APPENDIX F

LETTERS RECEIVED AFTER WORKSHOPS

L72299-Byrd
L72399-Hauser*
L72699-Propeller Club
L72799-Lihou
L72999-UMRCC
L72999-Rankovic
L72999-Ducks Unlimited*
L73099-Great River EDF
L73199-Sierra Club Piasa Palisades
L73199-Schmitt*
L80299-Garst
L80399-Bay Island Drainage District
L80399-Sierra Club Midwest Region
L80499-Sierra Club Midwest Region
L80499-Cairn
L80599-Brennan Marine
L80599-Missouri DOC
L80599-Koplin
L80699-Midwest Marine Terminals
L80699-MN Crop Production Retailers
L80699-Hohenstein
L80699-Valley Enterprises
L80699-Hanke Trucking
L80699-Hanke Terminals
L80699-Norine Transport
L80699-F.J. Robers Co.
L80799-Rettig
L80899-Slattery
L80899-Brevig
L80999-Tilney Farms
L80999-Scheffert
L80999-Cottonseed, Inc.
L80999-Gostomczik
L81099-Russell
L81099-Wilkening
L81099-Doyscher
L81099-Moss
L81099-TDA of Wisconsin
L81099-Havlik
L81099-Manly
L81099-Kissinger Levee District
L81099-Malacological Consultants
L81099-Dairyland Power
L81099-Clarke
L81099-Murdock
L81199-Kandiyohi Co. Corn Growers
L81199-Garlock
L81199-Clark
L81199-Wilson
L81199-Tennessee Valley Towing
L81299-Midland Eastern*
L81299-Upper Miss. Audubon Society
L81299-Jenkins
L81299-Herbison
L81299-Plaquemine Towing
L81299-Mississippi Welders
L81399-McAdams
L81399-Illinois DOA
L81999-Walker
L82499-Intl. Union Operating Engineers
L82699-Bankhead
LND99-Carlson
LND99-Wight
LND99-Waltz
LND99-Falk
LND99-Caradonna
LND99-Grain/Feed Assoc. Illinois
LND99-MN Corn Growers/Stearns Co.
LND99-Aiken*

* Letters containing statistical or technical data not reflected in detail in the Appendix B and G comment summaries.

6811 Kingsbury Blvd., Apt. 1
St. Louis, MO 63130-4604

U.S. Army Corps of Engineers
1222 Spruce Street
St. Louis, MO 63103-2833

July 22, 1999

Dear Sir or Madame:

Unfortunately I am unable to attend the July 26 public hearing on the major lock expansion proposed for the upper Mississippi river, including the St. Louis area. I am therefore writing now to urge you not to continue with this wasteful and harmful project.

It is my understanding that this lock expansion would damage native fish and wildlife riparian habitat as well as limit a variety of recreational activities along the river. Construction of the lock would primarily benefit large agricultural corporations, not family farmers, yet it would cost taxpayers millions of dollars in both building and maintenance expenses.

The Mississippi and its precious native fish and wildlife have suffered enormously in the past century as a result of increasing navigational pressure. It's time to give the river a break!

Thank you for your consideration of my position.

Sincerely,

Charles Byrd

UNIVERSITY OF ILLINOIS
AT URBANA-CHAMPAIGN

Department of Agricultural and Consumer Economics
College of Agricultural, Consumer and
Environmental Sciences

326 Mumford Hall, MC-710
1301 West Gregory Drive
Urbana, IL 61801-3605

July 23, 1999

Colonel James V. Mudd
Commander
U.S. Army Corps of Engineers, Rock Island
Clock Tower Building
Rock Island, IL 61204-2004

Dear Colonel Mudd:

Enclosed please find my statement regarding Barge Demand Elasticities for Grain on the Upper Mississippi and Illinois Rivers. A copy of this statement will also be presented at the public meetings.

Thank you for your consideration of this important issue.

Sincerely,

Robert J. Hauser
Professor & Head

Statement on Barge Demand Elasticities for Grain

Robert J. Hauser
Professor and Head
Department of Agricultural and Consumer Economics
University of Illinois, Urbana-Champaign

July 22, 1999

This statement concerns the estimate for the barge-rate elasticity of demand for grain shipments on the Upper Mississippi and Illinois Rivers used by the Corps of Engineers in its evaluation of various navigation-related projects. My understanding is that the most recent estimate of elasticity used by the Corps is approximately three. (Demand elasticities referred to in this statement will be in absolute (positive) terms.)

Since farm products account for the majority of the traffic on the Upper Mississippi and Illinois Rivers, assessments of navigation benefits and costs rely heavily on the underlying barge demand elasticities for corn and soybean shipments. In analyses conducted by the Corps, if the estimated demand elasticity is too high, waterway navigation benefits will be understated; if too low, the resulting benefits will be overstated. Thus it is important that (1) the general level of the elasticity be considered carefully, (2) differences in elasticities between river segments be considered, (3) a reasonable range of potential elasticities be considered, and (4) the sensitivity of the project-evaluation results to changes in the elasticity be measured. I will address points 1 through 3, based on a study conducted during the 1980's by Hauser, Beaulieu, and Baumel (HBB)[1].

HBB measured impacts of alternative waterway user fees. The 1980 transportation rate structure for rail, barge and truck was used to estimate user-fee impacts given forecasts of 1985 supply/demand conditions for grain. The HBB grain-flow projections were found with an optimization model containing over 11,000 alternatives for shipments of corn, soybeans, and wheat in the U.S., expressed in over 3,000 equations. A base line solution (in terms of grain flows and attendant transportation costs) was found under the 1980 rate structure. The impacts of user fees were then assessed by measuring changes in grain flows and costs caused by imposing user fees (i.e., changing barge rates.) An important output of the analysis are estimates of own-price elasticities for grain barge shipments since the change in barge rate causes a measurable change in barge shipments, enabling the calculation of elasticity estimates. Resulting estimates are presented in Table 1.

---

[1] Hauser, Robert J., Jeffrey Beaulieu, and C. Phillip Baumel. "Impacts of Waterway User Fees on Grain Transportation and Implied Barge Rate Elasticities," Logistics and Transportation Review, 21(1985), pp 37-55. Funded by U.S. Dept. of Transportation, Contract DTRS-57-80-C-00133.

Table 1. Estimated Barge Demand Elasticities for Grains (HBB)[1]

	Barge Demand Elasticity	
	Fuel Tax	Segment Tax
Upper Mississippi River	2.09	2.10
Illinois River	1.07	0.92
All River Segments	1.62	1.48

As indicated in Table 1, the barge demand elasticities for grain (corn, soybeans and wheat) found by HBB for the Illinois River, the Upper Mississippi River, and the entire system are well below the demand elasticity of 3.0 currently implied by the Corps' shipment demand function for grains. Moreover, the degree of difference depends on the river segment. Because of its location relative to other rivers and to production, the Illinois River's elasticity is approximately half that for the Upper Mississippi River. Consequently, the HBB analysis suggests that using a single transportation demand elasticity for all waterways is not appropriate.

HBB note that their analysis is a "snapshot" of demand characteristics that change from year to year, if not from day to day. In general, the barge rates used in the HBB analysis are higher than those which have existed since the study was conducted, implying that, under a stationary and linear demand, elasticities have fallen since the early 1980's and that the HBB estimates are probably biased upwards, indicating further that the Corps estimate is relatively high.

Given the HBB analysis, the Corps' elasticity estimate should be considered, at best, an upper bound for analysis. Lower bounds could reasonably be defined well below one. Given this type of range, an important question becomes: how sensitive are the Corps' findings to changes in elasticity estimates from, say, 0.5 to 3.0? Consideration of this question by river segment is critical to providing a sound assessment of the benefits and costs associated with new projects on the inland waterway system.

Your consideration of this statement is appreciated.

The PROPELLER CLUB of the United States

PORT OF THE QUAD CITIES
PORT NO 152
P.O. BOX 363
BETTENDORF, IOWA 52722

TO PROMOTE, FURTHER AND SUPPORT AN
AMERICAN MERCHANT MARINE
TO AID THE DEVELOPMENT OF RIVERS, GREAT LAKES
AND HARBOR IMPROVEMENTS

July 26, 1999

U.S. Army Corps of Engineers
Rock Island District Engineer
Clock Tower Building, P.O. box 2004
Rock Island, Illinois 61204-2004

Attention: Paul Soyke, Economic & Social Analysis Branch

Dear Mr. Soyke:

I am a strong Upper Mississippi River Activist. I grew up in Fulton, Illinois in Pool 13 and the Fulton, Clinton, and Camanche river area. I served as chairman of the Quad Cities' Venetian Night Lighted Boat Parade for ten years. I have been a committee member of the Buffalo Bill Ducks Unlimited Chapter in Bettendorf for the past fifteen years. For three years I was president and now serve as Chairman of the Board of the Port of the Quad Cities, of the Propeller Club of the United States. For twenty years I have been employed by the Pleasant Valley School District as the Co-op Education instructor, and I now serve as chairman of the high school's vocational department.

The reason for my brief personal bio is to indicate my continued and ongoing interest and support of the Upper Mississippi River as a recreational area, environmental ecological-system, and **extremely important economic navigational system.**

After the very expensive Navigational Study and the twenty six million dollars spent on studying the environment concerns, I believe strongly that upgrading of the Upper Mississippi River Navigational System **must begin now.** It is essential that the engineering design, funding, and construction begin now to avoid an economic disaster that will effect our upper mid-west farm region by delay of decisions and action. When I speak of design and construction, I hope that a patchwork approach is not used. I strongly recommend that a superior first-class system be constructed that will allow our farm products to be economically shipped so that our farmers are able to compete in the world market place.

This is a national issue that will effect the balance of international trade. The commercial marine industry will be covering half of the cost. The infusion of dollars into the navigational system will provide employment, better recreational use and continued improvement of the ecological system.

As an educator, I know that studies and knowledge are worthless if they are not applied in a timely matter. Action and cooperation is needed from all parties to insure the efficient development of the Upper Mississippi River Navigational and Environmental System.

Sincerely,

Paul Jones

Paul Jones
Chairman of the Board
703 Falcon Dr.
LeClaire, Iowa 52753

7008 Amherst Ave.
St. Louis. MO 63130
July 27, 1999

Dear Army Corp of Engineers Official,

I oppose the lock expansion project for the upper Mississippi River. This subsidy for corporate agri-business would cost us taxpayers millions of dollars for construction and maintenance of the system. When Congress is proposing tax cuts. wasting tax money on lock projects that will profit corporations and barge companies is particularly counterproductive. Even the Corps' own studies question the economic value of this lock system.

In addition the project will harm native fish and wildlife habitat at a time when government emphasis and public sentiment are focused on preserving wetland habitat. Altering the river and riparian areas degrades recreational uses of the river: recreational use of the river is of major economic value to communities.

If the Corps implements this project, they will be benefiting a few wealthy individuals at the expense of the public. Please reject this harmful and wasteful project.

Sincerely,

Leslie Lihou

Leslie Lihou

NEWS RELEASE

July 1999

UMRCC Statement of Continuing Concern Regarding the Corps of Engineers Systemic Navigation Study for the Upper Mississippi and Illinois Rivers

Having been the collective voice of Upper Mississippi River biologists, scientists, and managers since 1943, The Upper Mississippi River Conservation Committee feels compelled to issue a statement with respect to the Corps' navigation study environmental investigations conducted to date. The US Army Corps of Engineers began studying systemic navigation improvements for the Upper Mississippi River System (UMRS) in the early 1990's. In November 1994, the UMRCC issued a statement with respect to the Corps study plan for investigating the environmental effects associated with proposed navigation improvements. In that statement, the UMRCC advised that: (1) insufficient study time was allocated to investigate navigation impacts, (2) the long-term effects of continued navigation operation and maintenance activities needed to be addressed, and (3) a fish and wildlife plan for protecting the River's fish and wildlife resources should be developed concurrently with any navigation improvements.

After five years we have now begun to see the results of the Corps' planning efforts. Most of the 40 or so environmental investigations conducted in order to describe navigation related impacts have been either completed or now undergoing review. A preliminary array of navigation improvement alternatives has recently been presented to the public, although the analysis of environmental effects associated with those alternatives is yet to be completed. Based on the information reviewed thus far, the UMRCC believes that several of the completed studies and collected data are insufficient to determine the significance of increased navigation traffic upon the fish and wildlife resources of the UMRS.

The lack of response to the UMRCC's recommendations, to increase time scheduled for field studies, is reflected in such weak and uncertain study findings for certain fish and wildlife resources that they are virtually useless for predicting navigation impacts. The investigation into the effects of commercial tow traffic upon main channel fish populations developed a good sampling methodology, but collected too little field data (only 41 entrainment samples were collected) to model increased traffic effects. The UMRCC recommends that an additional 3 to 5 years of main channel fishery sampling be conducted while the Corps conducts advanced engineering and design studies.

Another critical flaw is the failure to include a "cause and effect" analysis of continued navigation channel operation and maintenance. The Corps of Engineers continues to spend approximately $130 million dollars annually to operate and maintain the existing navigation channel, yet we still do not understand the long-term cumulative consequences of these actions. The Cumulative Effects Study conducted by the Corps forecasts future UMR habitat changes, but fails to analyze and quantify the effects of such activities of dredging, dam regulation, fleeting and terminal development, revetments and regulating works, introduction of exotic species, and impeded fish passage. We still do not know the extent of avoid and minimize actions that must be taken to preserve existing resources such as bottomland hardwoods, backwater wetlands, and overwintering fish habitat, and aquatic vegetation.

Without the inclusion of such information in the Corps Systemic Navigation Study, the UMRCC believes it will be impossible to determine the significance of increased traffic effects on fish and wildlife resources. In addition it will be difficult, if not impossible, for the COE Mississippi Valley Division to fulfill its long overdue obligation to implement an avoid and minimize program for the UMRS. The UMRCC believes that a thorough analysis of the Nine-foot Navigation Channel Project's operation and maintenance activities must be accomplished within the current navigation study frame-work in order to determine the environmental significance of additional navigation traffic.

Thanks in large part to the Long Term Resource Monitoring Program, a significant amount of biological information relative to understanding navigation O&M effects has been generated since the Corps' navigation project environmental impact statements (EIS) were prepared in the 1970's. (Reference the recently released report *Ecological Status and Trends of the Upper Mississippi River*). In light of this, it is indefensible for the Corps of Engineers to continue to claim these outdated EIS documents adequately addressed O&M impacts.

The UMRCC position has been that it is not opposed to economically justified navigation improvements as long as those improvements do not jeopardize the long-term well being of UMR fish and wildlife resources. With respect to the recently released navigation improvement alternatives, the UMRCC has no comment to offer with respect to their economic validity. As for the environmental component, the UMRCC believes that a decision regarding the environmental significance of the proposed improvements cannot be made until the above information is provided.

For further information regarding the UMRCC position on navigation, please contact: UMRCC Chairperson, 4469 - 48th ave ct., Rock Island, Illinois 61201, telephone 309/793-5800, ext 522, FAX 309/793-5804, or e-mail <UMRCC@Mississippi-River.com>.

Take PRIDE in the MISSISSIPPI

L72999-Rankovic

29 July 1999

U.S. Army Corps of Engineers
1222 Spruce Street
St. Louis, MO 63103-2833

Dear Sir or Madam:

I could not attend the public hearing on July 26, but I want to register with you my opposition to the Corps' proposed lock expansion project on the Mississippi River.

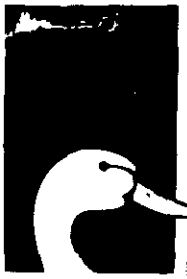
Considering the greatest good for the greatest number of people, the desire to send grain barges more quickly down the river is outweighed by the need to preserve as much as we can of the Mississippi's riparian corridor for fish, wildlife and future generations of citizens.

I also do not think that as a taxpayer I should foot the cost of a project which benefits a small number of grain producers, and a project which will also need money for maintenance as long as it remains in operation.

In any case, barges are not the best choice for the shipping of grain. The Mississippi is a temperamental river and as you know, the best and most expensive efforts have never been enough to tame it.

Sincerely,

Catherine Rankovic
7010 Lansdowne Ave.
St. Louis, MO 63109



DUCKS UNLIMITED INC.

ILLINOIS FIELD OFFICE

229 N. Third Ave., Suite B
Canton, IL 61520
(309) 647-5651
(309) 647-5652 Fax

July 29, 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Sirs:

Ducks Unlimited appreciates the opportunity to comment on the proposed "Upper Mississippi River—Illinois Waterway System Navigation Study."

From a conservation perspective, the eight alternatives presented for consideration in this proposed study are unidimensional and only address combinations of measures intended to increase commercial navigation benefits. Ecological considerations are presented as site specific habitat mitigation requirements (costs) associated with these alternatives.

We recommend that your study also include environmental alternatives that explore changes to the navigational system that result in enhanced ecological conditions as well as increased commercial navigation. Specifically, we propose that you include at least one such alternative associated with the Illinois River.

This alternative should explore the feasibility of adding more tainter gates or replacing the current wicket gates with a different kind of structure that would allow for slower and graduated manipulations of water levels while still accommodating pass-through barge traffic during high flow periods. The alternative also should include consideration of reducing the current 12 month navigation period to 9-11 months allowing for a 1-3 month non-navigational period in the summer whereby natural low flow conditions could return to the Illinois River.

Replacing the wickets would help reduce the rapid rise and fall of the river associated with lock and dam operation. Such fluctuations can cause up to 3 foot variations in river stages confounding the ability to manage backwater lakes and often trapping fish and other aquatic organisms in side-channels or other associated habitats.

Restoring natural low flow conditions to the river also would have immense ecological benefits. Backwater lakebed sediments would be allowed to settle and solidify. This would reduce turbidity and other negative consequences of sedimentation. In particular, such low flow conditions would result in a resurgence of submerged and emergent aquatic vegetation benefiting fish and wildlife, particularly waterfowl.

Reduced barge traffic on the Illinois River during the summer low flow period could be compensated by extending locks at Peoria and LaGrange, thereby increasing commercial capacity and cost-efficiency during the remaining 9-11 month navigational season. It is possible that the combination of increased daily barge traffic through the locks and increased environmental benefits associated with a shorter navigational season could produce a higher benefit-cost ratio for the Illinois River than other alternatives.

Ducks Unlimited appreciates the opportunity to provide these comments and would be pleased to work with the Corps on refining proposed alternatives.

Sincerely,

Eric W. Schenck
Regional Biologist

GREAT RIVER
ECONOMIC DEVELOPMENT FOUNDATION

300 CIVIC CENTER PLAZA • SUITE 256 • QUINCY, IL 62301
PHONE (217) 223-4313 FAX (217) 231-2030
www.gredf.org email gredf@gredf.org

July 30, 1999

U.S. Army Engineer District
Rock Island
Attn: Planning Division (PD-C)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-9908

To Whom It May Concern:

UMIRMA represents cities, businesses, and levee and drainage districts in Illinois, Missouri, and Iowa, along the Upper Mississippi from Cairo, Illinois, north to Rock Island, the Illinois River drainage districts and Missouri River districts throughout the state of Missouri. Current membership is over 200 members.

The study's main objective should be researching the requirements to have a navigation system that will allow the United States to compete and to lead in global markets. Agricultural commodities represent the majority of products that are shipped in the United States, Other than entertainment, agricultural products are the only positive trade balance item the United States can claim. In order to improve its balance of payments and to maintain a viable food production and processing industry, the United States must upgrade its navigation infrastructure to be economically efficient.

The study should recognize that barge transportation provides competition for rail and road shipping rates. A comparison of river, rail and road rates for shipping the same products from 1992 to 1996 will show a marked increase in rail and road prices during peak flood events. Having a third major option for shipping keeps transportation prices competitive.

The study should consider multiple facets of the environment in assessing the impact of river transportation on the environment. Air, water and soil quality and "viewscapes" (includes aesthetics such as scenery and noise levels) should be considered as separate environmental components in the study. Each transportation option should be modeled using the same type and quantities of product and timing of shipments. Additional impacts on physical infrastructure should also be quantified. For example; market forecast call for increase demand and increase production. If the product is hauled by road, increased truck traffic will damage roads more quickly. Additional revenue will be needed for expansion (including land acquisition, mitigation for habitat, planning and construction) and intensive maintenance of state and federal roads.

We would like to recommend the Corp of Engineers move forward, as soon as possible, with 1200 foot locks (20-25, Peoria, LaGrange) and Guidewalls (Locks 14-18). We would also like to recommend additional moorings be placed at strategic locations to prevent erosion along existing levees. UMIMRA recommends the design and construction proceed now and that the work be closely coordinated with the Comprehensive Plan, supporting improvements in all five major areas: Flood Protection, Navigation, Economic Development, Recreation, and Environmental Quality.

Sincerely,

James E. Mentesti
President

SIERRA CLUB
FOUNDED 1892

PIASA PALISADES GROUP

Gary Loss
River of Corporate Welfare Project Manager
U.S. Army Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

July 31, 1999

Dear Army:

We have some questions about the Navigation Study. Due to the format of the St. Louis meeting, we were not able to get answers to these concerns. Can the Army please answer the following:

1) *Formal Statements*: The announcement for the workshop indicated that there would not be time to give formal statements. As such, we did not prepare one. Please explain why the Army did not tell the public formal statements would be taken before the night of the meeting?

2) *Range of Alternatives:* The Range of Alternatives only explores alternative ways of increasing navigation. The Army has not developed alternative ways of reducing congestion at the locks. Specifically, the Army is not developing alternatives to eliminate or reduce navigation. Eliminating or reducing navigation would reduce congestion at the locks. Unexplored alternatives include limiting the number of barges on the river or eliminating corporate welfare by requiring the corporations to pay the costs of operating and maintaining the system, mitigation costs, and other indirect costs such as the cost to remove sediment from water supplies. We would remind you of the 7th Circuit's ruling on alternatives in *Simmons v. United States Army Corps of Engineers* , 120 F.3d 664 (C.A.7 (Ill.)1997). Please explain why these reasonable alternatives are not being developed.

3) *Impacts to lower section of river:* At the meeting, I asked the Army about the impacts of increased navigation on the lower Mississippi. For example, the loss of wetlands and increased cost of cities to remove sediment from drinking water. I was told the Army was not going to address and consider these impacts. Is the Army saying as soon as the barges go through L&D 27 they stop causing environmental damage? Is the Army saying there is no increased O&M for the increased traffic once it enters the middle and lower Mississippi? If so, please explain the basis for this belief.

223 Market Street • Alton, IL 62002-6231 • TEL: (618)462-6802 • FAX: (618)462-0282 • www.ezl.com/ppg

If not, what is the basis for the Army's belief that it does not need to consider these effects? 40 CFR § 1508.8(b) clearly requires the consideration of these effects.

4) *Economic claims:* At the meeting, the Army claimed that the navigation improvements would lower shipping costs for farmers and this would translate into lower costs for the consumers.

a) First, since the corporate welfare subsidies grain **exports**, can you tell us what percent of these benefitted consumers are in the United States and what percent of the benefitted consumers are in foreign countries?

b) What is your basis for the claims that the corporate welfare will benefit the consumers instead of just the corporations? Hog farmers recently got the lowest prices ever for hogs. The price consumers paid for pork, however, did not go down. The corporations are the only ones who benefitted from lower prices. I just read in the paper today that the price the farmers are getting for corn has dropped from $6.50 to $4.50 a crate. The story stated, "Despite the glut, supermarkets have not dropped the price of sweet corn, agriculture officials said." Please explain this as these two examples are in direct conflict with what the Army claimed at the public meeting.

5) *Sedimentation:* Sediment in the rivers increases costs to taxpayers, land-owners, and water consumers who must pay to remove it. Industries that use sediment-laden water in their industrial processes often incur additional costs to maintain their machinery, remove the sediment, or both. Please tell us how the study is addressing these impacts.

Sincerely,

Jim Bensman
Conservation Chair
117 North Shamrock ST APT #1
East Alton, IL 62024-1149
(618)259-3642, Fax also, Call First!
Internet: jbensman@ezl.com

Robert L. Schmitt
3331 N. 5th St.
Quincy, IL 62301
July 31, 1999

U.S. Army Engineer District, Rock Island
Attn: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Sir:

I attended the Mississippi - Illinois River System Workshop in Quincy on July 27, 1999. I found it very informative, but thought it missed one important possibility for obtaining maximum speed for river navigation.

My father had a river camp at the location of Quincy Dam 21. It was designed for two locks, one completed and the other incomplete with one gate only, to be finished later.

Why not complete the unfinished lock with the necessary walls to 1200'? This would speed up traffic at peak times for 1200' barges and the existing 600' would handle smaller barges and pleasure craft. Making the 1200' lock farther from shore would be a help in navigation and shore erosion.

Enclosed is a drawing showing this concept.

I would like to hear your response to these ideas.

Sincerely.

Robert L. Schmitt

SAM GARST

5500 Yorktown Lane North, Plymouth, MN 55442-1942

August 2, 1999

Gary Loss
USACE Rock Island Dist.
P. O. Box 2004
Rock Island IL 61204-2004

RE: Expansion & Construction of Lock & Dam System

Dear Mr. Loss:

This is to comment on proposal increase the subsidy to the barge industry. I oppose a larger subsidy for the barge industry, until funds are provided to improve water quality and the ecosystem along the Mississippi river and until actual improvements to the ecosystem can be documented.

Scientists agree that the problems of sedimentation, land use practices and decreasing water quality are all aggravated by the total focus by the Army Corp of Engineers only on the needs of the barge industry. The barge industry is one of the worlds most subsidized industries.

Any expansion will add stress to the already threatened ecosystem of the Upper Mississippi River. The plans are based mostly on the Corp's market projections and largely do not consider the environmental costs. Efforts to mitigate commercial traffic influences have been too little and too late to save thousands of acres of productive habitat from ecological failure.

The public should not be asked to subsidize an industry to the detriment of the overall environment. You have a public trust to preserve the environment and spend taxpayer funds wisely. Please act accordingly

Sincerely,

Sam Garst

Tel: (612) 557-7174 • Fax: (612) 557-0191 • E-Mail: SamGarst@aol.com

Bay Island Drainage & Levee District # 1

♦♋♦

771 Pumping Station Lane ♦ New Boston, IL 61272
Phone (309) 587-8194

August 03, 1999

Colonel James V. Mudd
US Army District Engineer
Rock Island District , Corps of Engineers
Clock Tower Building , P. O. 2004
Rock Island , IL 61204 - 2004

Dear Colonel Mudd :

I attended the Navigation study meeting in Bettendorf on July 29th. I have enclosed a copy of a letter I wrote to comment on some of the statements that were made at that meeting. I think that the meeting opened a lot of farmers eyes to how the environmentalist are trying to control our agenda. I hope that we can get this study behind us and get to the job of improving the navigation system.

Also I am still waiting to here from the Corps about the possibility of more rock on our levee. I imagine that everyone is probably busy with the flooding on the Iowa rivers so I will try to remain patient. Thank-you for your time.

Sincerely ,

Chris Neeld

Chris Neeld
Chairman Bay Island Drainage District

Bay Island Drainage & Levee District #1

♦♋♦

771 Pumping Station Lane ♦ New Boston, IL 61272
Phone (309) 587-8194

August 3, 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building
PO Box 2004
Rock Island, IL 61204-2004

Subject: Upper Mississippi River - Illinios Waterway System Navigation Study

To whom it may concern:

My name is Chris Neeld and I am a grain farmer living on a century farm in the Bay Island Drainage District along the Mississippi River. I have also been a Drainage Commissioner for 15 years, and I am currently the Director for UMIMRA. So as you can see, I have a lot of knowledge on river issues and have a lot at stake in the results of the Navigational Study.

I am writing to express one of these concerns about some of the statements I heard at the Public Workshop in Bettendorf, Iowa, on July 29, 1999. The workshop was called a Navigation Study, but some groups chose to focus on the environmental part only. There is a $50 million EMP program that I feel goes above and beyond all measures needed for the wildlife concerns we face. It appears that a lot of our wildlife has grown to nuisance levels showing up in places where they are not wanted like our airports, golf courses, urban areas, and the headlight of our cars. But seriously, if you look at the wildlife today, you can see that they have easily adapted to our growing economy.

Another statement was made about using taxpayer dollars to subsidize farmers and businesses. If you look at what consumers paid for food 30 years ago compared to now, you can see that the percent of income spent went from 18% to 8% - so who is subsidizing who? I think that they would only be happy if it were free. I think that these numbers show that farmers have paid their share.

Then there was a concern about sedimentation. Well, I know that this is something that will never go away completely. As you know, this river was known as the Muddy Mississippi since it was first discovered, and I wonder how much cleaner it is today then before it was tamed by the Corps who changed it into a navigable river with all the benefits possible that it offers today. It confuses

me because I have talked with some groups who want it cleaner yet and others who want to get more sediment moving through it. Personally, I think we need to do more dredging to maintain it to it's best use--a navigable river!

The last topic I will discuss deals with what the man from the Sierra Club said. His concern seemed to be environmental, but what he said was that he wanted environmental mitigation money. I feel that since there is a FWS Agency, DNR Service, and an EPA Agency that the last thing this study should do is spend money on mitigation to Environmental Clubs who will use that money to attack other projects as they have in the past. This study clearly shows it contains funds to restore any damage that its construction would cause. Also, I would be willing to help the Corps put a stop to this senseless expense that they want to add. If you would like, I will make myself available to further explain any or all of my concerns.

Thank you for putting this letter in the record of statements for the Navigational Study. I would like to go on record supporting alternative E of F as they show the best return for our money.

Sincerely,

Chris Neeld

Chris Neeld
Chairman, Bay Island Drainage District

xc: Colonel James V. Mudd

Sierra Club Midwest Region
P.O. Box 370
Morrisonville, IL 62546

August 3, 1999

Phillip R. Anderson
Major General, US Army
Mississippi Valley Division
US Army Corps of Engineers
P.O. Box 80
Vicksburg, MS 39181-0080

Gary Loss
Project Manager
UMR-IL Waterway Navigation Expansion Study
US Army Corps of Engineers, Rock Island
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-9908

Dear General Anderson and Mr. Loss:

The Sierra Club, Midwest Region has been attending the seven Public Workshops the US Army Corps of Engineers is conducting throughout the Upper Mississippi River region since July 26. This series of workshops is intended to inform the public regarding alternatives being examined as part of the plan formulation process for potentially expanding navigation capacity and reducing delays on the Upper Mississippi and Illinois Waterway System. We have previously written to you regarding our concerns with the "rush to judgment" we see occurring with this process (letter dated 7-28-99).

We have two additional observations regarding the Plan Formulation Process and the Public Workshops. First, we have discovered, only because we have attended several workshops personally, that a period set aside for questions to be forwarded to attending Corps personnel is being manipulated by the Corps personnel. After the introductory slide show, attendees are broken up into small groups for discussions and to ask questions. Those questions that cannot be answered within the small group are to be written down and submitted to the Workshop leadership to be answered when the groups recombine in the auditorium, or so the attendees are told. Actually a set of "prepared questions", apparently drawn up by Corps personnel are the ones actually being answered. All other written questions are set aside to be answered as part of the written record of the meeting, unless the individual happens to get up during a verbal question-answer period and asks the question. This is misleading to the public and is generating serious concerns on the part of the public regarding the trustworthiness of the process. Additionally, it raises the question of when an individual may ever get their question answered unless the Corps is planning on releasing to all who attend the full record collected from all the workshops with all the accompanying questions answered.

Second, and quite obviously throughout the initial four meetings (St. Louis, Quincy, East Peoria, and Bettendorf), there is the "rush to judgment" occurring within the political process we referred to in our previous letter. We pointed out that all parties to this issue are misled by the failure of the Workshops and the publicly released preliminary National Economic Development Plans to include System Environmental Costs.

We are supported in this by the observation that numerous organizations, including among others: quasi-governmental bodies such as the Quad City Chamber of Commerce; nongovernmental organizations such as MARC 2000 and Illinois Corngrowers; and businesses such as Alter Barge Lines; are stepping forth and endorsing a particular alternative. This may have serious consequences for the US Army Corps of Engineers publicly and legally as the process for selecting any alternative, including "Without Project" moves to the Governors Liaison Committee meetings in August and November. Proposed Alternative "H", as presented at the workshops, which includes 1200 foot locks at Lock & Dams 20-25 plus Peoria and LaGrange on the Illinois, and guidewall extensions at Locks 14-18, presented with a cost/benefit ratio of 1.04:1 is drawing the most attention. It is also among the most vulnerable to dropping out with System Environmental Costs inputted. NED discussions without System Environmental Costs are creating a serious legitimacy problem for the process.

We again urge you to postpone the Governors Liaison Meetings scheduled for August 16-17, postpone the planned December 1999 date for the forwarding of an Initial Recommended Plan, build in new Public Workshops upon completion of the System Environmental Costs, and establish new realistic dates for an IRP for sometime in the second quarter or third quarter of 2000, after full public discussion of alternatives with full disclosure of costs and benefits.

Sincerely,

Mark N. Beorkrem
Regional Representative
Mississippi River Protection Project
Sierra Club Midwest Region
P.O. Box 370
Morrisonville, IL 62546
217-526-4480

SIERRA CLUB
FOUNDED 1892

MIDWEST OFFICE
Mississippi River Protection Program

August 4, 1999

Phillip R. Anderson
Major General, US Army
Mississippi Valley Division
US Army Corps of Engineers
P.O. Box 80
Vicksburg, MS 39181-0080

Gary Loss
Project Manager
UMR-IL Waterway Navigation Expansion Study
US Army Corps of Engineers, Rock Island
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-9908

Dear General Anderson and Mr. Loss:

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We have two additional observations regarding the Plan Formulation Process and the Public Workshops. First, we have discovered only because we have attended several workshops personally, that a period set aside for questions to be forwarded to attending Corps personnel is being manipulated by the Corps personnel. After the introductory slide show, attendees are broken up into small groups for discussions and to ask questions. Those questions that cannot be answered within the small group are to be written down and submitted to the Workshop leadership to be answered when the groups recombine in the auditorium, or so the attendees are told. Actually a set of "prepared questions", apparently drawn up by Corps personnel are the ones actually being answered. All other written questions are set aside to be answered as part of the written record of the meeting, unless the individual happens to get up during a verbal question-answer period and asks the question. This is misleading to the public and is generating serious concerns on the part of the public regarding the trustworthiness of the process. Additionally it raises the question of when an individual may ever get their question answered unless the Corps is planning on releasing to all who attend the full record collected from all the workshops with all the accompanying questions answered.

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P.O. Box 370, 204 Wyandotte, Morrisonville, IL 62546 • (217) 526-4480 • email: mbeorkrem@hotmail.com

Environmental Costs inputted. NED discussions without System Environmental Costs are creating a serious legitimacy problem for the process.

We again urge you to postpone the Governors Liaison Meetings scheduled for August 16-17, postpone the planned December 1999 date for the forwarding of an Initial Recommended Plan, build in new Public Workshops upon completion of the System Environmental Costs, and establish new realistic dates for an IRP for sometime in the second quarter or third quarter of 2000, after full public discussion of alternatives with full disclosure of costs and benefits.

Sincerely,

Mark N. Beorkrem

Mark N. Beorkrem
Regional Representative
Mississippi River Protection Project
Sierra Club Midwest Region
P.O. Box 370
Morrisonville, IL 62546
217-526-4480

Rich and Susan Cairn
3715 45th Ave. South, Minneapolis, MN 55406-2910
(612) 722-5806 v. (612) 722-6062 f. cairn@gold.tc.umn.edu

August 4,. 1999

Gary Loss
USACE Rock Island District
Box 2004
Rock Island, IL 61204-2004

Dear Gary,

We write to express the strongest possible objection to expansion of the lock and dam system on the Mississippi River. In fact, we believe the existing system should be phased out.

Based on our reading on the issue, and our own experience managing water quality projects in Twin Cities' communities, we are appalled at the environmental damage caused by the Mississippi lock and dam system, at least in the upper reaches of the river. Given the extremely high levels of government subsidies required to keep the system in operation, it seems difficult to justify the expense, even if the environmental consequences were less.

Yours in service,

Rich Cairn

Susan Cairn

BRENNAN MARINE INC.
820 Bainbridge PO Box 2557 La Crosse, WI 54602-2557 (608) 782-3670 Fax (608) 785-2090

August 5, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, Ill 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". We recognize the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

I have some **questions** that came to mind after the workshop:

1. What tonnage capacity was the present system originally designed for?
2. In regards to the projected additional lockages from improvements, what percent is from increased efficiencies (i.e. moving current traffic more efficient) and what percent is from additional traffic?
3. It was stated at the workshop that the system is currently used at 80% capacity. Is this system wide or at congestion points? Furthermore, is this data arrived at from averages?

MARINE PROFESSIONALS
LA CROSSE, WI

If the data used to determine capacity is averages, you are not getting a clear picture of the system delay problems. The real delay problems take place at peak market demand times. The severity of the delay and subsequent cost are lost when viewed as averages.

The analysis states that there is "no cost if no action is taken". We have to question this statement and refer to the "costs" of no action to the producers, shippers, carriers and lost markets to the nation as a whole.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and are already improving their transportation systems. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be able to handle the traffic demand of peak market swings in order to compete in world markets. Anything less will make this Country a non-responsive, unreliable, non market player.

This system is needed and requires improvement to continue to provide the following benefits to the Port of LaCrosse:

Annual Tonnage: 1,246,000

Value: $153,875,000

Employees: 89

Payroll: $3,530,000

Local Property Tax: $325,000

In review of the Alternative Plans, we ask to be placed on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigation system.

Sincerely,

Kent A Pehler

MISSOURI DEPARTMENT OF CONSERVATION

Headquarters
2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ◆ Missouri Relay Center: 1-800-735-2966 (TDD)

JERRY M. CONLEY, Director

August 5, 1999

Colonel James V. Mudd
U.S. Army Corps of Engineers
Rock Island District
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-2004

Re: A Statement of Concern by the Missouri Department of Conservation for the protection and well-being of the fish and wildlife resources of the Upper Mississippi River System (UMRS).

Dear Colonel Mudd:

The Missouri Department of Conservation is providing the following statement on the *Upper Mississippi River - Illinois Waterway System Navigation Study* (Navigation Study). We request this statement be entered in as our agency's official comment regarding completed and ongoing environmental studies associated with the Navigation Study:

In partial fulfillment of its efforts to ensure conservation of Missouri's natural resources, the Missouri Department of Conservation (Department) has continued its involvement in the Upper Mississippi River - Illinois Waterway System Navigation Study (Navigation Study) being conducted by the U.S. Army Corps of Engineers (Corps). Department involvement has included participation on coordinating committees, reviewing Navigation Study-related environmental studies, providing technical expertise for evaluating impacts to natural resources, and attendance at public workshops.

Within the past few years, most of the studies being conducted in an attempt to describe navigation-related impacts have been either completed or are in the review stage. Based on review of the completed studies, the Department believes the results of several are insufficient to be useful in determining the impacts of current traffic levels and forecasting the significance of increased navigation traffic upon the fish and wildlife resources of the UMRS. Study results, in some cases, are based on insufficient data and include high uncertainty, making them virtually useless for determining or predicting navigation impacts. The Department believes using data from those studies in any of the risk assessment models only compounds the uncertainty already inherent in those models.

In recent weeks, an array of navigation improvement alternatives with calculated benefits has been presented to the public, yet those calculations only include construction costs, benefits to the navigation industry from reduced waiting time, benefits to the local and regional economy, etc. They do not include complete costs of environmental impacts associated with those alternatives. A summary of costs and benefits, including mitigation costs, for representative locks was presented at the recent public workshops. With detailed site-specific impacts yet to be determined, and detailed mitigation plans being drawn, the Department questions the accuracy of those figures.

The Navigation Study's final draft will hopefully put economic and environmental costs associated with proposed improvements into one document. However, it makes no provision to quantify environmental costs associated with current operation and maintenance (O&M) of the project. The Corps spends over $100 million per year to maintain the 9-foot channel, yet funds its Avoid and Minimize program at $1 million per year, and only in the St. Louis District. The Cumulative Effects Study funded by the Corps is a good first-step toward understanding the current level of impacts of the navigation project, but time and funding prevented a full analysis. For instance, it documents gain or loss of open water in the pools since authorization of the 9-foot channel project, but fails to analyze and quantify loss of depth diversity due to sediment accumulation in all but a select few navigation pools during that same period. Sedimentation, its rate and extent, is considered one of the most important pieces of information needed to quantify environmental costs of the navigation project, yet that information is lacking for the whole system.

Without the inclusion of such information in the Corps' Navigation Study, the knowledge and consideration of navigation-related impacts will continue to be as fragmented as it has in the past. In addition, it will be difficult, if not impossible, for the Corps Of Engineers, Mississippi Valley Division to fulfill its long overdue obligation to implement an Avoid and Minimize program for the UMRS.

The Department believes that a thorough impact analysis of the 9-foot Navigation Channel Project's O&M activities must be accomplished in order to determine the significance of additional navigation traffic. Thanks in large part to the Long Term Resource Monitoring Program, a significant amount of biological information and a lesser amount of physical information relative to understanding navigation O&M effects has been gathered since the Corps' Navigation Project Environmental Impact Statements were prepared in the 1970's. In light of this, it is indefensible for the Corps to continue to believe that these documents exempt them from any further obligation to address and rectify O&M impacts.

The Department's position is that it is not opposed to economically justified navigation improvements as long as those improvements do not jeopardize the long-term well-being of UMR fish and wildlife resources. The Department has no comment to offer with respect to the economic validity of the Navigation Study's identified alternatives. However, we have concerns that environmental impacts/costs of current and future activities are not being fully investigated and therefore will not receive consideration equal to the economic impacts.

Thank you for providing our agency the opportunity to comment on this important study.

Sincerely,

JERRY M. CONLEY
DIRECTOR

c: Fish and Wildlife Service (Rick Nelson)
Corps of Engineers, Rock Island District (Ken Barr)
Corps of Engineers, St. Louis District (Tom Keevin)

2800 43rd Avenue South
Minneapolis, MN 55406
5th August 1999

Gary Loss
USACE Rock Island District
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Mr. Loss:

I understand that there are local hearings today on the subject of a proposal to extend the Mississippi River lock and dam system to make barge traffic less difficult.

From reports that I have read, it appears that such expansion would cause further deterioration of the river environment between here and St. Louis. I therefore would very strongly urge that this expansion not be undertaken. Perhaps a more sustainable alternative would be to assess the barge/transportation industry to help in the costs of reversing some of the environmental damage already done.

Yours truly,

Sally Koplin

Sally Koplin

Midwest Marine Terminals, Inc.
3025 E 104th St
Chicago, IL 60617

August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Midwest Marine Terminals, Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shipper, carriers and to the nation as a whole as these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Richard Dykstra
Midwest Marine Terminals, Inc.

MINNESOTA CROP PRODUCTION RETAILERS

August 6, 1999

Gary Loss, Project Mgr.
ATTN: CEMVR-PM-P
U.S. Army Corps of Engineers, Rock Island
Clock Tower Bldg.
Rock Island, IL 61204-2004

RE: FOLLOW UP COMMENTS - AUGUST 5TH MEETING IN ST. PAUL

The following comments are being submitted on behalf of the MN Crop Production Retailers (MCPR) and our 700 members providing fertilizer, seed, ag chemicals and custom application services to farmers throughtout Minnesota.

The MCPR supports "Alternative H". This alternative provides: 1200 foot locks on the Mississippi River, two 1200 foot locks on the Illinois River and five guide wall extensions at locks 14-18 on the Mississippi River.

This option offers Minnesota agriculture the greatest opportunity to remain competitive in the world market for ag products. This competitiveness is important because it affects the US balance of trade with other nations - ag products are one of a very few products that provide a positive trade balance for the US. In addition, the ag economy has a ripple affect on the entire economy. If ag does well, the economy does well also.

Attending the meeting last night, one item was briefly mentioned, but not fully discussed. This was the "Alternative No Action". It was stated this option would not cause additional costs or benefits. We don't agree.

The current locks and dams are deteriorating and will need repairs. If they are not repaired, all river traffic (including recreational boats) will be affected. These repairs will cost money. The "no action alternative" has a cost side to it and this should be noted and explored more fully.

Thank you for sponsoring the meeting in St. Paul last night. We found it educational and informative. If you have any questions or needs regarding fertilizer being transported on the river, please don't hesitate to contact our office.

Sincerely,

Craig Sallstrom
Executive Director

1821 University Avenue, Room 204S • Saint Paul, Minnesota 55104-2805
651/644-6235 • Fax 651/644-9348

DEAR Sirs; 8-6-99

I support "Alternative H" - It is imperative that we improve the "water system" that we have. It is crucial to the livelyhood + Economy of many people thru out the mid west.

THANKyou -

David Hohenstein
~~D.E. Hohenstein~~
52 Forest Oak Court
Winona MN 55987

507-452-1992

Valley Enterprises, Inc.
P.O. Box 100
Slinger, WI 53086

August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Valley Enterprises, Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shipper, carriers and to the nation as a whole as these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Norine Hanke
Valley Enterprises, Inc.

Hanke TRUCKING, INC.

765 HILLDALE ROAD • P.O. BOX 100
SLINGER, WISCONSIN 53086-0100
PHONE (414) 644-9080 FAX (414) 644-9377

August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Hanke Trucking, Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shipper, carriers and to the nation as a whole as these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

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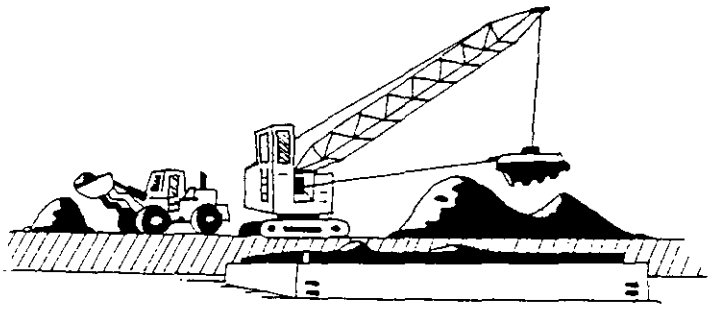
In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Norine Hanke
Hanke Trucking, Inc.

HANKE TERMINALS INC.
P.O. Box 56 • Slinger, WI 53086-0056
Phone (414) 644-9080



August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Hanke Terminals Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shipper, carriers and to the nation as a whole as these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Norine Hanke
Hanke Terminals Inc.

Norine Transport, Inc.
P.O. Box 100
Slinger, WI 53086

August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Norine Transport, Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shipper, carriers and to the nation as a whole as these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Norine Hanke
Norine Transport, Inc.

F. J. ROBERS CO., INC.
Intermodal River Terminal

816 So. Bainbridge St. LaCrosse, WI 54603
(608)784-1711
Fax: (608) 784-1712

August 6, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, Ill 61204-2004

Dear Navigation Study Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the Upper Mississippi River-Illinois Waterway System Navigation Study". F.J.Robers Co.,Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states " There is no cost if no action is taken". We disagree with this statement. Consideration should be given to the associated costs to the producers, shippers, carriers, and to the nation as a whole. If international trade is negatively affected , the loss economically will be devastating.

The navigation system allows for the safest, most cost affective and eviromentally friendly mode of transportation for the movement of bulk commodities. This infrastructure is our gateway to the world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain a dominant force in the world markets.

The system must be capable of handling the traffic demand at peak demand times in order to stay Competitive in international trade. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H.. Although the EIS was unavailable for review at this time, we would like to add that any funding that comes from the Federal Government be matched with EMP funding for the next ten years. In other words, if $500,000,000 dollars is allocated, $50,000,000 per year would be used to fund Upper Mississippi River EMP projects for each of the next ten years. We realize that the added costs will be harder to justify,but we feel that the overall protection of this multi-use resource also be addressed.

Sincerely,

John H. Noyes, President

VERNON RETTIG
7602 NE 114TH AVE
BONDURANT, IA. 50035
7 AUG 99

U.S. ARMY ENGINEER DISTRICT, ROCK ISLAND
ATTN: CEMVR-PM-A (JACKSON)
CLOCK TOWER BUILDING
P.O. BOX 2004
ROCK ISLAND, ILL. 61204-2004

DEAR SIRS:

I ATTENDED THE PUBLIC WORKSHOP CONCERNING THE UPPER MISSISSIPPI RIVER-ILLINOIS WATERWAY SYSTEM NAVIGATION STUDY THAT WAS HELD IN DES MOINES AUGUST 3RD. CORPS PERSONNEL DID AN EXCELLENT JOB AT THE MEETING.

I AM A 1955 ENGINEERING GRADUATE FROM COLORADO STATE UNIVERSITY AND WORKED AS A PRODUCT DESIGN ENGINEER FOR JOHN DEERE FOR 37 YEARS. I HAVE ALSO BEEN A PART TIME FARMER FOR 23 YEARS AND HAVE FARMED FULL TIME NOW FOR 7 YEARS. OTHER ACTIVITIES INCLUDE 9 YEARS AS SECRETARY FOR THE SKUNK RIVER BOARD OF TRUSTEES (POLK COUNTY), AND RECENTLY COMMISSIONER FOR THE POLK COUNTY SOIL AND WATER CONSERVATION DISTRICT.

I AM IN FAVOR OF UPGRADING OUR LOCK AND DAM SYSTEM. THE UPGRADE WILL NOT ONLY HELP KEEP MIDWEST AGRICULTURE COMPETITIVE, BUT WILL HELP OTHER INDUSTRY AS WELL. ONE BILLION DOLLARS

SPREAD OUT OVER 15 YEARS LOOKS SMALL IN COMPARISON TO THE 10 BILLION OR SO BEING SPENT ON AGRICULTURAL SUBSIDIES EACH YEAR. AGRICULTURAL EXPORTS ARE A VERY IMPORTANT FACTOR IN KEEPING OUR NATIONAL BALANCE OF PAYMENTS IN CHECK.

AT THE MEETING, PLAN OPPONENTS WERE VERY VOCAL AND WELL REHEARSED, BUT MANY OF THEIR IDEAS SEEMED RATHER NEBULOUS TO ME. GROUPS LIKE THE SIERRA CLUB ATTACH THEMSELVES TO THESE CAUSES TO ENHANCE MEMBERSHIP AND BRING IN MONEY. AS LONG AS THESE PEOPLE HAVE PLENTY TO EAT AND HAVE THE OTHER AMENITIES OF LIFE, THEY ARE AGAINST ALL PROGRESS, AND WOULD LIKE TO RETURN EVERYTHING BACK LIKE IT WAS 200 YEARS AGO.

SUGGESTIONS

PERHAPS BARGE FUEL TAX RATES COULD BE RAISED TO LESSEN THE CHARGES OF SUBSIDIZED TRANSPORTATION.

CONTROLLED TREE PLANTING COULD ALLEVIATE SHORE LINE EROSION PROBLEMS WITHOUT HAVING TO USE RIPRAP.

SINCERELY,

Vernon Rettig

Aug. 8, 1999

Dear Gary Loss,

I am in favor of the "Alternative H" option for improvement of the locks on the great Mississippi River.

I hope you will strongly consider my opinion.

Sincerely,

Jean Slattery
36030 110th St.
Waseca, Mn. 56093-4504

August 8, 1999
Attn: Gary Loss (CEMVS-PM-P)
U. S. Army Corps Engineers

I am in favor of Alternative A, making improvements to the aging lock and dam system on the Mississippi River.

Daniel D. Brevig
32 N Lady, #1111
Rochester Minn. 55906

Tilney Farms LLP
P.O. Box 115
209 West St.
Lewisville, MN 56060
Phone 507-435-4341
Fax 507-435-4351

August 9, 1999

Mr. Gary Loss Project Manager
U.S. Corps of Engineers
Rock Island Clock Tower Building
Rock Island, IL 61204-2004

Attention: CEMVR-PM-P

Dear Mr. Loss:

It has come to my attention that there is an immediate need for improvements on the lock and dam system on the Mississippi River. This river system is vital to the economic health of the Middle United States.

I urge you to adopt Alternative "H", which will provide the necessary improvements to accommodate a prosperous future river traffic system.

Sincerely yours,

Thomas Urevig

Thomas Urevig
Tilney Farms LLP

Aug 9 - 1999

Gary Loss Project Manager

It is very important to up grade the lock and Dam system on the Mississippi River for the transportation of farm products. I am infavor of alternative H.

Thank you
Don Scheffert
27400 - 80th st
Wanamingo Minn. 5607

COTTONSEED, INC.

Post Office Box L • Courtland, Alabama 35618
816 S. Bainbridge St. • La Crosse, Wisconsin 54603

Courtland, Alabama
(205) 637-6570
(205) 637-6517 FAX

La Crosse, Wisconsin
(608) 782-5311
(608) 782-5541 FAX

August 9, 1999

U.S. Army Engineer District, Rock Island
Attn.: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager:

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Cottonseed, Inc. recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The analysis states, "There is no cost if no action is taken". We question this statement. In fact, consider the "costs" of taking no action to the producers, shippers, carriers and to the nation as a whole if these markets are lost.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. Other world producers have and will continue to improve their transportation systems in order to improve their competitive advantage. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

In review of the Alternative Plans, we want to be put on record as supporting Alternative H. as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Larry A. Johnson

Larry A. Johnson
Cottonseed, Inc.

Wasca, Minnesota
August 9, 1999

Dear Sir,

As a farm wife, I support Alternative 2.

Yours truly,
Mrs. Joe Gostomczik
40371 140th St.
Wasca, Mn.
56093-4204

Matthew Russell
1530 Woodland Ave. #1
Des Moines, Iowa 50309

Formal Statement made at the Army Corps of Engineers listening session: Botanical Center, Des Moines, Iowa. August 3, 1999.

Who benefits most from the expansion and who pays the cost? Taxpayer dollars and national, public resources should not be used to subsidize industries and corporations that have little interest for public and national considerations.

Iowa will continue to be a net producer of food long into the future, but in the current system subsidized by public money and a willingness to sacrifice natural resources (soil, wildlife, safe drinking water) Iowa is becoming a value subtracted state.

In the export economy, Iowa is exporting raw materials (commodities) and transnational corporations are adding value that Iowa never sees. In return, Iowa imports products in a way that again takes financial assets out of Iowa. I find it indefensible that we would choose to intensify this system of dependence that keeps us from being the food capital of the world and makes us more and more the raw materials for food capital of the world. Another way to put it: the company town of transnational corporations.

Public dollars and public resources should be invested in real alternatives using real imaginations. Transnational corporations that have little public interest and little national interest should pay the real costs of doing business, which obviously includes environmental impacts.

10 Aug - 99

Gentlemen.

Re- Mississippi River System

I am writing in support of alternative #6 as a way to modernize the system for the ~~econo~~ economic benefit of agriculture in the upper Midwest

Thanks for Yours Consideration

Vernon Wilkening

R#4 Box 38

Vernon Wilkening Waseca Mn
R#4 Box 38
Waseca, Mn. 56093 - 4214

August 10, 1999

Gary Loss
USACE Rock Island Dist.
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Mr. Loss:

I'm writing this letter in regards to your plans for barge expansion on the Mississippi and Illinois Rivers.

We all agree (including all scientists) that the problems of sedimentation, land use practices and decreasing water quality are all aggravated by the Corp and barge industry needs.

Any expansion will add stress to an already threatened ecosystem of the Upper Mississippi River. If these problems are not addressed, the river will become only a dead channel for river traffic. The environment has been so degraded from the beginning when the locks were first made that it is hard to realize how healthy the River was at the beginning.

Ongoing operation and maintenance of the 9' channel project costs about $130M per year in our tax dollars. The barge industry paid ONLY 2% of the costs in 1997.

Why are we subsidizing an industry that has changed their barge length and have not taken it upon themselves to upgrade the system on their own!!! All other industries have to build their businesses and improve on their businesses as the climate changes.

The barge system receives so many dollars and serves so few people. And, also an industry that is one of the world's most subsidized.

The Corps wants the job – the industry wants the welfare money and the taxpayer picks up the bill. If the industry was picking up the bill, I don't think we would be building such an elaborate system – its easy when no one is accountable.

Sincerely,

Gladys Benson Richard Doyscher

Richard Doyscher
Gladys Benson
1945 Oakdale Ave
W. St. Paul, MN 55118

Cc: MN senators & representatives

PAUL MOSS
1849 WHITAKER AVENUE
WHITE BEAR LAKE, MN 55110

8/10/99

Dear Mr. Loss,

Please consider these comments on the proposed expansion of the Lock & Dam System.

(1) There should be a moratorium on new construction of the lock & dam System on the Upper Mississippi River.

(2) The Corps is too focused on the perceived needs of the barge industry and needs to focus on increasing water quality, restoring habitat, and restoring river health instead. Current Plans are based mostly on ACE market Projections and do not adequately

consider the very significant environmental costs of the Lock & Dam system, including loss of habitat, decreasing water quality, sedimentation, etc. Thousands of acres of productive habitat are now facing ecological failure due to the Lock & Dam system. Any expansion would further stress the already threatened ecosystem of the Upper Mississippi River, and should not be pursued.

Thank you for your consideration of these comments.

Sincerely,

Paul Dell

Transportation Development Association of Wisconsin

22 N. Carroll Street, Suite 102
Madison, WI 53703
(608) 256-7044
fax (608) 256-7079
e-mail tda @itis.com

Executive Director
Philip J. Scherer

August 10, 1999

U.S. Army Engineer District, Rock Island
Attn: CEMVR-PM-A (Jackson)
Clock Tower Building
P. O. Box 2004
Rock Island, IL 61204-2004

Dear Sir or Madam:

The Transportation Development Association (TDA) is a statewide non-profit alliance of transportation interests. As such, we represent approximately 500 members consisting of cities, counties, towns, villages, contractors, railroads, businesses, waterway interests, transit operations, airports, consultants and many others with an interest in transportation in one form or another. TDA members plan, build and maintain our transportation systems. Many of our members have a strong and direct interest in the future of the Upper Mississippi River System's (UMRS) infrastructure.

Commercial river navigation is an important part of Wisconsin's multi-modal transportation system. Barge shipping affects other transportation modes, as it works in conjunction with many other means of transport. Barge shipping does not occur in a vacuum; products must be shipped to and/or from the barge by one or more modes. It also helps reduce rail and highway travel, preventing added wear and tear on those systems.

Shipping on the Mississippi benefits Wisconsin's economy by helping keep prices competitive and opening Wisconsin to world markets. Barges deliver important bulk commodities to the state which directly impact our members, such as road salt, aggregates for road building, and fuel.

We agree with the U.S. Army Corps of Engineers study finding that the 60-year old lock and dam system on the UMRS must be modernized. After attending the La Crosse public meeting that discussed the possible alternatives resulting from the navigational study, we would like to register our support for "Alternative H." That alternative's inclusion of 1200' locks at seven locations and five guidewall extensions seems to best meet the increasing transportation demands facing the UMRS.

The UMRS lock and dam system is already 10 years past its design life; something must be done soon. By modernizing, the Midwest has a real opportunity to prepare the UMRS for the next 50+ years of both shipping and environmental needs.

We appreciate the opportunity to comment on the alternatives included in the U.S. Army Corps of Engineers navigation study. Please keep TDA informed as this process moves toward completion of the 50-year river management plan.

Sincerely,

Philip J. Scherer
Executive Director

cc: Don Hoeft, TDA President

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

August 10, 1999

To Whom It May Concern;

I am writing to express my concern over the proposed construction of seven new locks on the Mississippi River. According to the Navigation Study, the locks are not economically justified for another twenty years, and no comprehensive environmental impact study has been completed to make an informed decision about the risks and benefits of this multi-million dollar project. As a taxpayer, I think it is unbelievable that we would spend this kind of money without proper knowledge of the possible environmental effects.

I do not believe that the government should continue to subsidize large corporations such as ADM and Amoco at the expense of our natural resources. A recent study out of Iowa State University showed that *rail* was by far the most economic means of transporting grain year round.

I believe that our natural resources deserve equal consideration in this decision. Please do not authorize the construction of these locks without first considering the cost in wildlife habitat, and water quality.

Thank you for considering my comments.

Sincerely,

Molly Havlik

Molly Havlik
737 E. Walnut St. #27
Elkhart, IA 50073

8-10-99

Dear Sir or Madam:

Please send information on costs for each of the navigation alternatives, including the cost for mitigation for environmental damages, past, present & future, of the lock & dam system & maintenance of the navigation. Also, please furnish costs for construction, maintenance & the mitigation for systemic impacts. Thank you.

Charlie Manly
734 16th Ave, No. 6
Grinnell, IA 50112

KISSINGER LEVEE DISTRICT
c/o Homer Sterne, President
Board of Supervisors
19232 Highway 79
Clarksville, Missouri 63336-2713

August 10, 1999

U. S. ARMY DISTRICT
Rock Island
ATTN: CEMVR_PM_A (Jackson)
Clock Tower Building
P. O. Box 2004
Rock Island, IL 61204-2004

Gentlemen: RE: MASTER PLAN FOR UPPER MISSISSIPPI

We did attend the area meeting in Clarksville, but did not comment on the plan which was presented, we do wish to state as follows:

The Kissinger Levee District has been an organized District since 1981 under the laws of the State of Missouri. Landowners in this District appreciate all considerations given them in times of flooding and levee repair following floods in the past. It is our desire to continue this relationship with the U. S. Army Corps of Engineers in the future.

We are in favor of the Master Plan. It is our hope this plan will include more dredging in order to maintain the proper channel.

Very truly yours,

KISSINGER LEVEE DISTRICT
Homer Sterne
Homer Sterne, President
Board of Supervisors

HGS:SS

Lampsilis higginsi
(Lea, 1857)

MALACOLOGICAL CONSULTANTS

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1603 Mississippi Street
La Crosse, Wisconsin 54601-4969 USA
Phone/Fax: 608-782-7958 • E-mail: havlikme@aol.com

10 August 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building, P.O. Box 2004
Rock Island, Illinois 61204-2004

I've studied freshwater mussels in the Mississippi River for 30 yrs. In 1996 I spent 8 wks working on the Mississippi; in 1997 I spent 13 wks working on the Mississippi from Cottage Grove, MN - Fort Madison, IA. I've seen the good, the bad, and the ugly. The ugly includes degradation of the UMR system. I concur with statements released by the USFWS and UMRCC on this matter.

I am opposed to expansion of the Locks and Dams on the Mississippi because of the great environmental costs which the COE has yet to quantify, and because of the great cost to the taxpayer. A full EIS must be done. We cannot use an EIS of nearly 30 years ago (which used data from a 1930 mussel study).

The rationale given by the COE and others to justify expansion has overestimated the need for extreme measures. I'm not convinced exports will increase to the extent estimated, and that crop production will continue to increase. One farmer said his exports were down. What is the real story? What are the real statistics on the need for increased transportation? It appears that much of the grain crop will stay in the U.S. to feed animals on factory farms. The COE managed to get a positive/benefit ratio only by excluding environmental costs. I realize commercial river traffic will always be with use, and am less opposed to lower costly measures such as mooring buoys/cells. But these improvements should be paid for by the industries that benefit: Citicorp, ADM, Cargill etc.

State/federal agencies want to conduct drawdowns in the River to improve conditions. My observations for years have been that the Mississippi was kept higher than necessary. Statements regarding water levels in 1936, 1944, 1964, and 1972 (3.5', 2.0', 1.5', 1.0' drawdowns respectively) are in the 1999 Draft EA, Pool 8 Drawdown. After reading the Drawdown document, I discovered what river rats told me was true. The COE has manipulated constantly higher water levels since the 1940's strictly for the benefit of commercial navigation. Thus COE's activities have been the cause of much of the erosion on the river. Island after island has disappeared. Then we have to spend a great deal of taxpayer money to put artificial islands back into the system. Finish proper studies. Thank you.

Marian E. Havlik
Malacological Consultants

DAIRYLAND Power COOPERATIVE • 3200 EAST AVE. SO. • P.O. BOX 817 • LA CROSSE, WISCONSIN 54602-0817
OFFICE: (608) 788-4000
WEB SITE: www.dairynet.com

August 10, 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Sir:

SUBJECT: Upper Mississippi River – Illinois Water Navigation System Study

These comments are intended to help gauge public opinion on alternative river navigation improvements. When the initial lock and dam system was installed on the Upper Mississippi River, Dairyland Power Cooperative (DPC) did not exist. In the years following the late 1930s, DPC built a generation and transmission system to provide electrical service to rural consumers in Minnesota, Iowa, Wisconsin, and Illinois through a system of distribution cooperatives. Over the last 60 years, DPC has built this system and it currently is generating electric power to serve the needs of 210,000 member consumers in this four-state area. These consumers are primarily rural and are in the agricultural community.

Before the lock and dam system was built, there was a diesel generating facility at Chippewa Falls, Wisconsin, and since that time generating facilities have been built at Alma and Genoa, Wisconsin. DPC currently has approximately 965,000 kW of generation located at the Alma, Genoa, and the Flambeau Hydroelectric Stations. We also have 46 municipals with 53,000 kW under contract for a total generation of 1,019,000 kW.

The stations at Alma and Genoa, Wisconsin were built to receive coal by barge. The facility at Alma, or the J. P. Madgett Station, is a new source standard facility and hence was designed to receive western coal by rail. DPC depends on the Mississippi River for a reliable transportation system. It is necessary we believe to expand the system to include 1,200 foot locks from 20 through 25 on the Illinois River at Peoria and LaGrange and 1,200 foot guidewalls at locks 14 through 18. We also believe that it is necessary for environmental protection to include mooring buoys or cells at the locks on the Upper Mississippi, namely at lock and dam 4, 5A, 5, 6, 7, 8, 9, 10, 11, 12, and 13. This alternative was not included as one of the alternatives for the navigation study, but it is recommended that it be included in the final navigation study.

It is necessary that we maintain a sound and efficient river navigation system for the future of our power generating facilities. It is also necessary that a good river system is available to the community that we serve, namely, agriculture. When this system was built, the plants

noted above as well as the export of agricultural products did not exist. Since the system was installed, these two events came about. It is necessary for the future of this country that the improvements noted above occur.

It should be noted that the lock and dam system has brought great benefits to this region. It is necessary that additional moneys be spent for improvements to the system as well as environmental type of improvements to mitigate any environmental impact.

The mission of DPC is to supply wholesale electric service to our members. We must do this in a manner that is the lowest reasonable cost and maximum value now and in the future. We believe that we should use our resources in a manner which is environmentally and socially acceptable. We want to improve the quality of life of our members and the economic and social well-being of the region in which we live.

We believe that the Corps of Engineers' alternative H slightly modified would meet these principles.

Sincerely,

DAIRYLAND POWER COOPERATIVE

Thomas A Steele

Thomas A. Steele
Director
External Relations

TAS:mkw

\\NW4\SYS\GNR\GNRADMIN\letters\tas0806a.doc

Tom Clarke
317 South Ave
Oscoda WI 54020

Mr. Gary Loss
US Army Corps of Engineers
Rock Island District
~~P.O.~~ Box 2004

Dear Sir: 8-10-99

I am a frequent visitor who loves the Upper Miss River. I am concerned about the ecosystem damage caused by the ACOE navigation System. I strongly oppose plans for lock + dam expansion on Upper Miss + Illinois Rivers. I urge the COE to adopt a moratorium on new construction & expansion of this lock + dam system. Please restore damaged habitat first & stop the economic fiscal bondoggle. Tom Clarke

823 Carroll Avenue
Ames, Iowa 50010-6327
August 10, 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

Gentle People:

I would like to ask you to refrain from reconstructing the locks and dams on the Mississippi. It is not necessary at this time and studies actually show that a combination of rail and truck is a much more cost effective and efficient way to transport goods.

The Mississippi is already a sick ecosystem and needs help in recovery, not further degradation. Doubling barge traffic would do just that.

I urge you to do what is best for the planet, rather than the barge industry.

Thank you,

Sincerely,

Peggy Murdock

PFM/-

L81199--Kandiyohi Co.
Corn Growers

Kandiyohi County Corn Growers Association

Kandiyohi County, Minnesota

August 11, 1999

Gary Loss, Project Manager
Attn: CEMVR-PM-P
U.S. Army Corps of Engineers, Rock Island
Clock Tower Building
Rock Island, IL61204-2004

Corn and soybean growers in Kandiyohi County, Minnesota are very dependent on barge transportation on the Mississippi River for movement of farm commodities to export channels. We are very concerned about having an efficient Mississippi River transportation system to compete with foreign growers in South American.

We strongly urge the U.S. Army Corps of Engineers to select "Alternative H" when considering improvements to the aging lock and dam system on the Mississippi River. In addition we ask that you make this decision swiftly and begin the improvements as soon as possible.

Sincerely,

Glenn Arfstrom, President
986 60th Avenue N.E.
Willmar, MN 56201

8/11/99

To whom it Concerns

The people should be very concerned about the possibility of expansion of the locks (20-25) which will have a very deliterious effect on the Mississippi River and its backwaters.

It appears from studies conducted so far that there really isn't a need for any expansion for at least Rogers and that expansion is questionable.

It appears that the Corp also indicated that the Return and the Investment of Enlarging the locks is NOT Economically justified.

It would seem that other means should be Exercised and explored before committing to this money swallowing scheme.

Improving Railroads & Road Transport System, would be more Reasonable & cheaper.

We also need to start thinking about other things such as Desecration of the Environment and start Damn playing the Economics of this particular Study (Lock expansion

Environmentally yours,
Elwood Garlock
Elwood Garlock
1700 C Ave NW
Cedar Rapids, Iowa
52405

August 11, 1999

U.S. Army Engineer District, Rock Island
ATTN: CEMVR-PM-A
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

RE: Upper Mississippi Navigation

This letter is written to state opposition to the expansion of locks and dams on the Mississippi River. **I am opposed to further expansion.**

I encourage the USACE to restore the Upper Mississippi's ecological health by increasing funding for the Avoid and Minimize Program, and for the Environmental Management Program.

I encourage the USACE to return the floodplain to the river, to allow the river to help control flooding and to reestablish habitat for fish and wildlife.

I encourage the USACE to complete an assessment of the cumulative environmental effects of the changes that have already been made to the river.

We must restore this world class biological resource to health, for us and for future generations.

Sincerely,

Jane R. Clark

Jane R. Clark
9871 Lincoln Avenue
Des Moines, Iowa 50325

8/11/99

Dear Sirs,

I am a central IL Farmer and I feel that in order for The U.S. and central IL Farmers To compete in a World Market we need to have a more Modern transportation system on The ILL and Miss. Rivers. I urge you To go with Alternative #.

The more grain that is trucked or move by Rail the less competitive we are world wide. Also the more fuel is used, the roads are torn up faster, more accidents on The Roads, and The less friendly To the environment

Mark Wilson
Toulon, IL 61483

TVT

TENNESSEE VALLEY TOWING, INC.

3594 LONE OAK ROAD
PADUCAH, KENTUCKY 42003
Phone (502) 554-0154
Fax (502) 554-0183

August 11, 1999

Subject: Modernization of
Locks on Upper
Mississippi and
Illinois Rivers

U. S. Army Engineer District
Rock Island
Clock Tower Building
P. O. Box 2004
Rock Island, IL. 61204-2004

To CEMVR-PM-A (Jackson)

I wish to add my support to Alternative H. which calls for 5-1200' locks on the Upper Mississippi River (Lock 20-25), 2-1200' locks on the Illinois River (Peoria and LaGrange) and 15 guide wall extensions on the Upper Mississippi River (Lock 14-18).

If we are going to keep our Mid-Continent farmer in the world market, we must act with all possible haste. South America and China are improving their infrastructure at an alarming rate and once we lose the farm market it will be very difficult to regain.

In addition, the Waterways Trust Fund has funds available for its part of the cost. River Transportation is the safest, cheapest and most ecologically sound way to move bulk commodities. There is no alternative way for our mid-continent to stay competitive. Finally, waterways projects pay back investment many times ove, so the investment is sound.

Sincerely

William H. Dyer
Tennessee Valley Towing
President

The American Waterways Operators
RESPONSIBLE CARRIER PROGRAM

Midland Enterprises Inc.
300 Pike Street
Cincinnati, OH 45202-4222
Tel: 513-721-4000
Fax: 1-800-950-2080

J. Mark Cook
President

August 12, 1999

U.S. Army Corps of Engineers
Rock Island District
ATTN: CEMVR-PM-A
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Re: Modernization of the Upper Mississippi Lock and Dam System

Dear Sir or Madam:

I am writing on behalf of Midland Enterprises Inc. and its shareholders, officers and employees to provide commentary on the Upper Mississippi Navigation Study conducted by the U.S. Army Corps of Engineers. Midland Enterprises and its subsidiary companies are one of the largest inland river transportation companies operating barges and towboats on the Inland Rivers and their tributaries. We transport various commodities including coal, steel and scrap, HBI/DRI for mini-mills, grain, alumina, phosphate, logs, stone, sand and gravel on the inland waterways, utilizing approximately 2400 barges and 85 towboats. In addition, we operate coal, grain and fertilizer terminal facilities, a marine shipyard and numerous barge fleeting facilities along most of the navigable waterways including the Mississippi River. The inland waterway transportation business is a highly competitive, capital-intensive industry that contributes daily to the U.S. economy and to our country's ability to compete in the global marketplace.

Last year Midland and its operating subsidiaries including The Ohio River Company, Orgulf Transport Co., Orsouth Transport Co., and R&W Marine transported approximately 59,900,000 tons of commodities over 32,100,000,000 ton miles on the waterway system. We collectively employ more than 1,300 people across the United States. The tonnages moved by our vessels are significant to the economies of dozens of states, from the points of view of both producers and consumers, as well as to the economy of our country as a whole.

Barging is a very low cost method of transportation, responsible for moving more than 15% of all of the United States total freight for less than 2% of the nation's total transportation cost, which translates into savings for the consumer, such as lower rates for electricity, food products, appliances, automobiles, and chemical products in addition to cleaner air resulting from lower net fuel consumption per ton mile when compared to any other mode of cargo transport. In the late 1990's, more than 400,000,000 tons of dry cargo products per year moved up and down our river system. Navigation on the Upper Mississippi and Illinois rivers alone support more than 400,000 jobs and result in the export of more than 60% of all U.S. bulk agricultural exports. American manufacturers, farmers, and raw material producers as well as

consumers and the thousands of employees who make the marine industry so effective benefit each and every day from the service we provide.

The net value of inland waterway transportation to producers and consumers is very high, easily measured and has clear impact on millions of lives. The real challenge to maintaining our economic position and creating even greater value is the growing problem of diminution of efficiencies resulting from lock delays on the river system. Barge transportation companies and their customers and employees operate on a river system with mechanical, capital improvements that are 50-70 years old and falling apart. This aging system costs the American Farmer more than $90,000,000 per year and over the next twenty years could depress the value of our agricultural products by more than $350,000,000.

Inland waterway vessel operators contribute dollars each and every day to the Inland Waterways Trust Fund. The IWTF was established to collect 20¢ per gallon of fuel purchased by vessel operators; funds to be utilized for new construction and maintenance of the waterway lock and dam system. The trust fund currently contains a significant surplus balance. As a large user of the waterway system and a large payer into the funds that are to be allocated to build and maintain the system, Midland has a strong interest in the decisions that will be made as to capital improvements on the rivers. Clearly lock and dam modernization is not only warranted but also imperative for the continued success of the agricultural and manufacturing industries supported by marine companies.

Midland's firmly believes that the greatest value will be achieved for all interested parties by the construction of seven 1200' locks and five guidewall extensions on the Mississippi and Illinois River locks and covered by the Upper Mississippi Navigation Study. We endorse the views expressed in comments filed by MARC 2000 as to the assumptions, source data and analysis underlying the Navigation Study. Capital improvements of this magnitude cannot be implemented overnight. It is imperative that the Corps of Engineers seriously reevaluate the critical nature of the improvements required on this portion of the river system and move forward expeditiously to ensure these construction projects are undertaken. Midland Enterprises Inc. supports the ongoing partnership between the inland waterways industry and the Corps of Engineers. We urge your timely review of the Navigation Study and a corresponding recommendation that the only option offering the greatest increase in future river capacity, for a justifiable cost-benefit ratio is the construction option recommended herein. We appreciate the opportunity to provide comments and stand ready to provide any additional assistance you may require.

Very truly yours,

J. Mark Cook

cc: Christopher Brescia, MARC 2000

Midland

National Audubon Society

Upper Mississippi River Campaign
26 East Exchange Street, Suite 215
St. Paul, MN 55101
(612) 290-1695
FAX: (612) 225-4686

August 12, 1999

U.S. Army Engineer District
Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

Re: Upper Mississippi River Navigation System Study

Please accept the enclosed two documents on behalf of the Upper Mississippi River Campaign of the National Audubon Society, as our expression of concern at this time on the proposed alternatives for capacity expansion of the Upper Mississippi River and Illinois River Navigation System:

1. A Conservation Agenda for the Upper Mississippi River System, dated summer, 1999.
2. A copy of a letter (undated but received by personal delivery on August 1, 1999, from Julian Kuhn and submitted at his request.

As our agenda indicates, and for the reasons stated therein, our official position on the study at this time is that "a moratorium on any system expansion is needed while we truly evaluate the economic and environmental implications."

As the study process continues and more economic and environmental information becomes available, we will continue to be involved and provide additional comments.

Sincerely,

Dan McGuiness
Director, Upper Mississippi River Campaign

Enclosures, as listed

To Audobon Society

I am a farmer in Iowa I send about 15,000 bu of grain yearly down the Miss. from McGregor Iowa

I am also very much concerned about the old Locks Lets save what we have left. We don't need biggar locks and bigger boats.

What they have and not percieved What is the difference if it arrives today or the next day.

The literature I am enclosing is propaganda from the big grain Co's.

Bigger everything will benefit the big Co's. Not me the average Iowa farmer.

Julian Fisher
3055 128th ST.
Fort Atkinson
Iowa 52144

August 12 - 1999

Muriel Jenkins
22 N. Broadway 1103
Rochester, MN 55906

Attn. Gary Loss

It sounds to me as if Alternative 4 would be a very good project to improve the Mississippi River System — I have my support —

Muriel J Jenkins

Augest 12,1999

W1255 330th Ave
Plum City, WI 54761

U.S. Army Engineer District, Rock Island

Attention: CEMVR-PM-A (Jackson)
Clock Tower Building
P O Box 2004
Rock Island, IL 61204-2004

To whom it may concern:

In reading the article "Lock & Dam Upgrade" in the current issue of "Country Today" I was shocked to read the suggestion of removing the locks and dams on the Mississippi and let it return to a "natural state".

I am not a grain farmer and do not use the river for shipping anything, but to think of depriving the grain farmers of the midwest access to the river for moving their produce would compare with stopping the shipping by train or truck. They are using the waterways the same as others use the highways - locks and dams on the river compare to the bridges that are built for highway use.

If the bridges on our highways were built in the 1930's and they did'nt handle the traffic or were not safe they are replaced. Common sense says the same must be done for the lock and dam system on the Mississippi.

Sincerely,

Joyce Herbison

Plaquemine Towing Corporation
PHONE: 504-642-5432 • FAX: 504-642-5434
1237 HIGHWAY 75
Sunshine, Louisiana 70780

August 12, 1999

U. S. Army Engineer District, Rock Island
Attn: CEMVR-PM-A (Jackson)
Clock Tower Building
P. O. Box 2004
Rock Island, IL 61204-2004

To Whom It May Concern:

Historically, improvements to the infrastructure of a Country or a Region have almost always proven of lasting benefit to the peoples of that Country or Region. The improvements to waterways affect more people than any other improvement because it causes not only cheaper transportation, but also preservation of water for drinking, industrial development, recreation, wild life habitat and many other benefits to citizens over a very large area.

The proposed improvements to the Upper Mississippi and the Illinois Rivers are in that historical category.

We support the most extensive improvements that are recommended for those rivers and have complete faith that the future will prove them not only necessary but also indispensable.

Sincerely,

G. W. Banta

G. W. Banta

GWB/saj

Mississippi Welders Supply Co., Inc.

12 August 1999

U. S. Army Engineer District
Rock Island,
Attn: CEMVR_PM0A (Jackson)
Clock Tower Building
P. O. Box 2004
Rock Island, IL 61204-2004

Upper Mississippi River System Lock Modernization Plan.

I am writing this letter to you today to provide support for early completion of the study, accompanied by concurrent planning for the lock upgrading. I understand that the current system is already about ten years beyond original life projections, and can not be allowed to become unusable, let alone not be modernized to provide for efficient usage during the next 50 years.

The river is an important ~~like~~ link in the total intermodal transportation system, and its linkage must be modernized, kept strong and made user friendly. Our railroads and highways can not handle all the additional loading with out early degradation should the river become not usable for barge traffic. We must include upgraded barge traffic among our modes of transportation to keep our product flowing to market, and vice-versa.

Likewise the environmental concerns for river preservation, and the recreational needs should also be addressed and a harmonious plan developed.

In determining financial impacts of the modernization, the additional costs of early degradation of our highway and road system due to picking up all river traffic should be considered in the do nothing scene.

Sincerely,

Donald O. Peterson
President

RED WING MN 55066
5211 MOUNDVIEW DRIVE
651-388-1836
FAX 651-388-1838
800-657-4856

WINONA MN 55987
P.O. BOX 1036 • 5150 W. 6th ST
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FAX 507-454-8104
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ROCHESTER MN 55901
2705 N. FRONTAGE RD., HWY 14W
507-289-2026
FAX 507-289-2205
800-657-5100

www.mwsco.com

national welding supply association

U.S. Army Corps of Engineers
Rock Island District
Clock Tower Building
P.O. Box 2004
Rock Island, Illinois 61204-2004

Dear Sir:

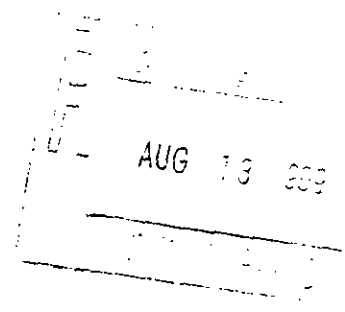
We are opposed to upgrading the locks and dams on the Mississippi River. According to the Corps' own study, the replacement of the existing locks with longer facilities is not economically justified at this time. We do not want our tax dollars used to further subsidize the barge industry at the expense of the Mississippi River.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Pat McAdams Glenda Buenger

Pat McAdams and Glenda Buenger
2282 Teller Avenue
Rose Hill, Iowa 52586
515-632-8308



Upper Mississippi River
Illinois Waterway System
Navigation Study

Testimony by Joe Hampton
Director Illinois Department of Agriculture

Amended Testimony

The Illinois Department of Agriculture would like to amend its original testimony submitted at the Public Workshop in Peoria, Illinois, on July 28, 1999. Our original comments supported adding 1,200' Locks (20-25), adding 1,200' Guidewalls (Locks 14-18, Peoria, LaGrange) and adding Mooring Buoys/Cells (Locks 12, 18, 20, 22, 24). Based on further study of the overall issue, the Illinois Department of Agriculture believes Illinois agriculture related economy would benefit more from 1,200' Locks (Locks 20-25, Peoria, LaGrange) and 1,200' Guidewalls (Locks 14-18) proposed in option "H."

The reason for amending our recommendation to the Army Corps of Engineers is based upon a couple of factors. The most important is that the alternative the Army Corps of Engineers outlined as "F" does not provide for locks on the Illinois River (Illinois Waterway System). The Illinois Department of Agriculture is extremely concerned about the overall impact of not addressing the Illinois Waterway System by adding two 1,200' locks.

Another reason for our concern and our support of alternative "H" is the overall costs associated with lock extensions versus building new locks. Building lock extensions is very costly. Considering the lock extensions will be placed on existing locks that are roughly 60-70 years old, we are concerned about the condition of those locks. If the locks need to be improved or upgraded prior to adding the new lock extensions, the overall plan and budget would undoubtedly be more costly than anticipated.

Another area of concern is the backlog of maintenance on the existing locks. If the maintenance schedule is so behind, how are we to be sure the current locks will even be able to accommodate lock extensions. Further, we are concerned about the reasons contributing to the backlog. Is the delayed maintenance schedule a result of lack of funding, lack of other resources, or lack of personnel? If any one of these is true, what happens when the Corps begins scheduled lock extension construction. Illinois agriculture will lose its share of the world grain market without timely improvement of the lock.

Given all the variables in this project, the Illinois Department of Agriculture recommends the alternative that includes 1,200' Locks (Locks 20-25, Peoria, LaGrange) and 1,200' Guidewalls (Locks 14-18). Additionally, we believe the US Corps should re-evaluate the net economic benefits to new locks at LaGrange and Peoria as we believe they have been under estimated. Thank you for the opportunity to provide input.

Lock Expansion Comments

8/19/99
315 N. Madison
Macomb, IL 61455

Army Corps of Engineers, Rock Island
Attn.: CEMVR-PM-A(Jackson)

To whom it may concern:

My comments are based on an article in the Quincy Herald-Whig of Sunday, July 25, and conversations with friends who are among the leading experts on the rivers' biology. They tell me your studies (to date) of potential environmental effects are nothing more than "follow shells" and there is no doubt that increased traffic will be detrimental to fish and other wildlife.

The information in the article reveals that extending the guidewalls and installing mooring buoys or cells would save about 2/3 of the lockage time, compared to 1200-foot locks, at only about 1/3 of the cost of expanding the locks. It appears that this option is the most economical, by far. I don't believe the public's tax money should be used for building 1200' locks. If the barge industry will pay for them with user fees, a serious environmental impact study could be done. We have living rivers here, not canals!

Sincerely, Dana Roy Walker

cc: Senator Durbin
Congressman Evans

L82499-Intl.Union

INTERNATIONAL UNION OF OPERATING ENGINEERS Operating Engineer

LOCAL No. 649, 649-A, 649-RA, 649-B, 649-C, 649-D

Affiliated with
American Federation of Labor
Congress of Industrial Organizations
and Illinois State Federation of Labor

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PEORIA, ILLINOIS
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STEVEN F. NEAL
Business Manager
ROBERT MARKHAM
Business Representative
CARL LAFOLLETTE
Apprentice Coordinator
VIRGIL ROBBINS, JR.
Business Representative
JOHN E. SALZER
Organizer

August 24, 1999

U.S. Army Engineer District, Rock Island
ATTN CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Navigation Study Project Manager,

Thank you for the opportunity to comment on the "Alternative Plans" of the "Upper Mississippi River-Illinois Waterway System Navigation Study". Operating Engineers Local No. 649 recognizes the Upper Mississippi River as an important multi-user Eco and transportation system. Furthermore, we realize the importance of this transportation system to the Midwest and national economies.

The navigation system allows for the safest, cost effective and environmentally friendly mode of moving bulk commodities. This infrastructure is our gateway to world markets. We need to improve and expand the Upper Mississippi River system to remain competitive in world markets.

The system must be capable of handling the traffic demand at peak demands in order to compete in world markets. Anything less will make this country a non-responsive, unreliable, non-competitive market player.

Furthermore, consider the impact to our labor forces. Our Local represents 1400 union employees. In review of the Alternative Plans, we want to be put on record as supporting Alternative H, as the most effective alternative for improvement and expansion of the navigational system.

Sincerely,

Steven F. Neal
Business Manager
IUOE Local 649

SFN/cm

August 26, 1999

U.S. army engineer District,
Rock Island
ATTN: CEMVR-PM-A (Jackson)
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Ladies and Gentlemen:

On August 18, 1999, I saw a publication produced by MARC 2000 The River Alert, which I am sure you are familiar with. The publication noted that the "deadline for comments is August 12, 1999". I gather from this that my comments will not be considered. However, I did want to express them anyway.

My husband and I are in support of the lock improvements and understand the economic benefits of enlarging and extending them. However, as homeowners of three properties on the Mississippi, we do also have some concerns. We aren't so concerned about our properties in Muscatine. However, we do own a home in Clarksville, Missouri. We are wondering what plans are being proposed for this lock and dam. Clarksville is an incredibly historic town. There is an active Chamber and Main Street group which has raised considerable funds to restore many of the historic buildings in the down town area -- which, is quite small, a matter of blocks, with a wonderful view of the Mississippi. There are also several historic homes along the main street, also with wonderful views. Our home is one of them, and is also registered on the Historic Register. Our concern is what is being planned. If the lock is extended and disrupts the view from the historic buildings and the homes, we feel this will have a tremendous impact on our town. Look at what has happened in Hannibal Missouri. They now have this retaining wall which eliminates any views of the river. We would hate to see this happen in Clarksville. We also feel this will impact the economy, development, and negate the hard work of the Main Street efforts.

Since, I don't know what is exactly being planned in the Clarksville area, my concerns may not be justified. Is there any information on what is being proposed for this lock and dam? If it is an extension, it would seem to me that an extension "north" of the existing lock/dam would be a better solution. There is no town and no homes which would be impacted. I would appreciate hearing from someone on what is being proposed.

I have only just heard of these efforts and would have attended one of the public hearings, however, we have been out of the country for an extended period of time, only returning on August 16.

Any insight on the Clarksville project would certainly be appreciated. Thanks in advance.

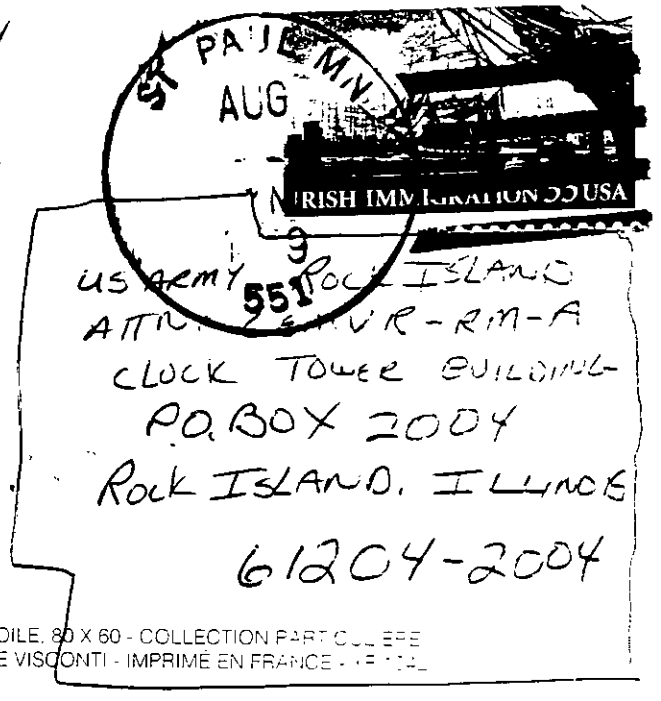
Sincerely,

Kathleen K. Bankhead

I attended your St. Paul MN workshop & believe it was informative & well-run. I have 3 comments: (1) while guidewall extensions & levels would reduce lock times when successive tows are traveling in the same direction, time savings would be substantially reduced when they are traveling in opposite directions. The increased wait should have been averaged INTO the posted time savings not footnoted ~~ignored~~ (2) when analyzing the costs of 1200' locks vrs guidewalls & levels, please consider the future correction costs of converting from guidewalls to locks if you have underestimated demand. A mistake in estimating = expensive correction.

(3) The Corps speaker stated they had "zeroed out" any effects on recreational boating. Pleasure boats wait alongside of tows at locks. Any reduction in that time makes boating more enjoyable, a positive not zero effect. I would endorse alternative Plan G. Thank you

Gary Carlson
1489 W. Minnehaha Ave
St. Paul
MN 55104



JEREMY WIGHT
1471 SIMPSON ST
ST PAUL MN 55108

U.S. ARMY CORP of ENG.
ROCK ISLAND DIST.
ATTN: GARY LOSS
P.O. BOX 2004
ROCK ISLAND, IL 61204-2004

Dear Mr. Loss,

Please save U.S. taxpayer money and the environment of the upper Mississippi + Illinois River by enacting a moratorium on new construction of the lock + dam system.

Thank you.

Jeremy Wight

Frederick & Dorothy Waltz
2095 Delaware Avenue
Mendota Heights, MN 55118-4801
651-454-8994

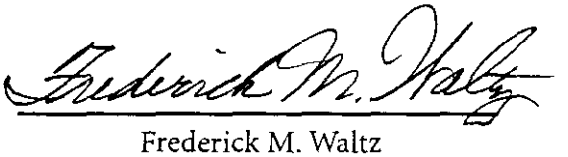
Navigation on the Upper Mississippi River

We are residents of Minnesota who spend a significant amount of time enjoying and using the Mississippi River and its shorelines. We also lead group field trips and tours along the Mississippi for adults and school groups.

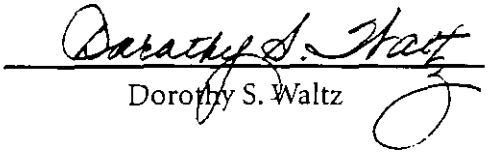
For the past several years we have been following the U.S. Corps of Engineers Systemic Navigation Study for the Upper Mississippi River. We are concerned that the studies to date do not adequately address the impacts of the proposed navigation changes on the environment of the river. We fear that the studies and related data are inadequate to assess accurately the impact of increased navigation traffic on fish and other wildlife of the Upper Mississippi River and its backwaters.

We also question whether the economic justification for the "improvements" in the lock and dam system is still relevant. There have been significant changes in the agricultural and mining industries in recent years. We are not personally opposed to navigational improvements if they are justified economically and if they do not degrade the natural habitats along the river, but giving further subsidies to an already heavily-subsidized activity does not strike us as either fair or sensible. We hope that updated economic analyses of the related industries will be incorporated in future decisions about navigational construction and maintenance.

In summary, we urge the Corps of Engineers to study more thoroughly the possible impacts of changes in navigation operation and maintenance on the environment and especially fish and wildlife habitats. This information is crucial to making a scientific and defensible decision on the future of the river's navigation system.



Frederick M. Waltz



Dorothy S. Waltz

Allegory Inspired By The Corps of Engineers' Public Information Meeting On Their Navigation Study To Relieve Barge Congestion On The Mississippi River

I met an old friend the other day and we spent some time bringing each other up to date. My friend, who likes to speak in allusions, told me his internal transport system had been suffering from "congestion" (I quickly understood his image), and that though all cargo eventually made it to the port of embarkation it was not always when expected and this caused him some distress. He said he went to another friend who was a "learned" engineer in such matters, described his problems and was examined, and the engineer went to a shelf and brought down a box with bottles, three containing pills of a single color, and the others containing various mixtures of the first three. He then proceeded to describe the expected effects on "congestion" each bottle would have if taken as directed and gave the price of each bottle on the basis of a fifty year supply. My friend gasped and asked if these would really deal with his congestion problems for the next fifty years? The engineer answered affirmatively but added they would only ameliorate, as described, the current congestion problems. Any new congestion problems that developed would have to be examined as they occurred.

My friend said he had just read an article that advocated asking about "environmental side effects" when taking something for internal congestion. The learned engineer replied his practice was limited to "solutions" and he knew nothing about their side effects, but he had a colleague who was an expert in examining such impacts to internal systems and gave a phone number. My friend called to make an appointment. The receptionist took his name, gave him an appointment day and time, asked who would be the responsible party, and then asked what question he wanted the expert in side effects to answer. My friend replied he thought his internal transportation system was a significant ecosystem as well as a significant transport system and wanted to know if he needed to worry about the environmental side effects to his internal ecosystem of the prescriptions given by his engineer. The prescriptions were being sent to the expert's office by the engineer.

At the appointed time my friend went to the expert and was examined and poked and prodded and measurements and scans were taken and he was told to come back in two months when the results would be available. When he returned at the appointed time, the environmental side effects expert told him the results were in. Using new methods of observation and analysis, and even constructing a scale model of my friend's internal transport system and watching many transport items make their way through with careful examination of results and comparison with real life, the conclusion was none of the proposed remedies would make him much worse than he already was. He was free to choose and be relieved or not.

My friend paused and thought for a while. He wondered out loud, "What do you mean none would make me much worse than I am? How bad am I?" The environmental expert was dismayed and replied that he had answered the question he had originally been asked. Any other question would require another appointment, further examinations, and he didn't think insurance would cover it. My friend left.

"What should I do?" he asked me. "I'm worried about my internal ecosystem."

I told him I had heard of an internal transportation economist who was an expert in cost-benefit analysis at 50 year spans. Of course, having started at age 25, he had never had the opportunity to compare his forecasts to reality, but he would even take into consideration the costs (and benefits)of the environmental side effects.

My friend replied he had heard of such people but thought they placed too much value on getting the cargo to the system exit on time and would have little assurance any such person would value his internal ecosystem as much as he did. After all how could anyone else understand how much it meant to him? He really needed to know the current condition of his ecosystem and then he could decide about relieving congestion. Until then he could live with it, he hoped.

I couldn't disagree.

Jeff Falk
Box 5
Fountain City, WI 54629
608-687-8486

US Army Corps
of Engineers

June 1999

UPPER MISSISSIPPI RIVER - ILLINOIS WATERWAY SYSTEM NAVIGATION STUDY
COMMENT SHEET

Name Tony Caradonna Telephone 573-242-9874 636-379-1930

Address 503 Sapphire Dr.

City O'Fallon State MO ZIP 63366

note: Name, Telephone, and Address are optional and can be left blank.

(Please provide your comments in the space below)

I Am very Concerned about the proposed extension of lock # 24 at Clarksville. I own a business on the riverfront across from the park directly on the Mississippi. Tourism, which is my business, would be hurt if the lock is extended Southward. It would take away the focal point of the city: the Park & the River.

(fold here, and return to addressee)

Please keep me informed. Thank you.

Tony Caradonna

Please check ONE category below that represents your primary interest in the study.

___ Waterborne Industry	___ Federal Government (Congressional)	___ Regional Planning
✓ Other Business/Industry	___ Federal Government (All Other)	___ Recreation
___ Environmental Group	___ State Government	___ No Particular Affiliations:
___ Agriculture	___ City/County Government	___ Personal Interest
___ Media	___ Education	___ Other (specify)

Privacy Act Statement:

In accordance with the Privacy Act of 1974 (Authority: Chapter 5, ER 1105-2-100), routine uses of the information obtained from this form include compiling official mailing lists for future informational publications and recording additional views and public participation in studies.

GRAIN & FEED ASSOCIATION *of Illinois*

3521 HOLLIS DRIVE · SPRINGFIELD, ILLINOIS 62707-9496 · (217) 787-2417 · FAX (217) 787-8671

Comment Sheet
Upper Mississippi-Illinois Waterway System Navigation Study
US Army Corps of Engineers-Public Workshops

The Grain and Feed Association of Illinois supports the 7-1200 ft. lock option (20 thru 25 on the Mississippi River and La Grange and Peoria on the Illinois River) along with 1200 ft. guidewall extensions (14 thru 18 on the Mississippi River).

1) The Chicago Board of Trade will shift the delivery point for it's corn and soybean contracts from Chicago and Toledo to the Illinois River beginning in the year 2000. The Illinois River was determined to be the best outlet to access the export market via the Gulf and provide routes to domestic markets. The success of this shift is dependent on the Illinois Waterway to handle current and projected traffic. The need for efficient locks is critical.

2) Recent studies show that the demand for barges remains constant, even though there are major changes in barge rates. This low elasticity is a major benefit to the nation in that barge transportation is recognized as the most environmentally friendly, most economical and the safest means of moving bulk commodities. Also, in estimating the barge demand on the Illinois River, the State of Illinois Economic Coordinating Committee strongly objects to the exclusive use of Iowa data.

3) The Corps has reported an average delay of six hours per tow in moving through lock 25. however an average delay has little significance when tows are waiting six days during peak export times. The Upper Mississippi River System handles 66 percent of all grain exports. We cannot afford to loose the export market, due to the fact that we cannot get our products to market.

4) The fuel tax that is paid by commercial navigation is to be used for improvements on the nations waterway system. Forty percent of the money in the trust fund has come from the Upper Mississippi Region, which has only received 15 percent of the money for improvements. The money in the trust fund needs to be used to the benefit of our nations economy. Historically, for every dollar invested in our inland waterway system, the nation has received a six dollar benefit.

5) Five billion dollars worth of Illinois agriculture products, mostly corn and soybeans for export, use the river to get to market. Illinois consumers rely on the river to move another eight billion dollars worth of products.

6) Navigation, flood protection, environmental restoration, water supply, and other civil works programs serve the country in countless ways, providing benefits far beyond their actual cost to the taxpayer. These programs deserve funding that meets the nations growing water resources needs.

37089 395th Ave.
Sauk Centre, MN 56378

Phone: (320) 352 3326
Toll Free: 1-877-738-2326
www.roastedbeans.com

Mr. Loss

I am writing to show my support for Alternative H

This improvement to the Mississippi River system is important to farmers. If we do not continue to improve our systems and efficiently market our products we will loose our customers to countries like Brazil who are making effective gains in the quality of their countries infrastructure.

The implementation of Alternative H will help improve the efficiency of the Mississippi River system and help to keep the American farmer along with other industry competitive on a world wide scale.

Thank you for your consideration on this matter

Sincerely,

Kevin Lahr
President Stearns County; Minnesota Corn Growers

Comment to the ACE relative to the study on the proposed expansion of navigation on the MR.

Sirs/MS: Below are my initial comments on the study as presented at your recent August 5th meeting in Inver Grove Heights Mn. I would like to comment on the thoroughness of your presentation and compliment all of you on how hard you worked at it; however, I have many criticisms of the study. While I am not opposed to barge traffic on the MR, I am concerned about wasteful government spending and the excess influence of special interest in Congress. The proceedings seemed designed primarily to gain industry input and indeed a majority of the audience seemed to represent special interest relative to navigation and agri-business industries. The dominant attitude of the ACE seems to be that you are the designated landlord of the MR. You have appropriated the water and land that belong to the heritage of the American people and converted it for use solely as a barge canal and ignored the responsibilities that good public officials would not ignore.

While I believe that you are decent people, you are presenting yourselves as an arrogance of government that the average citizen has learned to recognize and quite frankly-despise. You spend tax dollars for the benefit of a very few special interests and neglect all other users of the River whose voice is much smaller. Since recreational pursuits account for as much revenue as all the traffic on the river, I believe your study is seriously remiss in not making an analysis of the environmental changes and damages that would alter the natural and human landscape of small and mid size towns and their whole economies. The limited environmental analysis you did do has been commented on already by USFWS and the UMRCC, so I will not review those issues here. I very much agree with the issues raised in both those comments. I have not seen much criticism of your economic precepts and so have turned my focus in this direction. Below you will see quotes from your summary and my viewpoints/suggestions on the merits of these points. I regret that time and space do not allow me to go into greater detail and to provide you with annotations and footnotes. I will be continuing my research and looking at your findings and hope to make more detailed comments at a later date:

ACE: The yield per acre in the U.S. for corn is about double the world average, and Iowa and Illinois are above average for the total U.S. Yields per acre for soybeans in the U.S. are significantly above world average and Iowa and Illinois are above the total U.S. average.

Other countries will expand markets and buy agri-chemical products that have made the US a large producer for the last four decades. With the advent of free trade, other economies can compete for local and international markets. Even in the best economic scenario, U S dominance of the past is not a given in the future.

ACE: *Since almost all of the grain traffic on the Upper Mississippi River originates in the Study Area and moves to Louisiana ports for export, this export trade supports most of the Upper Mississippi River grain traffic.*
The events in agriculture of the last few years have demonstrated how fast the markets for products can change. The study bases most of the need for traffic increases on this type of export trade. Since these

are the largest product group shipped, the analysis should give the most weight to assessing the longterm elasticity of this market. The analysis of the areas benefited most by barge traffic indicates that the further you move from the river, the less the benefit derived.

ACE:SCI's forecast that acreage will slightly grow rather than fall is based on two assumptions: that world demand for grain will continue to be strong and that the passage of the recent Farm Bill will allow U.S. farmers to remain competitive in world grain markets.

Neither one of these scenarios has held true in the short run. The markets have historically fluctuated . The Study is basing its conclusions on a full production mode, which is an assumption based on markets that developed as a result of farm policy legislation prior to 1996. It remains to be seen if American farmers can maintain competitive edge in a deregulated world economy. It is uncertain that deregulation will even survive the next session of Congress as farmers clamor for Government assistance.

ACE: The widespread location of the manufacturers (of animal feed products) and the consumption locations offer little opportunity for domestic transportation on the waterways.

An illustration of an elastic market and how the barge industry is not able to take advantage or compete for this type of commodity. The impact of production is often local so only a small portion of its commerce is within reach of river transport.

ACE:Riverborne receipts for (Coal) use in the Study Area amount to only about 10 percent of the total receipts which are mostly supplied by direct rail.

Power plants running on pollution credits will be phased out in the next 50 years and replaced by more efficient units powered by fuels producing fewer greenhouse gasses. This will further reduce the need for this commodity.

ACE:The substitution of ethanol in gasoline would also have some effect on the reduced share of U.S. petroleum product consumption.

Petroleum products will continue to decline due to consolidation in the energy industry. New larger companies will rely on pipelines and integrated supply systems. Increased energy efficiency will also alter the transportation of bulk chemical commodity shipments as replacements are found in the marketplace. This process is well known over the last 30 years and yet is not factored into the Report.

ACE: Additionally, in both Minnesota and Wisconsin, cement is shipped into the states by three major modes: barge via the upper Mississippi, lake vessel, and overland rail and truck routes from nearby cement producing States.

Cement usage will continue to be shipped by barge to MN and WI, however, expansion of the IL., IA. lock system would benefit only regional and trans shipment users. Iowa uses cement locally and MN and WI users, depending on region, would still have access to cement by Lake Vessel. The question arises as to how much subsidy to the barge industry will actually cause higher market prices for cement than would have developed in an open competitive system.

ACE: It is generally expected that the increase in U.S. steel production capacity will first and foremost displace U.S. steel imports. Second, steel industry analysts indicated that the relevant steel producers within the Study Area are among the healthiest in the U.S. steel industry.

Again recent events related to world market deregulation has resulted in a faltering steel industry. Foreign imports are undercutting US producers who are asking for price supports. The GATT process will take years to mediate and is no guarantee in a world order based on competition that US producers will not be out produced by lower cost manufacturers in South America or Europe. Also local affect can drastically change predictive barge behavior. For example If MN enters the steel market with a new mini mill in Northern Minnesota its production would draw traffic away from the River and redirect it towards the Great Lakes.

ACE: For example, shifts in projected grain exports to or from Northwest ports versus the Louisiana ports (depending on the foreign country destinations) could affect the overall modal split and barge traffic level as discussed at length in Volume II.

This feature is again related to world markets. Rail shipment directly to deep-water ports with larger vessel capacity may be the competitive edge of the future.

ACE:The forecasts represent our estimates of traffic levels that we would expect under the hypothetical scenario that the current transportation environment (e.g., relative price, relative capacity, etc.) will not change. In reality, these conditions have been changing and will continue to change. However, the purpose of this effort was not to predict actual traffic levels; rather, we attempted to develop a set of forecasts that could be used by the Corps to conduct a benefits-cost assessment of potential...

I don't understand a forecast model that does not assume some standard of changing external parameters. You must assume some type of an elastic market relative to the future since the policies and legal basis of the former inelastic market has changed in the course of the last fifteen years. Using the older data locked into an inelastic market model will only predict benefits and costs for the past into the future. You should be asking some serious questions here, like how might actual traffic levels change relative to future markets and precisely where?

ACE:Rail cost reductions and/or capacity improvements could also affect actual traffic levels.

Deregulation of rail traffic and efficiency improvements are just starting to show results in the Rail industry. The study underrates the competitive impacts of rail transportation and the ability for markets to move with the transportation mode. These modes are also not heavily subsidized as is the barge industry but increasingly market based, and therefore represent a true cost floor.
Barge industry contributions for operations and maintenance should be targeted to achieve parity in operations with the railroad industry. This could be phased in as Ag subsidies are phased out over a long period of time.

ACE:A full production scenario is assumed. In other words, it is assumed that the total land available for crop production will be fully utilized. There are a finite number of acres that can be utilized for crops, thus there is an upper limit on area. The high area levels of the late 1970s and early 1980's were used to represent an upper extreme or limit for total crop area.

Recent farm economies have not demonstrated that full production will be the rule. Contrary to projections the excess dependency on export farm economy coupled with low prices and more frequent drought/flood cycles is favoring less acreage in production. Lower prices mean fewer producers, who will manage supply in a vertically integrated farm economy. American multi - nationals will enjoy competitive advantage, but can only make money on larger yields. The impact of other markets competing with the American farmer is underestimated. Increasing environmental legislation of pesticides and herbicides plus technological advances in genetics will likely lead to the use of less Ag chemical usage in the long term. Also the bio-engineered plant varieties are taking more acreage every year. In favor of the Corps 50-year projection is a world population topping off at 10 billion, however, what will they like to eat?
Large portions of the world are vegetarians or only marginal meat eaters. An agriculture with a meat production only focus is highly marginalized when other products come to market. The most efficient productivity increases of the future will result in higher quality production, which will be immediately food grade, rather than making an intermediate step through animal production. An example is Soymilk and bean curd for human consumption. Many of these products are still imported even though we are the largest producers of soybeans in the world. Also take note that roughly 1/3 of the worlds population are practicing Hindu's or Buddhists. To a great extent the vegetarian diet predominates in these religions. Also note the fact that animal husbandry practices in the US make many products unacceptable to Europeans and Asians. This is true in other agricultural products as well and is likely to increase as technology continues to alter plant/animal production. Many of these practices will be viewed with suspicion for several generations in societies less enamored with technology than our own.

ACE:Most petroleum products are transported by pipeline; however, there is no good source of pipeline data that we could forecast and compare with the water traffic. As a result, we had to forecast barge traffic directly as a function of the supply and demand proxies.

The study extrapolates an entire commodity supply/demand forecast, but fails to properly factor in the effect of vertically integrated energy suppliers with increasing network capacity of pipelines. One need only document the recent mergers of local energy companies to verify this fact. Also the localized affects of increases in consumption are not properly reflected in the localized change in consumption. Ethanol production is likely to be enhanced as a result of EPA rulings concerning MTBE. However, as the study states, due to market limitations the production is likely to be absorbed locally. This will result in less barge transportation. The problem of elastic market dynamics is again being ignored.

ACE:The primary underlying factor in Criton's riverborne cement forecast is overall cement demand in the five-state Upper Mississippi Study Region. Cement demand forecasts were developed for each of the five states in the study region. These forecasts were based upon forecasts for "Gross State Product: Construction" prepared by the U.S. Dept. of Commerce, Bureau of Economic Analysis (BEA). by JFA.

The affect again of elastic markets is understated. Minnesota's barge traffic benefit for cement can only include a narrow geographic area served. Wisconsin is the same case. The availability of lake transport and the existence of good road and rail connections to the main development areas means that barge traffic has a natural competitor in terms of lake traffic. Subsidy for the barges is a direct subsidy to Illinois cement producers and inhibits free trade from other producers.

ACE:Since the vast majority of steel and steel-sector raw materials moving on the upper Mississippi River above the Missouri River represents traffic moving into and out of the Illinois Waterway, waterway traffic forecasts were first developed for the Illinois

Waterway. Upper Mississippi waterway traffic forecasts were then largely developed using the results of the Illinois Waterway traffic forecasts.

While on the one hand using data from an entire industry sector, when the data is favorable it is applied to a localized area. External factors such as the development and production of new capacity for steel production and changing prices and markets as a result of worldwide competition negate this forecast method except to show that a narrow area will benefit from this small portion of the traffic.

Summary
Two glaring omissions of the economic study:

1. **If the subsidy of the waterway system even without including environmental costs were added to the net cost comparison of shipping these products via different your projections would be much more conservative. In most cases the ACE projections show only a marginal benefit over less subsidized forms of transport, especially as you move 50 or more miles away from the River. If cost share were introduced to level the playing field-how much traffic would exist? This is a question the study should be addressing more thoroughly since they are projecting worldwide competition as a 50-year trend.**
2. **The flexible and changeable market with buyers and sellers moving to the best price is ignored. Rather they are using the model of an inelastic market with regular and statistically computable inputs even though the cost and expense data they are using is extrapolated and of questionable accuracy for such long term forecasts. The entire premise that markets prior to 1996 were based upon has changed in terms of law, policy and culture, which renders the assumptions made within these old parameters obsolete.**

My suggestions on how the study may be improved:
Since many of your proposed changes have mostly local affects, change your scenarios to include options for specific pools and assign a level of benefit to each local area (Since no buildout will really have any larger affect on the entire system, until all of the locks are expanded); Do an honest environmental assessment of these local impacts based on current knowledge of River dynamics, including the changes that prior navigation changes have caused; Include realistic cost sharing for operations and maintenance where delays for industry are mitigated as part of your alternatives. This is at least equal to the manner that EMP programs are administered; Introduce more free market based assumptions and tie them directly to your scenarios as a subset of localized alternatives; Present a rational phased funding method so Congress can progressively accomplish your goals based on realistic market projections (not Industry projections). Support a greatly expanded EMP program to mitigate and repair the environmental damage of navigation and encourage Congress to promote more active watershed improvements to prevent the problem of sedimentation occuring (and thus lower the overall cost of System maintenance).

Thank you.

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