



3 January 2017

The Honorable Christy Goldfuss, Managing Director
White House Council on Environmental Quality
Old Executive Office Building
Washington, DC 20006

Dear Ms. Goldfuss:

The Missouri Parks Association, an independent citizens organization of more than 3,000 members statewide, would like to thank you for agreeing to review the St. Johns Bayou/NewMadrid Floodway Project referred to you from the Department of the Interior. We sincerely hope you will agree with USDI that there are compelling reasons to call an end to this project now, in the public interest, after more than six decades of fruitless advocacy by a handful of wealthy landowners in the New Madrid Floodway.

Our association has long been concerned about the disruption of normal hydrologic function and consequent severe degradation in Big Oak Tree State Park (located near the outlet of the New Madrid Floodway) that has resulted from a century of agricultural drainage and Corps of Engineers projects 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 not opposed to the Corps plan for mitigation at the park. But it is our understanding that the Corps has both the authority and an obligation to undertake this mitigation and restoration regardless of the current project.

In any case, we cannot support the Corps proposal to close the remaining 1,500-foot gap in the New Madrid levee, which would sever the last remaining connection of the Mississippi River with its floodplain anywhere in the state and further degrade not only the park but more than 50,000 acres of functional wetlands. Closing the gap would not only prevent ecosystem-sustaining backwater flows into the Floodway but also allow more (unnecessary) agricultural infrastructure that would make it likely that the Floodway would never again be used for its intended purpose, to serve as a relief valve to protect human communities and infrastructure elsewhere along the river during times of extreme flooding. Such results are directly contrary to current national floodplain policy, to the Obama Administration's concern for environmental justice, and to the need for ecosystem resiliency in the face of continued climate change.

Accordingly, we urge you to terminate this indefensible project once and for all. We would have no objection to a subsequent smaller project to protect the community of East Prairie in St. Johns Bayou, and we would encourage the Memphis district of the Corps to immediately begin working cooperatively with state agencies on the mitigation and restoration project long envisioned for Big Oak Tree State Park. We applaud and strongly support other districts of the Corps that are working cooperatively with public agencies and NGOs on such restoration projects elsewhere along the Mississippi and Missouri rivers with great public benefit.

Again, thank you for your review of the St. Johns Bayou/New Madrid Floodway Project in the public interest.

Sincerely,

Steve Nagle, President