



24 April 2017

U.S. Army Corps of Engineers, Omaha District
ATTN: CENWO-PM-AC, Management Plan Comments
1616 Capitol Avenue
Omaha, NE 68102

Subject: Missouri River Recovery Draft Management Plan and Environmental Impact Statement

The Missouri Parks Association is pleased to comment on your Missouri River Recovery Management Plan and Environmental Impact Statement, and to support the continued restoration of hydrologic and ecosystem function and endangered species recovery that we believe can best be advanced by the plan's Alternative #2.

Our association is a citizen 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, in which state park staff have been leaders, at times in cooperation with the Corps. Our Missouri state park system has more than a dozen parks and historic sites located along the Missouri River, from Big Lake in northwest Missouri to Confluence Point at the mouth, many of which may benefit significantly from efforts in cooperation with the Corps to restore habitat for native fish and wildlife populations and establish more natural—and more historic—hydrologic and ecosystem function along the river.

We regard Alternative #2 as having the greatest potential for restoration of ecosystem and hydrologic function as well as recovery of endangered species populations, with the caveat that you use the most scientifically advanced and proactive plan for adaptive management, such as is contemplated for the other alternatives; there is no justification for anything less. Alt #2 provides for considerably more emergent sandbar and shallow water habitat as well as more land acquisition, including more channel widening, backwater construction, and floodplain connectivity, all critically needed for river restoration. It is more expensive in dollar cost, but we believe that if the EIS included a state-of-the-art analysis of ecosystem services, as it certainly should by law and by Corps policy, alt #2 would prove to be the least expensive as well as the most effective in the long run.

In the near term, we know that Missouri has greater potential damages from flooding and risks to drinking water from low flows than other states along the river, so we would be willing to accept somewhat more limited flow modification, as in Alt #3. But these risks have been *exacerbated* by the Corps's Bank Stabilization and Navigation Project and its failure to enforce the minimum floodway widths (3,000 feet above and 5000 feet below Kansas City) mandated by the Flood Control Act of 1944. This makes it all the more imperative for the Corps to acquire available lands in the floodway from Sioux City to the mouth as required by WRDA 1986 and 1999, at least up to the mandated 166,000 acres. This mandate is still less than a third of the 522,000 acres of fish and wildlife habitat lost to the BSNP, 300,000 acres of which were lost in Missouri alone; and the Corps is still far from reaching the mandated goal. Alt #2 would provide for a good faith continuation of the effort; the other alternatives would not. The lands, once acquired, would be available for levee removal or setback and other restoration for the benefit of fish and wildlife, including the three endangered species, as well as for substantial flood risk reduction for humans.

The Missouri Parks Association has been on record in strong support of Corps restoration projects at Jameson Island, Cora Island, and elsewhere along the Missouri River, especially in the vicinity of our state parks, and we would be happy to voice our support for more such projects and encourage others to do so as well. We particularly appreciate the commitment to scientific research, monitoring, and state-of-the-art adaptive management in the proposed plan, and trust that it would be applied to Alt #2 as well as to the other alternatives. In the event the Corps selects its preferred Alt #3, we ask that it be augmented with a substantially greater commitment to land acquisition, floodplain connectivity, and habitat restoration, with all the attendant benefits for people as well as for wildlife.

Sincere thanks for your consideration.

A handwritten signature in black ink that reads "Steve Nagle". The signature is written in a cursive, flowing style.

Steve Nagle, President, Missouri Parks Association