



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Missouri Ecological Services Field Office  
608 East Cherry Street, Room 200  
Columbia, Missouri 65201  
Phone: (573) 876-1911 Fax: (573) 876-1914

JUN 7 2000

Colonel Daniel W. Krueger  
District Engineer  
Memphis District, Corps of Engineers  
B-202 Clifford Davis Federal Building  
167 North Main Street  
Memphis, Tennessee 38103-1894

**FILE COPY**

Dear Colonel Krueger:

Enclosed is the Fish and Wildlife Coordination Act (FWCA) Report for the East Prairie Phase of the St. Johns Bayou and New Madrid Floodway Project. The project as described in your agency's supplemental draft environmental impact statement (DSEIS) would enlarge selected drainage ditches in the St. Johns basin and construct pump stations in the St. Johns basin and the New Madrid Floodway. It would also include a separately authorized levee closure in the New Madrid Floodway. Our report contains the findings of the U.S. Fish and Wildlife Service's (Service) analyses and recommendations regarding the proposed project and constitutes the report of the Secretary of the Interior as required by Section 2(b) of the FWCA (U.S.C. 661 *et seq.*). We have coordinated this report with the Missouri Department of Conservation and have enclosed a copy of their comments.

Both project alternatives analyzed in detail ( i.e., Authorized Project and the Avoid and Minimize Alternative) in the DSEIS would lead to significant losses of fish and wildlife resources, including some of the largest wetlands losses in the State of Missouri in two decades. Our recommendations to your agency to modify the St. Johns Bayou and New Madrid Floodway Project to substantially reduce predicted environmental impacts were not included in the proposed alternatives that were considered in detail. The current preferred alternative would still result in severe adverse impacts to natural resources that the Department of the Interior holds in Federal trust for the citizens of the United States.

Specifically, the Service opposes the St. Johns Bayou and New Madrid Floodway preferred alternative because:

- 1.) The preferred alternative would cause substantial, irretrievable losses of nationally significant fish and wildlife resources and greatly diminish rare and unique habitats found in southeast Missouri;

- 2.) The project will likely cause a significant reduction in fishery resources because the levee closure will block the natural spring river flooding in the New Madrid Floodway, virtually eliminating fish access to shallow backwater wetlands in the floodway during the critical spawning and nursery season; and
- 3.) Project-related wetlands losses are at odds with the Administration's conservation policy goals and those of the Clean Water Action Plan. There will be a significant net loss of both wetland acreage and important wetland functions (e.g., inherent capacity for floodwater storage, nutrient cycling, pollution abatement, and biodiversity refugia). In part, this reflects limitations of state-of-the-art habitat assessment methodologies that are not technically sophisticated enough to accurately model many of the beneficial aspects of wetlands. Therefore, the proposed mitigation plans does not address them.

Because of the significant project-related impacts to fish and wildlife resources and the difficulty in functionally compensating those losses, the Service believes that project plans can and should be further modified to avoid those negative impacts, rather than trying to compensate for them after the damage is done. Therefore, the Service continues to recommend that the Corps consider alternatives that would provide flood protection for East Prairie, while maintaining the significant fish and wildlife values of the project area.

If the Memphis District elects to pursue a project alternative requiring extensive compensatory mitigation, we will recommend that the Corps adopt the following elements to offset project-related adverse impacts to fish and wildlife resources, and include the following commitments in the Record of Decision:

- 1.) Acquisition of mitigation lands in close proximity to the areas directly affected;
- 2.) Close replication of the types and functions of habitats lost due to project construction and operation;
- 3.) Maintenance of continued connectivity between the floodplain and the river, as much as possible, to perpetuate the ecological integrity of the floodplain-river ecosystem; and
- 4.) Completion of a substantial portion of compensatory mitigation concurrently with project construction (i.e., acquisition of mitigation lands has been completed and restoration of replacement habitats has begun before project is operated).

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We appreciate the extensive help your staff provided us. Please contact Jane Ledwin at (573) 876-1911, extension 109, if you have questions or need further information.

Sincerely,

A handwritten signature in cursive script that reads "R. Mark Wilson".

R. Mark Wilson  
Field Supervisor

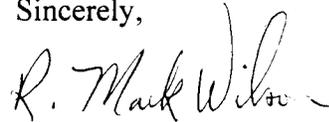
Enclosures

cc: MDC; Jefferson City, MO (Attn: Gary Christoff)  
EPA; Kansas City, KS (Attn: Joe Cothem)  
DNR; Jefferson City, MO (Attn: Thomas Lange)

Krueger letter  
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We appreciate the extensive help your staff provided us. Please contact Jane Ledwin at (573) 876-1911, extension 109, if you have questions or need further information.

Sincerely,

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R. Mark Wilson  
Field Supervisor

Enclosures

cc: MDC; Jefferson City, MO (Attn: Gary Christoff)  
EPA; Kansas City, KS (Attn: Joe Cothorn)  
DNR; Jefferson City, MO (Attn: Thomas Lange)

bcc: FWS, AES/GARD II (Lewis), Fort Snelling, MN  
FWS, AES/DHC (Tuggle) Arlington, VA