

# **Appendix N: Summary and Disposition of Comments on Draft Comprehensive Conservation Plan**



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Comments were received on the Draft Comprehensive Conservation Plan from the Illinois Department of Natural Resources, the Missouri Department of Conservation, the Iowa Department of Natural Resources, and two U.S. Army Corps of Engineers Districts (St. Louis and Rock Island). In addition, the Illinois Branch of The Nature Conservancy submitted comments on the Plan. A total of 28 individuals submitted comments on the draft plan, 18 of which were sent as email and 10 through the mail.

We considered the comments as we prepared the final Comprehensive Conservation Plan. The following paragraphs summarize the comments and our response. In addition to the comments, some reviewers noted typographical errors and minor editing needs. We thank the reviewers for catching these errors and we have corrected them.

## U.S. Army Corps of Engineers:

The U.S. Army Corps of Engineers (COE) served as a Cooperative Agency according to National Environmental Policy Act (NEPA) guidelines during the entire Mark Twain CCP process. This involved additional interactions directly with the COE at each stage of the process in which draft content or program direction could possibly affect COE interests. The COE does not have “approval” privileges on this plan, however their input is given particular evaluation due to the other Federal authority the agency represents.

### St. Louis District:

- Requested that the Service indicate that the Rivers Project Master Plan has been approved (as of July 2001) and that mutually agreed upon administrative boundary adjustments on General Plan/ Cooperative Agreement lands have been accomplished through this plan.

*Response:* These revisions have been made.

- In regard to Clarence Cannon NWR, commented that it should be understood that any reduction to downstream flooding would be minimal due to installation of flood damage reduction spillway, which also permits flood water storage at a lower river level.

*Response:* This revision has been made.

- Suggested clarifying the statement concerning river structures: Since the early 1970s, structures in the Middle Mississippi River have been coordinated and designed with environmental considerations and have been providing aquatic habitat benefits. As the St. Louis District has developed and experimented with designs and brought partners into the process, they have been continuing to achieve even more positive results.

*Response:* Paragraph was reworded

- Indicated that while water levels at the upper ends of navigation pools were slightly modified, they do most closely resemble the river's natural condition.

*Response:* Reference statement reworded

- Commented that our statement regarding decreased sediment transport within the pools is questionable concerning pools 24, 25 and 26. The Combination of regulating structures and operations based on hinge point control results in adequate sediment transport. This may be a valid statement for pools managed with few regulating structures and operated on dam point control.

*Response:* Reference statement reworded

- Regarding Goal 4 Discussion – The discussion of the training structures is a fair accurate portrayal of the recent conditions of the lower Missouri River. It could also be construed as a fairly accurate portrayal of the future conditions if a river were managed solely for the purpose of navigation, with no other considerations or objectives taken into account. However, it is not a fair representation of the Middle Mississippi River, where a large number of islands and side channels exist primarily as a direct result of either the original design or modifications (notching) of existing training structures. Recent innovations (bend way weirs, off bank revetments, chevrons, etc.) have resulted in additional tools to yield environmental benefits while maintaining a safe dependable navigation channel.

*Response:* Reference statement reworded to acknowledge all these efforts.

### Rock Island District:

- The statement which reads “A significant feature of the Land Use Allocation Plan (LUAP) is the Shoreline Management Plan (SMP)....”, requires revision. The SMP establishes the District’s administrative policy concerning private exclusive use of recreational structures such as boat docks. The SMP does not set policy for the cottage site lease program which is also considered private exclusive use.

*Response:* Reference statement reworded to add this land use guidance detail.

- Need citation to support the statement “Consequently, both commercial fish and mussel harvesting were dramatically decreased.” Fish and mussel populations fluctuated greatly prior to the construction of dams on the Upper Mississippi River. Recommend authors consider Townsend (1901) and Carlander (1954). The decline in fish and mussel populations has a stronger correlation with pollution and over harvest than it does with dams.

*Response:* CCP statement is in relation to the early dams built in Hastings, Minnesota and Keokuk, Iowa. We don’t know which of these is more causal, however over-harvests and pollution conditions have improved over the years while many more dams are now in place since the this statement was made about the Hastings and Keokuk pools. The 1931 Hastings citation, which was mistakenly omitted from the draft, has been added to the CCP.

Rock Island District also provided numerous comments on the CCP Environmental Assessment (EA) relating to content questions, document organization and typographic errors. These changes were made as necessary.

## **Other Comments Received by Subject Area**

### Shorebirds

- Fifteen comments were received recommending that the Refuge Complex create wetland habitat for shorebirds where water levels are managed and controlled to coincide with early spring and fall migration, particularly at Two Rivers NWR.

*Response:* Within the Wetlands and Aquatic habitats section, we have focused on the habitats themselves more than the long list of species that utilize each type. However we also recognize that all other things being equal, a few inches of water can change habitat utilization, species by species. In the Wetlands and Aquatic Habitat Goal section, 15 strategies indicate that our water levels can be managed to provide habitat for migrating shorebirds. We share the intended outcome expressed by these citizens. The best opportunity to address the level of detail that these comments speak to will be in the “step-down” water level management plans prepared at each individual station during the next couple years after the completion of the CCP.

We will also review the public use sections of the plan to see if there may be additional ways to make these prime shorebird habitats more available for viewing.

### Land Acquisition:

The Illinois Department of Natural Resources, the Missouri Department of Conservation, and the Iowa Department of Natural Resources offered support in favor of the land acquisition proposal outlined in the Draft Plan. Specifically, representatives of these agencies said:

- “Illinois has limited public land available to citizens and any effort to provide land for outdoor recreation and natural resource conservation is desperately needed. Efforts targeting the Middle Mississippi between its confluence with the Missouri and Ohio rivers are necessary due to limited public land and resource management opportunities.” *Illinois DNR*.
- “Purchasing land from willing sellers within the proposed purchase boundary will improve and enhance opportunity to increase floodplain connectivity and flood water storage capabilities, restore and create wetlands and other floodplain habitats, reduce the impacts to sedimentation and provide benefits to resources and recreationists in the Upper Mississippi River.” *Missouri DOC*
- “The goals, objectives and implementation outlined in the document are consistent with the DNR goals along the Mississippi River. We would like to emphasize our desire to expand refuge lands through additional acquisition as stated in Alternative A. As you are aware, Iowa has one of the lowest percentages of public lands. We support the acquisition of additional lands, from willing sellers, to add to Iowa’s limited public lands base.....The Levee District 11 area would be an important addition that would tie the Horseshoe Bend Division to our Millrace Flats Wildlife Area and the Louisa County Conservation Board’s Indian Slough Wildlife Area. The addition would create a continuous 8,000-acre corridor on the lower Iowa River.” *Iowa DNR*
- One citizen commenter stated support for land acquisition and suggested that the Service consider acquiring Priority 2-4 lands when they are adjacent to existing refuges and have the potential to contribute to restoring river connectivity.
- Another commenter expressed opposition to land acquisition at Two Rivers NWR, saying that the Refuge should instead “manage what we already have.” The individual also stated that the Refuge should work with private land owners along Swan Lake who have major tributaries (ditches) that lead into the lake.
- The Nature Conservancy indicated full support for the implementation of the Preferred Alternative.

*Response:* The acquisition of key land would make existing Refuge lands as well as adjoining state wildlife areas better for wildlife, public use and water quality. Priority land for the Refuge Complex is land that has proven to be too flood-prone for good and consistent agricultural practices and highly restorable; both natural resources and willing sellers would benefit from the planned boundary expansion. Working with private landowners, as suggested by the landowner adjacent to Two Rivers NWR, is vital to habitat restoration throughout the watershed and the CCP reflects our desire to work with private landowners on conservation projects they may wish to undertake.

### Wildlife-dependent Recreation

- One commenter suggested that more effort should go toward fish and aquatic species for sport fishing instead of the waterfowl focus.

*Response:* In compiling the final CCP, Refuge staff felt that the Refuge’s authorized purpose mandates a migratory bird focus, however every effort has been made to evaluate the whole system and to plan a balanced approach for all native species based on habitat health and diversity, along with compatible public uses.

- The Iowa DNR expressed support for a proposed “no wake zone” but noted that some boaters and anglers may object.

*Response:* No change to the CCP was necessary.

- The Iowa DNR recommended continued use of permanent hunting blinds if there is hunter support for them and if blinds are not resulting in an adverse effect.

*Response:* Due to the potential to expand public hunting opportunity and to reduce the amount of debris in the river from this activity, Refuge staff maintained the existing strategy, which proposes to restrict permanent blind construction on the Big Timber Division of Port Louisa NWR in Iowa, in favor of open hunting with portable blinds.

- An individual commenter encouraged the Refuge Complex to increase public use opportunities on the refuges when it is compatible with fish and wildlife species. Specifically, the commenter wants the Complex to build trails and boardwalks, develop information kiosks and interpretive displays, and build wildlife observation platforms. The commenter said that emphasis should be placed on facilities that are designed to be inundated and not on structural facilities that would be damaged by flooding.

*Response:* No editing necessary; the CCP includes strategies for new facilities, improvements to existing facilities, and improved educational material.

### Wildlife and Habitat

- While the Iowa DNR supports management as it is outlined in Alternative A, the agency expressed strong interest in maintaining at least partial isolation from the river in some places to reduce sedimentation and allow water level manipulation. The Iowa DNR stated that Alternative A (the preferred alternative) maintains the flexibility to make area-by-area decisions on management.

*Response:* We believe that Alternative A offers the flexibility to provide various levels of connectivity or isolation from the river depending on evaluation of the specific conditions site by site. No change was made to the CCP.

- An individual commenter in interested Port Louisa NWR said that the Complex should: buy additional land to the south and north; modify refuge close dates from September 16 to December 15; add interpretive panels and kiosk at boat ramp; make a no wake zone; dredge for fish habitat; work with adjoining landowners to provide a buffer to stop nutrient invasion; add restroom facilities at boat ramp; remove volunteer trees from boat ramp; improve sand prairie at boat ramp parking area and add more forbs; move boat ramp entrance to improve sight at a distance; improve parking facilities; add fish cribbing to dredged area; add clam colonies to preserve water; improve trail along levee for hiking and biking; purchase old train bridge for future bike trail to Iowa; relocate snags from dredging for fish habitat; provide a GPS/GIS depth chart and map for fishermen; enhance shallow wetlands; provide a fish hatchery for the park.

*Response:* Land Acquisition, closed area dates, kiosk, map improvements, no wake zone, limited dredging, adjacent private lands work, and enhancement of wetland values recommendations are each addressed in CCP as prepared. Specific suggestions relating to facility design are noted and will be addressed location by location as site plans are prepared. There are no plans to buy the

“old railroad bridge” as the Service would assume a huge liability with no attendant wildlife or habitat value. There are not plans for a fish hatchery within the Complex, however, the refuge would be glad to work with volunteer groups on issues such a fish cribbing where and when appropriate opportunities exists.

- An individual offered comments pertaining to the Wilkinson Island section and the Illinois additions: Improve wetland habitat as needed; a small water control dam could hold back water throughout low lying areas at the Bower’s woods; better access needed on the old township road to the back part of the area near the river; The Wagner Landing boat ramp needs to be replaced with a better ramp; fee hunters should not be allowed to drive to the adjoining Vasquez property and hunt on refuge land.

*Response:* Evaluations for wetland restoration opportunity will generally occur after legal access has been gained to properties, and assuming that any such plans would not negatively affect any private lands, such as may be the case at the old Bower property at this time. Unimproved road maintenance in the flood plain is problematic and thus most of the river “bottom” areas will be managed with very little infrastructure. Private permit hunters using “easement” access across the refuge is not a CCP issue and will be taken up as a coordination issue with the inholding owner.

- One individual encouraged the Complex to plant corn and beans on refuges to benefit bird populations.

*Response:* The Service is focusing on providing native habitat that provides necessary nourishment for waterfowl species rather than relying on agricultural crops. This focus reflects a shift in management approach based on waterfowl nutritional needs research.

- The COE, Rock Island District, suggested mentioning a significant new threat to wetland vegetation in the form of invading common reed (*Phragmites australis*).

*Response:* This plant has been added to the list of plants threatening Complex habitats.

