



DEPARTMENT OF THE ARMY  
CORPS OF ENGINEERS  
MISSISSIPPI RIVER COMMISSION  
1400 WALNUT STREET  
VICKSBURG MS 39180-3262

October 16, 2025

Mr. Roger Sutter  
Chairman of the Board  
Midwest Flood Control Association  
6220 County Road 306  
Taylor, MO 63471

Dear Mr. Sutter:

Thank you for joining the Mississippi River Commission during the 413<sup>th</sup> Session of its Annual Low-Water Inspection Trip and for providing testimony at our public hearing in St. Louis, Missouri, on August 15, 2025. This tradition of listening, partnering and inspecting goes back to the Commission's very first inspection trip in 1879. Your participation in this historic tradition is critical for helping the Commission better understand and develop solutions to the water resource challenges facing the people of the valley.

We appreciate the insights you shared regarding the formation and mission of the Midwest Flood Control Association, as well as the challenges faced by levee and drainage districts in the Upper Mississippi River region. Your testimony highlighted several critical areas of focus:

The Commission commends the establishment of the Midwest Flood Control Association and its commitment to advocating for strategic policies and investments to protect communities and regional economies from destructive floods. Your efforts to create a balanced governance structure and foster collaboration among stakeholders are commendable.

Your emphasis on preserving and maintaining current levels of flood protection and accreditation for levee and drainage districts is well noted. The Commission recognizes the importance of addressing immediate challenges while working toward long-term solutions.

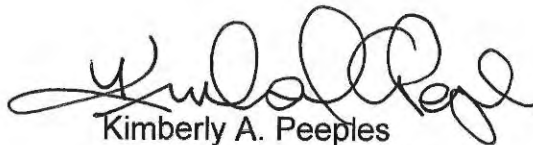
The Commission acknowledges your concerns about the potential regulatory use of the Upper Mississippi River Flood Risk and Resiliency Study for PL 84-99 compliance and Federal Emergency Management Agency Levee accreditation. The Commission recommends only using the information from the study as a planning tool until the study is completed and actionable items have been identified to mitigate any impacts. Section 8219 of the Water Resources Development Act of 2022, which authorized the Flow Frequency Study, stated that any information developed from this study shall be made publicly available. Therefore, the Commission believes that congressional legislation will likely be required to prevent the information from this study from being used as a regulatory tool until such time actionable solutions have been determined.

The Commission believes the most prudent course of action is direct engagement. We ask that the respective District Commanders COL Aaron Williams, Commander of the Rock Island District, and COL Andy Pannier, Commander of the St. Louis District, and their staff to meet with you and your team to discuss this study and the issues you discussed in your testimony.

Your commitment to building lasting relationships with regional groups, including the Upper Mississippi River Basin Association and other levee districts, aligns with the Commission's mission to foster collaboration and develop comprehensive solutions to flood challenges.

Once again, thank you for your testimony. We look forward to hearing from you on future inspection trips and working together to improve the watershed so that future generations can continue to enjoy this incredible system we have inherited.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimberly A. Peebles', with a stylized, flowing script.

Kimberly A. Peebles  
Major General, U.S. Army  
President, Mississippi River  
Commission

cc:  
COL Aaron Williams (MVR)  
COL Andy Pannier (MVS)