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Subject: FW: [EXTERNAL] St. Johns Bayou and New Madrid Floodway Project Draft Environmental Impact Statement: Comments

Audubon Missouri appreciates the opportunity to comment on the U.S. Army Corps of Engineers' St. Johns Bayou and New Madrid Floodway Project Draft Environmental Impact Statement.

Our organization and its membership throughout the state and elsewhere along the Mississippi River are deeply concerned about the potential loss of over 50,000 acres of wetlands and wetland habitat that would result from this project's construction, as calculated by the U.S. Fish and Wildlife Service (USFWS) and the Environmental Protection Agency. In fact, the USFWS has stated that the project would "result in significant losses of regionally and nationally important fish and wildlife resources which cannot be adequately mitigated."

In addition, the construction of this project would prevent backwater flows into the New Madrid Floodway during floods and make it less likely that the Floodway would be used for its intended purpose—as a relief valve to protect human communities and valuable infrastructure along the Mississippi River during times of extreme flooding. As you know, the communities that would be impacted negatively during extreme flooding events as a result of the loss of this Floodway have been quite vocal in their opposition to this project. In fact, in 2007, a federal court called the rationale for essentially the same project "arbitrary and capricious." In addition, the Corps' economic analyses have thus far failed to account for many of the negative potential outcomes associated with implementation of this project. The shortcomings of this economic analysis put the interests of a few ahead of the national interest, which is utterly unfair to U.S. taxpayers.

We also join with the Missouri Parks Association, the USFWS, and other organizations and agencies, in requesting that the St. Johns Bayou project be separated from the New Madrid project, so as to provide additional project analysis clarity. There are aspects of the St. Johns Bayou project that could be considered acceptable, but we cannot support the construction of the New Madrid levee as we have outlined above.

If the Corps proceeds with the St. Johns-only project, please prioritize project mitigation efforts for Big Oak Tree State Park. If the Corps does not proceed with the project, we request that the Memphis district work cooperatively the Missouri Department of Natural Resources (MDNR) on restoration for Big Oak Tree State Park, as indicated in the 2003 Memorandum of Understanding between the USACE and the MDNR. Mitigation is necessary for the significant degradation in Big Oak Tree caused by the Corps' existing frontline levee. Such mitigation efforts would have great public benefits.

Thank you for the opportunity to comment on this project. Please contact me with any questions regarding Audubon Missouri's position on these issues.

Sincerely,

Patricia Hagen, PhD

Executive Director, Audubon Missouri

Vice President, National Audubon Society