



# MO-ARK

MISSOURI-ARKANSAS RIVER BASIN ASSOCIATION  
*Promoting Beneficial Use of Water and Related Land Resources Since 1952*

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February 27, 2010

Council on Environmental Quality  
Attn: Terry Breyman  
722 Jackson Place, NW.  
Washington, DC 20503

**RE: *Proposed National Objectives, Principles and Standards for Water  
and Related Resources Implementation Studies***

The Mo-Ark Association (Mo-Ark) submits these comments in response to the Notice and Request for Comments published in the Federal Register on December 9, 2009. 74 Fed. Reg. 65102. Mo-Ark is a stakeholder based not-for-profit organization formed to advocate for responsible water resource management following the 1951 floods that ravaged the Midwest. Our organization is diverse in its membership, comprised of local governments, utility companies, river operators, farmers and others.

Mo-Ark has submitted comments to the Corps of Engineers and the Council on Environmental Quality (CEQ) during the development of the new Principles & Standards (P&S's). As we once again revisit this matter, we are disappointed that our concerns have gone unheeded, and our discussions continue to be centered on the need for transparency in the process being used to make significant changes to these P&S's that have such far-reaching and long-term impacts on life safety, our environment and the nation's economy. A primary area of concern for many in our region, located at the juncture of two major rivers, is that the loss of life and livelihood has not received appropriate consideration. Many people here have suffered devastating losses due to flooding, and the families and businesses in our region continue to be impacted by the nearby rivers and many streams in our community.

Those same rivers that threaten us also provide us with an adequate supply of quality drinking water, irrigation, recreation, electrical power generation, and a much needed transportation alternative. How best to weigh these needs, along with the loss of life and livelihood due to flooding, and the benefits of a functioning ecosystem, should have been carefully considered and addressed in the P&S's. We do not see that to be the case. The proposed P&S's move the study and formulation of water resource projects away from a comprehensive approach that can effectively address multiple purposes and that allows for meaningful stakeholder involvement at the state and local levels. Instead the P&S's presume that the many federal agencies having some responsibility for water resources management will be able to best determine how this most precious resource should be managed, while at the same time not providing the appropriate tools to those agencies to even begin to accomplish such a task. We find this approach to be not only naïve, but also inconsistent with the intent of Congress as expressed in the language of WRDA 2007, and strongly believe they will ultimately result in a substantial and potentially disastrous step backward in our nation's water resources management policy.

Considering the importance of water to our nation's long-term viability, and the failure of CEQ to recognize that and appropriately provide for a comprehensive approach that promotes coordination amongst federal agencies and significant involvement of state and local government, we request that the development of these P&S's by CEQ be immediately stopped. We suggest instead that an open and transparent process which includes state and local representatives and stakeholders be developed to craft an entirely new set of P&S's that reflect the intent of Congress as expressed in WRDA 2007 to appropriately balance our economic, environmental and public safety needs.

Sincerely,

*Ronald J. Blakley*

Ronald J. Blakley

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*Agriculture, Environment, Flood Damage Reduction, Navigation, Recreation, Shipping & Ports, Power, Water Quality & Supply*