourselves with the comments of the Coalition to Protect the Missouri River (CPR), and we would like to reiterate some of the points made in those comments as well as offer our perspective on the proposed rule.

MRRIC needs to maintain focus on the objective of restoring the endangered and threatened species of the Missouri River. The Proposed Framework states, “As a recovery implementation committee, the focus of the MRRIC will be on issues and activities associated with recovery of federally listed Missouri River threatened and endangered species and the ecosystem on which they depend.” (Page 1) The words “ecosystem on which they depend” should be stricken from any language regarding the purpose of MRRIC. While the ecosystem in which a species lives is a component of the recovery discussion, adding language about ecosystem recovery only serves to confuse and possibly expand the purpose of the committee.

Furthermore, there are other statements (Pages 3, 10) within the Proposed Framework that give the impression the Federal Working Group (FWG) has a broader based plan for MRRIC. For example, the Proposed Framework states “The successful establishment and productive operation of [MRRIC] is dependent upon the willingness of the varied basin interests to *work together toward a shared vision for the future of the Missouri River.*” (Page 3, emphasis added) This statement suggests the FWG envisions MRRIC will address other issues

besides restoration of the threatened and endangered species of the Missouri River.

To give the impression that MRRIC will address issues beyond species recovery will only serve to confuse and mislead participants in this process. More importantly, addressing all encompassing ecosystem restoration is beyond what the U.S. Corps of Engineers is required to accomplish through the Endangered Species Act. The purpose of MRRIC should be to provide recommendations for restoration of the Missouri River's threatened and endangered species in a manner that has the least amount of detrimental impact on stakeholders.

The socioeconomic impacts of how the Corps manages the Missouri River is vitally important. ICGA is encouraged by the statement, "To be effective, the federal agencies recognize that the MRRIC must pursue recovery goals while also ensuring that the basin can continue to meet its socioeconomic needs and that any adverse impacts to river users and stakeholders should be minimized to the extent possible." (Page 11) However, ICGA believes the FWG came to the wrong conclusion in stating, "As social values have shifted over the years, the emerging consciousness of the value of a healthy ecosystem has focused the basin's attention on restoration of the Missouri River."

On the contrary, many lower basin stakeholders would disagree with the FWG's assessment of social values. Lower basin stakeholders who own property along the Missouri River want their lands protected from flooding the same as the people who owned the land 60 years ago. In addition, there is a large number of stakeholders who view the need to transport products and materials up and down the Missouri River is just as important today as it was 60 years ago. The FWG, and more importantly MRRIC, need to understand very clearly that lower basin stakeholders need continued flood protection and river transportation. While species recovery is important, it should not come at the expense of socioeconomic considerations.

ICGA is also concerned about the proposed size of the planning committee and MRRIC. Forty participants is too large for the planning committee; neither the planning committee nor MRRIC should involve more than 25 participants. We believe this will allow for more productive debate and input, while still maintaining a number allowing all groups to be represented. Furthermore, having more than 25 participants will make it extremely difficult for the group to come to a consensus on difficult issues. If more input is needed from individuals outside of the 25 members (for either the planning committee or MRRIC) it would be more effective to involve them through some form of "study group," and have them report back to the committee.

Finally, federal agencies should not be voting members (not needed for consensus) of either the planning committee or MRRIC. The entire MRRIC process needs to be free from the internal politics of the agencies that will

ultimately be responsible for implementing the species recovery. Having the planning committee and MRRIC free from the federal votes, will give stakeholders, tribes and states more voice in the entire species recovery process, and it will give the agencies a more unbiased perspective on whether MRRIC is a success; the success of which of course will be judged by whether the agencies adopt whatever recommendations MRRIC presents. We fully support all interested and necessary federal agencies, including agencies not represented on the FWG, to attend planning committee and MRRIC meetings to provide input and information.

ICGA urges the FWG to alter the Proposed Framework to address the concerns expressed above.

Thank you again for the opportunity to comment. If you should have any questions or wish to discuss these comments further, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Bob Bowman". The signature is written in black ink and is positioned below the word "Sincerely,".

Bob Bowman, President  
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