

## Appendix M: Response to Comments

*Editor's Note: All comments are presented verbatim as received by the U.S. Fish and Wildlife Service (FWS, Service).*

**Comment 1-1:** BIG MUDDY FISH & WILDLIFE KILLING FIELD IS A MORE ACCURATE NAME FOR THIS SITE.

**Response: 1-1:** This comment is beyond the scope of this project. The refuge was established as the Big Muddy National Fish and Wildlife Refuge; there is no proposal to change the name.

**Comment 1-2:** THE SITES YOU ARE CHOOSING FOR MEETINGS ARE BIASED TO LOCAL CONCERNS BUT YOU SEND THE BILLS FOR OPERATION OF THIS SITE TO GENERAL TAXPAYERS, BUT YOU GIVE THEM NO VOICE IIN ANY MEETINGS ANYWHERE. YOU HOLD YOUR MEETINGS IN LOCAL HUNTING CLUBS I THINK.YOU PURSUE A POLICY OF PAY UP TO GENERAL TAXPAEYRS BUT GIVE THEMNO VOICE.

**Response 1-2:** The Service held four open house meetings at the following locations and venues:

- Tuesday, November 12, 2013 from 3:00 p.m. to 7:00 p.m. at the Schoettger Conference Building of the USGS Columbia Environmental Research Center (4200 New Haven Road, Columbia, MO 65201)
- Wednesday, November 13, 2013 from 3:00 p.m. to 7:00 p.m. Arrow Rock State Park Visitor Center (39521 Visitor Center Drive, Arrow Rock, MO 65230)
- Thursday, November 14, 2013 from 3:00 p.m. to 7:00 p.m. Chesterfield Parks and Recreation Building (17891 N. Outer 40 Road, Chesterfield, MO 63005)
- Tuesday, November 19, 2013 from 3:00 p.m. to 7:00 p.m. Ray County Library Community Room (215 E. Lexington, Richmond, MO 64085)

Those unable to attend the meetings could submit comments online through the Big Muddy NFWR CCP website, via U.S. mail, or by contacting the refuge directly. All comments, regardless of method of submission, receive consideration and response.

**Comment 1-3:** EXTEND THE TIME TO COMMENT. I DONT UNDERSTAND WHY THE GOVT TAKES YEARS TO MAKE A PLAN AND THEN DISRESPECTS THE PUBLIC BY GIVING THEM 30 DAYS TO COMMENT.THE PUBLIC WORKS AND HAS FAMILIES AND HAS LITTLE OFF TIME FOR THIS KIND OF THING AND THEN YOU HARASS THEM WITH THESE SHORT TIME PERIODS. THIS COMMENT IS FOR THE PUBLIC RECORD. PLEASE RECEIPT.JEAN PUBLIC

**Response 1-3:** A 30-day comment period is typical for environmental assessments associated with CCPs. The duration of the comment period is derived from Service policy for the Comprehensive Conservation Planning Process, a policy which was also developed using a public notice and comment procedure. The 16-day government shutdown occurred during the comment period for the EA and Draft CCP. To compensate for the inconvenience and to allow sufficient time for public comments, the original comment deadline of Thursday, October 31, 2013 was extended until Wednesday, November 20, 2013.

**Comment 1-4:** ALSO WE WANT TO KNOW WHAT THE PUBLIC SAID. WE WANT A CALCULATION OF WHO RESPONDED WITH WHAT PLAN TO YOU. I NOTE THAT A MILLION PEOPLE CAN WRITE IN AND YOU THEN IGNORE ALL ONE MILLION COMMENTS, SHOWING THAT NOBODY MATTERS TO YOUR AGENCY EXCEPT YOUR INSIDERS WHO WORK THERE.

**Response 1-4:** The Service received four separate responses, three from individuals and one from another government agency, each contained a number of separate comments. This response to comments section is a collection of the comments received and the Service responses.

**Comment 2-1:** I have specific comments on what you have printed on each page. Some are lies. pg 12 - please stop using the words "wildlife recreation" to hide the despotic, ugly business of selling licenses to kill wildlife and hunting. That is not "wildlife recreation" when you kill the hunted. It is certainly not fun for the murdered animal. Maybe the pervert with the gun is "recreated" but many Americans suffer at seeing animals treated in this brutal, obnoxious, inhumane, murderous way by human slime with guns. We don't need this in 2013. This is not 1860 and pretending it is doesn't make it so. Some men play games with their minds that they are still living in 1860. Look at that murderous Dick Cheney who almost killed his hunting pal. A fine example of human slime. Murdering wildlife is not a fit pastime for American citizens anymore. YOU ARE USING THE WORD "RECREATION" COMPLETELY ERRONEOUSLY. TO CONSIDER MURDERING AN INNOCENT ANIMAL AS "PLAY" IS OBNOXIOUS FOR MOST AMERICANS.

**Response 2-1:** We understand some citizens' concern with hunting on national wildlife refuges. Big Muddy NFWR, as well as the entire National Wildlife Refuge System, is guided by laws enacted by Congress and the President as well as policy derived from those laws. The 1997 National Wildlife Refuge System Improvement Act identifies hunting as one of six wildlife-dependent recreational uses to be facilitated when compatible with the purposes of a refuge and the mission of the Refuge System. The other five wildlife-dependent uses are fishing, wildlife observation, wildlife photography, environmental education, and interpretation. While national wildlife refuges are managed first and foremost for wildlife the focus is on perpetuating populations not individuals. Hunting does adversely affect individual animals but is allowed when it will not threaten the perpetuation of the population being hunted.

**Comment 2-2:** PG 15 - "SCIENCE BASED" IS BEING UTILIZED FRAUDULENTLY BY THIS AGENCY SINCE THE "SCIENCE" YOU EMPLOY IS FAKE JUNK POLITICAL SCIENCE WITH NO REAL INCLUSION OF THE ENTIRE SPECTRUM OF OPINION ON ISSUES. YOU HIRE ONLY GUN WACKOS. IF YOU ARE AN ANIMAL PROTECTOR, YOU DON'T GET A JOB AT FWS. IT IS ALL POLITICAL, BIASED AND SCAMMING THE PUBLIC. LOOK AT THE ALLEGED "PEER REVIEWERS" RECENTLY EMPLOYED BY FWS, THEY WERE HAND CHOSEN AND NOT TRULY REPRESENTATIVE OF OPINION ON THE SUBJECT, JUST HIRING COMPLETELY BIASED, SKEWED INDIVIDUALS.

USFWS IS NO LONGER A LEADER IN FISH AND WILDLIFE TO CONSERVATION. THE AGENCY HAS BECOME A CORRUPT MESS OF CATERING TO GUN WACKO NRA TYPE KILLERS. FWS IS DISRESPECTED AND NOTORIOUS TO ALL ANIMAL PROTECTORS AND ENVIRONMENTAL GROUPS, UNLESS YOU FEED THEM MONEY AND BUY THEM LIKE YOU ARE KNOWN TO DO. YOU FEED MONEY TO SOME ENVIRONMENTAL GROUPS TO BRIBE THEIR COMMENTS TO BE FAVORABLE TO YOUR HORRENDOUS ACTIONS. YOU USE

GENERAL TAXPAYERS DOLLARS TO DO THIS--TO BRIBE SOME ENVIRO GROUPS WHO THEN BECOME YOUR PIMPS. THIS IS OBNOXIOUS.

**Response 2-2:** The Fish and Wildlife Service is committed to using sound science in its decision-making and to providing the American public with information of the highest quality possible. Federal agencies are required to publish guidelines for ensuring the quality, objectivity, utility, and integrity of information we use and disseminate, and to provide mechanisms for allowing the public to seek correction of that information. The Service maintains a website at <http://www.fws.gov/informationquality/> for this purpose.

**Comment 2-3:** PG 19 - THERE SHOULD BE NO "PATNERS" BECAUSE THE "PARTNER" YOU HAVE AND SEND THE BILLS TO IS THE GENERAL US TAXPAYER--ALL 325 MILLION OF US. LETTING SPECIAL INTEREST GROUPS WITH GUNS TAKE AWAY OUR RIGHT TO DO WHAT WE WANT WITH OUR NATIONAL SITES IS ATTACKIGN DEMOCRACY.NOBODY ELSE IS A "PARTNER". UNFORTUNATELY SO OFTEN WHAT YOU CALL "PARTNERS" ARE REALLY THOSE SEEKING INSSIDER GIFTS FROM THIS AGENCY. THIS AGENCY IS DISCRIMINATING AGAINST CITIZENS FO THE USA.

**Response 2-3:** The mission of the Service is "working with others to conserve, protect and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." The Service's ability to achieve this mission depends on partnerships. Throughout its history, the agency has been committed to a collaborative approach to conservation. Our strategy is to empower Americans to become citizen conservationists. The more the Service can empower people as stewards of the land, the more effective we can be in our conservation mission.

A partnership is an agreement between two or more organizations, created to achieve or assist in reaching a common goal. Partnerships may involve one organization using another's unique abilities, equipment or services, or they can be a sharing of resources (money, time, knowledge, equipment, etc.), to accomplish short- or long-term objectives for one or all of the participating partners.

The Service engages in many types of formal and informal partnership arrangements including: grants and cooperative agreements, memoranda of understanding, donations to the Service, and statutory partnerships. These tools are available for use in structuring the partnership arrangements specific to the needs of, and to the mutual benefit of, the parties involved.

**Comment 2-4:** PG 21 - THIS PLAN NEEDS SHUTDOWN AND DEFUNDING TO ZERO. IT IS FILLED WITH GROSS CORRUPTION.

**Response 2-4:** This comment is beyond the scope of this planning process. Congress and the President of the United States determine funding at the national level and Service obligations derived from law guide funding decisions at smaller scales.

**Comment 2-5:** PG 37 NO NEW BUILDINGS OF ANY TYPE SHOULD BE BUILT. THIS AREA IS SUBJECT TO FLOODING--MASSIVE FLOODING. I SEE NO REASON FOR GENERAL TAXPAYERS OF THIS COUNTRY TO FUND FLOODED BUILDINGS. THAT IS A POOR INVESTMENT.

**Response 2-5:** Alternatives B and C include a proposal for a refuge office building on refuge holdings. Most refuge lands are within the Missouri River floodplain and subject to periodic flooding. The site proposed for the refuge office is not within the floodplain and is suitable for building construction. Appendix L of the EA and Draft CCP contains additional information.

**Comment 2-6:** PG 60100 TO 500 YEAR FLOODS ARE ON THE WAY. ANY CHANGS TO LAND FOR 5 YEAR AND 10 YEAR FLOODS ARE STUPID BECAUSE THE FLOODING WILL GET MUCH MORE MASSIVE QUICKLY. SUCH CHANGS ARE OF NO VALUE AT ALL. THOSE IN 5 YEAR FLOOD ZONES NEED TO GET OUT WHILE THE GETTING IS GOOD.

**Response 2-6:** This comment is beyond the scope this planning process because it is in reference to a description of current conditions and practices on private lands within the Missouri River floodplain.

**Comment 2-7:** PG 87 STOP SPRAYING GLYPHOSATE AND OTHER DAMAGING AGENT ORANGE TYPE PRODUCTS ON OUR NATIONAL LAND. THIS IS TOTALLY TOXIC TO ALL LIE. ITS LIKE MALATHION -HARMFUL.

**Response 2-7:** The comment is in reference to the use of glyphosate to control Johnson grass, an invasive species found on the refuge. Exotic and invasive plant species threaten the diverse habitats found on the refuge by causing population declines of native species and by altering key ecosystem processes such as hydrology, nitrogen fixation, and fire regimes. Left unchecked, these plants dominate large areas and reduce their value as wildlife habitat. Pesticides are useful in slowing the spread of invasive species. Protective measures are followed to ensure the proper use of herbicides on Service lands. Service policy requires that land managers complete a Pesticide Use Proposal, or PUP, before applying herbicide on Service lands. Each PUP must be approved by Environmental Contaminant staff or national wildlife refuge staff at the field, regional, or national levels, depending on the pesticide being proposed for use. Requiring PUPs helps ensure that product label instructions are followed, that pesticides are used effectively and safely, that the lowest risk products are selected, and that buffers are maintained.

**Comment 2-8:** PG 123 - I OPPOSE CONSTRUCTION OF BUILDINGS AT COLUMBIA REACH. IT WOULD BE BETTER TO USE TRAILERS THAT CAN BE MOVED WHEN THE FLOODS COME. TRAILERS CAN BE PULLED TO HIGH GROUND.

**Response 2-8:** See Response 2-5.

**Comment 2-9:** BIBLIOGRPHY IS OLD AND SUCH OLD MATERIAL CAN BE DONE AWAY WITH. WE ARE LIVING WITH CHANGING NEW CONDITIONS, NOT WHAT EXISTED HERE 50 YEARS AGO.

**Response 2-9:** Nearly all of the literature cited in the bibliography is from peer-reviewed scientific publications. Others are well-respected agency publications and policies. The year of publication is usually irrelevant to an article's merit once it clears the peer-review process. Many basic principles of ecology and biology published decades ago, are still very relevant today.

**Comment 2-10:** PG 187 - GATHERING MUSHROOMS TAKES FOOD FROM WILDLIFE AND BIRDS AND SHOULD NOT BE ALLOWED. I OPPOSE ALLOWING THIS USE. ALL THINGS IN REFUGE ARE PROPERTY OF NATIONAL OWNERS, NOT LOCAL PROFITEERS. THIS USE IS NOT COMPATIBLE.

HUNTING/WILDLIFE MURDER IS ALSO NOT COMPATIBEL WITH ANY OTHER PEACEFUL USE.

**Response 2-10:** Mushroom picking is a non-wildlife dependent public use. Such uses may occur on national wildlife refuges where they are compatible with the Refuge System mission and refuge purposes, and do not conflict with wildlife dependent recreation. Mushroom picking meets these standards. Gathering mushrooms for commercial purposes or disturbing the soil to gather mushrooms is prohibited by existing regulations.

The quantity of mushrooms produced in a given year is closely tied to variations in temperature and moisture. In general, wet years produce more mushrooms and dry years fewer. Refuge lands occur within the Missouri River floodplain where seasonal overbank flooding precludes mushroom growth during high water levels. After flood waters recede, the heavily saturated soil is not conducive to mushroom production. The temperature and moisture regime of central Missouri provides conditions conducive to some mushroom production in most years. The irregular and episodic nature of mushroom production in Missouri means animals that consume mushrooms do so in an opportunistic fashion. There are no species of animals in Missouri known to be *dependent* on mushrooms as a food source.

Much of the concern regarding mushroom picking originated in the Pacific Northwest where climate and vegetative cover favor mushrooms including a number of rare species associated with old growth forests. There, collection of large quantities of mushrooms for commercial use is common and has resulted in greater research and regulation to promote sustainable harvesting practices and protection of rare species. Commercial gathering of mushrooms is prohibited within the refuge, but the information developed in the Pacific Northwest is helpful in guiding refuge policy on mushroom picking because it pertains to a number of widely distributed edible mushroom species, including several found in Missouri. One important finding based on a number of small scale studies, shows that careful commercial-level mushroom harvesting does not diminish subsequent fruiting (Pilz et al. 2003). This supports the conclusion that the lower harvest levels associated with personal use mushroom picking have little effect on the amount of mushrooms available to wildlife.

Another consideration is the history and duration of human gathering of mushrooms. Archaeological evidence from within the refuge shows it has been inhabited by humans for more than 12,000 years. Many of the early inhabitants relied heavily on wild plants for food. It is reasonable to conclude that they harvested mushrooms when available and that permitting individual gathering today for personal use is consistent with the historic conditions of the area.

**Comment 3-1:** The relationship between the NEPA compliance documentation and the CCP itself is not clear within the draft EA. Even though the public-noticed document is titled "Environmental Assessment and Draft Comprehensive Conservation Plan", there is no actual CCP as part of this review. The content of Appendix A is not a good representation of what the public might expect in a more complete CCP. Service NEPA documentation supporting CCP development reviewed in the past by this office included separate draft NEPA and CCP documentation. For example, the draft CCP was often included within the draft EA as an appendix. Although this approach is duplicative in content, it allows the public to recognize that there are two separate documents being developed and provides the opportunity to review the draft CCP in the context of the assessment conducted within the EA.

**Response 3-1:** Service policy 602 FW 3 <http://www.fws.gov/policy/602fw3.html> guides development of CCPs. The policy offers two options for structuring the associated documents,

one separates the NEPA document from the Draft CCP and the other integrates the two. The Big Muddy EA and Draft CCP is an example of the latter, but the Service has produced CCPs in the former as well. Separating the two documents places greater emphasis on the Draft CCP, less emphasis on the environmental assessment, and increases duplication of content. Integrating the NEPA document with the content of the Draft CCP places greater emphasis on the alternatives, “the heart of the NEPA process” as noted in Council on Environmental Quality (CEQ) regulations (Code of Federal Regulations 1502.14), and less on a discrete Draft CCP.

**Comment 3-2:** The Refuge goals described in the draft EA are broad and conceptual. The EA and CCP should provide more specificity and detail as to how these Refuge goals are to be achieved. The draft EA identifies eight “driving issues” grouped into three categories. The questions posed within each group serve as a foundation from which the CCP could be developed. Unfortunately, the specific actions which might result in achieving broad goals and objectives are not included within either of the alternatives. Without further specificity, it is difficult to evaluate the proposed actions or their impacts/effects within an EA or a CCP. The development and comparison of alternatives has no real purpose under NEPA, or substantive meaning to the public, without specific Refuge-linked objectives and metrics against which to evaluate them. If the Step-Down Management Plans are intended to provide the missing detail on implementation, the EA itself offers little value for public review in the context of NEPA.

**Response 3-2:** The term “goal” is defined in the glossary of the EA and Draft CCP as “a descriptive, open-ended, and often broad statement of desired future conditions that conveys purposes but does not define measurable units.” The goals in the EA and Draft CCP are consistent with this definition. The alternatives each offer a way to meet the goals. Variation in amount, location, and type are common elements that provide the difference between alternatives. In some cases these elements refer to specific activities, in the case of the EA these elements refer to different potential allocations of refuge resources. Although the alternatives lack site-specific proposals, they do offer different options for allocating refuge resources, a substantive matter worthy of public consideration. Future site-specific refuge proposals will be guided by the final CCP derived from this process. The programmatic nature of the EA and Draft CCP provides management guidance to the entire potential extent of the refuge. This approach is well-suited to the refuge because of its expansive nature and that much of the refuge is yet to be acquired. Specifically, the refuge is authorized to acquire up to 60,000 acres within the 820,000-acre Missouri River floodplain stretching from Kansas City to St. Louis, and at present includes about 30 percent of the total authorized acres. The size and location of future units, totaling approximately 40,000 acres, is not known at this time.

**Comment 3-3:** The draft EA identifies “Issues outside the Scope of the Planning Process” in Chapter 2 and includes three issues critical to any determination of the utility and effectiveness of the CCP design. The legal, regulatory and economic environment within which this CCP will operate largely defines whether one design or another will actually result in achieving the objectives of the action and addressing the needs identified earlier. Although the Service might determine that its own internal refuge planning processes at the level of the CCP should be less comprehensive and more constrained, Council on Environmental Quality’s NEPA implementing regulations specify that alternatives which are “not within the jurisdiction of the lead agency” shall be considered and “possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans, policies, and controls for the area concerned” shall be included in evaluating consequences of proposed actions” ( 40 CFR 1502.14 and 1502.16). Simply, limitations to future land acquisition due to either the lack of willing sellers or inadequate Congressional funding of payments to local governments and critical restrictions on hydrology which prevent floodplain connection or sustainability of created habitat within Refuge

property will affect the effectiveness of any CCP developed to address Refuge objectives. For example, if a more natural hydrograph is not provided for under current operational limits, if the floodplain continues to be constrained by levees repeatedly rebuilt under Public Law 84-99 throughout this river segment or if habitat creation is constrained by State certification requirements, will management actions under the CCP have the desired effect on Refuge resources? The EA should evaluate alternatives in the context of all these limitations and describe the consequences of CCP implementation in the face of these limitations without regard to existing authorities. A comprehensive examination of how hydrology and floodplain reconnection might define or limit the effectiveness of approaches included within the CCP is critical to a meaningful NEPA review. Placing the discussion of these issues outside the scope of the CCP's NEPA compliance documentation, or including only generic management actions, interferes with a public review of this federal action, in general, and the usefulness of this EA, specifically. This weakens the NEPA compliance coverage provided by the EA and could require additional assessment and documentation under NEPA for later, more detailed management actions under the Step-Down Management Plans. The public review of this EA represents the best opportunity for the public to evaluate how the Service will manage the Refuge in the context of current operational conditions and actions by other parties.

**Response 3-3:** The range of alternatives considered is relative to the purpose and need of the proposal. In this case, the purpose is to develop a CCP that provides management direction to the entire refuge, both existing and future units, which among other things helps achieve refuge purposes and the Refuge System mission. The range of alternatives is reasonable relative to the purpose and need. The refuge is authorized to acquire up to 60,000 acres within the 820,000-acre Missouri River floodplain stretching from Kansas City to St. Louis. At present the refuge includes about 30 percent of the authorized acres. The size and location of future units, totaling approximately 40,000 acres, is not known at this time. The programmatic nature of the EA and Draft CCP provides management guidance to the entire potential extent of the refuge. As indicated in the EA and Draft CCP, additional site level planning will be required for specific actions. The legal, regulatory, and economic environment affecting the refuge is in constant flux. Assessing the implications of various potential futures associated with these elements is beyond the scope of this planning effort. Finally, as noted in chapter 4 of the EA and Draft CCP, the refuge advocates for conservation with a wide variety of groups that influence the legal, regulatory, and economic environment of the refuge.

**Comment 3-4:** Although the statement of purpose is fairly clear regarding the development and implementation of a CCP to meet the goals of the Big Muddy Fish and Wildlife Refuge, specifically, and the mission and goals of the National Wildlife Refuge System, generally, the 'need' described in the draft EA for the CCP and the Refuge itself is tethered to legislative authority and agency requirement. From the text, it might appear to the public that the CCP is necessary because it is required by law and Service policy. The EA would be improved with an expansion of the project need discussion to include a limited survey of the ecological impacts of constructing the Missouri River Bank Stabilization and Navigation Project on the lower river between Kansas City and St. Louis necessitating creation of the Refuge and implementation of the CCP. The EA purpose and need component is weakened without a more clear connection between environmental condition (problem statement and need) and the approach undertaken by the CCP as the preferred approach to addressing that problem or need. Relying upon the directives of law, regulation and policy to define need instead of real environmental need creates a weak base from which to analyze consequences and evaluate alternatives.

**Response 3-4:** The need indicated by the commenter is similar to the need described for the establishment of the refuge documented in the Final Environmental Impact Statement for the

expansion of Big Muddy NFWR. The expansion and ongoing acquisition of the refuge is the agency response to that need. The need described for this environmental assessment is for long-term management direction for the entire refuge, both existing and future units. The NWRS had no legislative mandate for long-term planning until the passage of the NWRS Improvement Act in 1997. The Purpose and Need as stated in the EA and Draft CCP is suited to the programmatic nature of the planning effort.

**Comment 3-5:** The range of alternatives does not appear to address any of the eight "driving issues" in any specific terms. In general, the design of creating a range of alternative management approaches based on the application of "supplemental objectives" applied to either one or two reaches of the Refuge does not seem at all robust or rigorous as prescribed by CEQ regulations (40 CFR 1502.14). There is very little meaningful and substantial distinction between the two 'action alternatives' other than in the number of reaches to which some number of vague supplemental objectives are applied. The alternatives chapter within the draft EA is thin, offers no real insight into what range of specific actions could be undertaken to initiate meaningful change in beneficial habitat and does not provide for public review of how the Service might ultimately manage the Refuge resource in its follow-on "step-down management planning process." If the public is to evaluate the comparative merits of each alternative, the EA should provide a more substantial treatment of management approaches than is described in Table 3-1. It might be more useful to construct alternatives which incorporate concepts such as targeting specific reaches for acquisition, targeting river habitat types (e.g., confluence areas) and specifying different restoration strategies for different land types (e.g., not suitable for habitat restoration, but suitable for levee pullback). Neither the objectives nor the make-up of the alternatives appear to have any connection to specific restoration objectives.

**Response 3-5:** See Response 3-2.

**Comment 3-6:** The construct used for evaluating and comparing the impacts of the range of alternatives contained in Chapter 4 is not particularly useful. It would be impossible to discern specific direct, indirect or cumulative effects from the general actions comprising each alternative and their objectives.

**Response 3-6:** The EA and Draft CCP describes a programmatic range of alternatives intended to provide management direction for existing and future units of the refuge. The effects analysis is qualitative and consistent with the programmatic scope of the planning effort.

**Comment 3-7:** I appreciate the importance of the restoration of natural river structures and functions to the improvement of the ecological health of the Missouri River and reduction of flood risk on a reach scale. The intended purpose of the CCP is an important component of active management of the Refuge system as a part of this restoration. However, it is not apparent how the alternatives evaluated within this draft EA will provide useful content for the CCP or support meaningful public review and participation under NEPA.

**Response 3-7:** See Response 3-2.

**Comment 4-1:** I support Alternative C of the Environmental Assessment for the Big Muddy Refuge, but believe that resources should be used to support programming for the St. Louis Reach. The Cora Island Unit is an important part of efforts to restore the Mississippi and Missouri River confluence. Environmental education programs and interpretive programs should be part of Cora Island Unit.

**Response 4-1:** The Cora Island Unit is an important part of efforts to restore the confluence of the Mississippi and Missouri Rivers, and environmental education and interpretation are priority public uses for the Refuge System. Nevertheless, the alternatives considered different allocations of the same level of refuge resources broadly defined as staff and funding. Under alternative C, the preferred alternative, both the Columbia and St. Louis reaches are emphasized. Emphasizing two reaches required tradeoffs to make alternative C commensurate with the others in terms of resource allocation. Outreach and collaboration remain an emphasis within the St. Louis reach under alternative C opening the opportunity to deliver environmental education and interpretive programming via partnerships or some other arrangement.