

Illinois Chapter Sierra Club
70 East Lake St.
Chicago, IL 60601
Reply to:
Barbara McKasson
2 Hillcrest Dr.
Carbondale, IL 62901

Army Corps of Engineers
Submitted by email to:
Joshua.m.koontz@usace.army.mil
Daniel.d.ward@usace.army.mil

Re: Comments on St. Johns Bayou and New Madrid Floodway Project Proposal (the Project) and DEIS

First of all, we object to the Army Corps of Engineers (ACE) decision to combine two projects that were previously separate into one project. St. Johns Bayou Project addresses flooding problems that are mainly caused by drainage problems. The New Madrid Floodway Project flooding is mainly caused by flood conditions when high water from the Mississippi and Ohio Rivers enter the NM Floodway. These projects should be addressed separately. However, we object to the highly technical proposal of using large pumps to “fix” flooding in both areas - the environmental and monetary costs are most definitely not justified. Plus, the ACE analysis is extremely flawed and does a superficial and artificial job of trying to justify both projects.

We support the “No Action” alternative for the New Madrid Floodway and the St. Johns Bayou. We do support lower technology and lower cost alternatives to solve the drainage problems in the St. Johns Bayou area.

Our primary concern is with the New Madrid Floodway Project and the aspect of greatest concern is the proposal to close the last 1500 foot gap in the Mississippi River Levee system in the entire state of Missouri. Closing this gap is predicted by the US Fish and Wildlife Service (USFWS), plus a peer review panel of scientists to trigger a “tipping point” that would cause population crashes for many species of fish, amphibians, and reptiles in the area. In fact, the USFWS has determined that the proposed levee would cause fish populations in the whole Middle Mississippi River to decline

precipitously.

The ACE has provided inadequate evidence for the “Need and Purpose” for the Project. The new DEIS states that 75% of the benefits would be increased intensity of agriculture, but does not quantify the value of the agriculture currently present in the Project area, nor does it quantify how much the agricultural value would be increased by the Project. The ACE claims another 22% of the Project is justified by alleviating the need to raise a section of Interstate 55 because the project would alleviate flood risk. The ACE claims over \$3.4 million saved per year by decreasing the amount spent to protect I-55 during floods in the project area. In fact, during the 2011 flood, the State of Missouri Dept. of Transportation spent only \$163,000 to protect I-55 from flooding.

The DEIS egregiously discounts the increased flooding that would likely be caused by closing the 1500 ft. gap in the levee system. The DEIS does not even fully take into account the Illinois and Kentucky flooding of 2011. In Metropolis, IL, ten homes were completely destroyed and dozens more homes damaged by flooding because the ACE was being pressured to not use the New Madrid Floodway. Because of this political pressure from landowners in the New Madrid Floodway, blasting open the Birds Point Levee was unnecessarily delayed, causing unnecessary damage in Olive Branch, Metropolis, Brookport and farmland in Illinois. Famously, the entire town of Olive Branch is now being moved out of the floodplain to higher ground. However, the proposed levee would raise the level of flooding on the Illinois and Kentucky side of the Mississippi River. How much more damage would likely be caused, and how much more expense to taxpayers and property owners? These questions are not adequately addressed by the DEIS.

The DEIS inadequately addresses the damage that would be caused by the proposed Project - 50,000 acres of wetlands in the New Madrid Floodway area alone. On top of this, the outlined wetland mitigation proposed by the ACE is not only insufficient, according to the scientific peer review panel, but some of the proposed mitigation is even detrimental to wetlands. Dr. Joy Zedler, a wetland mitigation expert, has stated that the mitigation in the DEIS proposed by the ACE “cannot offset the impacts of this project.” Dr. Zedler also states that the ACE proposed mitigation is “inconsistent with established practice under the Section 404 program.” [of the Clean Water Act].

The proposed alternative favored by the ACE ignores the ecosystem services of wetlands, floodplains, backwater areas, and connectivity of these areas to the Mississippi River. The proposed ACE project, if approved, should be vetoed by the U.S. EPA under Section 404(c) of the Clean Water Act. In addition, the DEIS does not satisfy the requirements of the National Environmental Protection Act in that it overvalues the agricultural benefits and the flood prevention benefits while undervaluing the environmental and monetary impacts.

The Army Corps of Engineers and the U.S. taxpayers already subsidize the landowners in the New Madrid Floodway through the easements purchased for the use of the Floodway (flowage easements on over 111,000 acres of land in the Floodway) and through significant federal farm subsidy payments. How can the ACE justify providing a huge additional subsidy by building the proposed levee and installing huge pumps to drain the project areas? It is certainly not justified by the ACE analysis in the DEIS.

These comments are being sent electronically, with a hard copy to follow in order to provide signature.

Sincerely,

Barbara McKasson, Chair
Shawnee Group Sierra Club

Joyce Blumenshine, Conservation Chair
Illinois Chapter Sierra Club