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21 November 2013

Mr. Joshua Koontz, NEPA Coordinator
Upper Delta Environmental Compliance Branch
167 N. Main, Room B-202
Memphis, TN 38103-1894
joshua.m.koontz@usace.army.mil

Dear Mr. Koontz:

The Missouri Parks Association appreciates this opportunity to submit comments on the U.S. Army Corps of Engineers St. Johns Bayou and New Madrid Floodway Project Draft Environmental Impact Statement.

The Missouri Parks Association is an independent citizens organization of more than 3,000 members statewide dedicated to the protection, enhancement, and interpretation of Missouri state parks and historic sites. We have long been concerned about the disruption of normal hydrologic cycles and consequent severe degradation in Big Oak Tree State Park (located near the outlet of the New Madrid Floodway) that has resulted from Corps of Engineers projects and agricultural drainage ditches and levees in the surrounding area. Big Oak Tree, a National Natural Landmark, is one of the most distinctive and ecologically significant of our state parks, so we are pleased to note the Corps plan for substantial mitigation at the park by purchase of 1800 acres of buffer lands and construction of a water delivery system to the park through the existing Mississippi River frontline levee that would enable park officials to mimic more natural hydrologic flows.

But we cannot support the proposed New Madrid levee, which would sever the last remaining connection of the Mississippi River with its floodplain anywhere in the state of Missouri with a 1,500-foot long 60-foot high plug. This levee would imperil more than 50,000 acres of wetlands, as calculated by the U.S. Fish and Wildlife Service and the Environmental Protection Agency using more appropriate models than those of the Corps. The Fish and Wildlife Service has said the project would "result in significant losses of regionally and nationally important fish and wildlife resources which cannot be adequately mitigated." Moreover, construction of this project would prevent backwater flows into the New Madrid Floodway during floods and make it much less likely that the Floodway would ever again be used for its intended purpose, to serve as a relief valve to protect human communities and valuable infrastructure elsewhere along the Mississippi River during times of extreme flooding. A federal court in 2007 struck down the rationale for substantially the same project as "arbitrary and capricious," and an expert review of the economic analysis contained in the current DEIS recently prepared for the National Wildlife Federation and Great Rivers Environmental Law Center clearly demonstrates that the Corps' economic analysis is so deficient that it cannot be relied upon. As a result, the Corps has failed to demonstrate that the project is economically justified.

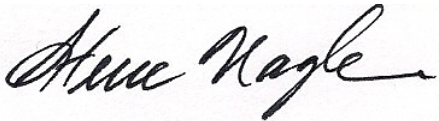
Accordingly, the Missouri Parks Association follows the lead of the Fish and Wildlife Service and other agencies in asking that the St. Johns Bayou project be separated from the New Madrid project, and that the New Madrid levee not be constructed or further considered. We have no objection to aspects of

Alternative 2.1 intended to protect human populations and infrastructure within the St. John's Bayou basin, as that basin has long since been severed from the Mississippi, but we would insist on appropriate modifications to protect substantial remaining habitat, including elimination of the pumping plant that does nothing to protect East Prairie, and full mitigation for lost wetlands.

If the Corps decides to go ahead with the St. Johns-only project, we ask that priority for mitigation under that project be the restoration measures proposed for Big Oak Tree State Park in the immediately adjacent basin. Surely this is the most significant wetland acreage anywhere in the region that could be restored. If the Corps does not proceed with the project, we ask that the Memphis district immediately begin working cooperatively with the Missouri Department of Natural Resources and its state park division on the restoration envisioned for Big Oak Tree in the 2003 Memorandum of Understanding between USACE and MDNR in mitigation for the very substantial degradation the park has suffered from impacts of the Corps' existing frontline levee. We know and applaud other districts of the Corps that have worked cooperatively with other agencies and organizations on such restoration projects elsewhere along the Mississippi and Missouri rivers with great public benefit.

In sum, we request that the Corps move forward expeditiously with the Missouri Department of Natural Resources to provide buffer lands and restored hydrologic flow for Big Oak Tree State Park in mitigation for past impacts from the frontline levee, regardless of the outcome of the current proposal. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Steve Nagle". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Steve Nagle, President
Missouri Parks Association