



26 December 2012

Mr. John Madras, Director
MDNR Water Protection Program
Operating Permits Section, 401 Unit
P.O. Box 176
Jefferson City, MO 65102

Re: Certification No. CEK006872

Dear Mr. Madras:

The Missouri Parks Association is pleased to comment in support of the proposed 401 water quality certification No. CEK006872 regarding shallow water habitat restoration on the Jameson Island unit of the Big Muddy National Fish and Wildlife Refuge, but we respectfully ask that condition number one be eliminated from the proposed draft list of conditions.

MPA is a 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 supported both ecosystem and historic landscape restoration within and in the vicinity of our state parks and historic sites. We strongly support the Jameson Island Project because of its potential to restore more natural—and more historic—riverine habitat and hydrologic function in this unit of the Big Muddy Refuge directly adjacent to Arrow Rock State Historic Site. We also look forward to more such restoration projects in the vicinity of others of the twenty state parks and historic sites located along the Missouri and Mississippi Rivers. Missouri citizens, especially the nearly 100,000 who annually visit Arrow Rock and the millions who visit other parks along our great rivers, will benefit and learn from this project.

Our association is on record in strong support of the Corps of Engineers' proposed habitat restoration project on Jameson Island as outlined in the Corps' preferred Alternative 4 of its Project Implementation Report, but we have also testified before the Clean Water Commission that we are quite willing to accept the modification offered by the Corps in its letter of August 15, 2012. This modification, which would reduce the width of the constructed channel from 100 to 75 feet and sidecast the top three feet of material within the 200-foot-wide corridor from which trees will be cleared, would allow a more gradual and more natural incorporation of material into the river during high water events without impeding restoration or increasing the cost.

Condition one in your proposed list of conditions, however, would require the stockpiling of the top three feet of excavated material beyond the corridor from which trees were planned for removal. This would result in the loss of about nine acres of additional riparian habitat, impact negatively on wetlands, interfere with more natural hydrologic function, and cost about \$300,000 more, as estimated by the Corps. Moreover, this requirement is not supported by the scientific analysis in the 2011 National Academy report on Missouri River sediment and it would not likely result in any improvement in water quality, as indicated by the Corps' sampling of phosphorus concentrations at various depths in borings along the proposed chute.

We in the Missouri Parks Association strongly urge approval of water quality certification for the Jameson Island Project **without condition number one**. We hope that this restoration project may lead to other cooperative efforts with our state park system and other partners to restore more natural ecosystems, riverine function, and historic landscapes on public lands in certain stretches along our Great Rivers in Missouri. Thank you for your consideration.

Sincerely,

Susan Flader, President