



Grand River Ecosystem Restoration Study

Final Integrated Feasibility Report and Environmental Assessment

Appendix O: USFWS and Non-Federal Sponsors Letters of Support

October 2020



**US Army Corps
of Engineers** ®
Kansas City District



United States Department of the Interior

FISH AND WILDLIFE SERVICE
National Wildlife Refuge System – Legacy Region 3, Area 1
102 Walnut Street Suite 204
Winona, Minnesota 55987



October 1, 2020

Ms. Kaely Megaro
Project Manager
U.S. Army Corps of Engineers PMP-F
601 E. 12th Street
Kansas City, MO 64106

Dear Ms. Megaro:

The U.S. Fish and Wildlife Service (Service) would like to thank the U.S. Army Corps of Engineers (Corps) for the opportunity to participate and comment during the planning process, and on the Recommended Federal Plan, for the Grand River Feasibility Study (Study), which has a purpose of restoring ecosystem benefits within the Lower Grand River Basin (Basin). As you are aware, the Service has a stake in the overall health and function of lands in the Basin, specifically those within Swan Lake National Wildlife Refuge (Refuge). The comments in this letter are specifically related to the actions resulting from the Study that would impact the Refuge.

The Yellow Creek portion of Recommended Plan outlines several features recommended for implementation by the Corps, which directly affects the Refuge. These features include a setback of the Yellow Creek Levee, and installation of several pipes and water control structures, with all work occurring on the Refuge.

The Service recognizes that extreme sedimentation and altered hydrology has resulted in a much higher frequency and duration of flood events that affect all lands within the Basin, including the Refuge. These frequent events not only limit ability of Service staff to carry out its mission, but also cause significant damage to infrastructure. In recent months, Service staff, along with outside agency partners, have worked to develop restoration plans that would enhance Refuge infrastructure and allow the Service to carry out its mission in spite of these increasing challenges. Some of the options that staff have developed incorporates features listed in the Recommended Plan. The Service agrees that a setback of the Yellow

Creek Levee would have limited benefits in regards to sedimentation and flooding on the Refuge and surrounding lands, although we feel the impacts would be minimal within the entire Basin.

The Service is supportive of the Recommended Plan as it relates to other future restoration efforts on the Refuge, as a result, the Service has already been authorized to pursue and manage these recommended actions from the Corps. The Service is currently planning to incorporate portions, and potentially all of the features within the Recommended Plan into other restoration and enhancement plans for the Refuge, pending coordination and funding opportunities. Any work or direct impacts to Refuge lands must be approved and endorsed by the Service prior to any commitment of funds or commencement of work. The Service will be responsible for deciding on and overseeing implementation of any enhancement on refuge lands and we look forward to working with the Corps and other partners on these critical actions.

The Service understands the need to address the sedimentation and altered hydrology issues affecting the Basin, and we appreciate the Corps allowing us to be an active participant in this study. If you have any questions or concerns, please feel free to contact me via telephone at 507-458-0144 or via email at sabrina_chandler@fws.gov or you can contact Project Leader Jason Wilson at 573-999-5204 or jason_wilson@fws.gov.

Sincerely,

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

Sabrina Chandler
Refuge Supervisor



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573-751-4115 ▲ www.MissouriConservation.org

SARA PARKER PAULEY, Director

October 9, 2020

Colonel William Hannan, Jr.
Commander and District Engineer
Department of the Army
Corps of Engineers, Kansas City District
635 Federal Building
601 E. 12th Street
Kansas City, MO 64106-2824

RE: Lower Grand River Feasibility Study

Dear Colonel Hannan:

The Missouri Department of Conservation (Department) supports the findings of the Lower Grand River Feasibility Study (Feasibility Study) and understands the potential obligations as a non-federal partner if the projects are authorized by the federal government. Attached is a signed Non-Federal Sponsor's Self-Certification of Financial Capability as requested by the U. S. Army Corps of Engineers (USACE).

For the Feasibility Study, the Department has invested funds and most importantly, the expertise and experience of our conservation professionals, which has greatly exceeded the required non-federal share as a non-federal sponsor of the Feasibility Study. The Department's input was integral to understanding the environmental conditions of the study region and for subsequent models from which projects were developed and proposed in the Feasibility Study. In addition, the Department continues to invest efforts to build upon decades of work and funding in the region to support fish, forest, and wildlife resources and diverse, native habitats of national importance, especially for migratory wildlife.

The Department understands the future process for the Feasibility Study includes approval by the Chief of Engineers and authorizations via the Water Resources Development Act (WRDA) and appropriations by Congress to provide funding for implementation. The Department understands the next phase includes obligations as a non-federal Sponsor to become part of a Project Partnership Agreement between the Department and USACE which potentially includes formal commitment of state resources as cost share to implement a project at Fountain Grove Conservation Area.

The potential obligations for Fountain Grove Conservation Area (Fountain Grove) include:

- Lands, easements, rights-of-way, relocations, and disposal placement areas (LERRD) necessary for implementation of the project at Fountain Grove, which will

COMMISSION

DON C. BEDELL
Sikeston

STEVEN D. HARRISON
Rolla

MARK L. McHENRY
Kansas City

WM. L. (BARRY) ORSCHELN
Columbia

be identified during project design. The value of LERRDs provided by the Department will be included in the total project costs and credited toward the Department's share of costs.

- Operation and maintenance costs to operate and maintain structures necessary to create, manage, and rehabilitate habitat at Fountain Grove using adaptive management and best professional practices during the operational life of the project.
- Cash contributions, in-kind work, and LERRD credits for land where construction occurs, which as a combined total, will be the non-federal sponsor share of 35 percent of the total project costs for construction at Fountain Grove. The current estimated project cost for Fountain Grove is \$34.2 million, with the Department share being \$12 million, which may be reduced by the LERRD estimated credit of \$3.6 million. All Department capital improvement and financial obligations are subject to the approval of the Missouri Conservation Commission.

The Department's investment in the Lower Grand River region has been substantial through the decades and focused on long-term conservation goals, well-defined and focused management, and public engagement and public involvement with fish, forest, and wildlife resources. The Department looks forward to a partnership with USACE to continue efforts in the region. The Department requests approval of the Feasibility Study and authorization of the Grand River Ecosystem Restoration Project for future construction.

For any questions or additional information, please contact Policy Coordinator Stuart Miller by email at stuart.miller@mdc.mo.gov, telephone at 573-522-4115, Extension 3378, or mail to P.O. Box 180, Jefferson City, MO, 65102-0180.

Sincerely,



SARA PARKER PAULEY
DIRECTOR

Attachment

c: Aaron Jeffries, Deputy Director
David Thorne, Policy Supervisor
Stuart Miller, Policy Coordinator

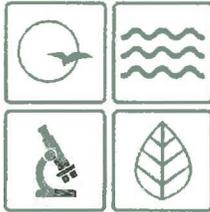
**NON-FEDERAL SPONSOR'S
SELF-CERTIFICATION OF FINANCIAL CAPABILITY
FOR DECISION DOCUMENTS**

I, Sara Parker Pauley, do hereby certify that I am the Director of the Missouri Department of Conservation (the "Non-Federal Sponsor"); that I am aware of the financial obligations of the Non-Federal Sponsor for the Grand River Ecosystem Restoration Project; and that the Non-Federal Sponsor will have the financial capability to satisfy the Non-Federal Sponsor's obligations for that project. I understand that the Government's acceptance of this self-certification shall not be construed as obligating either the Government or the Non-Federal Sponsor to implement a project.

IN WITNESS WHEREOF, I have made and executed this certification this 9th day of October, 2020.

BY: 
Sara Parker Pauley, Director
Missouri Department of Conservation

DATE: October 9, 2020



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

OCT 13 2020

Colonel William Hannan, Jr.
Commander and District Army Engineer
Department of the Army
Corps of Engineers, Kansas City District
635 Federal Building
601 E. 12th Street
Kansas City, MO 64106-2824

RE: Lower Grand River Feasibility Study

Dear Colonel Hannan:

This letter is to express the support of the Missouri Department of Natural Resources (Department) for the Grand River Basin project. Since the inception of the Grand River Feasibility Study, the Missouri Department of Natural Resources and Missouri Department of Conservation, along with the Missouri Department of Transportation, U.S. Fish and Wildlife Service, USDA Natural Resources Conservation Service, and other partners, have been integrally involved in all aspects of the study. Department staff have been actively involved in the analyses, formulation of habitat assessments, and planning for restoration of the Locust Creek area.

The Grand River Feasibility Study provides an opportunity to benefit approximately 40,000 acres of wet prairie, emergent wetland, bottomland forest, and aquatic riverine habitats, on State and Federal lands that are considered the most representative of these natural systems in the Lower Grand River sub-basin. This region has national significance and is an integral part of the Mississippi Flyway and is the transcontinental migration corridor and rearing habitat for many wildlife species. This project is important to the stability of the system and those dependent on the area for recreation and livelihood.

The Department looks forward to project approval by the Chief of Engineers, authorization via the Water Resources Development Act (WRDA), and appropriation of implementation funding. The Department understands that as the Non-Federal Sponsor (NFS) we will be required to enter into a Project Partnership Agreement (PPA) which provides the formal commitment of State resources to cost sharing in implementation of the project. The Department recognizes the responsibilities of a non-federal project sponsor and accordingly makes the following non-binding acknowledgements:

- All lands, easements, rights-of-way, relocations, and disposal placement areas (LERRD), necessary for the implementation of the project will be identified during project design.



Recycled paper

The value of any and all LERRDs provided by the NFS will be included in the total project costs and credited toward the Department's share of costs.

- The Department understands that it will assume all costs and obligations for the long-term operation, maintenance, repair, replacement, and rehabilitation of the project, after the period of adaptive management is completed, during the life of the project.
- The Department understands it will be obligated to contribute through cash, land acquisition or easements, or other sources, 35% of the total project costs. At the estimated total project first costs in FY20 dollars, it will cost approximately \$84.3 million for Locust Creek and the NFS's projected cost share is approximately \$29.5 million, of which \$7.8 million is projected for land acquisition.

The Department looks forward to working in partnership with the Corps of Engineers on this project and requests approval of this plan and authorization of the Grand River Ecosystem Restoration Project for construction. If you have any questions, please contact Tim Rielly at 573-526-3353.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carol S. Comer", followed by a horizontal line extending to the right.

Carol S. Comer
Director

**NON-FEDERAL SPONSOR'S
SELF-CERTIFICATION OF FINANCIAL CAPABILITY
FOR DECISION DOCUMENTS**

I, Carol S. Comer, do hereby certify that I am the Director of the Missouri Department of Natural Resources (the "Non-Federal Sponsor"); that I am aware of the financial obligations of the Non-Federal Sponsor for the Grand River Ecosystem Restoration Project; and that the Non-Federal Sponsor will have the financial capability to satisfy the Non-Federal Sponsor's obligations for that project. I understand that the Government's acceptance of this self-certification shall not be construed as obligating either the Government or the Non-Federal Sponsor to implement a project.

IN WITNESS WHEREOF, I have made and executed this certification this 13th day of October, 2020.

BY: 

TITLE: Director

DATE: 10/13/2020