Message

From: Ainslie, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F0961103D9BC495AB830CDC6DBA07B18-AINSLIE, WILLIAM]
Sent: 7/12/2021 5:39:21 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Attachments to Conservation Organization comments

Thanks Jill! These are very helpful.

Stay safe,

Bill Ainslie

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Monday, July 12, 2021 12:18 PM
To: Ainslie, William <Ainslie.William@epa.gov>
Subject: RE: Attachments to Conservation Organization comments

Hello Bill,

Good to hear from you and hopefully you've been enjoying some summer travels. All's well here but wondering how it's already mid-July.

Please find attached a copy of the Conservation Orgs scoping comments with Appendix A and Appendices B-I are downloadable here.

Please don't hesitate to reach out if there is anything else I can assist with.

Kind regards,
Jill

From: Ainslie, William <Ainslie.William@epa.gov>
Sent: Monday, July 12, 2021 10:49 AM
To: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: Attachments to Conservation Organization comments

Jill:

Hope this finds you doing well, staying safe, and keeping busy. I was hoping you could help me obtain a complete set of the Attachments the Conservation Organizations included in their scoping comments on the Yazoo Pumps project. Might you have those and be able to provide me with copies?

Thanks,

Bill Ainslie

William Ainslie
Wetlands Regulatory Section
EPA Region IV
61 Forsyth St., NE
Atlanta, GA 30303
(404) 562-9400

"We are drowning in information, while starving for wisdom. The world henceforth will be run by synthesizers, people able to put together the right information at the right time, think critically about it, and make important choices wisely." ***E.O. Wilson (via Rob Brooks)***

Message

From: Ainslie, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F0961103D9BC495AB830CDC6DBA07B18-AINSLIE, WILLIAM]
Sent: 7/12/2021 3:48:48 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: Attachments to Conservation Organization comments

Jill:

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Bill Ainslie

William Ainslie
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Sent: 4/15/2021 3:53:08 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Pumps Federal Lawsuit Filed

Jill:

Hope this finds you well and staying safe. Thanks for the information. We had heard that the lawsuit had been filed and we appreciate the information you have forwarded on. Will make others aware as well.

Regards,

Bill Ainslie

William Ainslie
Wetlands Regulatory Section
EPA Region IV
61 Forsyth St., NE
Atlanta, GA 30303
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From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Thursday, April 15, 2021 11:34 AM
To: Ainslie, William <Ainslie.William@epa.gov>
Subject: Yazoo Pumps Federal Lawsuit Filed

Good Morning, Bill,

I hope you are doing well --

I wanted to let you know that yesterday Audubon and partners filed a lawsuit against the Corps and FWS challenging the Yazoo Pumps. Our press release follows and our complaint can be downloaded here.

Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Kind regards,
Jill

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

Lawsuit challenges Army Corps' unlawful approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

The Yazoo Pumps project would involve construction of a 14,000 cubic-feet-per-second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, the Corps admitted in 2007 that 80 percent of the project's benefits would be for agriculture.

"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally endangered species, such as the pondberry. Also, the Yazoo Pumps would increase flood risk for downstream communities while failing to provide the promised level of relief to communities in the Yazoo Backwater Area.

Instead of the ineffective, antiquated pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. See: Alternative Flood Relief Solutions to the Yazoo Pumps .

The conservation groups' legal complaint can be downloaded here.

####

CONTACTS:
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Ainslie, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F0961103D9BC495AB830CDC6DBA07B18-AINSLIE, WILLIAM]
Sent: 2/26/2021 10:56:40 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Resilience Alternative

Thanks Jill. I will take a look. Appreciate you sharing the information with me.

Have a good weekend,

Bill Ainslie

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Friday, February 26, 2021 4:28 PM
To: Ainslie, William <Ainslie.William@epa.gov>
Subject: Yazoo Resilience Alternative

Good Afternoon, Bill,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information.

Kind regards,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Ainslie, William [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F0961103D9BC495AB830CDC6DBA07B18-AINSLIE, WILLIAM]
Sent: 2/10/2021 10:12:35 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Notice of Intent Filed on ESA

Jill:

Hope you are doing well and staying busy. Thanks for keeping me informed!

Regards,

Bill

William Ainslie
Wetlands Regulatory Section
EPA Region IV
61 Forsyth St., NE
Atlanta, GA 30303
(404) 562-9400

"Examine each question in terms of what is ethically and esthetically right, as well as what is economically expedient. A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise." ***Aldo Leopold***

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Wednesday, February 10, 2021 5:08 PM
To: Ainslie, William <Ainslie.William@epa.gov>
Subject: Yazoo Notice of Intent Filed on ESA

Hello Bill,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026

Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 4:05:41 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: RE: Yazoo Pumps Federal Lawsuit Filed

Much appreciate you passing along. Please stay well.

From: Ainslie, William <Ainslie.William@epa.gov>
Sent: Thursday, April 15, 2021 10:53 AM
To: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: RE: Yazoo Pumps Federal Lawsuit Filed

Jill:

Hope this finds you well and staying safe. Thanks for the information. We had heard that the lawsuit had been filed and we appreciate the information you have forwarded on. Will make others aware as well.

Regards,

Bill Ainslie

William Ainslie
Wetlands Regulatory Section
EPA Region IV
61 Forsyth St., NE
Atlanta, GA 30303
(404) 562-9400

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From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Thursday, April 15, 2021 11:34 AM
To: Ainslie, William <Ainslie.William@epa.gov>
Subject: Yazoo Pumps Federal Lawsuit Filed

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Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Kind regards,
Jill

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

Lawsuit challenges Army Corps' unlawful approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

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"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

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The conservation groups' legal complaint can be downloaded here.

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Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
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Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 3:34:01 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: Yazoo Pumps Federal Lawsuit Filed

Good Morning, Bill,

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Jill

FOR IMMEDIATE RELEASE
April 14, 2021

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The conservation groups' legal complaint can be downloaded here.

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Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 1/11/2021 10:01:05 PM
To: Kajumba, Ntale [Kajumba.Ntale@epa.gov]; Ainslie, William [Ainslie.William@epa.gov]; Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS
Attachments: Conservation Organization Comments on Final SEIS_Yazoo Pumps_Final with attachments_01-11-21.pdf; EPA_FOIA_FinalEMAPSubmittal.xlsx; EPA_FOIA_pt5out.xlsx

Good Afternoon, Ms. Kujumba, Mr. Ainslie, and Mr. Hicks,

On behalf of American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi, please find attached our comments with two supporting documents on the Final Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Kind regards,

Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

American Rivers ◆ Audubon Mississippi ◆ Healthy Gulf
National Audubon Society ◆ Sierra Club ◆ Sierra Club Mississippi

January 11, 2021

Via email: YazooBackwater@usace.army.mil

Colonel Robert A. Hillard
District Engineer
U.S. Army Corps of Engineers
Vicksburg District
4155 Clay Street
Vicksburg, MS 39183-3435

Re: Comments on the Final Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement

American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi (collectively, the Conservation Organizations) submit these comments on the Final Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Comments

The Conservation Organizations call on the Corps to abandon the Proposed Plan—which is prohibited by the 2008 Clean Water Act § 404(c) Final Determination and the Clean Water Act 404(b)(1) Guidelines. The Corps should also withdraw the deeply flawed FSEIS, which like the Draft SEIS, does not comply with the important, longstanding requirements of the National Environmental Policy Act (NEPA). The Corps should permanently abandon all efforts to build the environmentally devastating, extremely costly, highly controversial, and long-vetoed Yazoo Pumps project and instead focus on opportunities for providing more effective, meaningful, sustainable, and immediate benefits to the communities in the Yazoo Backwater Area while restoring this ecologically critical region.

The Conservation Organizations remind the Corps of the commitment provided in both the FSEIS and the Draft SEIS that the Corps will not sign the Record of Decision for the already-vetoed Yazoo Pumps until Endangered Species Act (ESA) coordination on the pondberry has been completed:

> ESA coordination on the pondberry is ongoing and the Record of Decision would not be signed until coordination is complete (see Threatened and Endangered Species Appendix for additional information on Pondberry assessment).[1]

On November 5, 2020, the U.S. Fish and Wildlife Service (the Service) advised the Corps that "sufficient data is not available at this time to make an 'effects' determination" for the federally endangered

[1] FSEIS at 52; Draft SEIS at 51.

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pondberry.[2] As a result, the Conservation Organizations believe that the Service will not concur with the Corps' Biological Assessment for the pondberry. This will mandate formal consultation and development of a full Biological Opinion. As a result, the Corps almost certainly will not be able to sign a Record of Decision for the Proposed Plan in the near future without violating its explicit commitment in the FSEIS.

A. The FSEIS Does Not Correct the Many Failings that Led the Environmental Protection Agency and the U.S. Fish and Wildlife Service to Conclude that the Project Should Not Move Forward

Both the U.S. Environmental Protection Agency (EPA) and the U.S. Fish and Wildlife Service submitted scathing comments on the Draft SEIS—comments that make clear that the project may not move forward. While the Corps provided nominal responses to these comments, the FSEIS does not address even one of the many critical problems identified by those agencies.

EPA's comments on the Draft SEIS make clear that the Proposed Plan is prohibited by the Clean Water Act 404(b)(1) Guidelines.[3] EPA's comments also determine that the proposed mitigation plan violates the Clean Water Act § 404 mitigation regulations. As a result, the Proposed Plan also violates 33 USC § 2283(d), which requires that civil works projects comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps. As EPA's comments highlight:

- The analysis of wetland impacts is fatally flawed. Among other problems, the analysis cannot be reconciled with the findings of the interagency field-based Environmental Monitoring and Assessment Program (EMAP) which "determined that there are approximately 216,000 acres of wetlands" in the Yazoo Backwater Area, an estimate that "has not changed in the 2020 DSEIS." The Corps has not completed the required jurisdictional determination required by current regulations. The wetlands impact analysis should—but does not—evaluate the full suite of wetland impacts, including because the FSEIS: (1) does not evaluate the "potential effects on wetlands based on expected changes in flood duration and frequency;" (2) does not evaluate "how the pumps project would impact wetlands that currently experience ≥ 7 days of flood inundation;" (3) does not evaluate "all flooded wetlands that are in the 5-year floodplain;" and (4) does not evaluate "how many wetlands would no longer be within the 2-year and 5-year floodplains with the pumps project implemented."

- The analysis of impacts to fish and other aquatic species is fatally flawed. Notably, EPA concludes that it "is unclear whether the pumps project's potential impacts to fish and other aquatics have been fully assessed" which is particularly important because "prior data also indicate that between 2007 and 2020 there has been a 30% decrease in the size of the spawning

[2] FSEIS, Appendix H (Threatened and Endangered Species) at 97. The Service also raised significant concerns about the impacts of the same plan on the federally endangered pondberry in 2007, when the Service determined that take would occur. 2007 FSEIS, Main Report at 33-34.

[3] FSEIS, Appendix E (Public Comments) at 34-44. The Conservation Organizations strongly disagree with the statement contained in the EPA cover letter transmitting these comments that the Proposed Plan is not subject to the 2008 Clean Water Act Veto of the Yazoo Pumps. As discussed in these comments and in our comments on the Draft SEIS, the Proposed Plan is unquestionably prohibited by the 2008 Veto. EPAs scathing comments on the Draft SEIS also document the fact that the Corps has relied on the same flawed wetland assessment methodologies decisively rejected by EPA in the 2008 veto because those methodologies severely underestimate and obscure the pumps' significant, unacceptable impacts.

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habitat impact assessment area and a 133% decrease in the size of the rearing habitat impact assessment area."

- The analysis of water quality impacts is fatally flawed. EPA concludes that the "statements regarding water quality benefits from the operation of the pumps, are not supported by data to quantify beneficial or adverse effects."

- The analysis of secondary and cumulative impacts is fatally flawed. EPA recommends a fundamentally new analysis of these impacts. EPA notes that the new analysis should include an evaluation of the "effects of discharging water from the YBA into the Yazoo River on homes, communities, and/or infrastructure along the Yazoo River, particularly in areas downstream of the Deer Creek site's pump discharge point (e.g., Vicksburg)."

- The compensatory mitigation plan is fatally flawed. EPA has determined that the "compensatory mitigation plan described in the 2020 DSEIS includes a number of deficiencies that would preclude a private party from receiving a Section 404 permit" including, but not limited to failing to identify specific mitigation sites. As a result, the Proposed Plan also violates 33 USC § 2283(d), which requires that civil works projects comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps.

- The proposed adaptive management plan is fatally flawed. Among other problems this plan does not require collection of scientific data on key resources, "including aquatic biology, water quality, and wetlands" and does not require "use of that information to inform ongoing management of the project." The plan also does not evaluate the "effects and management of the pumps" or the proposed groundwater wells. The plan also fails to identify the steps that will be followed if mitigation is not offsetting the actual impacts of the Yazoo Pumps.

- The Environmental Justice analysis is fatally flawed. EPA has determined that this important analysis fails on many levels. As the starting point to correct these failings, "EPA recommends the EJ analysis clarify information regarding the scope of the study area, project benefits, and impacts in the FSEIS."

The comments from the U.S. Fish and Wildlife Service (the Service) are equally scathing. The Service highlights its significant concerns with the Proposed Plan and identifies 20 substantial recommendations that would need to be followed to address the Service's concerns, including such major actions as: (1) restoring the one-year floodplain; (2) reforesting the 2-year floodplain; and (3) fully compensating for all wetland impacts "including impacts to shorter hydroperiod wetlands and wetlands outside the two-year floodplain"—impacts that the Corps has not even evaluated, let alone proposed to mitigate.[4]

The Service concludes that the Proposed Plan should not move forward:

> In conclusion, the Service does not believe the currently formulated plan represents a balanced approach to addressing the flood damage reduction and environmental opportunities in the

[4] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 8-16.

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Yazoo Study Area. The fish and wildlife resource planning goals must be addressed to at least a satisfactory level."[5]

The Service also advised the Corps that the "abbreviated timeframe" imposed by the Corps precluded "the Service and the Corps from undertaking necessary coordination during the planning process to ensure adequate time for Service review of Corps-relied upon models and assumptions, as well as compliance with the [Fish and Wildlife Coordination Act]. The abbreviated timeframe has restricted the Service's ability to undertake a more thorough analysis and fully develop recommendations to reduce damages to fish and wildlife resources."[6]

B. The FSEIS Does Not Address the Detailed Technical Comments Submitted by the Public In Opposition to the Proposed Plan

The FSEIS fails to substantively address the many detailed technical comments submitted by the public on the Draft SEIS. Instead, the Corps opted to finalize the FSEIS just 4 days after the public comment period closed on the Draft SEIS, precluding the Corps from providing any degree of meaningful review to those technical comments.[7] The Corps' failure to respond to significant comments violates NEPA and the Administrative Procedure Act.[8]

As the Corps is aware, the Conservation Organizations submitted 113 pages of detailed technical comments on the Draft SEIS along with a detailed expert analysis denouncing the model used by the Corps to assess downstream flood impacts, a detailed proposal for a Resilience Alternative, and 13 additional attachments consisting of hundreds of pages of information.[9] The Corps' response to these highly detailed, technical comments consists of a scant five general paragraphs, each of which provides a blanket rejection of concerns raised in our comments. The Corps did not make any changes to the Draft SEIS in response to these comments. Each issue highlighted in our comments on the Draft SEIS remains valid and applicable to the FSEIS and should be considered a part of our comments on the FSEIS. Accordingly, the Conservation Organizations incorporate our comments on the Draft SEIS into these comments on the FSEIS, as though fully set forth herein.

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[5] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 16.

[6] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 1.

7 While the FSEIS was noticed in the December 11, 2020 Federal Register (85 Fed. Reg. 80093), the FSEIS electronic files, including all appendices, are dated (04Dec20) in the official EPA Environmental Impact Statement (EIS) Database. See https://cdxnodengn.epa.gov/cdx-enepa-II/public/action/eis/details?eisId=316671 (last visited January 8, 2021). The public comment period on the Draft SEIS closed on November 30, 2020. 85 Fed. Reg. 65800 (October 16, 2020).

[8] *See, e.g., Ala. Power Co. v. Costle*, 636 F.2d 323 (D.C. Cir. 1979)(finding that the "duty to respond to significant comments finds a statutory basis in required notice and comment procedures for the opportunity to comment for the opportunity to comment is meaningless unless the agency responds to significant points raised by the public."); *FBME Bank Ltd. v. Lew*, 2016 WL 5108018, *1, *23 (D.D.C. 2016) (finding that the agency's failure to respond to significant comments that would have required a change in the proposed rule was arbitrary and capricious); *Lilliputian Systems Inc. v. Pipeline and Hazardous Materials Safety Admin.*, 741 F.3d 1309, 1313 (D.C. Cir. 2004) ("An agency's failure to respond to relevant and significant public comments generally demonstrates that the agency's decision was not based on a consideration of the relevant factors." (internal quotations and citations omitted)).

[9] Comments of American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi on the October 2020 Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement, dated November 30, 2020.

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As the Corps is also aware, the Conservation Organizations submitted 80 pages of detailed technical comments during the scoping period for the FSEIS.[10] The Conservation Organizations also submitted a detailed proposal for a Resilience Alternative with those scoping comments, along with 8 additional attachments consisting of many hundreds of pages of information. Neither the FSEIS nor the Draft SEIS addressed any of the concerns or proposals made in these scoping comments. Each issue highlighted in these scoping comments remains valid and applicable to the FSEIS and should be considered a part of our comments on the FSEIS. Accordingly, the Conservation Organizations incorporate our scoping comments into these comments on the FSEIS, as though fully set forth herein.

The Corps provides no response at all to any of the other more than 50,500 comment letters submitted by citizens, scientists, and public interest groups from Mississippi and across the country. For example, the Corps refused to provide any response to any of the following detailed technical comments:

- Detailed comments submitted by more than 110 scientific professionals;
- Detailed comments submitted by the Society of Wetland Scientists;
- Detailed comments submitted by the Society of Freshwater Science;
- Detailed comments submitted by the North American Lake Management Society;
- Detailed comments submitted by the American Fisheries Society;
- Detailed comments submitted by a number of biologists who specialize in turtles;
- Detailed comments submitted by a former Environmental Protection Agency attorney; and
- Detailed comments submitted by more than 120 national, state and local conservation, faith-based, social justice, and recreation organizations.

C. The FSEIS Recommends the Exact Same Unacceptable Project and Relies on the Exact Same Flawed Analyses Utilized in the Draft SEIS

The FSEIS recommends the exact same project as the Draft SEIS, and relies on the exact same flawed analysis utilized in the Draft SEIS. These flaws, which are extensively detailed in the Conservation Organizations' Comments on the Draft SEIS and in the Conservation Organizations' Scoping Comments, are briefly summarized below.

1. The FSEIS Recommends a Project That is Prohibited by the 2008 Clean Water Act Veto. The FSEIS recommends construction of the same 14,000 cubic-feet-per-second (cfs) pumping plant whose purpose, structure, operation, and impacts fall squarely within the scope of the 2008 veto—which explicitly prohibits plans that would harm more than 28,400 acres of wetlands.[11]

[10] Comments of American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi in response to the April 16, 2020 Notice of Intent to Prepare Supplemental Environmental Impact Statement for the Yazoo Area Pump Project (85 Fed. Reg. 21218), dated June 15, 2020.
[11] 2008 Clean Water Act 404(c) Final Determination at iii, 73.

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The FSEIS, which severely underestimates wetland impacts, acknowledges that the pumps will degrade more than 38,744 acres of wetlands.[12]

The FSEIS acknowledges that the recommended plan is the same project vetoed by EPA in 2008. For example, the FSEIS states:

- "Because the Proposed Plan is an updated and reevaluation of the 2007 recommended plan there was no reformulation of the array of alternatives examined in the 2007 Main Report. The original formulation of plans has been reviewed and accepted as remaining valid. Because the project is authorized, and a recommended plan for the remaining features has been vetted and reviewed, this FSEIS No. 2 serves the specific purpose of updating and completing the NEPA requirement for disclosure of impacts, and to support finalizing a ROD."[13]

- "The goal of this study is to update and reevaluate the recommended plan from the 2007 Main Report based on new environmental and hydraulic data. No new study goals or objectives have been added."[14]

- **"Why is the Corps proposing the same pumping project that was vetoed by the EPA?** The Corps received funding to update the recommended plan from the 2007 Main Report based on updated environmental and hydrologic data. A number of changes have been made to the proposed project."[15]

- **"You said that you reviewed non-structural alternatives in the 2007 report, but you did not review all the non-structural alternatives, as pointed out in the 2008 veto. Why didn't you consider these new alternatives in the DSEIS?** Congress directed funding only to update the recommended plan from the 2007 Main Report based on updated environmental and hydrologic data."[16]

- FSEIS Table 2-28 refers to the Proposed Plan as "Plan 5" which was the plan recommended in the 2007 FSEIS.[17]

2. The FSEIS Recommends a Project That is Prohibited by the Clean Water Act 404(b)(1) Guidelines. The Yazoo Pumps are clearly prohibited by the 404(b)(1) Guidelines because they: (1) are not the least environmentally damaging practicable alternative; (2) will clearly cause significant—and conclusively unacceptable, as documented in the EPA veto—degradation of the aquatic ecosystem; (3) rely on a wholly conceptual mitigation proposal that is woefully inadequate and infected by the very same fatal flaws identified by EPA in the veto; (4) will cause or contribute to violations of state water quality standards; and (5) will jeopardize the continued existence of the

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[12] FSEIS, Appendix F-5 (Wetlands) at 33.
[13] FSEIS at 86.
[14] FSEIS at 17.
[15] FSEIS, Appendix E (Public Comments) at 9 (bolded language in original).
[16] FSEIS, Appendix E (Public Comments) at 24 (bolded language in original).
[17] FSEIS, Appendix G (Engineering Report) at 144 ("Table 2-28. Base condition cumulative land-use by frequency and Plan 5 Pump Frequency land-use."); *see also* Draft SEIS, Appendix G (Engineering) at 123 ("The proposed plan is Plan 5 from the 2007 FEIS.").

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federally endangered pondberry. EPA's comments on the Draft SEIS highlight many of these failings and make it clear that the Yazoo Pumps are prohibited by the 404(b)(1) Guidelines.

3. The FSEIS Recommends a Project That Will Not Provide the Promised Flood Relief. The vetoed Yazoo Pumps will not provide the promised flood relief for the Yazoo Backwater Area. In fact, the pumps are so ineffective that they will leave 82% to 89% of flooded lands underwater, and will take weeks to months to drawdown floodwaters on the remaining lands, as acknowledged in the FSEIS.[18]

4. The FSEIS Recommends a Project That Threatens Public Safety. The vetoed Yazoo Pumps could create significant flood risks for communities in north Vicksburg and the Yazoo Backwater Area—concerns raised repeatedly by the conservation community and EPA. Operation of the Yazoo Pumps would put downstream communities on the receiving end of an additional 9 billion gallons of water a day when the Yazoo River is already at flood stage. Communities in the Yazoo Backwater Area could flood if that massive influx of water overtopped or damaged the Yazoo Backwater Levee, which is at risk of crevassing and is so low that it is not accredited to handle a 100-year flood.[19] Collapse of this levee would flood the very communities the pumps are purported to protect. The FSEIS dismisses these concerns out of hand in a brief analysis[20] based on a model that an independent expert found to be so flawed that it "cannot be trusted to get a correct answer" regarding the impact of the Yazoo Pumps on flood levels in the Yazoo River.[21] The FSEIS makes no effort to address this expert analysis.

5. The FSEIS Does Not Look at Even a Single Alternative to the Vetoed Yazoo Pumps. The FSEIS does not consider even a single alternative to the vetoed Yazoo Pumps, in direct violation of the National Environmental Policy Act, the Clean Water Act, and modern floodplain management techniques. The FSEIS makes no mention of repeated requests to consider alternatives, including from EPA, and the Conservation Organizations whose scoping and Draft SEIS comments proposed a suite of proven, low-cost, natural infrastructure and non-structural measures (referred to as the Resilience Alternative) that would provide effective, sustainable, and environmentally sound relief to communities in the Yazoo Backwater Area.

6. The FSEIS Ignores a Wide Array of Devastating Impacts to Hemispherically Significant Wetlands. The FSEIS dramatically understates wetland impacts by looking only at some types of impacts to a small subset of wetlands, and by relying on scientifically unsound methodologies that were decisively rejected by EPA in the 2008 veto. The FSEIS arbitrarily and severely restricts its review of wetland impacts to changes in the duration of inundation to the small subset of wetlands located within the 2-year floodplain that receive ≥ 14 consecutive days of flooding. These severe, scientifically unsound restrictions cause the FSEIS to significantly understate impacts to wetlands and aquatic habitat, as made clear in the 2008 veto. Even this severe underestimate acknowledges degradation to at least 38,774 acres of wetlands in the 2-year floodplain; a level of impacts prohibited by the 2008 veto.

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[18] FSEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering Report) at 135, Table 2-26.
[19] National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/fema (accessed November 6, 2020). Lack of accreditation means that the Yazoo Backwater Levee cannot protect Yazoo Backwater communities during flood events at or greater than the 1% chance of exceedance (100-year flood event).
[20] FSEIS, Appendix G (Engineering Report) at 165, paragraph 205.
[21] FSEIS, Appendix E (Public Comment) at 225-273.

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7. The FSEIS Ignores Critical Impacts to the Many Rivers and Streams in the Project Area. The FSEIS does not assess impacts to the project area's many hydrologically-connected streams, even though the pumps-induced wetland losses will likely reduce flows and increase sedimentation and nutrient pollution in those streams. These wetland losses also could reduce groundwater recharge in the project area, exacerbating low stream flows and the already-significant declines in the Mississippi Alluvial Plain aquifer.

8. The FSEIS Ignores Critical Impacts to a Vast Array of Fish and Wildlife. The FSEIS fails to assess critical impacts to a vast array of fish and wildlife, including by failing to fully evaluate the pumps' adverse impacts to internationally significant aquatic resources. For example, the FSEIS does not evaluate how many acres would no longer flood to a depth of 1 foot for 8 consecutive days with the pumps in place, even though the FSEIS makes clear that all fish spawning habitat would be lost in such areas. The entire analysis of waterfowl impacts is based on a single duck species even though more than 40 percent of the nation's waterfowl migrate through the project area twice each year, including more than 30 species of waterfowl that rely on bottomland hardwood wetlands. The shorebird analysis is limited to a few vague paragraphs even though up to one million shorebirds migrate through the project area twice each year, as highlighted in the 2008 veto. The U.S. Fish and Wildlife Service opposes the FSEIS plan, and the Corps has refused to adopt recommendations that could alleviate some of the Services' concerns.[22] The FSEIS also does not include a completed Endangered Species Act consultation on the federally endangered Pondberry.

9. The FSEIS Mitigation Is Wholly Inadequate and Ignores Longstanding Legal Requirements. Because the FSEIS does not assess the full extent of the pumps' adverse impacts to hemispherically significant aquatic resources and wildlife, it cannot assess the amount of mitigation needed to offset those impacts. The FSEIS also repeats the same mitigation errors identified in the 2008 veto by failing to identify specific mitigation sites, provide a detailed mitigation plan, and ensure adequate mitigation even for the severe underestimate of 38,744 acres of wetland impacts. Relying on the same functional assessment rejected in the 2008 veto precisely because it significantly understates lost wetland functions and significantly overstates mitigation outcomes,[23] the FSEIS proposes just 2,405 acres of reforestation of yet-to-be-identified frequently flooded lands as in-kind mitigation.[24] This is 8,257 fewer acres of mitigation than proposed by the Corps in 2007; the FSEIS also eliminates 52,900 acres of additional restoration that was a much-touted component of the Corps' 2007 proposal. As discussed above, EPA has advised the Corps that the mitigation plan violates the Clean Water Act § 404 mitigation regulation. As result, the Proposed Plan also violates 33 USC § 2283(d), which requires civil works projects to comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps.

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[22] FSEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report).

[23] FSEIS, Appendix F-5 (Wetlands) at 26; 2008 Clean Water Act 404(c) Final Determination at 28 and 47.

[24] The FSEIS also proposes out-of-kind mitigation consisting of the installation of groundwater wells far outside of the project area that would result in even more groundwater pumping from the already severely-depleted Mississippi Alluvial Plain aquifer.

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10. The FSEIS Does Not Provide an Estimate of the Project's Costs and Benefits. The FSEIS does not provide any information on the costs or benefits of the Yazoo Pumps, and as a result cannot demonstrate that the project's benefits will exceed the project's costs, as required by law. Construction costs have increased substantially since the last estimate provided by the Corps in 2007, and the FSEIS proposes massive new construction at the Deer Creek location that has never been accounted for in a cost estimate; these changes have likely pushed the cost of construction to well over $450 million. The FSEIS does make clear that the pumps will provide little if any flood damage reduction benefits, acknowledging that 82% to 89% of the project area will still flood even with the pumps in place, and the pumps will take weeks to months to drawdown floodwaters on the remaining lands.[25] The FSEIS also highlights the extremely limited potential for agricultural benefits, noting that "agricultural crop acres benefited are expected to be 28,700 acres per year over the life of the project."[26] In 2007, the Corps acknowledged that 80% of project benefits would come from agricultural intensification, which further reinforces that the pumps are not designed to provide flood relief for homes and other structures.

11. The FSEIS Has Not Undergone the Mandatory Independent External Peer Review. The FSEIS does not include a report—or account for the findings of—an Independent External Peer Review (IEPR) panel. The FSEIS also makes no references to such a review being conducted, even though IEPR improves project planning and is required for this project as a matter of law.[27]

12. The FSEIS Does Not Respond to Public Comments. As detailed above, the FSEIS responds to just one set of comments submitted by the public. In a scant five paragraphs that response dismisses more than 100 pages of detailed technical comments and an expert analysis denouncing the model used by the Corps to assess downstream flood impacts. The FSEIS provides no response to any of the other 50,500 comment submitted by citizens, scientists, and public interest groups from Mississippi and across the country, including detailed technical comments submitted by more than 110 scientific professionals, the Society of Wetland Scientists, the Society of Freshwater Science, the North American Lake Management Society, the American Fisheries Society, more than 120 conservation and social justice organizations, and others.[28]

D. Additional Problems with the FSEIS

In addition to the extensive problems detailed in the comments submitted by EPA, the Service, and the public, the FSEIS suffers from at least the following additional flaws.

1. 2019 Flood After Action Report

Because the Corps reinitiated its study of the vetoed Yazoo Pumps project in response to the 2019 flood event, it is particularly critical for the Corps and the public to fully understand how that event played out in the Yazoo Backwater Area, and how any actions undertaken by the Corps and others may have exacerbated or otherwise influenced the level and extent of flooding in the Yazoo Backwater Area.

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[25] FSEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering) at 135, Table 2-26.
[26] FSEIS, Appendix F-1 (Environmental Justice) at 9.
[27] 33 USC 2343(a) (making independent external peer review mandatory for civil works projects that cost more than $200 million or are controversial).
[28] The FSEIS does provide minimal responses to the comments submitted by EPA and the U.S. Fish and Wildlife Service.

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The Conservation Organizations urged the Corps to develop an After Action Report for the 2019 flood in their scoping comments, but no such report was referenced in the Draft SEIS. The Corps was also asked whether it had prepared an After Action Report for the 2019 flood during the virtual public hearing. The Corps responded in the FSEIS that an after action report had been prepared, and that a copy of the report was available upon request from the Vicksburg District:

> **Did the Corps prepare an after action flood report for the 2019 flood to help inform the development of solutions? If not, why not? Where is that available?**
>
> An AAR was completed for the 2019 flood and is available upon request from the Vicksburg District. The Vicksburg District utilized flood data from the 2019 flood in the updated period of record for the Proposed Plan.[29]

However, the Corps still has not provided a copy of this report to the Conservation Organizations even though we requested a copy on December 11, 2020.[30] Because the Corps has failed to supply this critical After Action Report, the public has no way of knowing whether or not the Corps properly accounted for the 2019 flood in the FSEIS. The 2019 Flood After Action Report, and any supporting materials and documentation, should be immediately provided to the Conservation Organizations, and must be made a part of the record for the FSEIS.

The FSEIS also acknowledges that it "does not discuss the exact number of homes and farmland acres impacted from the 2019 flood."[31] In the absence of this information—including the precise elevations of the structures and farmland acres impacted—it is not possible for the Corps or the public to determine whether, or by how much, operation of the Yazoo Pumps would have reduced flood damages during the 2019 flood.

As highlighted at page 19 of the Conservation Organization Comments on the Draft SEIS, documentation provided by the Corps in response to a Freedom of Information Act request demonstrates that had the Yazoo Pumps been in operation during the 2019 flood, 442,195 acres—**83% of the lands that flooded in 2019**—would still have been underwater, based on data provided by the Corps.[32] Just 17% of the acreage that flooded in 2019 would have been drained by the Yazoo Pumps.

Moreover, even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data,[33] as highlighted at page 89 of the Conservation Organization Comments on the Draft SEIS. The Conservation Organizations also understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event.

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[29] FSEIS, Appendix E (Public Comments) at 13.

[30] Email from Olivia Dorothy, American Rivers, to Kent Parrish, U.S. Army Corps of Engineers Vicksburg District, dated December 11, 2020 (making the following request: "The FSEIS documents indicate that the 2019 Flood After Action Review is available upon request. I am requesting those documents, please send me the full report and any appendices or other supporting documentation.")

[31] FSEIS, Appendix E (Public Comments) at 29.

[32] This data was provided to the Conservation Organizations in response to a November 2, 2020 Freedom of Information Act request submitted by Earthjustice.

[33] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.

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This information should have been considered by the Corps in the FSEIS, but was not.

2. Yazoo Backwater Levee Accreditation

The FSEIS incorrectly states that the Yazoo Backwater Levee is accredited.[34] This levee is in fact not accredited as confirmed by the Corps' National Levee Database, Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps, and the Mississippi Department of Environmental Quality (MDEQ).[35]

A provisional accreditation issued by FEMA in 2010 expired in 2012 because the Corps did not certify that the levee could withstand a 100-year flood event. MDEQ, which manages the levee accreditations in Mississippi, has advised the Conservation Organizations that the Corps also has not recommended the Yazoo Backwater Levee for accreditation since Provisionally Accredited Levee (PAL) Agreements expired in 2014. The Conservation Organizations provided this information and supporting documentation to the Corps on December 11, 2020.[36] According to the National Levee Database the minimum design standard for the Yazoo Backwater Levee is 107-feet NAVD. To be certified to provide protection for a 100-year event the levee requires a minimum design standard of 108-feet NAVD because the base flood elevation of the Yazoo River is 105-feet NAVD.

By incorrectly asserting that the Yazoo Backwater Levee is accredited, the Corps is misrepresenting the level of protection provided by the Yazoo Backwater Levee to the public. The lack of accreditation also means that it would be irresponsible for the Corps to operate the Yazoo Pumps during a 100-year flood event when the additional water being pumped into the Yazoo River (up to 9 billion gallons of water a day) would likely overtop the Yazoo Backwater Levee, potentially threatening the levee's integrity and the safety of the 40,000 people who live and work in the Yazoo Backwater Area—the very people that the pumps purport to protect. As a result, the Corps' inclusion of modeling results showing reductions in stage, volume and area of inundation from the Yazoo Pumps during the 100-year flood event is unrealistic, inappropriate, and highly misleading, as highlighted in the Conservation Organization comments on the Draft SEIS. The FSEIS should not claim benefits for reducing the impacts of a 100-year flood—including the unsupported claim that 615 structures would be protected during a 100-year flood with the pumps in place[37]—because the Corps could not operate the Yazoo Pumps during such an event.

3. Missing EMAP Data

As documented in the 2008 Veto, in EPA's comments on the Draft SEIS, and in the Conservation Organizations' comments on the Draft SEIS (at pages 35-37), the analysis in the FSEIS cannot be reconciled with the baseline wetland acreage identified through the statistically valid, field sample of wetlands carried out under EPA's Environmental Monitoring and Assessment Program (EMAP). This flaw taints the entire FSEIS.

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[34] FSEIS, Appendix E (Public Comments) at 19.
[35] E.g., National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/fema (accessed November 6, 2020). Lack of accreditation means that the Yazoo Backwater Levee cannot protect Yazoo Backwater communities during flood events at or greater than the 1% chance of exceedance (100-year flood event).
[36] Email from Olivia Dorothy, American Rivers, to Kent Parrish, U.S. Army Corps of Engineers Vicksburg District, dated December 11, 2020.
[37] *See* FSEIS at 21.

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In response to a November 2, 2020 Freedom of Information Act (FOIA) request submitted to the Corps by the Conservation Organizations, the Corps indicated that they no longer have the data identifying the locations of the EMAP sample sites. By definition, this means that the Corps could not have considered this important information during its preparation of the Draft SEIS or FSEIS. The Conservation Organizations obtained this data through a FOIA submitted to EPA, and provide it to the Corps in pdf form as Attachment A to these comments and in excel form via the email transmitting these comments.

4. Unacceptable Impacts of the Proposed Groundwater Wells

In the Conservation Organizations' comments on the Draft SEIS, the Conservation Organizations demonstrated that the Corps' proposal to drill supplemental groundwater wells up to five miles away from the Mississippi River levee is an unacceptable option that would not provide the purported benefits claimed by the Corps. In fact, the Mississippi Delta Comprehensive Multipurpose Water Resource Plan (the Comprehensive Plan) explicitly rejected such a proposal as an "unacceptable option" because groundwater studies show that the Mississippi River "does not directly influence wells at distances greater than about 1 mile from the levee."[38] Accordingly, by locating wells beyond that one-mile limit, the Corps' proposal would further deplete the aquifer, undercutting if not negating the purported mitigation.

The Conservation Organizations also provided monitoring data corroborating this point[39] and showing that the proposed groundwater wells, such as at Straight Bayou and Brown Bayou, would be located in areas where groundwater levels have dropped significantly over time due to excessive pumping and insufficient recharge.[40] Drilling additional wells in these areas would worsen the overdraft problem and further deplete surface flows—an unacceptable impact, as made clear by the Comprehensive Plan.

Yet, the Corps responded to neither the Comprehensive Plan nor the monitoring data provided by the Conservation Organizations. Instead, the FSEIS relies on a 2001 USGS study for the proposition that "ground water recharge occurs within five miles of the Mississippi River."[41] But that study is of no assistance because the Corps proposes to locate wells more than five miles away from the Mississippi River Channel, as depicted below.

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[38] USDA, Natural Resource Conservation Service, Mississippi Delta Comprehensive Multipurpose Water Resource Plan provided as Attachment K to the Conservation Organizations'' Nov. 30, 2020 Comments on the Draft SEIS.
[39] USGS Groundwater Watch, Field Groundwater Level Measurements for Site Numbers 334957090564301 - 011F0020 BOLIVAR & 334106090590902 - 011N0002 BOLIVAR, provided as Attachment M to the Conservation Organizations'' Nov. 30, 2020 Comment Letter.
[40] The Conservation Organizations have provided a map showing the location of the USGS monitoring well, as well as the proposed wells at Straight Bayou and Brown Bayou, all of which are more than one mile away from the levee. See Attachment B to these comments.
[41] FSEIS Appendix E (Public Comments) at 27.

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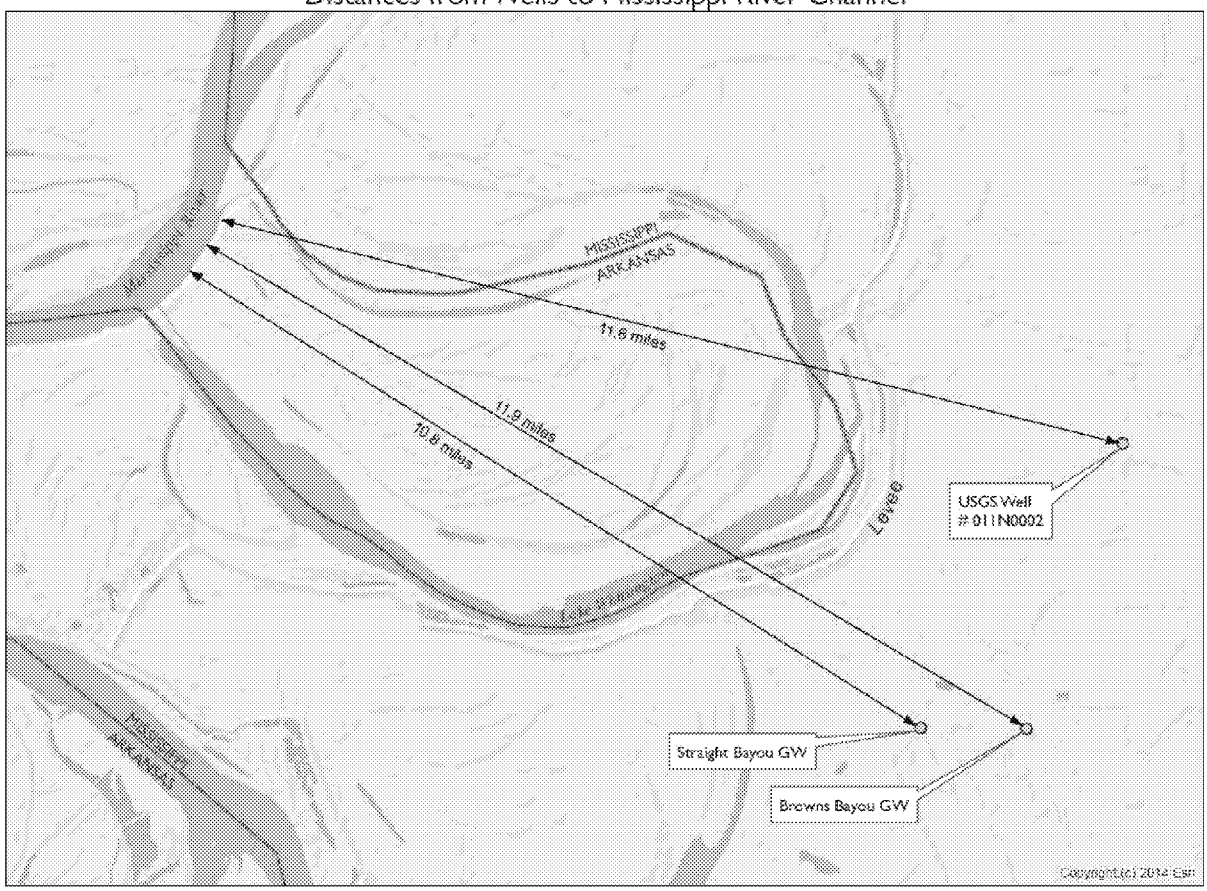
Distances from Wells to Mississippi River Channel



These wells are thus in an area beyond the influence of the River, as shown by *both* the 2001 USGS study and the Comprehensive Plan. In fact, the adjacent USGS groundwater monitoring well shows a significant decline in groundwater levels over time, proving that the River is not recharging this area.[42] The Corps' proposal to drill additional wells will therefore deplete the aquifer and further drawdown baseflows, causing adverse impacts which the Corps has entirely failed to address.

5. Agricultural Lands and Structures

As the Corps is well aware—and as discussed in the Conservation Organizations' Comments on the Draft SEIS—neither the Draft SEIS nor the FSEIS include an analysis of the economic costs or benefits of the Proposed Plan. This precludes a full assessment of the project's impacts under NEPA and prevents the Corps from demonstrating that the project benefits will exceed the project costs, as required by law for all federal flood damage reduction projects.

The FSEIS explicitly acknowledges that "[a]n updated cost estimate has not been developed" for the Proposed Plan.[43] However, simply applying the costs of inflation to the Corps' 2007 cost estimate

[42] USGS Groundwater Watch at 3-4, provided at Attachment M to the Conservation Organizations' Nov. 30, 2020 comments.
[43] FSEIS, Appendix E (Public Comments) at 17.

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demonstrates that the costs of the Yazoo Pumps have ballooned to at least $450 million, as noted in the Conservation Organizations' comments on the Draft SEIS.

The few tidbits of information relating to potential benefits in the FSEIS strongly suggest that these significant costs will be much greater than any potential project benefits. Notably, the FSEIS concludes that just 28,700 acres of crop acres a year are expected to benefit from the project:

> "With existing conditions, the annual damages to the number of agricultural acres total 36,600 while with the pumps in place, the annual agricultural acres damaged decreases to 7,900. The agricultural crop acres benefited are expected to be 28,700 acres per year over the life of the project."[44]

In accounting for any benefits attributable to these acres, the Corps would have to account for the fact that planting can often occur even after flood events, and that agricultural damages can often be offset through other federal and state programs. For example, as noted above, even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data.[45] In addition, the Conservation Organizations understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event.

Since the FSEIS does not assess economic benefits, the public must assume that agricultural benefits would still constitute 80% of project benefits as determined in the 2007 FSEIS, which the current FSEIS is tiered to. However, if 80% of the project benefits would come only from benefits attributable to the 28,700 acres of cropland identified in Appendix F-1, it is extremely unlikely that the project benefits could exceed the costs of the Proposed Plan, which have certainly ballooned to well over $450 million.

The FSEIS provides equally limited information on potential benefits to structures, and provides no information on the source of the structure data or the time period in which the data on structures was collected.[46] The date of any structure inventory is particularly relevant since older data would not account for the precipitous decline in the population of the Yazoo Backwater Area since 2007 and the related decline in the total number of households.[47] In addition, the limited and unsupported structure data provided in the Table at page 21 of the FSEIS is different than the limited structure data provided at page 9 in Appendix F-1.

Moreover, the FSEIS does not include any assessment regarding the primary areas where structural damages occurred during the 2019 flood despite the fact that this information, which is critical to formulating any type of meaningful approach to reducing flood damages to structures, was provided to the Corps in the Conservation Organizations' scoping comments (at pages 24-25). This information, which is provided again below, strongly suggests that limited and very targeted non-structural solutions such as elevating and floodproofing homes, elevating a portion of the roadway, and improving

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[44] FSEIS, Appendix F-1 (Environmental Justice) at 9.
[45] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.
[46] *See* FSEIS, Table at page 21; Appendix F-1 (Environmental Justice) at 7-9 (which acknowledges that not all of the structures counted actually flood).
[47] *See* FSEIS, Appendix B (Figures), Figure 4.1 at 10 and Figure 4.4 at 13.

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management of Eagle Lake would be the most effective and cost-effective way to reduce structural flood damages in the Yazoo Backwater Area.

During the 2019 flood, structural damages within the Yazoo Backwater counties were highly concentrated with **76% of all structural damage** and **85% of all structural monetary damages** occurring in Warren County, which includes the Eagle Lake community and extensive areas located outside of the boundaries of the Yazoo Backwater Area (*see* Figure below). In 2019, relatively few structures were affected by flooding in Issaquena and Sharkey counties, the two counties located entirely within the Yazoo Backwater Area, according to Mississippi Emergency Management data. Within Issaquena and Sharkey counties a total of 53 homes and 19 mobile homes were affected. Of those, 27 homes had only minor or very minor damage. Data for other counties include large areas that would not be affected by the Pumps.

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YAZOO BACKWATER 2019 FLOOD DAMAGES*

During the prolonged 2019 flood, homes and businesses in the counties that make up the Yazoo Backwater Area sustained $12.3 million in structural damage. This damage was concentrated in Warren County (including the Eagle Lake community). Warren County sustained 85% of the monetary damage. Flood mitigation, such as elevating structures, purchasing floodplain easements, and elevating flood-prone roads, is rarely practiced in the Yazoo Backwater Area.

WASHINGTON COUNTY

NO DAMAGES REPORTED

HUMPREYS, SHARKEY AND YAZOO COUNTIES

HOMES DAMAGED: 62
BUSINESSES DAMAGED: 3

TOTAL MONETARY DAMAGE:
$560,000

WARREN COUNTY

HOMES DAMAGED: 358
BUSINESSES DAMAGED: 14

TOTAL MONETARY DAMAGE:
$10,442,000

% OF ALL FLOOD DAMAGES OCCURRING IN WARREN COUNTY

76% All structures damaged

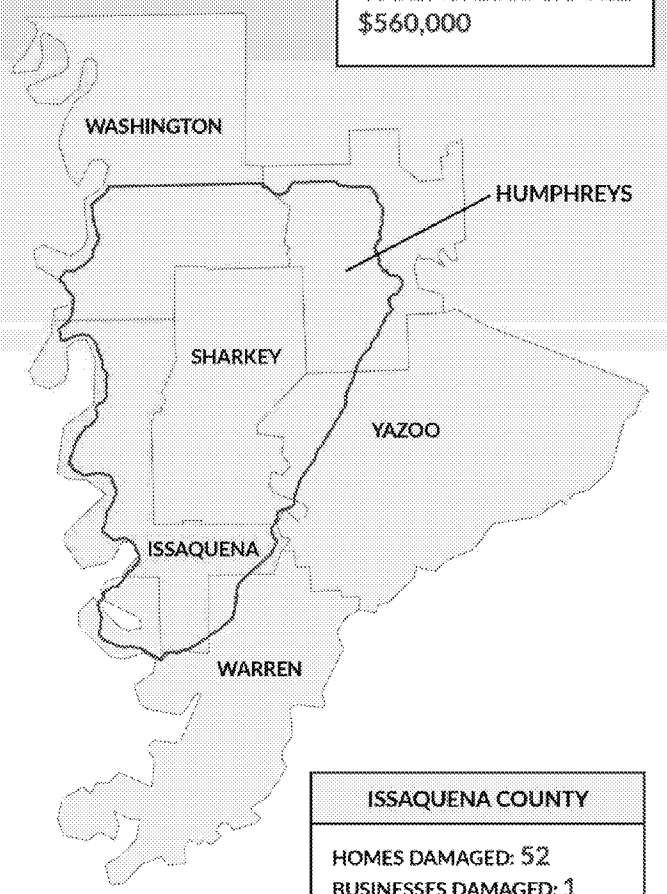
85% All monetary damage

76% Homes damaged

85% Homes-monetary damage

78% Businesses damaged

82% Businesses-monetary damage



ISSAQUENA COUNTY

HOMES DAMAGED: 52
BUSINESSES DAMAGED: 1

TOTAL MONETARY DAMAGE:
$1,335,000

*Estimated damages to homes and businesses in counties that fall within the Yazoo Backwater Area, as reported by the Mississippi Emergency Management Agency. It is unclear how much of the damage reported occurred outside the Yazoo Backwater Area (outlined in blue).

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Conclusion

The Conservation Organizations staunchly oppose the Proposed Plan which is clearly prohibited by the 2008 Clean Water Act § 404(c) Final Determination and the Clean Water Act 404(b)(1) Guidelines. The Conservation Organizations urge the Corps to abandon the Proposed Plan and the deeply flawed FSEIS, and instead focus on opportunities for providing meaningful, sustainable, and immediate benefits to the communities in the Yazoo Backwater Area while restoring this ecologically critical region.

Please contact Olivia Dorothy with American Rivers (odorothy@americanrivers.org, 217-390-3658) or Jill Mastrototaro with Audubon Mississippi (jill.Mastrototaro@audubon.org, 504-481-3659) if you have any questions or would like additional information.

Respectfully submitted,

Olivia Dorothy
Director, Upper Mississippi River Basin
American Rivers

Louie Miller
State Director
Mississippi Chapter of the Sierra Club

Jill Mastrototaro
Policy Director
Audubon Mississippi

Brian Moore
Vice-President, Gulf Policy
National Audubon Society

Matt Rota
Senior Policy Director
Healthy Gulf

Dalal Aboulhosn
Deputy Legislative Director
Sierra Club

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Attachment A

Conservation Organizations Comments on the
Final Supplement No. 2 to the 1982 Yazoo Area Pump Project
Final Environmental Impact Statement

DESIGN ID	DESIGN N(	SITE ID	STF	PAN	OVI	DIV	MD	N	N	NEST1	NEST1 WT	STRAT	LONG DD	LAT DD	LONG DMS	LAT DMS	newSTRAT	I	newEPAW	newW	newAC	ext base	ext p5	base 5wet	b2 plan	b1 plan
MSW03411-	1	MSW03411-0001	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.953280	32.603523	-90 57 11.807999	32 36 12.682800	Corps		0	3	1	in	in	in	in	in
MSW03411-	2	MSW03411-0002	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766177	32.899246	-90 45 58.237198	32 53 57.285600	Corps		2	0	1	in	in	in	out	out
MSW03411-	3	MSW03411-0003	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.978034	32.546897	-90 58 40.922399	32 32 48.829200	Corps		2	0	1	in	in	in	in	in
MSW03411-	4	MSW03411-0004	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801334	32.785408	-90 48 4.802399	32 47 7.468800	Corps		2	0	1	in	in	in	in	in
MSW03411-	5	MSW03411-0005	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893030	32.591397	-90 53 34.907999	32 35 29.029200	Corps		0	3	1	in	in	in	in	in
MSW03411-	6	MSW03411-0006	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.845267	32.721975	-90 50 42.961199	32 43 19.110000	Corps		0	3	1	in	in	in	in	in
MSW03411-	7	MSW03411-0007	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.626684	32.802933	-90 37 36.062398	32 48 10.558800	Corps		2	0	1	in	in	in	in	in
MSW03411-	8	MSW03411-0008	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.803771	32.741187	-90 48 13.575599	32 44 28.273200	Corps		2	0	1	in	in	in	in	in
MSW03411-	9	MSW03411-0009	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.856535	32.498470	-90 51 23.525999	32 29 54.492000	Corps		2	0	1	in	in	in	in	in
MSW03411-	10	MSW03411-0010	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.886115	32.784079	-90 53 10.013999	32 47 2.684400	Corps		0	0	1	in	in	in	in	in
MSW03411-	11	MSW03411-0011	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766058	33.213506	-90 45 57.808799	33 12 48.621600	Corps		0	0	1	out	out	in	out	out
MSW03411-	12	MSW03411-0012	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.750520	32.772719	-90 45 1.871998	32 46 21.788400	Corps		2	0	1	in	in	in	in	in
MSW03411-	13	MSW03411-0013	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.915135	32.500399	-90 54 54.485999	32 30 1.436400	Corps		2	0	1	in	in	in	in	in
MSW03411-	14	MSW03411-0014	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893849	32.617195	-90 53 37.856399	32 37 1.902000	Corps		0	3	1	in	out	in	in	in
MSW03411-	15	MSW03411-0015	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.782173	32.953953	-90 46 55.822798	32 57 14.230800	Corps		0	0	1	out	out	in	out	out
MSW03411-	16	MSW03411-0016	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.038348	32.814583	-91 2 18.052799	32 48 52.498800	Corps		2	0	1	in	out	in	in	in
MSW03411-	17	MSW03411-0017	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.934277	32.611308	-90 56 3.397199	32 36 40.708800	Corps		0	3	1	in	in	in	in	in
MSW03411-	18	MSW03411-0018	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.994111	32.701448	-90 59 38.799599	32 42 5.212800	Corps		0	0	1	in	in	in	in	in
MSW03411-	19	MSW03411-0019	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.953467	32.456948	-90 57 12.481199	32 27 25.012800	Corps		2	0	1	in	out	in	out	out
MSW03411-	20	MSW03411-0020	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.828365	32.785036	-90 49 42.113999	32 47 6.129600	Corps		2	0	1	in	in	in	in	in
MSW03411-	21	MSW03411-0021	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.887230	32.575552	-90 53 14.027999	32 34 31.987200	Corps		0	0	1	in	in	in	in	in
MSW03411-	22	MSW03411-0022	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.861907	32.826201	-90 51 42.865199	32 49 34.323600	Corps		2	0	1	in	in	in	in	in
MSW03411-	23	MSW03411-0023	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.750511	32.762378	-90 45 1.839598	32 45 44.560800	Corps		2	0	1	in	in	in	in	in
MSW03411-	24	MSW03411-0024	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.779582	32.685170	-90 46 46.495199	32 41 6.612000	Corps		2	0	1	in	in	in	in	in
MSW03411-	25	MSW03411-0025	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.889858	32.502548	-90 53 23.488799	32 30 9.172800	Corps		2	0	1	in	out	in	in	in
MSW03411-	26	MSW03411-0026	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.852285	32.749034	-90 51 8.225999	32 44 56.522400	Corps		0	0	1	in	in	in	in	in
MSW03411-	27	MSW03411-0027	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.068145	33.097930	-91 4 5.321999	33 5 52.548000	Corps		0	0	1	out	out	in	out	out
MSW03411-	28	MSW03411-0028	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.752365	32.681403	-90 45 8.513998	32 40 53.050800	Corps		2	0	1	in	out	in	in	in
MSW03411-	29	MSW03411-0029	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.911339	32.530351	-90 54 40.820399	32 31 49.263600	Corps		2	0	1	in	in	in	in	in
MSW03411-	30	MSW03411-0030	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.823288	32.837883	-90 49 23.836799	32 50 16.378800	Corps		2	0	1	in	in	in	in	in
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MSW03411-	32	MSW03411-0032	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.738619	32.623094	-90 44 19.028398	32 37 23.138400	Corps		0	0	1	in	in	in	in	in
MSW03411-	33	MSW03411-0033	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.925678	32.591267	-90 55 32.440799	32 35 28.561200	Corps		2	0	1	in	out	out	in	in
MSW03411-	34	MSW03411-0034	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.739268	32.906428	-90 44 21.364798	32 54 23.140800	Corps		2	0	1	in	out	in	out	out
MSW03411-	35	MSW03411-0035	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.965723	32.477146	-90 57 56.602799	32 28 37.725600	Corps		2	0	1	in	in	in	in	in
MSW03411-	36	MSW03411-0036	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.807675	32.800842	-90 48 27.629999	32 48 3.031200	Corps		2	0	1	in	in	in	in	in
MSW03411-	37	MSW03411-0037	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.870262	32.532745	-90 52 12.943199	32 31 57.882000	Corps		2	0	1	in	in	in	in	in
MSW03411-	38	MSW03411-0038	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.974408	32.837817	-90 58 27.868799	32 50 16.141200	Corps		2	0	1	out	out	in	out	out
MSW03411-	39	MSW03411-0039	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.747889	32.876854	-90 44 52.400398	32 52 36.674400	Corps		2	0	1	in	in	in	in	in
MSW03411-	40	MSW03411-0040	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.776592	32.721243	-90 46 35.731199	32 43 16.474800	Corps		2	0	1	in	in	in	in	in
MSW03411-	41	MSW03411-0041	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.872116	32.506255	-90 52 19.617599	32 30 22.518000	Corps		2	0	1	in	in	in	in	in
MSW03411-	42	MSW03411-0042	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893222	32.727480	-90 53 35.599199	32 43 38.928000	Corps		0	3	1	in	in	in	in	in
MSW03411-	43	MSW03411-0043	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.040142	33.039776	-91 2 24.511199	33 2 23.193600	Corps		0	0	1	in	in	in	in	in
MSW03411-	44	MSW03411-0044	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.768170	32.744782	-90 46 5.411999	32 44 41.215200	Corps		2	0	1	in	in	in	in	in
MSW03411-	45	MSW03411-0045	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.935732	32.524618	-90 56 8.635199	32 31 28.624800	Corps		2	0	1	in	in	in	in	in
MSW03411-	46	MSW03411-0046	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.839500	32.821599	-90 50 22.199999	32 49 17.756400	Corps		2	0	1	in	in	in	in	in
MSW03411-	47	MSW03411-0047	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.838650	32.911654	-90 50 19.139999	32 54 41.954400	Corps		0	0	1	in	in	in	out	in
MSW03411-	48	MSW03411-0048	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.790894	32.596030	-90 47 27.218399	32 35 45.708000	Corps		2	0	1	in	out	out	out	out
MSW03411-	49	MSW03411-0049	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.983151	32.618424	-90 58 59.343599	32 37 6.326400	Corps		0	0	1	in	in	in	in	in
MSW03411-	50	MSW03411-0050	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.859155	32.786188	-90 51 32.957999	32 47 10.276800	Corps		2	0	1	in	in	in	in	in
MSW03411-	51	MSW03411-0051	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.063206	32.524526	-91 3 47.541599	32 31 28.293600	Corps		0	0	1	in	in	in	in	in
MSW03411-	52	MSW03411-0052	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.751408	32.784148	-90 45 5.068798	32 47 2.932800	Corps		2	0	1	in	in	in	in	in
MSW03411-	53	MSW03411-0053	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.931911	32.478106	-90 55 54.879599	32 28 41.181600	Corps		2	0	1	in	out	in	out	out
MSW03411-	54	MSW03411-0054	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.840460	32.847150	-90 50 25.655999	32 50 49.740000	Corps		2	0	1	in	in	in	in	in
MSW03411-	55	MSW03411-0055	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.728897	32.783145	-90 43 44.029198	32 46 59.322000	Corps		2	0	1	in	in	in	in	in
MSW03411-	56	MSW03411-0056	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.823265	32.720035	-90 49 23.753999	32 43 12.126000	Corps		2	0	1	in	in	in	in	in
MSW03411-	57	MSW03411-0057	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.913438	32.553868	-90 54 48.376799	32 33 13.924800	Corps		0	0	1	in	in	in	in	in
MSW03411-	58	MSW03411-0058	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.864524	32.767750	-90 51 52.286399	32 46 3.900000	Corps		2	0	1	in	in	in	in	in
MSW03411-	59	MSW03411-0059	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.670445	33.110799	-90 40 13.601998	33 6 38.876400	Corps		2	0	1	in	in	in	in	in
MSW03411-	60	MSW03411-0060	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.762105	32.709220	-90 45 43.577999	32 42 33.192000	Corps		2	0	1	in	in	in	in	in
MSW03411-	61	MSW03411-0061	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.939824	32.530289	-90 56 23.366399	32 31 49.040400	Corps		2	0	1	in	in	in	in	in
MSW03411-	62	MSW03411-0062	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801523	32.767223	-90 48 5.482799	32 46 2.002800	Corps		2	0	1	in	in	in	in	in
MSW03411-	63	MSW03411-0063	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.821744	32.856691	-90 49 18.278399	32 51 24.087600	Corps		0	0	1	in	in	in	in	in
MSW03411-	64	MSW03411-0064	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.803621	32.538527	-90 48 13.035599	32 32 18.697200	Corps		0	0	1	in	in	in	in	in
MSW03411-	65	MSW03411-0065	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.978593	32.551009	-90 58 42.934799	32 33 3.632400	Corps		2	0	1	in	in	in	in	in
MSW03411-	66	MSW03411-0066	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.698003	32.932167	-90 41 52.810798	32 55 55.801200	Corps		2	0	1	in	out	in	out	out
MSW03411-	67	MSW03411-0067	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.997133	32.492877	-90 59 49.678799	32 29 34.357200	Corps		0	0	1	in	in	in	in	in
MSW03411-	68	MSW03411-0068	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801465	32.791277	-90 48 5.273999	32 47 28.597200	Corps		2	0	1	in	in	in	in	in
MSW03411-	69	MSW03411-0069	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.912535	32.584957	-90 54 45.125999	32 35 5.845200	Corps		2	0	1	in	in	in	in	in
MSW03411-	70	MSW03411-0070	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.904178	32.778629	-90 54 15.040799	32 46 43.064400	Corps		0	0	1	in	in	in	in	in
MSW03411-	71	MSW03411-0071	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.759845	32.840838	-90 45 35.441998	32 50 27.016800	Corps		0	0	1	in	in	in	in	in
MSW03411-	72	MSW03411-0072	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.793630	32.730979	-90 47 37.067999	32 43 51.524400	Corps		2	0	1	in	in	in	in	in
MSW03411-	73	MSW03411-0073	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.913068	32.456571	-90 54 47.044799	32 27 23.655600	Corps		0	0	1	in	out	in	out	out
MSW03411-	74	MSW03411-0074	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.892005	32.757490	-90 53 31.217999	32 45 26.964000	Corps		0	3	1	in	in	in	in	in
MSW03411-	75	MSW03411-0075	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.984067	33.117973	-90 59 2.641199	33 7 4.702800	Corps		2	0	1	in	in	in	in	in
MSW03411-	76	MSW03411-0076	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.782649	32.832652	-90 46 57.536399	32 49 57.547200	Corps		2	0	1	in	out	in	out	out
MSW03411-	77	MSW03411-0077	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.955381	32.527950	-90 57 19.371599	32 31 40.620000	Corps		2	0	1	in	in	in	in	in
MSW03411-	78	MSW03411-0078	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.850957	32.700590	-90 51 3.445199	32 42 2.124000	Corps		2	3	1	in	in	in	in	in
MSW03411-	79	MSW03411-0079	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766809	32.862050	-90 46 0.512399	32 51 43.380000	Corps		2	0	1	in	in	in	in	in
MSW03411-	80	MSW03411-0080	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.737633	32.666296	-90 44 15.478798	32 39 58.665600	Corps		2	0	1	in	in	out	in	in
MSW03411-	81	MSW03411-0081	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.984492	32.599173	-90 59 4.171199	32 35 57.022800	Corps		2	0	1	in	out	in	in	in
MSW03411-	82	MSW03411-0082	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.811183	32.871424	-90 48 40.258799	32 52 17.126400	Corps		0	0	1	in	in	in	in	in
MSW03411-	83	MSW03411-0083	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.930562	32.550476	-90 55 50.023199	32 33 1.713600	Corps		2	0	1	in	in	in	in	in
MSW03411-	84	MSW03411-0084	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.825915	32.767297	-90 49 33.293999	32 46 2.269200	Corps		2	0	1	in	in	in	in	in
MSW03411-	85	MSW03411-0085	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.926980	32.563803	-90 55 37.127999	32 33 49.690800	Corps		0	0	1	in	in	in	in	in
MSW03411-	86	MSW03411-0086	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.841217	32.735924	-90 50 28.381199	32 44 9.326400	Corps		0	3	1	in	in	in	in	in
MSW03411-	87	MSW03411-0087	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.596336	33.112172	-90 35 46.809597	33 6 43.819200	Corps		0	0	1	in	in	in	in	in
MSW03411-	88	MSW03411-0088	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.752242	32.710100	-90 45 8.071199	32 42 36.360000	Corps		2	0	1	in	in	in	in	in
MSW03411-	89	MSW03411-0089	1	0	1	2	1	1	1	80	7.83390141	Corps	-91.040288	32.492051	-91 2 25.036799	32 29 31.383600	Corps		0	0	1	in	in	in	in	in
MSW03411-	90	MSW03411-0090	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.854765	32.794157	-90 51 17.153999	32 47 38.965200	Corps		0	0	1	in	in	in	in	in
MSW03411-	91	MSW03411-0091	1	0	1	2	1	1	1	80	7.83390141	Corps	-91.060008	32.507667	-91 3 36.028800	32 30 27.601200	Corps		0	0	1	in	in	in	in	in
MSW03411-	92	MSW03411-0092	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.780254	32.790940	-90 46 48.914398	32 47 27.384000	Corps		2	0	1	in	in	in	in	in
MSW03411-	93	MSW03411-0093	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.910965	32.485248	-90 54 39.473999	32 29 6.892800	Corps		2	0	1	in	in	in	in	in
MSW03411-	94	MSW03411-0094	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.895527	32.798620	-90 53 43.897199	32 47 55.032000	Corps		2	0	1	in	in	in	in	in
MSW03411-	95	MSW03411-0095	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.739001	32.778030	-90 44 20.403599	32 46 40.908000	Corps		2	0	1	in	in	in	in	in
MSW03411-	96	MSW03411-0096	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.825151	32.715014	-90 49 30.543599	32 42 54.050400	Corps		2	0	1	in	in	in	in	in
MSW03411-	97	MSW03411-0097	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.933616	32.589938	-90 56 1.017599	32 35 23.776800	Corps		0	3	1	in	in	in	in	in
MSW03411-	98	MSW03411-0098	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.763636	32.940832	-90 45 49.089598	32 56 26.995200	Corps		0	0	1	in	in	in	in	in
MSW03411-	99	MSW03411-0099	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.957787	32.464464	-90 57 28.033199	32 27 52.070400	Corps		2	0	1	in	in	in	in	in
MSW03411-	100	MSW03411-0100	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.782161	32.807301	-90 46 55.779599	32 48 26.283600	Corps		0	3	1	in	in	out	in	in
MSW03411-	101	MSW03411-0101	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.893440	32.527110	-90 53 36.383999	32 31 37.596000	Corps		2	0	1	in	in	in	in	in
MSW03411-	102	MSW03411-0102	1	0	1	4	1	1	1	80	7.83390141	Corps	-91.007839	32.791281	-91 0 28.220399	32 47 28.611600	Corps		2	0	1	in	in	in	in	in
MSW03411-	103	MSW03411-0103	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.694770	32.814065	-90 41 41.171998	32 48 50.634000	Corps		0	0	1	out	out	in	out	out
MSW03411-	104	MSW03411-0104	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.802998	32.709100	-90 48 10.792799	32 42 32.760000	Corps		2	0	1	in	in	in	in	in
MSW03411-	105	MSW03411-0105	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.859736	32.487524	-90 51 35.049599	32 29 15.086400	Corps		2	0	1	in	in	in	in	in
MSW03411-	106	MSW03411-0106	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.879477	32.744594	-90 52 46.117199	32 44 40.538400	Corps		0	3	1	in	in	in	in	in
MSW03411-	107	MSW03411-0107	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.969825	33.072545	-90 58 11.369999	33 4 21.162000	Corps		2	0	1	in	in	in	in	in
MSW03411-	108	MSW03411-0108	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.773271	32.726248	-90 46 23.775599	32 43 34.492800	Corps		2	0	1	out	in	in	out	out
MSW03411-	109	MSW03411-0109	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.971254	32.523010	-90 58 16.514399	32 31 22.836000	Corps		2	0	1	in	in	in	in	in
MSW03411-	110	MSW03411-0110	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.846231	32.688246	-90 50 46.431599	32 41 17.685600	Corps		0	3	1	in	in	in	in	in
MSW03411-	111	MSW03411-0111	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.781977	32.868209	-90 46 55.117199	32 52 5.552400	Corps		2	0	1	in	in	in	in	in
MSW03411-	112	MSW03411-0112	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.772231	32.599697	-90 46 20.031598	32 35 58.909200	Corps		2	0	1	in	in	in	in	in
MSW03411-	113	MSW03411-0113	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.972808	32.576776	-90 58 22.468799	32 34 36.393600	Corps		2	0	1	in	in	in	in	in
MSW03411-	114	MSW03411-0114	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.783321	32.903301	-90 46 59.955599	32 54 11.883600	Corps		0	0	1	in	in	in	in	in
MSW03411-	115	MSW03411-0115	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.995154	32.498863	-90 59 42.554399	32 29 55.906800	Corps		0	0	1	in	in	in	in	in
MSW03411-	116	MSW03411-0116	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.805204	32.761579	-90 48 18.734399	32 45 41.684400	Corps		2	0	1	in	in	in	in	in
MSW03411-	117	MSW03411-0117	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.884315	32.592699	-90 53 3.533999	32 35 33.716400	Corps		0	3	1	in	in	in	in	in
MSW03411-	118	MSW03411-0118	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.851053	32.708880	-90 51 3.790799	32 42 31.968000	Corps		0	3	1	in	in	in	in	in
MSW03411-	119	MSW03411-0119	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.763751	32.847395	-90 45 49.503598	32 50 50.622000	Corps		2	0	1	in	in	in	in	in
MSW03411-	120	MSW03411-0120	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.810424	32.738269	-90 48 37.526399	32 44 17.768400	Corps		2	0	1	in	in	in	in	in
MSW03411-	121	MSW03411-0121	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.861356	32.505281	-90 51 40.881599	32 30 19.011600	Corps		2	0	1	in	in	in	in	in
MSW03411-	122	MSW03411-0122	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.872707	32.771698	-90 52 21.745199	32 46 18.112800	Corps		2	0	1	in	in	in	in	in
MSW03411-	123	MSW03411-0123	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.954650	33.095354	-90 57 16.739999	33 5 43.274400	Corps		2	0	1	in	in	in	in	in
MSW03411-	124	MSW03411-0124	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.802038	32.828791	-90 48 7.336799	32 49 43.647600	Corps		2	0	1	in	in	in	in	in
MSW03411-	125	MSW03411-0125	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.962386	32.507460	-90 57 44.589599	32 30 26.856000	Corps		0	0	1	in	in	in	in	in
MSW03411-	126	MSW03411-0126	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.873927	32.623568	-90 52 26.137199	32 37 24.844800	Corps		0	0	1	in	out	in	in	in
MSW03411-	127	MSW03411-0127	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.780834	32.880497	-90 46 51.002399	32 52 49.789200	Corps		2	0	1	in	in	in	in	in
MSW03411-	128	MSW03411-0128	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.993918	32.970509	-90 59 38.104799	32 58 13.832400	Corps		0	0	1	out	out	in	out	out
MSW03411-	129	MSW03411-0129	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.929122	32.598814	-90 55 44.839199	32 35 55.730400	Corps		2	0	1	in	in	in	in	in
MSW03411-	130	MSW03411-0130	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.700927	33.041062	-90 42 3.337198	33 2 27.823200	Corps		2	0	1	in	in	in	out	out
MSW03411-	131	MSW03411-0131	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.939956	32.455927	-90 56 23.841599	32 27 21.337200	Corps		0	0	1	in	in	in	in	in
MSW03411-	132	MSW03411-0132	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.833301	32.789618	-90 49 59.883599	32 47 22.624800	Corps		2	0	1	in	in	in	in	in
MSW03411-	133	MSW03411-0133	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.880091	32.550212	-90 52 48.327599	32 33 0.763200	Corps		0	0	1	in	in	in	in	in
MSW03411-	134	MSW03411-0134	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.875165	32.812112	-90 52 30.593999	32 48 43.603200	Corps		2	0	1	in	in	in	in	in
MSW03411-	135	MSW03411-0135	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.691594	32.827595	-90 41 29.738398	32 49 39.342000	Corps		0	0	1	in	in	in	in	in
MSW03411-	136	MSW03411-0136	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.815190	32.682011	-90 48 54.683999	32 40 55.239600	Corps		2	0	1	in	in	in	in	in
MSW03411-	137	MSW03411-0137	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.876385	32.494766	-90 52 34.985999	32 29 41.157600	Corps		2	0	1	in	in	in	in	in
MSW03411-	138	MSW03411-0138	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.830196	32.761127	-90 49 48.705599	32 45 40.057200	Corps		0	3	1	in	in	in	in	in
MSW03411-	139	MSW03411-0139	1	0	1	5	1	1	1	80	7.83390141	Corps	-91.041332	33.085039	-91 2 28.795200	33 5 6.140400	Corps		0	0	1	in	in	in	in	in
MSW03411-	140	MSW03411-0140	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.790385	32.743250	-90 47 25.385998	32 44 35.700000	Corps		2	0	1	in	in	in	in	in
MSW03411-	141	MSW03411-0141	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.916918	32.517243	-90 55 0.904799	32 31 2.074800	Corps		2	0	1	in	in	in	in	in
MSW03411-	142	MSW03411-0142	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.829991	32.844349	-90 49 47.967599	32 50 39.656400	Corps		0	3	1	in	in	in	in	in
MSW03411-	143	MSW03411-0143	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.813565	32.886871	-90 48 48.833999	32 53 12.735600	Corps		2	0	1	in	in	in	in	in
MSW03411-	144	MSW03411-0144	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.829103	32.609337	-90 49 44.770799	32 36 33.613200	Corps		2	0	1	in	in	in	in	in
MSW03411-	145	MSW03411-0145	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.973000	32.622016	-90 58 22.799999	32 37 19.257600	Corps		0	0	1	in	in	in	in	in
MSW03411-	146	MSW03411-0146	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.771313	32.905529	-90 46 16.726799	32 54 19.904400	Corps		2	0	1	in	in	in	in	in
MSW03411-	147	MSW03411-0147	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.991547	32.545715	-90 59 29.569199	32 32 44.574000	Corps		2	0	1	in	in	in	in	in
MSW03411-	148	MSW03411-0148	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.792807	32.783877	-90 47 34.105199	32 47 1.957200	Corps		2	0	1	in	in	in	in	in

MSW03411-	149	MSW03411-0149	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.895189	32.592022	-90 53 42.680399	32 35 31.279200	Corps	0	3	1	in	in	in	in	in
MSW03411-	150	MSW03411-0150	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.871965	32.726512	-90 52 19.073999	32 43 35.443200	Corps	0	3	1	in	in	in	in	in
MSW03411-	151	MSW03411-0151	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.638139	32.792468	-90 38 17.300398	32 47 32.884800	Corps	2	0	1	out	out	in	out	out
MSW03411-	152	MSW03411-0152	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.807859	32.719173	-90 48 28.292399	32 43 9.022800	Corps	2	0	1	in	in	in	in	in
MSW03411-	153	MSW03411-0153	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.844793	32.501356	-90 50 41.254799	32 30 4.881600	Corps	0	0	1	in	in	in	in	in
MSW03411-	154	MSW03411-0154	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.888047	32.786526	-90 53 16.969199	32 47 11.493600	Corps	0	3	1	in	in	in	in	in
MSW03411-	155	MSW03411-0155	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.714226	33.218587	-90 42 51.213598	33 13 6.913200	Corps	0	0	1	out	out	in	out	out
MSW03411-	156	MSW03411-0156	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.765310	32.792065	-90 45 55.115999	32 47 31.506000	Corps	2	0	1	in	in	in	in	in
MSW03411-	157	MSW03411-0157	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.939875	32.486212	-90 56 23.549999	32 29 10.363200	Corps	2	0	1	in	in	in	in	in
MSW03411-	158	MSW03411-0158	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.815282	32.676094	-90 48 55.015199	32 40 33.938400	Corps	2	0	1	in	in	in	in	in
MSW03411-	159	MSW03411-0159	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.768157	32.994579	-90 46 5.365198	32 59 40.484400	Corps	0	0	1	out	out	in	out	out
MSW03411-	160	MSW03411-0160	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.829896	32.698780	-90 49 47.625599	32 41 55.608000	Corps	0	3	1	in	in	in	in	in
MSW03411-	161	MSW03411-0161	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.942091	32.584721	-90 56 31.527599	32 35 4.995600	Corps	0	3	1	in	in	in	in	in
MSW03411-	162	MSW03411-0162	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.724818	33.030776	-90 43 29.344798	33 1 50.793600	Corps	0	0	1	out	out	in	out	out
MSW03411-	163	MSW03411-0163	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.943758	32.470128	-90 56 37.528799	32 28 12.460800	Corps	2	0	1	in	in	in	in	in
MSW03411-	164	MSW03411-0164	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.830295	32.799274	-90 49 49.061999	32 47 57.386400	Corps	2	0	1	in	in	in	in	in
MSW03411-	165	MSW03411-0165	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.887209	32.531366	-90 53 13.952399	32 31 52.917600	Corps	2	0	1	in	in	in	in	in
MSW03411-	166	MSW03411-0166	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.849514	32.821799	-90 50 58.250399	32 49 18.476400	Corps	2	0	1	in	in	in	in	in
MSW03411-	167	MSW03411-0167	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.739977	32.881912	-90 44 23.917198	32 52 54.883200	Corps	2	0	1	in	in	in	out	in
MSW03411-	168	MSW03411-0168	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.782640	32.723311	-90 46 57.503999	32 43 23.919600	Corps	2	0	1	in	in	in	in	in
MSW03411-	169	MSW03411-0169	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.900318	32.493795	-90 54 1.144799	32 29 37.662000	Corps	2	0	1	in	in	in	in	in
MSW03411-	170	MSW03411-0170	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.891386	32.717578	-90 53 28.989599	32 43 3.280800	Corps	0	3	1	in	in	in	in	in
MSW03411-	171	MSW03411-0171	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.000278	33.108411	-91 0 1.000799	33 6 30.279600	Corps	2	0	1	in	in	in	in	in
MSW03411-	172	MSW03411-0172	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.772669	32.756742	-90 46 21.608398	32 45 24.271200	Corps	2	0	1	in	in	in	in	in
MSW03411-	173	MSW03411-0173	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.908615	32.527039	-90 54 31.013999	32 31 37.340400	Corps	2	0	1	in	in	in	in	in
MSW03411-	174	MSW03411-0174	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.826008	32.827547	-90 49 33.628799	32 49 39.169200	Corps	2	0	1	in	in	in	in	in
MSW03411-	175	MSW03411-0175	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804596	32.896397	-90 48 16.545599	32 53 47.029200	Corps	0	0	1	in	in	in	in	in
MSW03411-	176	MSW03411-0176	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.815031	32.620727	-90 48 54.111599	32 37 14.617200	Corps	2	0	1	in	in	in	out	out
MSW03411-	177	MSW03411-0177	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.951463	32.582813	-90 57 5.266799	32 34 58.126800	Corps	0	3	1	in	in	in	in	in
MSW03411-	178	MSW03411-0178	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.719152	32.959299	-90 43 8.947198	32 57 33.476400	Corps	2	0	1	in	out	in	in	in
MSW03411-	179	MSW03411-0179	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.955169	32.472793	-90 57 18.608399	32 28 22.054800	Corps	2	0	1	in	in	in	in	in
MSW03411-	180	MSW03411-0180	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.803883	32.814958	-90 48 13.978799	32 48 53.848800	Corps	2	0	1	in	in	in	in	in
MSW03411-	181	MSW03411-0181	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.909508	32.586675	-90 54 34.228799	32 35 12.030000	Corps	2	0	1	in	in	in	in	in
MSW03411-	182	MSW03411-0182	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.916520	32.770377	-90 54 59.471999	32 46 13.357200	Corps	0	0	1	out	out	in	out	out
MSW03411-	183	MSW03411-0183	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.751124	32.842761	-90 45 4.046398	32 50 33.939600	Corps	0	0	1	in	in	in	in	in
MSW03411-	184	MSW03411-0184	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.787805	32.699057	-90 47 16.097999	32 41 56.605200	Corps	2	0	1	in	in	in	in	in
MSW03411-	185	MSW03411-0185	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.892984	32.476589	-90 53 34.742399	32 28 35.720400	Corps	2	0	1	in	in	in	in	in
MSW03411-	186	MSW03411-0186	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.875274	32.761027	-90 52 30.986399	32 45 39.697200	Corps	0	0	1	in	in	in	in	in
MSW03411-	187	MSW03411-0187	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.945634	33.130903	-90 56 44.282399	33 7 51.250800	Corps	0	0	1	out	out	in	out	out
MSW03411-	188	MSW03411-0188	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.776840	32.845162	-90 46 36.623999	32 50 42.583200	Corps	0	0	1	out	out	in	out	out
MSW03411-	189	MSW03411-0189	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.948362	32.510599	-90 56 54.103199	32 30 38.156400	Corps	2	0	1	in	in	in	in	in
MSW03411-	190	MSW03411-0190	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851268	32.695601	-90 51 4.564799	32 41 44.163600	Corps	0	3	1	in	in	in	in	in
MSW03411-	191	MSW03411-0191	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.761192	32.866930	-90 45 40.291199	32 52 0.948000	Corps	2	0	1	in	in	in	in	in
MSW03411-	192	MSW03411-0192	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.793192	32.592490	-90 47 35.491199	32 35 32.964000	Corps	2	0	1	in	in	in	in	in
MSW03411-	193	MSW03411-0193	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.936398	32.618487	-90 56 11.032799	32 37 6.553200	Corps	0	0	1	in	in	in	in	in
MSW03411-	194	MSW03411-0194	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.913750	32.750776	-90 54 49.499999	32 45 2.793600	Corps	0	0	1	in	out	in	in	in
MSW03411-	195	MSW03411-0195	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.016012	32.519155	-91 0 57.643199	32 31 8.958000	Corps	0	0	1	in	in	in	in	in
MSW03411-	196	MSW03411-0196	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.843643	32.809511	-90 50 37.114799	32 48 34.239600	Corps	2	0	1	in	in	in	in	in
MSW03411-	197	MSW03411-0197	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830212	32.548347	-90 49 48.763199	32 32 54.049200	Corps	0	0	1	out	out	in	out	out
MSW03411-	198	MSW03411-0198	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.877632	32.829388	-90 52 39.475199	32 49 45.796800	Corps	2	0	1	in	in	in	in	in
MSW03411-	199	MSW03411-0199	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.735758	32.747733	-90 44 8.728799	32 44 51.838800	Corps	2	0	1	in	in	in	in	in
MSW03411-	200	MSW03411-0200	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.838613	32.705024	-90 50 19.006799	32 42 18.086400	Corps	0	3	1	in	in	in	in	in
MSW03411-	201	MSW03411-0201	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.908210	32.536491	-90 54 29.555999	32 32 11.367600	Corps	0	0	1	in	in	in	in	in
MSW03411-	202	MSW03411-0202	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.847029	32.781661	-90 50 49.304399	32 46 53.979600	Corps	0	0	1	in	in	in	in	in
MSW03411-	203	MSW03411-0203	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.029022	33.165323	-91 1 44.479199	33 9 55.162800	Corps	2	0	1	in	in	in	in	in
MSW03411-	204	MSW03411-0204	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.767924	32.694665	-90 46 4.526399	32 41 40.794000	Corps	0	0	1	in	in	in	in	in
MSW03411-	205	MSW03411-0205	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.927260	32.536357	-90 55 38.135999	32 32 10.885200	Corps	2	0	1	in	in	in	in	in
MSW03411-	206	MSW03411-0206	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.756859	32.795119	-90 45 24.692398	32 47 42.428400	Corps	2	0	1	in	in	in	in	in
MSW03411-	207	MSW03411-0207	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811628	32.845662	-90 48 41.860799	32 50 44.383200	Corps	2	0	1	in	in	in	in	in
MSW03411-	208	MSW03411-0208	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.765400	32.654279	-90 45 55.439999	32 39 15.404400	Corps	2	0	1	in	out	in	out	in
MSW03411-	209	MSW03411-0209	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.962443	32.611840	-90 57 44.794799	32 36 42.624000	Corps	0	0	1	in	out	in	in	in
MSW03411-	210	MSW03411-0210	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.768253	32.917288	-90 46 5.710798	32 55 2.236800	Corps	0	0	1	in	in	in	in	in
MSW03411-	211	MSW03411-0211	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.996863	32.547242	-90 59 48.706799	32 32 50.071200	Corps	2	0	1	in	in	in	in	in
MSW03411-	212	MSW03411-0212	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.796595	32.771024	-90 47 47.741999	32 46 15.686400	Corps	2	0	1	in	in	in	in	in
MSW03411-	213	MSW03411-0213	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.919333	32.547927	-90 55 9.598799	32 32 52.537200	Corps	2	0	1	in	in	in	in	in
MSW03411-	214	MSW03411-0214	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.855835	32.730206	-90 51 21.005999	32 43 48.741600	Corps	0	0	1	in	in	in	in	in
MSW03411-	215	MSW03411-0215	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.631589	32.838275	-90 37 53.720398	32 50 17.790000	Corps	2	0	1	in	out	in	in	in
MSW03411-	216	MSW03411-0216	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830511	32.735874	-90 49 49.839599	32 44 9.146400	Corps	0	3	1	in	in	in	in	in
MSW03411-	217	MSW03411-0217	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.016421	32.490078	-91 0 59.115599	32 29 24.280800	Corps	0	0	1	in	in	in	in	in
MSW03411-	218	MSW03411-0218	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.892218	32.785510	-90 53 31.984799	32 47 7.836000	Corps	0	3	1	in	in	in	in	in
MSW03411-	219	MSW03411-0219	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.680428	33.193543	-90 40 49.540798	33 11 36.754800	Corps	0	0	1	in	in	in	in	in
MSW03411-	220	MSW03411-0220	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.774323	32.795675	-90 46 27.562799	32 47 44.430000	Corps	2	0	1	in	in	in	in	in
MSW03411-	221	MSW03411-0221	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.934880	32.487888	-90 56 5.567999	32 29 16.396800	Corps	2	0	1	in	in	in	in	in
MSW03411-	222	MSW03411-0222	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.829235	32.684253	-90 49 45.245999	32 41 3.310800	Corps	2	0	1	in	in	in	in	in
MSW03411-	223	MSW03411-0223	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.558535	32.912466	-90 33 30.725997	32 54 44.877600	Corps	2	0	1	in	out	in	in	in
MSW03411-	224	MSW03411-0224	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.817401	32.696452	-90 49 2.643599	32 41 47.227200	Corps	2	0	1	in	in	in	in	in
MSW03411-	225	MSW03411-0225	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.915964	32.575479	-90 54 57.470399	32 34 31.724400	Corps	0	0	1	in	in	in	in	in
MSW03411-	226	MSW03411-0226	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.730493	32.905791	-90 43 49.774799	32 54 20.847600	Corps	0	0	1	in	in	in	in	in
MSW03411-	227	MSW03411-0227	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.976472	32.466208	-90 58 35.299199	32 27 58.348800	Corps	2	0	1	in	out	in	out	out
MSW03411-	228	MSW03411-0228	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851777	32.782506	-90 51 6.397199	32 46 57.021600	Corps	0	0	1	in	in	in	in	in
MSW03411-	229	MSW03411-0229	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.889266	32.531472	-90 53 21.357599	32 31 53.299200	Corps	2	0	1	in	in	in	in	in
MSW03411-	230	MSW03411-0230	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.971007	32.829361	-90 58 15.625199	32 49 45.699600	Corps	0	0	1	in	in	in	in	in
MSW03411-	231	MSW03411-0231	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.740064	32.890730	-90 44 24.230398	32 53 26.628000	Corps	2	0	1	in	in	in	in	in
MSW03411-	232	MSW03411-0232	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.783613	32.711953	-90 47 1.006798	32 42 43.030800	Corps	2	0	1	in	out	in	in	in
MSW03411-	233	MSW03411-0233	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.886219	32.484831	-90 53 10.388399	32 29 5.391600	Corps	0	0	1	in	in	in	in	in
MSW03411-	234	MSW03411-0234	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.887528	32.716611	-90 53 15.100799	32 42 59.799600	Corps	0	0	1	in	in	in	in	in
MSW03411-	235	MSW03411-0235	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.989351	33.118685	-90 59 21.663599	33 7 7.266000	Corps	2	0	1	in	in	in	in	in
MSW03411-	236	MSW03411-0236	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.790047	32.750591	-90 47 24.169199	32 45 2.127600	Corps	2	0	1	in	in	in	in	in
MSW03411-	237	MSW03411-0237	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.900933	32.530332	-90 54 3.358799	32 31 49.195200	Corps	2	0	1	in	in	in	in	in
MSW03411-	238	MSW03411-0238	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.833902	32.831801	-90 50 2.047199	32 49 54.483600	Corps	2	0	1	in	in	in	in	in
MSW03411-	239	MSW03411-0239	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.815842	32.919818	-90 48 57.031199	32 55 11.344800	Corps	0	0	1	in	in	in	in	in
MSW03411-	240	MSW03411-0240	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.819019	32.609558	-90 49 8.468399	32 36 34.408800	Corps	2	0	1	in	in	in	in	in
MSW03411-	241	MSW03411-0241	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.984808	32.557251	-90 59 5.308799	32 33 26.103600	Corps	2	0	1	in	in	in	in	in
MSW03411-	242	MSW03411-0242	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.745046	32.975866	-90 44 42.165598	32 58 33.117600	Corps	0	0	1	out	out	in	out	out
MSW03411-	243	MSW03411-0243	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.014981	32.498580	-91 0 53.931599	32 29 54.888000	Corps	0	0	1	out	out	in	out	out
MSW03411-	244	MSW03411-0244	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.813008	32.813350	-90 48 46.828799	32 48 48.060000	Corps	2	0	1	in	in	in	in	in
MSW03411-	245	MSW03411-0245	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.879451	32.590466	-90 52 46.023599	32 35 25.677600	Corps	2	3	1	in	in	in	in	in
MSW03411-	246	MSW03411-0246	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.899389	32.771624	-90 53 57.800399	32 46 17.846400	Corps	0	0	1	in	in	in	in	in
MSW03411-	247	MSW03411-0247	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.748530	32.832881	-90 44 54.707998	32 49 58.371600	Corps	0	0	1	in	in	in	in	in
MSW03411-	248	MSW03411-0248	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.831743	32.723411	-90 49 54.274799	32 43 24.279600	Corps	0	3	1	in	in	in	in	in
MSW03411-	249	MSW03411-0249	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.893448	32.459578	-90 53 36.412799	32 27 34.480800	Corps	0	0	1	out	out	in	out	out
MSW03411-	250	MSW03411-0250	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.883674	32.745196	-90 53 1.226399	32 44 42.705600	Corps	0	3	1	in	in	in	in	in
MSW03411-	251	MSW03411-0251	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.952193	33.128278	-90 57 7.894799	33 7 41.800800	Corps	0	0	1	out	out	in	out	out
MSW03411-	252	MSW03411-0252	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.769441	32.835782	-90 46 9.987598	32 50 8.815200	Corps	2	0	1	in	in	in	in	in
MSW03411-	253	MSW03411-0253	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.950277	32.509876	-90 57 0.997199	32 30 35.553600	Corps	2	0	1	in	in	in	in	in
MSW03411-	254	MSW03411-0254	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.881291	32.704319	-90 52 52.647599	32 42 15.548400	Corps	0	3	1	in	in	in	in	in
MSW03411-	255	MSW03411-0255	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.774354	32.853811	-90 46 27.674399	32 51 13.719600	Corps	2	0	1	in	in	in	in	in
MSW03411-	256	MSW03411-0256	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.694840	32.705912	-90 41 41.423998	32 42 21.283200	Corps	0	0	1	out	out	in	out	out
MSW03411-	257	MSW03411-0257	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.910547	32.620751	-90 54 37.969199	32 37 14.703600	Corps	2	0	1	in	in	in	in	in
MSW03411-	258	MSW03411-0258	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.002508	32.672486	-91 0 9.028799	32 40 20.949600	Corps	2	0	1	in	in	in	in	in
MSW03411-	259	MSW03411-0259	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.022733	32.527068	-91 1 21.838800	32 31 37.444800	Corps	0	0	1	out	out	in	out	out
MSW03411-	260	MSW03411-0260	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.824577	32.802953	-90 49 28.477199	32 48 10.630800	Corps	2	0	1	in	in	in	in	in
MSW03411-	261	MSW03411-0261	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.873210	32.582711	-90 52 23.555999	32 34 57.759600	Corps	2	0	1	in	in	in	in	in
MSW03411-	262	MSW03411-0262	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.847476	32.809881	-90 50 50.913599	32 48 35.571600	Corps	2	0	1	in	in	in	in	in
MSW03411-	263	MSW03411-0263	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.737678	32.768865	-90 44 15.640798	32 46 7.914000	Corps	2	0	1	in	in	in	in	in
MSW03411-	264	MSW03411-0264	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804388	32.674402	-90 48 15.796799	32 40 27.847200	Corps	2	0	1	in	in	in	in	in
MSW03411-	265	MSW03411-0265	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.890311	32.556666	-90 53 25.119599	32 33 23.997600	Corps	0	0	1	in	in	in	in	in
MSW03411-	266	MSW03411-0266	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.845607	32.743346	-90 50 44.185199	32 44 36.045600	Corps	0	0	1	in	in	in	in	in
MSW03411-	267	MSW03411-0267	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.992401	33.130733	-90 59 32.643599	33 7 50.638800	Corps	2	0	1	in	in	in	in	in
MSW03411-	268	MSW03411-0268	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.759604	32.693823	-90 45 34.574398	32 41 37.762800	Corps	2	0	1	in	in	in	in	in
MSW03411-	269	MSW03411-0269	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.924922	32.541572	-90 55 29.719199	32 32 29.659200	Corps	2	0	1	in	in	in	in	in
MSW03411-	270	MSW03411-0270	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.810297	32.818182	-90 48 37.069199	32 49 5.455200	Corps	2	0	1	in	in	in	in	in
MSW03411-	271	MSW03411-0271	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.825592	32.868708	-90 49 32.131199	32 52 7.348800	Corps	2	0	1	in	in	in	in	in
MSW03411-	272	MSW03411-0272	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.766940	32.630784	-90 46 0.983998	32 37 50.822400	Corps	2	0	1	in	in	in	in	in
MSW03411-	273	MSW03411-0273	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.961700	32.639436	-90 57 42.119999	32 38 21.969600	Corps	0	0	1	in	in	in	in	in
MSW03411-	274	MSW03411-0274	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.748906	32.919168	-90 44 56.061599	32 55 9.004800	Corps	2	0	1	out	out	in	out	out
MSW03411-	275	MSW03411-0275	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.003317	32.502965	-91 0 11.941199	32 30 10.674000	Corps	0	0	1	in	in	in	in	in
MSW03411-	276	MSW03411-0276	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.823750	32.775099	-90 49 25.499999	32 46 30.356400	Corps	2	0	1	in	in	in	in	in
MSW03411-	277	MSW03411-0277	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.899938	32.574557	-90 53 59.776799	32 34 28.405200	Corps	0	0	1	in	in	in	in	in
MSW03411-	278	MSW03411-0278	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851813	32.717666	-90 51 6.526799	32 43 3.597600	Corps	0	3	1	in	in	in	in	in
MSW03411-	279	MSW03411-0279	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.741178	32.849904	-90 44 28.240799	32 50 59.654400	Corps	0	0	1	in	in	in	in	in
MSW03411-	280	MSW03411-0280	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.803271	32.741316	-90 48 11.775599	32 44 28.737600	Corps	2	0	1	in	in	in	in	in
MSW03411-	281	MSW03411-0281	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.840223	32.493662	-90 50 24.802799	32 29 37.183200	Corps	2	0	1	in	in	in	in	in
MSW03411-	282	MSW03411-0282	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.883244	32.788631	-90 52 59.678399	32 47 19.071600	Corps	0	0	1	in	in	in	in	in
MSW03411-	283	MSW03411-0283	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.689186	33.158361	-90 41 21.069598	33 9 30.099600	Corps	0	0	1	in	in	in	in	in
MSW03411-	284	MSW03411-0284	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.776075	32.776177	-90 46 33.869999	32 46 34.237200	Corps	2	0	1	in	in	in	in	in
MSW03411-	285	MSW03411-0285	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.934576	32.501337	-90 56 4.473599	32 30 4.813200	Corps	2	0	1	in	in	in	in	in
MSW03411-	286	MSW03411-0286	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.886064	32.618279	-90 53 9.830399	32 37 5.804400	Corps	0	3	1	in	out	in	in	in
MSW03411-	287	MSW03411-0287	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.762001	32.882764	-90 45 43.203598	32 52 57.950400	Corps	2	0	1	in	in	in	in	in
MSW03411-	288	MSW03411-0288	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.973698	32.987980	-90 58 25.312799	32 59 16.728000	Corps	2	0	1	in	in	in	in	in
MSW03411-	289	MSW03411-0289	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.987671	32.601681	-90 59 15.615599	32 36 6.051600	Corps	0	0	1	in	in	in	in	in
MSW03411-	290	MSW03411-0290	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.699657	33.086088	-90 41 58.765198	33 5 9.916800	Corps	2	0	1	in	in	in	in	in
MSW03411-	291	MSW03411-0291	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.918240	32.464155	-90 55 5.663999	32 27 50.958000	Corps	2	0	1	in	in	in	in	in
MSW03411-	292	MSW03411-0292	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.818238	32.787567	-90 49 5.656799	32 47 15.241200	Corps	2	0	1	in	in	in	in	in
MSW03411-	293	MSW03411-0293	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.825437	32.592129	-90 49 31.573199	32 35 31.664400	Corps	2	0	1	in	in	in	in	in
MSW03411-	294	MSW03411-0294	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.877117	32.811989	-90 52 37.621199	32 48 43.160400	Corps	2	0	1	in	in	in	in	in
MSW03411-	295	MSW03411-0295	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.744648	32.882667	-90 44 40.732798	32 52 57.601200	Corps	2	0	1	out	out	in	out	out
MSW03411-	296	MSW03411-0296	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.796007	32.718433	-90 47 45.625199	32 43 6.358800	Corps	2	0	1	in	in	in	in	in
MSW03411-	297	MSW03411-0297	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.884190	32.510837	-90 53 3.083999	32 30 39.013200	Corps	2	0	1	in	in	in	in	in

MSW03411-	298	MSW03411-0298	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.890887	32.708542	-90 53 27.193199	32 42 30.751200	Corps	0	0	1	in	in	in	in	in
MSW03411-	299	MSW03411-0299	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.051674	33.093052	-91 3 6.026400	33 5 34.987200	Corps	0	0	1	out	out	in	in	in
MSW03411-	300	MSW03411-0300	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.789134	32.738425	-90 47 20.882399	32 44 18.330000	Corps	2	0	1	in	in	in	in	in
MSW03411-	301	MSW03411-0301	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.924363	32.511121	-90 55 27.706799	32 30 40.035600	Corps	2	0	1	in	in	in	in	in
MSW03411-	302	MSW03411-0302	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830484	32.817203	-90 49 49.742399	32 49 1.930800	Corps	0	0	1	in	in	in	in	in
MSW03411-	303	MSW03411-0303	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.800229	32.891301	-90 48 0.824399	32 53 28.683600	Corps	2	0	1	in	in	in	in	in
MSW03411-	304	MSW03411-0304	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811215	32.616285	-90 48 40.373999	32 36 58.626000	Corps	2	0	1	in	in	in	in	in
MSW03411-	305	MSW03411-0305	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.931012	32.561868	-90 55 51.643199	32 33 42.724800	Corps	2	0	1	in	in	in	in	in
MSW03411-	306	MSW03411-0306	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.766084	32.939926	-90 45 57.902399	32 56 23.733600	Corps	0	0	1	in	in	in	in	in
MSW03411-	307	MSW03411-0307	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.943637	32.472060	-90 56 37.093199	32 28 19.416000	Corps	2	0	1	in	in	in	in	in
MSW03411-	308	MSW03411-0308	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.794171	32.803664	-90 47 39.015599	32 48 13.190400	Corps	2	0	1	in	in	in	in	in
MSW03411-	309	MSW03411-0309	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.878456	32.542176	-90 52 42.441599	32 32 31.833600	Corps	0	0	1	in	in	in	in	in
MSW03411-	310	MSW03411-0310	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.985455	32.802261	-90 59 7.637999	32 48 8.139600	Corps	0	0	1	in	in	in	in	in
MSW03411-	311	MSW03411-0311	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.725697	32.834700	-90 43 32.509198	32 50 4.920000	Corps	0	0	1	in	out	in	out	out
MSW03411-	312	MSW03411-0312	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.774708	32.709648	-90 46 28.948799	32 42 34.732800	Corps	2	0	1	in	in	in	in	in
MSW03411-	313	MSW03411-0313	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.867506	32.476578	-90 52 3.021599	32 28 35.680800	Corps	2	0	1	in	in	in	in	in
MSW03411-	314	MSW03411-0314	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.885169	32.765293	-90 53 6.608399	32 45 55.054800	Corps	0	3	1	in	in	in	in	in
MSW03411-	315	MSW03411-0315	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.045394	33.068422	-91 2 43.418399	33 4 6.319200	Corps	0	0	1	in	in	in	in	in
MSW03411-	316	MSW03411-0316	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.780462	32.743796	-90 46 49.663198	32 44 37.665600	Corps	2	0	1	in	in	in	in	in
MSW03411-	317	MSW03411-0317	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.945817	32.518206	-90 56 44.941199	32 31 5.541600	Corps	2	0	1	in	in	in	in	in
MSW03411-	318	MSW03411-0318	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.866463	32.695260	-90 51 59.266799	32 41 42.936000	Corps	0	3	1	in	in	in	in	in
MSW03411-	319	MSW03411-0319	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.793146	32.878993	-90 47 35.325599	32 52 44.374800	Corps	2	0	1	in	in	in	in	in
MSW03411-	320	MSW03411-0320	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.787858	32.583236	-90 47 16.288799	32 34 59.649600	Corps	2	0	1	in	in	in	in	in
MSW03411-	321	MSW03411-0321	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.992229	32.639359	-90 59 32.024399	32 38 21.692400	Corps	0	0	1	in	out	in	in	in
MSW03411-	322	MSW03411-0322	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.916060	32.732102	-90 54 57.815999	32 43 55.567200	Corps	0	0	1	in	in	in	in	in
MSW03411-	323	MSW03411-0323	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.055343	32.505134	-91 3 19.234800	32 30 18.482400	Corps	0	0	1	in	in	in	in	in
MSW03411-	324	MSW03411-0324	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.767049	32.770325	-90 46 1.376399	32 46 13.170000	Corps	2	0	1	in	in	in	in	in
MSW03411-	325	MSW03411-0325	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.871393	32.595466	-90 52 17.014799	32 35 43.677600	Corps	2	0	1	in	in	in	in	in
MSW03411-	326	MSW03411-0326	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.845770	32.856877	-90 50 44.771999	32 51 24.757200	Corps	2	0	1	in	in	in	in	in
MSW03411-	327	MSW03411-0327	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.702756	32.748853	-90 42 9.921598	32 44 55.870800	Corps	0	0	1	out	out	in	out	out
MSW03411-	328	MSW03411-0328	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.818573	32.713636	-90 49 6.862799	32 42 49.089600	Corps	2	0	1	in	in	in	in	in
MSW03411-	329	MSW03411-0329	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.905156	32.546303	-90 54 18.561599	32 32 46.690800	Corps	0	0	1	in	in	in	in	in
MSW03411-	330	MSW03411-0330	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.859794	32.768333	-90 51 35.258399	32 46 5.998800	Corps	0	0	1	in	in	in	in	in
MSW03411-	331	MSW03411-0331	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.562814	33.043925	-90 33 46.130397	33 2 38.130000	Corps	0	0	1	out	out	in	out	out
MSW03411-	332	MSW03411-0332	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.743193	32.689613	-90 44 35.494798	32 41 22.606800	Corps	2	0	1	in	in	in	in	in
MSW03411-	333	MSW03411-0333	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.943342	32.545969	-90 56 36.031199	32 32 45.488400	Corps	2	0	1	in	in	in	in	in
MSW03411-	334	MSW03411-0334	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.749675	32.828913	-90 44 58.829998	32 49 44.086800	Corps	0	0	1	in	in	in	in	in
MSW03411-	335	MSW03411-0335	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.822720	32.866745	-90 49 21.791999	32 52 0.282000	Corps	2	0	1	in	in	in	in	in
MSW03411-	336	MSW03411-0336	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.776537	32.642308	-90 46 35.533199	32 38 32.308800	Corps	2	0	1	in	in	in	in	in
MSW03411-	337	MSW03411-0337	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.945664	32.612810	-90 56 44.390399	32 36 46.116000	Corps	0	0	1	in	in	in	in	in
MSW03411-	338	MSW03411-0338	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804623	32.857419	-90 48 16.642799	32 51 26.708400	Corps	2	0	1	in	in	in	in	in
MSW03411-	339	MSW03411-0339	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.955394	32.558004	-90 57 19.418399	32 33 28.814400	Corps	2	0	1	in	out	in	in	in
MSW03411-	340	MSW03411-0340	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.797315	32.762127	-90 47 50.333998	32 45 43.657200	Corps	2	0	1	in	in	in	in	in
MSW03411-	341	MSW03411-0341	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.911486	32.570541	-90 54 41.349599	32 34 13.947600	Corps	0	0	1	in	in	in	in	in
MSW03411-	342	MSW03411-0342	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.865676	32.715688	-90 51 56.433599	32 42 56.476800	Corps	0	3	1	in	in	in	in	in
MSW03411-	343	MSW03411-0343	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.603227	32.842411	-90 36 11.617198	32 50 32.679600	Corps	2	0	1	in	in	in	in	in
MSW03411-	344	MSW03411-0344	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.743035	32.703965	-90 44 34.925998	32 42 14.274000	Corps	2	0	1	in	out	in	in	in
MSW03411-	345	MSW03411-0345	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.045001	32.499875	-91 2 42.003600	32 29 59.550000	Corps	0	0	1	in	in	in	in	in
MSW03411-	346	MSW03411-0346	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.874604	32.801840	-90 52 28.574399	32 48 6.624000	Corps	2	0	1	in	in	in	in	in
MSW03411-	347	MSW03411-0347	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.019789	32.656014	-91 1 11.240399	32 39 21.650400	Corps	2	0	1	in	in	in	in	in
MSW03411-	348	MSW03411-0348	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.760364	32.778802	-90 45 37.310398	32 46 43.687200	Corps	2	0	1	in	in	in	in	in
MSW03411-	349	MSW03411-0349	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.926240	32.487007	-90 55 34.463999	32 29 13.225200	Corps	0	0	1	in	in	in	in	in
MSW03411-	350	MSW03411-0350	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.916903	32.631507	-90 55 0.850799	32 37 53.425200	Corps	2	0	1	in	in	in	in	in
MSW03411-	351	MSW03411-0351	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.738441	32.790480	-90 44 18.387598	32 47 25.728000	Corps	2	0	1	in	in	in	in	in
MSW03411-	352	MSW03411-0352	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.847465	32.691655	-90 50 50.873999	32 41 29.958000	Corps	0	3	1	in	in	in	in	in
MSW03411-	353	MSW03411-0353	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.953104	32.574838	-90 57 11.174399	32 34 29.416800	Corps	2	0	1	in	in	in	in	in
MSW03411-	354	MSW03411-0354	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.712515	32.976211	-90 42 45.053998	32 58 34.359600	Corps	2	0	1	in	out	in	out	out
MSW03411-	355	MSW03411-0355	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.945450	32.487872	-90 56 43.619999	32 29 16.339200	Corps	2	0	1	in	in	in	in	in
MSW03411-	356	MSW03411-0356	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.781642	32.793211	-90 46 53.911198	32 47 35.559600	Corps	2	0	1	in	in	in	in	in
MSW03411-	357	MSW03411-0357	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.870790	32.516450	-90 52 14.843999	32 30 59.220000	Corps	2	0	1	in	in	in	in	in
MSW03411-	358	MSW03411-0358	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.016152	32.817944	-91 0 58.147199	32 49 4.598400	Corps	2	0	1	in	in	in	in	in
MSW03411-	359	MSW03411-0359	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.712951	32.901615	-90 42 46.623598	32 54 5.814000	Corps	2	0	1	in	out	in	out	out
MSW03411-	360	MSW03411-0360	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.794832	32.698306	-90 47 41.395199	32 41 53.901600	Corps	2	0	1	in	in	in	in	in
MSW03411-	361	MSW03411-0361	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.895181	32.498188	-90 53 42.651599	32 29 53.476800	Corps	2	0	1	in	in	in	in	in
MSW03411-	362	MSW03411-0362	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.885036	32.747460	-90 53 6.129599	32 44 50.856000	Corps	0	3	1	in	in	in	in	in
MSW03411-	363	MSW03411-0363	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.035215	33.024774	-91 2 6.774000	33 1 29.186400	Corps	0	0	1	in	in	in	in	in
MSW03411-	364	MSW03411-0364	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.758339	32.752387	-90 45 30.020399	32 45 8.593200	Corps	2	0	1	in	in	in	in	in
MSW03411-	365	MSW03411-0365	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.897125	32.515465	-90 53 49.649999	32 30 55.674000	Corps	2	0	1	in	in	in	in	in
MSW03411-	366	MSW03411-0366	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.865288	32.700284	-90 51 55.036799	32 42 1.022400	Corps	0	3	1	in	in	in	in	in
MSW03411-	367	MSW03411-0367	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.788944	32.918743	-90 47 20.198399	32 55 7.474800	Corps	0	0	1	in	in	in	out	out
MSW03411-	368	MSW03411-0368	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.796931	32.578372	-90 47 48.951599	32 34 42.139200	Corps	2	0	1	in	in	in	in	in
MSW03411-	369	MSW03411-0369	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.959723	32.584095	-90 57 35.002799	32 35 2.742000	Corps	2	0	1	in	in	in	in	in
MSW03411-	370	MSW03411-0370	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.826721	32.898323	-90 49 36.195599	32 53 53.962800	Corps	0	0	1	in	in	in	in	in
MSW03411-	371	MSW03411-0371	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.002167	32.513008	-91 0 7.801199	32 30 46.828800	Corps	0	0	1	in	in	in	in	in
MSW03411-	372	MSW03411-0372	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.814631	32.807377	-90 48 52.671599	32 48 26.557200	Corps	2	0	1	in	in	in	in	in
MSW03411-	373	MSW03411-0373	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.887832	32.596245	-90 53 16.195199	32 35 46.482000	Corps	0	3	1	in	in	in	in	in
MSW03411-	374	MSW03411-0374	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.858642	32.734550	-90 51 31.111199	32 44 4.380000	Corps	0	0	1	in	in	in	in	in
MSW03411-	375	MSW03411-0375	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.747960	32.862528	-90 44 52.655999	32 51 45.100800	Corps	2	0	1	in	in	in	in	in
MSW03411-	376	MSW03411-0376	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811466	32.747396	-90 48 41.277599	32 44 50.625600	Corps	2	0	1	in	in	in	in	in
MSW03411-	377	MSW03411-0377	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.915381	32.467276	-90 54 55.371599	32 28 2.193600	Corps	2	0	1	in	in	in	in	in
MSW03411-	378	MSW03411-0378	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.894463	32.743976	-90 53 40.066799	32 44 38.313600	Corps	0	3	1	in	in	in	in	in
MSW03411-	379	MSW03411-0379	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.965615	33.112906	-90 57 56.213999	33 6 46.461600	Corps	2	0	1	in	in	in	in	in
MSW03411-	380	MSW03411-0380	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.786564	32.833550	-90 47 11.630399	32 50 0.780000	Corps	2	0	1	in	in	in	out	out
MSW03411-	381	MSW03411-0381	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.955501	32.493403	-90 57 19.803599	32 29 36.250800	Corps	2	0	1	in	in	in	in	in
MSW03411-	382	MSW03411-0382	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.901268	32.635161	-90 54 4.564799	32 38 6.579600	Corps	0	0	1	in	in	in	in	in
MSW03411-	383	MSW03411-0383	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.780189	32.878567	-90 46 48.680399	32 52 42.841200	Corps	2	0	1	in	in	in	in	in
MSW03411-	384	MSW03411-0384	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.999711	33.017278	-90 59 58.959599	33 1 2.200800	Corps	0	0	1	in	in	out	in	in
MSW03411-	385	MSW03411-0385	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.936234	32.605804	-90 56 10.442399	32 36 20.894400	Corps	0	3	1	in	in	in	in	in
MSW03411-	386	MSW03411-0386	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.008787	32.670310	-91 0 31.633199	32 40 13.116000	Corps	2	0	1	in	in	in	in	in
MSW03411-	387	MSW03411-0387	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.075582	32.531312	-91 4 32.095199	32 31 52.723200	Corps	0	0	1	out	out	in	out	out
MSW03411-	388	MSW03411-0388	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.818907	32.798964	-90 49 8.065199	32 47 56.270400	Corps	2	0	1	in	in	in	in	in
MSW03411-	389	MSW03411-0389	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.864320	32.564717	-90 51 51.551999	32 33 52.981200	Corps	0	0	1	in	in	in	in	in
MSW03411-	390	MSW03411-0390	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.859233	32.810553	-90 51 33.238799	32 48 37.990800	Corps	2	0	1	in	in	in	in	in
MSW03411-	391	MSW03411-0391	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.724805	32.768977	-90 43 29.297998	32 46 8.317200	Corps	2	0	1	in	in	in	in	in
MSW03411-	392	MSW03411-0392	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.792205	32.693877	-90 47 31.937999	32 41 37.957200	Corps	2	0	1	in	in	in	in	in
MSW03411-	393	MSW03411-0393	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.895239	32.556140	-90 53 42.860399	32 33 22.104000	Corps	0	0	1	in	in	in	in	in
MSW03411-	394	MSW03411-0394	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.849644	32.760213	-90 50 58.718399	32 45 36.766800	Corps	0	3	1	in	in	in	in	in
MSW03411-	395	MSW03411-0395	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.051449	33.153397	-91 3 5.216399	33 9 12.229200	Corps	2	0	1	in	in	in	in	in
MSW03411-	396	MSW03411-0396	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.747919	32.685243	-90 44 52.508398	32 41 6.874800	Corps	2	0	1	in	in	in	in	in
MSW03411-	397	MSW03411-0397	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.918089	32.501238	-90 55 5.120399	32 30 4.456800	Corps	2	0	1	in	in	in	in	in
MSW03411-	398	MSW03411-0398	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.810534	32.837003	-90 48 37.922399	32 50 13.210800	Corps	2	0	1	in	in	in	in	in
MSW03411-	399	MSW03411-0399	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.801178	32.903780	-90 48 4.240799	32 54 13.608000	Corps	0	0	1	in	in	in	in	in
MSW03411-	400	MSW03411-0400	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.787657	32.638516	-90 47 15.565199	32 38 18.657600	Corps	2	0	1	in	out	out	out	out
MSW03411-	401	MSW03411-0401	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.940081	32.718670	-90 56 24.291599	32 43 7.212000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	402	MSW03411-0402	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.917894	33.008613	-90 55 4.418399	33 0 31.006800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	403	MSW03411-0403	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.054375	33.029112	-91 3 15.749999	33 1 44.803200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	404	MSW03411-0404	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.745053	33.214996	-90 44 42.190798	33 12 53.985600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	405	MSW03411-0405	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.856491	32.842122	-90 51 23.367599	32 50 31.639200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	406	MSW03411-0406	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.731969	32.643673	-90 43 55.088399	32 38 37.222800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	407	MSW03411-0407	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.642376	32.927055	-90 38 32.553598	32 55 37.398000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	408	MSW03411-0408	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.962297	32.541629	-90 57 44.269199	32 32 29.864400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	409	MSW03411-0409	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.830975	32.665840	-90 49 51.509999	32 39 57.024000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	410	MSW03411-0410	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.822305	32.626764	-90 49 20.297999	32 37 36.350400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	411	MSW03411-0411	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.679434	32.902405	-90 40 45.962398	32 54 8.658000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	412	MSW03411-0412	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.961790	33.086412	-90 57 42.443999	33 5 11.083200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	413	MSW03411-0413	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.011064	32.770721	-91 0 39.830399	32 46 14.595600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	414	MSW03411-0414	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.669432	33.104031	-90 40 9.955198	33 6 14.511600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	415	MSW03411-0415	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.704798	32.962462	-90 42 17.272798	32 57 44.863200	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	416	MSW03411-0416	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.012540	32.567588	-91 0 45.143999	32 34 3.316800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	417	MSW03411-0417	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.880654	32.662703	-90 52 50.354399	32 39 45.730800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	418	MSW03411-0418	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.805779	32.534032	-90 48 20.804399	32 32 2.515200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	419	MSW03411-0419	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.041482	32.869081	-91 2 29.335200	32 52 8.691600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	420	MSW03411-0420	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.668450	33.166359	-90 40 6.419998	33 9 58.892400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	421	MSW03411-0421	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.001358	32.805621	-91 0 4.888799	32 48 20.235600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	422	MSW03411-0422	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.659165	33.133248	-90 39 32.993998	33 7 59.692800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	423	MSW03411-0423	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.741320	32.917775	-90 44 28.751998	32 55 3.990000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	424	MSW03411-0424	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.980214	32.586737	-90 58 48.770399	32 35 12.253200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	425	MSW03411-0425	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.808321	32.666751	-90 48 29.955599	32 40 0.303600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	426	MSW03411-0426	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.781828	32.619945	-90 46 54.580798	32 37 11.802000	EPAnot	2	0	0	in	out	in	out	out
MSW03411-	427	MSW03411-0427	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.696168	32.762430	-90 41 46.204798	32 45 44.748000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	428	MSW03411-0428	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.840237	32.528961	-90 50 24.853199	32 31 44.259600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	429	MSW03411-0429	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.080379	32.813195	-91 4 49.364400	32 48 47.502000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	430	MSW03411-0430	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.653992	32.971483	-90 39 14.371198	32 58 17.338800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	431	MSW03411-0431	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.801992	32.936179	-90 48 7.171199	32 56 10.244400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	432	MSW03411-0432	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.046676	32.664974	-91 2 48.033599	32 39 53.906400	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	433	MSW03411-0433	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.961192	32.697877	-90 57 40.291199	32 41 52.357200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	434	MSW03411-0434	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.921418	32.899940	-90 55 17.104799	32 53 59.784000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	435	MSW03411-0435	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.009530	32.885015	-91 0 34.308000	32 53 6.054000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	436	MSW03411-0436	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.755438	33.110235	-90 45 19.576798	33 6 36.846000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	437	MSW03411-0437	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.883177	32.732014	-90 52 59.437199	32 43 55.250400	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	438	MSW03411-0438	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.587116	33.130555	-90 35 13.617598	33 7 49.998000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	439	MSW03411-0439	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.660880	32.910041	-90 39 39.167998	32 54 36.147600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	440	MSW03411-0440	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.989277	32.613342	-90 59 21.397199	32 36 48.031200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	441	MSW03411-0441	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.760427	32.735158	-90 45 37.537199	32 44 6.568800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	442	MSW03411-0442	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.746338	32.646571	-90 44 46.816799	32 38 47.655600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	443	MSW03411-0443	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.599405	32.835550	-90 35 57.857998	32 50 7.980000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	444	MSW03411-0444	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.910398	32.599249	-90 54 37.432799	32 35 57.296400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	445	MSW03411-0445	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.057693	32.799695	-91 3 27.694799	32 47 58.902000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	446	MSW03411-0446	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.502430	33.051629	-90 30 8.747997	33 3 5.864400	EPAnot	2	0	0	out	out	out	out	out

MSW03411-	447	MSW03411-0447	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.811287	32.913414	-90 48 40.633199	32 54 48.290400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	448	MSW03411-0448	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.039607	32.693421	-91 2 22.585199	32 41 36.315600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	449	MSW03411-0449	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.905148	32.658714	-90 54 18.532799	32 39 31.370400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	450	MSW03411-0450	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.720622	32.686434	-90 43 14.239198	32 41 11.162400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	451	MSW03411-0451	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.718230	32.879854	-90 43 5.627998	32 52 47.474400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	452	MSW03411-0452	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.986276	33.147600	-90 59 10.593599	33 8 51.360000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	453	MSW03411-0453	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.000253	32.749506	-91 0 0.910799	32 44 58.221600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	454	MSW03411-0454	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.616787	33.070527	-90 37 0.433198	33 4 13.897200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	455	MSW03411-0455	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.744644	32.962334	-90 44 40.718398	32 57 44.402400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	456	MSW03411-0456	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.019833	32.586090	-91 1 11.398799	32 35 9.924000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	457	MSW03411-0457	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.905901	32.800681	-90 54 21.243599	32 48 2.451600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	458	MSW03411-0458	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.779176	32.631939	-90 46 45.033599	32 37 54.980400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	459	MSW03411-0459	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.685469	32.735779	-90 41 7.688398	32 44 8.804400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	460	MSW03411-0460	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.985321	32.528956	-90 59 7.155599	32 31 44.241600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	461	MSW03411-0461	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.041696	32.825963	-91 2 30.105599	32 49 33.466800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	462	MSW03411-0462	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.673924	33.011998	-90 40 26.126398	33 0 43.192800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	463	MSW03411-0463	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.730261	33.022647	-90 43 48.939598	33 1 21.529200	NonWet	0	0	0	out	in	out	out	out
MSW03411-	464	MSW03411-0464	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.066911	32.784791	-91 4 0.879599	32 47 5.247600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	465	MSW03411-0465	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.976621	32.736897	-90 58 35.835599	32 44 12.829200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	466	MSW03411-0466	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.894208	32.967089	-90 53 39.148799	32 58 1.520400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	467	MSW03411-0467	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.949266	32.886868	-90 56 57.357599	32 53 12.724800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	468	MSW03411-0468	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.809911	33.183925	-90 48 35.679599	33 11 2.130000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	469	MSW03411-0469	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.787993	32.848701	-90 47 16.774799	32 50 55.323600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	470	MSW03411-0470	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.810071	32.647816	-90 48 36.255599	32 38 52.137600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	471	MSW03411-0471	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.629851	32.859470	-90 37 47.463598	32 51 34.092000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	472	MSW03411-0472	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.848421	32.510864	-90 50 54.315599	32 30 39.110400	EPAnot	2	3	0	in	out	out	out	out
MSW03411-	473	MSW03411-0473	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.907478	32.669138	-90 54 26.920799	32 40 8.896800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	474	MSW03411-0474	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.785143	32.602782	-90 47 6.514799	32 36 10.015200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	475	MSW03411-0475	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.637152	32.854588	-90 38 13.747198	32 51 16.516800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	476	MSW03411-0476	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.809014	32.570161	-90 48 32.450399	32 34 12.579600	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	477	MSW03411-0477	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.971866	32.768091	-90 58 18.717599	32 46 5.127600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	478	MSW03411-0478	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.498900	33.004220	-90 29 56.039997	33 0 15.192000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	479	MSW03411-0479	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.671310	32.938669	-90 40 16.715998	32 56 19.208400	NonWet	0	0	0	in	out	in	out	out
MSW03411-	480	MSW03411-0480	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.028418	32.545967	-91 1 42.304799	32 32 45.481200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	481	MSW03411-0481	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.925955	32.669707	-90 55 33.437999	32 40 10.945200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	482	MSW03411-0482	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.779973	33.101313	-90 46 47.902799	33 6 4.726800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	483	MSW03411-0483	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.047623	32.832358	-91 2 51.442800	32 49 56.488800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	484	MSW03411-0484	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.778502	33.220064	-90 46 42.607199	33 13 12.230400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	485	MSW03411-0485	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.869052	32.839338	-90 52 8.587199	32 50 21.616800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	486	MSW03411-0486	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.767151	32.631290	-90 46 1.743599	32 37 52.644000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	487	MSW03411-0487	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.718436	32.719476	-90 43 6.369598	32 43 10.113600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	488	MSW03411-0488	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.987941	32.535764	-90 59 16.587599	32 32 8.750400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	489	MSW03411-0489	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.913146	32.662103	-90 54 47.325599	32 39 43.570800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	490	MSW03411-0490	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.743045	32.662633	-90 44 34.961998	32 39 45.478800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	491	MSW03411-0491	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.741706	32.869375	-90 44 30.141598	32 52 9.750000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	492	MSW03411-0492	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.932772	33.236853	-90 55 57.979199	33 14 12.670800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	493	MSW03411-0493	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.986631	32.756982	-90 59 11.871599	32 45 25.135200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	494	MSW03411-0494	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.659861	33.097088	-90 39 35.499598	33 5 49.516800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	495	MSW03411-0495	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.729591	32.989359	-90 43 46.527598	32 59 21.692400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	496	MSW03411-0496	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.989765	32.603991	-90 59 23.153999	32 36 14.367600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	497	MSW03411-0497	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.029100	32.684494	-91 1 44.759999	32 41 4.178400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	498	MSW03411-0498	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.912254	32.915161	-90 54 44.114399	32 54 54.579600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	499	MSW03411-0499	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.997450	32.839537	-90 59 50.819999	32 50 22.333200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	500	MSW03411-0500	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.770739	33.161033	-90 46 14.660399	33 9 39.718800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	501	MSW03411-0501	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.770228	32.834952	-90 46 12.820798	32 50 5.827200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	502	MSW03411-0502	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.808777	32.633074	-90 48 31.597199	32 37 59.066400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	503	MSW03411-0503	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.595809	32.886328	-90 35 44.912398	32 53 10.780800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	504	MSW03411-0504	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.934061	32.629521	-90 56 2.619599	32 37 46.275600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	505	MSW03411-0505	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.742437	32.712310	-90 44 32.773199	32 42 44.316000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	506	MSW03411-0506	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.782638	32.641321	-90 46 57.496799	32 38 28.755600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	507	MSW03411-0507	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.614066	32.848580	-90 36 50.637598	32 50 54.888000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	508	MSW03411-0508	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.860632	32.618374	-90 51 38.275199	32 37 6.146400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	509	MSW03411-0509	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.970679	32.821200	-90 58 14.444399	32 49 16.320000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	510	MSW03411-0510	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.593933	33.041356	-90 35 38.158798	33 2 28.881600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	511	MSW03411-0511	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.676993	32.921697	-90 40 37.174798	32 55 18.109200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	512	MSW03411-0512	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.043014	32.678575	-91 2 34.850399	32 40 42.870000	NonWet	0	0	0	out	out	out	in	in
MSW03411-	513	MSW03411-0513	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.954339	32.711207	-90 57 15.620399	32 42 40.345200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	514	MSW03411-0514	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.931405	32.967347	-90 55 53.057999	32 58 2.449200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	515	MSW03411-0515	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.024714	32.978397	-91 1 28.970399	32 58 42.229200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	516	MSW03411-0516	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.823898	33.210389	-90 49 26.032799	33 12 37.400400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	517	MSW03411-0517	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.923548	32.827119	-90 55 24.772799	32 49 37.628400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	518	MSW03411-0518	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.729607	32.620500	-90 43 46.585198	32 37 13.800000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	519	MSW03411-0519	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.558753	32.910003	-90 33 31.510797	32 54 36.010800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	520	MSW03411-0520	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.930958	32.476866	-90 55 51.448799	32 28 36.717600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	521	MSW03411-0521	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.912695	32.678651	-90 54 45.701999	32 40 43.143600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	522	MSW03411-0522	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.826436	32.616059	-90 49 35.169599	32 36 57.812400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	523	MSW03411-0523	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.607355	32.828696	-90 36 26.477998	32 49 43.305600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	524	MSW03411-0524	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.962993	32.452071	-90 57 46.774799	32 27 7.455600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	525	MSW03411-0525	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.021263	32.779027	-91 1 16.546799	32 46 44.497200	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	526	MSW03411-0526	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.551874	32.975412	-90 33 6.746397	32 58 31.483200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	527	MSW03411-0527	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.689148	32.918984	-90 41 20.932798	32 55 8.342400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	528	MSW03411-0528	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.001899	32.550572	-91 0 6.836399	32 33 2.059200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	529	MSW03411-0529	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.891147	32.651296	-90 53 28.129199	32 39 4.665600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	530	MSW03411-0530	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.807625	32.552038	-90 48 27.449999	32 33 7.336800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	531	MSW03411-0531	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.956147	32.849932	-90 57 22.129199	32 50 59.755200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	532	MSW03411-0532	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.618306	33.149211	-90 37 5.901598	33 8 57.159600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	533	MSW03411-0533	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.014947	32.809388	-91 0 53.809199	32 48 33.796800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	534	MSW03411-0534	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.667893	33.110446	-90 40 4.414798	33 6 37.605600	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	535	MSW03411-0535	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.706157	32.924952	-90 42 22.165198	32 55 29.827200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	536	MSW03411-0536	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.996814	32.579420	-90 59 48.530399	32 34 45.912000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	537	MSW03411-0537	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.800366	32.665458	-90 48 1.317599	32 39 55.648800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	538	MSW03411-0538	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.772573	32.618946	-90 46 21.262798	32 37 8.205600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	539	MSW03411-0539	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.662581	32.789124	-90 39 45.291598	32 47 20.846400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	540	MSW03411-0540	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.846144	32.532074	-90 50 46.118399	32 31 55.466400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	541	MSW03411-0541	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.071881	32.813626	-91 4 18.771600	32 48 49.053600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	542	MSW03411-0542	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.655089	33.019521	-90 39 18.320398	33 1 10.275600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	543	MSW03411-0543	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.851747	32.911096	-90 51 6.289199	32 54 39.945600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	544	MSW03411-0544	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.036391	32.660723	-91 2 11.007599	32 39 38.602800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	545	MSW03411-0545	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.927271	32.717653	-90 55 38.175599	32 43 3.550800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	546	MSW03411-0546	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.847300	33.106712	-90 50 50.279999	33 6 24.163200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	547	MSW03411-0547	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.084747	32.799957	-91 5 5.089199	32 47 59.845200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	548	MSW03411-0548	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.729497	33.231963	-90 43 46.189198	33 13 55.066800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	549	MSW03411-0549	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.863796	32.841770	-90 51 49.665599	32 50 30.372000	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	550	MSW03411-0550	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.741356	32.646619	-90 44 28.881598	32 38 47.828400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	551	MSW03411-0551	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.656943	32.922321	-90 39 24.994798	32 55 20.355600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	552	MSW03411-0552	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.967314	32.551923	-90 58 2.330399	32 33 6.922800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	553	MSW03411-0553	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.832884	32.675965	-90 49 58.382399	32 40 33.474000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	554	MSW03411-0554	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.728042	32.656142	-90 43 40.951198	32 39 22.111200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	555	MSW03411-0555	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.715062	32.883067	-90 42 54.223198	32 52 59.041200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	556	MSW03411-0556	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.998496	33.107057	-90 59 54.585599	33 6 25.405200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	557	MSW03411-0557	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.044321	32.773548	-91 2 39.555599	32 46 24.772800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	558	MSW03411-0558	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.674642	33.088012	-90 40 28.711198	33 5 16.843200	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	559	MSW03411-0559	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.730141	32.937994	-90 43 48.507599	32 56 16.778400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	560	MSW03411-0560	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.019184	32.572642	-91 1 9.062400	32 34 21.511200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	561	MSW03411-0561	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.991174	32.731682	-90 59 28.226399	32 43 54.055200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	562	MSW03411-0562	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.812260	33.007277	-90 48 44.135999	33 0 26.197200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	563	MSW03411-0563	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.956266	32.848995	-90 57 22.557599	32 50 56.382000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	564	MSW03411-0564	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.716021	33.146745	-90 42 57.675598	33 8 48.282000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	565	MSW03411-0565	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.834024	32.769645	-90 50 2.486399	32 46 10.722000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	566	MSW03411-0566	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.556747	33.154440	-90 33 24.289197	33 9 15.984000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	567	MSW03411-0567	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.710310	32.984612	-90 42 37.115998	32 59 4.603200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	568	MSW03411-0568	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.986680	32.569650	-90 59 12.047999	32 34 10.740000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	569	MSW03411-0569	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.807285	32.687259	-90 48 26.225999	32 41 14.132400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	570	MSW03411-0570	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.782072	32.662112	-90 46 55.459199	32 39 43.603200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	571	MSW03411-0571	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.636695	32.808868	-90 38 12.101998	32 48 31.924800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	572	MSW03411-0572	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.860681	32.530856	-90 51 38.451599	32 31 51.081600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	573	MSW03411-0573	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.038576	32.809149	-91 2 18.873600	32 48 32.936400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	574	MSW03411-0574	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.489239	33.037339	-90 29 21.260397	33 2 14.420400	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	575	MSW03411-0575	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.746980	32.915746	-90 44 49.127998	32 54 56.685600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	576	MSW03411-0576	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.048523	32.665333	-91 2 54.682800	32 39 55.198800	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	577	MSW03411-0577	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.031512	32.689738	-91 1 53.443200	32 41 23.056800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	578	MSW03411-0578	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.902049	32.958037	-90 54 7.376399	32 57 28.933200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	579	MSW03411-0579	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.025334	32.895391	-91 1 31.202399	32 53 43.407600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	580	MSW03411-0580	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.660636	33.242780	-90 39 38.289598	33 14 34.008000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	581	MSW03411-0581	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.796860	32.846005	-90 47 48.695999	32 50 45.618000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	582	MSW03411-0582	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.793403	32.635622	-90 47 36.250799	32 38 8.239200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	583	MSW03411-0583	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.610626	32.879163	-90 36 38.253597	32 52 44.986800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	584	MSW03411-0584	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.903038	32.460623	-90 54 10.936799	32 27 38.242800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	585	MSW03411-0585	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.845996	32.653313	-90 50 45.585599	32 39 11.926800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	586	MSW03411-0586	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.804149	32.587485	-90 48 14.936399	32 35 14.946000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	587	MSW03411-0587	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.640329	32.844793	-90 38 25.184398	32 50 41.254800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	588	MSW03411-0588	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.815858	32.575195	-90 48 57.088799	32 34 30.702000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	589	MSW03411-0589	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.978731	32.818718	-90 58 43.431599	32 49 7.384800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	590	MSW03411-0590	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.520647	33.044878	-90 31 14.329197	33 2 41.560800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	591	MSW03411-0591	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.691754	32.923507	-90 41 30.314398	32 55 24.625200	EPAnot	2	0	0	in	out	in	out	out
MSW03411-	592	MSW03411-0592	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.010610	32.530996	-91 0 38.195999	32 31 51.585600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	593	MSW03411-0593	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.928910	32.656810	-90 55 44.075999	32 39 24.516000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	594	MSW03411-0594	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.729344	32.687565	-90 43 45.638398	32 41 15.234000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	595	MSW03411-0595	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.683123	32.824390	-90 40 59.242798	32 49 27.804000	NonWet	0	0	0	out	out	out	out	out

MSW03411-	596	MSW03411-0596	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.956310	33.080300	-90 57 22.715999	33 4 49.080000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	597	MSW03411-0597	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.003895	32.775410	-91 0 14.021999	32 46 31.476000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	598	MSW03411-0598	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.596176	33.097292	-90 35 46.233598	33 5 50.251200	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	599	MSW03411-0599	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.726063	32.936183	-90 43 33.826798	32 56 10.258800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	600	MSW03411-0600	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.979342	32.611551	-90 58 45.631199	32 36 41.583600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	601	MSW03411-0601	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.771833	32.692047	-90 46 18.598799	32 41 31.369200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	602	MSW03411-0602	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.759331	32.609031	-90 45 33.591599	32 36 32.511600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	603	MSW03411-0603	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.718942	32.754311	-90 43 8.191198	32 45 15.519600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	604	MSW03411-0604	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.961838	32.527805	-90 57 42.616799	32 31 40.098000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	605	MSW03411-0605	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.059469	32.842188	-91 3 34.088400	32 50 31.876800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	606	MSW03411-0606	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.627043	33.029225	-90 37 37.354798	33 1 45.210000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	607	MSW03411-0607	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.745357	33.042893	-90 44 43.285198	33 2 34.414800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	608	MSW03411-0608	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.033532	32.746045	-91 2 0.715199	32 44 45.762000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	609	MSW03411-0609	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.957161	32.680287	-90 57 25.779599	32 40 49.033200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	610	MSW03411-0610	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.859683	33.107045	-90 51 34.858799	33 6 25.362000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	611	MSW03411-0611	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.099459	32.811917	-91 5 58.052399	32 48 42.901200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	612	MSW03411-0612	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.757075	33.200668	-90 45 25.469998	33 12 2.404800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	613	MSW03411-0613	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.920992	32.881829	-90 55 15.571199	32 52 54.584400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	614	MSW03411-0614	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.755636	32.633877	-90 45 20.289599	32 38 1.957200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	615	MSW03411-0615	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.646233	32.942529	-90 38 46.438798	32 56 33.104400	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	616	MSW03411-0616	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.972707	32.533958	-90 58 21.745199	32 32 2.248800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	617	MSW03411-0617	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.839378	32.685053	-90 50 21.760799	32 41 6.190800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	618	MSW03411-0618	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.736845	32.654111	-90 44 12.641998	32 39 14.799600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	619	MSW03411-0619	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.711967	32.891408	-90 42 43.081198	32 53 29.068800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	620	MSW03411-0620	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.997806	33.070663	-90 59 52.101599	33 4 14.386800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	621	MSW03411-0621	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.021558	32.789124	-91 1 17.608799	32 47 20.846400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	622	MSW03411-0622	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.658118	33.085744	-90 39 29.224798	33 5 8.678400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	623	MSW03411-0623	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.761085	32.925370	-90 45 39.905998	32 55 31.332000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	624	MSW03411-0624	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.011073	32.571544	-91 0 39.862799	32 34 17.558400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	625	MSW03411-0625	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.996161	32.712795	-90 59 46.179599	32 42 46.062000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	626	MSW03411-0626	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.789120	32.980291	-90 47 20.831998	32 58 49.047600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	627	MSW03411-0627	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.012811	32.879823	-91 0 46.119599	32 52 47.362800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	628	MSW03411-0628	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.710084	33.151034	-90 42 36.302398	33 9 3.722400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	629	MSW03411-0629	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.884364	32.729384	-90 53 3.710399	32 43 45.782400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	630	MSW03411-0630	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.548717	33.100444	-90 32 55.381197	33 6 1.598400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	631	MSW03411-0631	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.720269	32.986955	-90 43 12.968398	32 59 13.038000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	632	MSW03411-0632	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.945249	32.638839	-90 56 42.896399	32 38 19.820400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	633	MSW03411-0633	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.811120	32.691042	-90 48 40.031999	32 41 27.751200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	634	MSW03411-0634	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.763321	32.668246	-90 45 47.955598	32 40 5.685600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	635	MSW03411-0635	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.633807	32.806074	-90 38 1.705198	32 48 21.866400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	636	MSW03411-0636	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.882398	32.523477	-90 52 56.632799	32 31 24.517200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	637	MSW03411-0637	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.045697	32.816373	-91 2 44.509200	32 48 58.942800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	638	MSW03411-0638	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.500305	33.035750	-90 30 1.097997	33 2 8.700000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	639	MSW03411-0639	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.844096	32.895004	-90 50 38.745599	32 53 42.014400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	640	MSW03411-0640	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.057342	32.661621	-91 3 26.431199	32 39 41.835600	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	641	MSW03411-0641	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.959148	32.730870	-90 57 32.932799	32 43 51.132000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	642	MSW03411-0642	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.909360	32.955759	-90 54 33.695999	32 57 20.732400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	643	MSW03411-0643	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.965630	32.891657	-90 57 56.267999	32 53 29.965200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	644	MSW03411-0644	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.785373	33.182304	-90 47 7.342799	33 10 56.294400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	645	MSW03411-0645	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.765404	32.805396	-90 45 55.454398	32 48 19.425600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	646	MSW03411-0646	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.803146	32.644599	-90 48 11.325599	32 38 40.556400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	647	MSW03411-0647	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.606877	32.873844	-90 36 24.757197	32 52 25.838400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	648	MSW03411-0648	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.829599	32.506633	-90 49 46.556399	32 30 23.878800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	649	MSW03411-0649	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.909492	32.676248	-90 54 34.171199	32 40 34.492800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	650	MSW03411-0650	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.803749	32.605577	-90 48 13.496399	32 36 20.077200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	651	MSW03411-0651	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.631269	32.849826	-90 37 52.568398	32 50 59.373600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	652	MSW03411-0652	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.826736	32.561164	-90 49 36.249599	32 33 40.190400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	653	MSW03411-0653	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.984777	32.793703	-90 59 5.197199	32 47 37.330800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	654	MSW03411-0654	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.540317	32.961030	-90 32 25.141197	32 57 39.708000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	655	MSW03411-0655	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.693198	32.916830	-90 41 35.512798	32 55 0.588000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	656	MSW03411-0656	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.021639	32.568073	-91 1 17.900399	32 34 5.062800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	657	MSW03411-0657	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.903570	32.627595	-90 54 12.851999	32 37 39.342000	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	658	MSW03411-0658	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.723892	32.688203	-90 43 26.011198	32 41 17.530800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	659	MSW03411-0659	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.741339	32.862753	-90 44 28.820398	32 51 45.910800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	660	MSW03411-0660	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.675415	33.228968	-90 40 31.493998	33 13 44.284800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	661	MSW03411-0661	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.031760	32.814555	-91 1 54.335999	32 48 52.398000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	662	MSW03411-0662	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.580724	33.106127	-90 34 50.606397	33 6 22.057200	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	663	MSW03411-0663	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.712318	32.912193	-90 42 44.344798	32 54 43.894800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	664	MSW03411-0664	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.972234	32.593689	-90 58 20.042399	32 35 37.280400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	665	MSW03411-0665	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.769290	32.677342	-90 46 9.443999	32 40 38.431200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	666	MSW03411-0666	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.773570	32.608899	-90 46 24.851999	32 36 32.036400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	667	MSW03411-0667	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.743499	32.756581	-90 44 36.596398	32 45 23.691600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	668	MSW03411-0668	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.024821	32.469720	-91 1 29.355599	32 28 10.992000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	669	MSW03411-0669	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.111499	32.811033	-91 6 41.396399	32 48 39.718800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	670	MSW03411-0670	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.638253	32.992331	-90 38 17.710798	32 59 32.391600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	671	MSW03411-0671	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.674487	33.013180	-90 40 28.153198	33 0 47.448000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	672	MSW03411-0672	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.035433	32.765480	-91 2 7.558799	32 45 55.728000	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	673	MSW03411-0673	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.942943	32.709599	-90 56 34.594799	32 42 34.556400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	674	MSW03411-0674	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.873409	32.995091	-90 52 24.272399	32 59 42.327600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	675	MSW03411-0675	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.979288	32.994971	-90 58 45.436799	32 59 41.895600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	676	MSW03411-0676	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.705816	33.191851	-90 42 20.937598	33 11 30.663600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	677	MSW03411-0677	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.850955	32.848636	-90 51 3.437999	32 50 55.089600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	678	MSW03411-0678	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.756177	32.623799	-90 45 22.237198	32 37 25.676400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	679	MSW03411-0679	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.622005	32.953408	-90 37 19.217998	32 57 12.268800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	680	MSW03411-0680	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.952674	32.550970	-90 57 9.626399	32 33 3.492000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	681	MSW03411-0681	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.875521	32.682416	-90 52 31.875599	32 40 56.697600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	682	MSW03411-0682	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.811853	32.599440	-90 48 42.670799	32 35 57.984000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	683	MSW03411-0683	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.693262	32.899797	-90 41 35.743198	32 53 59.269200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	684	MSW03411-0684	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.926638	32.451486	-90 55 35.896799	32 27 5.349600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	685	MSW03411-0685	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.022415	32.785657	-91 1 20.693999	32 47 8.365200	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	686	MSW03411-0686	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.624249	33.053276	-90 37 27.296398	33 3 11.793600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	687	MSW03411-0687	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.720392	32.968814	-90 43 13.411198	32 58 7.730400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	688	MSW03411-0688	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.008598	32.571115	-91 0 30.952799	32 34 16.014000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	689	MSW03411-0689	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.890800	32.665662	-90 53 26.879999	32 39 56.383200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	690	MSW03411-0690	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.757341	32.990382	-90 45 26.427599	32 59 25.375200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	691	MSW03411-0691	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.952098	32.873378	-90 57 7.552799	32 52 24.160800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	692	MSW03411-0692	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.741159	33.138404	-90 44 28.172399	33 8 18.254400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	693	MSW03411-0693	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.018295	32.827904	-91 1 5.861999	32 49 40.454400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	694	MSW03411-0694	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.654545	33.103587	-90 39 16.361998	33 6 12.913200	NonWet	0	0	0	in	in	out	out	in
MSW03411-	695	MSW03411-0695	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.695625	32.963692	-90 41 44.249998	32 57 49.291200	EPAnot	0	3	0	in	out	out	out	out
MSW03411-	696	MSW03411-0696	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.990686	32.578741	-90 59 26.469599	32 34 43.467600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	697	MSW03411-0697	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.787900	32.674638	-90 47 16.439999	32 40 28.696800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	698	MSW03411-0698	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.758006	32.655262	-90 45 28.821599	32 39 18.943200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	699	MSW03411-0699	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.634000	32.818685	-90 38 2.399998	32 49 7.266000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	700	MSW03411-0700	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.842976	32.540186	-90 50 34.713599	32 32 24.669600	EPAnot	2	3	0	in	out	out	out	out
MSW03411-	701	MSW03411-0701	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.064725	32.815797	-91 3 53.010000	32 48 56.869200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	702	MSW03411-0702	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.599656	33.018420	-90 35 58.761597	33 1 6.312000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	703	MSW03411-0703	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.761894	32.896966	-90 45 42.818399	32 53 49.077600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	704	MSW03411-0704	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.031556	32.665410	-91 1 53.601600	32 39 55.476000	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	705	MSW03411-0705	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.010780	32.682562	-91 0 38.807999	32 40 57.223200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	706	MSW03411-0706	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.904860	32.977320	-90 54 17.495999	32 58 38.352000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	707	MSW03411-0707	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.018703	32.907122	-91 1 7.330799	32 54 25.639200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	708	MSW03411-0708	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.793468	33.134865	-90 47 36.484799	33 8 5.514000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	709	MSW03411-0709	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.785801	32.843700	-90 47 8.883599	32 50 37.320000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	710	MSW03411-0710	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.807333	32.623575	-90 48 26.398799	32 37 24.870000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	711	MSW03411-0711	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.599933	32.873334	-90 35 59.758798	32 52 24.002400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	712	MSW03411-0712	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.879373	32.480440	-90 52 45.742799	32 28 49.584000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	713	MSW03411-0713	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.751473	32.734152	-90 45 5.302798	32 44 2.947200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	714	MSW03411-0714	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.758117	32.662773	-90 45 29.221199	32 39 45.982800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	715	MSW03411-0715	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.644559	32.847157	-90 38 40.412398	32 50 49.765200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	716	MSW03411-0716	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.861384	32.571243	-90 51 40.982399	32 34 16.474800	NonWet	0	0	0	out	out	out	in	in
MSW03411-	717	MSW03411-0717	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.970547	32.834597	-90 58 13.969199	32 50 4.549200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	718	MSW03411-0718	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.541928	33.016640	-90 32 30.940797	33 0 59.904000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	719	MSW03411-0719	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.689491	32.931485	-90 41 22.167598	32 55 53.346000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	720	MSW03411-0720	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.034793	32.548939	-91 2 5.254800	32 32 56.180400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	721	MSW03411-0721	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.910208	32.639820	-90 54 36.748799	32 38 23.352000	EPAnot	0	3	0	in	out	out	in	in
MSW03411-	722	MSW03411-0722	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.715514	32.692283	-90 42 55.850398	32 41 32.218800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	723	MSW03411-0723	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.745223	32.893922	-90 44 42.802799	32 53 38.119200	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	724	MSW03411-0724	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.960364	33.122106	-90 57 37.310399	33 7 19.581600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	725	MSW03411-0725	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.978380	32.758931	-90 58 42.167999	32 45 32.151600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	726	MSW03411-0726	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.587085	33.107188	-90 35 13.505998	33 6 25.876800	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	727	MSW03411-0727	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.730222	32.924172	-90 43 48.799198	32 55 27.019200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	728	MSW03411-0728	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.000582	32.586901	-91 0 2.095199	32 35 12.843600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	729	MSW03411-0729	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.748281	32.673798	-90 44 53.811598	32 40 25.672800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	730	MSW03411-0730	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.792498	32.606078	-90 47 32.992799	32 36 21.880800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	731	MSW03411-0731	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.720453	32.795801	-90 43 13.630798	32 47 44.883600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	732	MSW03411-0732	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.995843	32.539009	-90 59 45.034799	32 32 20.432400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	733	MSW03411-0733	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.056960	32.832295	-91 3 25.055999	32 49 56.262000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	734	MSW03411-0734	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.594987	33.029753	-90 35 41.953198	33 1 47.110800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	735	MSW03411-0735	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.775721	33.060399	-90 46 32.595599	33 3 37.436400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	736	MSW03411-0736	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.024775	32.749826	-91 1 29.189999	32 44 59.373600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	737	MSW03411-0737	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.932040	32.680469	-90 55 55.343999	32 40 49.688400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	738	MSW03411-0738	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.802605	33.122166	-90 48 9.377999	33 7 19.797600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	739	MSW03411-0739	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.095970	32.796087	-91 5 45.492000	32 47 45.913200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	740	MSW03411-0740	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.750439	33.200830	-90 45 1.580398	33 12 2.988000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	741	MSW03411-0741	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.919456	32.877386	-90 55 10.041599	32 52 38.589600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	742	MSW03411-0742	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.751485	32.607851	-90 45 5.345998	32 36 28.263600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	743	MSW03411-0743	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.643991	32.933583	-90 38 38.367598	32 56 0.898800	EPAnot	0	3	0	out	out	out	in	in
MSW03411-	744	MSW03411-0744	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.975445	32.534696	-90 58 31.601999	32 32 4.905600	EPAnot	2	0	0	in	out	out	in	in

MSW03411-	745	MSW03411-0745	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.848513	32.667855	-90 50 54.646799	32 40 4.278000	EPAnot	2	3	0	in	in	out	in	in
MSW03411-	746	MSW03411-0746	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.720437	32.673476	-90 43 13.573198	32 40 24.513600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	747	MSW03411-0747	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.737967	32.872819	-90 44 16.681198	32 52 22.148400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	748	MSW03411-0748	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.980739	33.052632	-90 58 50.660399	33 3 9.475200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	749	MSW03411-0749	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.039200	32.793406	-91 2 21.120000	32 47 36.261600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	750	MSW03411-0750	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.666762	33.072167	-90 40 0.343198	33 4 19.801200	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	751	MSW03411-0751	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.740005	32.937648	-90 44 24.017999	32 56 15.532800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	752	MSW03411-0752	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.943847	32.571967	-90 56 37.849199	32 34 19.081200	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	753	MSW03411-0753	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.985326	32.709905	-90 59 7.173599	32 42 35.658000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	754	MSW03411-0754	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.902455	32.918371	-90 54 8.837999	32 55 6.135600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	755	MSW03411-0755	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.013448	32.837991	-91 0 48.412799	32 50 16.767600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	756	MSW03411-0756	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.758781	33.177561	-90 45 31.611599	33 10 39.219600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	757	MSW03411-0757	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.841941	32.793454	-90 50 30.987599	32 47 36.434400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	758	MSW03411-0758	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.559295	33.177846	-90 33 33.461997	33 10 40.245600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	759	MSW03411-0759	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.576384	32.875378	-90 34 34.982397	32 52 31.360800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	760	MSW03411-0760	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.928388	32.617968	-90 55 42.196799	32 37 4.684800	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	761	MSW03411-0761	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.737937	32.729891	-90 44 16.573198	32 43 47.607600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	762	MSW03411-0762	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.761034	32.644759	-90 45 39.722399	32 38 41.132400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	763	MSW03411-0763	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.610969	32.854117	-90 36 39.488398	32 51 14.821200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	764	MSW03411-0764	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.857479	32.602143	-90 51 26.924399	32 36 7.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	765	MSW03411-0765	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.053048	32.822568	-91 3 10.972799	32 49 21.244800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	766	MSW03411-0766	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.513357	33.041511	-90 30 48.085197	33 2 29.439600	NonWet	0	0	0	out	out	out	in	in
MSW03411-	767	MSW03411-0767	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.708170	32.929388	-90 42 29.411998	32 55 45.796800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	768	MSW03411-0768	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.051848	32.678665	-91 3 6.652799	32 40 43.194000	EPAnot	0	3	0	in	in	out	out	out
MSW03411-	769	MSW03411-0769	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.969419	32.723362	-90 58 9.908399	32 43 24.103200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	770	MSW03411-0770	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.927413	32.965122	-90 55 38.686799	32 57 54.439200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	771	MSW03411-0771	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.005263	32.944159	-91 0 18.946799	32 56 38.972400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	772	MSW03411-0772	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.809183	33.152869	-90 48 33.058799	33 9 10.328400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	773	MSW03411-0773	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.778494	32.813832	-90 46 42.578399	32 48 49.795200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	774	MSW03411-0774	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.791488	32.654161	-90 47 29.356799	32 39 14.979600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	775	MSW03411-0775	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.568852	32.911001	-90 34 7.867197	32 54 39.603600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	776	MSW03411-0776	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.844826	32.514985	-90 50 41.373599	32 30 53.946000	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	777	MSW03411-0777	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.889339	32.681391	-90 53 21.620399	32 40 53.007600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	778	MSW03411-0778	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.798994	32.620452	-90 47 56.378399	32 37 13.627200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	779	MSW03411-0779	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.621209	32.853457	-90 37 16.352398	32 51 12.445200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	780	MSW03411-0780	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.982725	32.459410	-90 58 57.809999	32 27 33.876000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	781	MSW03411-0781	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.030064	32.769318	-91 1 48.230399	32 46 9.544800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	782	MSW03411-0782	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.561666	32.943580	-90 33 41.997597	32 56 36.888000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	783	MSW03411-0783	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.676007	32.916310	-90 40 33.625198	32 54 58.716000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	784	MSW03411-0784	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.012947	32.554412	-91 0 46.609199	32 33 15.883200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	785	MSW03411-0785	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.900459	32.609695	-90 54 1.652399	32 36 34.902000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	786	MSW03411-0786	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.725963	32.697978	-90 43 33.466798	32 41 52.720800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	787	MSW03411-0787	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.034161	32.877465	-91 2 2.979599	32 52 38.874000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	788	MSW03411-0788	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.617263	33.212993	-90 37 2.146798	33 12 46.774800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	789	MSW03411-0789	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.022500	32.808741	-91 1 20.999999	32 48 31.467600	EPAnot	2	0	0	out	out	out	in	in
MSW03411-	790	MSW03411-0790	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.621735	33.138301	-90 37 18.245998	33 8 17.883600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	791	MSW03411-0791	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.739637	32.910932	-90 44 22.693198	32 54 39.355200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	792	MSW03411-0792	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.957479	32.591879	-90 57 26.924399	32 35 30.764400	EPAnot	0	3	0	in	out	out	in	in
MSW03411-	793	MSW03411-0793	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.747346	32.696399	-90 44 50.445599	32 41 47.036400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	794	MSW03411-0794	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.790420	32.622373	-90 47 25.511999	32 37 20.542800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	795	MSW03411-0795	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.714155	32.754432	-90 42 50.957998	32 45 15.955200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	796	MSW03411-0796	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.058598	32.477013	-91 3 30.952799	32 28 37.246800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	797	MSW03411-0797	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.103366	32.823556	-91 6 12.117600	32 49 24.801600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	798	MSW03411-0798	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.629353	32.964978	-90 37 45.670798	32 57 53.920800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	799	MSW03411-0799	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.720720	33.054750	-90 43 14.591998	33 3 17.100000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	800	MSW03411-0800	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.040872	32.695905	-91 2 27.139199	32 41 45.258000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	801	MSW03411-0801	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.751069	33.219145	-90 45 3.848399	33 13 8.922000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	802	MSW03411-0802	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.854264	32.882412	-90 51 15.350399	32 52 56.683200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	803	MSW03411-0803	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.633666	33.023782	-90 38 1.197598	33 1 25.615200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	804	MSW03411-0804	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.615165	32.816597	-90 36 54.593998	32 48 59.749200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	805	MSW03411-0805	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.741057	33.105626	-90 44 27.805198	33 6 20.253600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	806	MSW03411-0806	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.776122	32.999449	-90 46 34.039199	32 59 58.016400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	807	MSW03411-0807	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.907368	32.807157	-90 54 26.524799	32 48 25.765200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	808	MSW03411-0808	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.001767	32.987145	-91 0 6.361199	32 59 13.722000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	809	MSW03411-0809	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.654674	33.227605	-90 39 16.826398	33 13 39.378000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	810	MSW03411-0810	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.750527	32.998970	-90 45 1.897199	32 59 56.292000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	811	MSW03411-0811	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.579368	33.175902	-90 34 45.724798	33 10 33.247200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	812	MSW03411-0812	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.625433	32.870581	-90 37 31.558798	32 52 14.091600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	813	MSW03411-0813	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.645731	33.084743	-90 38 44.631598	33 5 5.074800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	814	MSW03411-0814	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.693884	32.973342	-90 41 37.982398	32 58 24.031200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	815	MSW03411-0815	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.940417	32.743490	-90 56 25.501199	32 44 36.564000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	816	MSW03411-0816	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.835868	32.521779	-90 50 9.124799	32 31 18.404400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	817	MSW03411-0817	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.662281	33.146973	-90 39 44.211598	33 8 49.102800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	818	MSW03411-0818	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.851834	33.099107	-90 51 6.602399	33 5 56.785200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	819	MSW03411-0819	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.529335	32.975773	-90 31 45.605997	32 58 32.782800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	820	MSW03411-0820	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.694156	32.765865	-90 41 38.961598	32 45 57.114000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	821	MSW03411-0821	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.822670	32.634940	-90 49 21.611999	32 38 5.784000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	822	MSW03411-0822	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.946584	32.951234	-90 56 47.702399	32 57 4.442400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	823	MSW03411-0823	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.005325	32.791688	-91 0 19.169999	32 47 30.076800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	824	MSW03411-0824	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.991765	32.527508	-90 59 30.353999	32 31 39.028800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	825	MSW03411-0825	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.797275	33.198498	-90 47 50.189999	33 11 54.592800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	826	MSW03411-0826	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.821376	32.951544	-90 49 16.953599	32 57 5.558400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	827	MSW03411-0827	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.919654	32.694192	-90 55 10.754399	32 41 39.091200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	828	MSW03411-0828	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.987087	32.935509	-90 59 13.513199	32 56 7.832400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	829	MSW03411-0829	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.591050	33.045206	-90 35 27.779998	33 2 42.741600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	830	MSW03411-0830	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.671592	32.852577	-90 40 17.731198	32 51 9.277200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	831	MSW03411-0831	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.961868	32.747124	-90 57 42.724799	32 44 49.646400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	832	MSW03411-0832	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.033456	32.496596	-91 2 0.441600	32 29 47.745600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	833	MSW03411-0833	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.658305	33.229689	-90 39 29.897998	33 13 46.880400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	834	MSW03411-0834	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.798303	33.044121	-90 47 53.890799	33 2 38.835600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	835	MSW03411-0835	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.633087	32.983217	-90 37 59.113198	32 58 59.581200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	836	MSW03411-0836	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.715266	32.744837	-90 42 54.957598	32 44 41.413200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	837	MSW03411-0837	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.784008	33.153119	-90 47 2.428799	33 9 11.228400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	838	MSW03411-0838	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.909420	32.974159	-90 54 33.911999	32 58 26.972400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	839	MSW03411-0839	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.006409	32.755269	-91 0 23.072399	32 45 18.968400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	840	MSW03411-0840	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.050297	32.785489	-91 3 1.069199	32 47 7.760400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	841	MSW03411-0841	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.813560	33.214101	-90 48 48.815999	33 12 50.763600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	842	MSW03411-0842	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.742319	33.058540	-90 44 32.348398	33 3 30.744000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	843	MSW03411-0843	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.881485	32.631199	-90 52 53.345999	32 37 52.316400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	844	MSW03411-0844	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.039656	32.871130	-91 2 22.761599	32 52 16.068000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	845	MSW03411-0845	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.584730	33.077869	-90 35 5.027997	33 4 40.328400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	846	MSW03411-0846	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.727543	32.851185	-90 43 39.154798	32 51 4.266000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	847	MSW03411-0847	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.001430	32.663892	-91 0 5.147999	32 39 50.011200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	848	MSW03411-0848	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.035833	32.535879	-91 2 8.998800	32 32 9.164400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	849	MSW03411-0849	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.645900	33.197163	-90 38 45.239998	33 11 49.786800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	850	MSW03411-0850	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.760754	33.025773	-90 45 38.714399	33 1 32.782800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	851	MSW03411-0851	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.546094	33.108834	-90 32 45.938397	33 6 31.802400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	852	MSW03411-0852	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.654019	32.771740	-90 39 14.468398	32 46 18.264000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	853	MSW03411-0853	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.805700	32.541728	-90 48 20.519999	32 32 30.220800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	854	MSW03411-0854	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.935390	32.985374	-90 56 7.403999	32 59 7.346400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	855	MSW03411-0855	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.990851	32.810901	-90 59 27.063599	32 48 39.243600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	856	MSW03411-0856	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.848686	32.563123	-90 50 55.269599	32 33 47.242800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	857	MSW03411-0857	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.707024	33.173568	-90 42 25.286398	33 10 24.844800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	858	MSW03411-0858	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.868349	32.980528	-90 52 6.056399	32 58 49.900800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	859	MSW03411-0859	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.861994	32.867223	-90 51 43.178399	32 52 2.002800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	860	MSW03411-0860	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.022664	32.902103	-91 1 21.590399	32 54 7.570800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	861	MSW03411-0861	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.666738	32.990902	-90 40 0.256798	32 59 27.247200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	862	MSW03411-0862	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.702952	32.835496	-90 42 10.627198	32 50 7.785600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	863	MSW03411-0863	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.005393	32.683646	-91 0 19.414799	32 41 1.125600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	864	MSW03411-0864	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.843953	32.521067	-90 50 38.230799	32 31 15.841200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	865	MSW03411-0865	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.727914	33.209918	-90 43 40.490398	33 12 35.704800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	866	MSW03411-0866	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.803319	32.911743	-90 48 11.948399	32 54 42.274800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	867	MSW03411-0867	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.587140	33.004351	-90 35 13.703997	33 0 15.663600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	868	MSW03411-0868	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.705689	32.806345	-90 42 20.480398	32 48 22.842000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	869	MSW03411-0869	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.687322	33.136862	-90 41 14.359198	33 8 12.703200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	870	MSW03411-0870	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.919872	32.937643	-90 55 11.539199	32 56 15.514800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	871	MSW03411-0871	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.740937	32.821382	-90 44 27.373198	32 49 16.975200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	872	MSW03411-0872	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.112143	32.798496	-91 6 43.714799	32 47 54.585600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	873	MSW03411-0873	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.659777	33.218890	-90 39 35.197198	33 13 8.004000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	874	MSW03411-0874	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.715598	33.063546	-90 42 56.152798	33 3 48.765600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	875	MSW03411-0875	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.854092	32.642396	-90 51 14.731199	32 38 32.625600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	876	MSW03411-0876	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.665492	32.892086	-90 39 55.771198	32 53 31.509600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	877	MSW03411-0877	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.589215	33.087949	-90 35 21.173998	33 5 16.616400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	878	MSW03411-0878	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.747404	32.990517	-90 44 50.654399	32 59 25.861200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	879	MSW03411-0879	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.950887	32.681255	-90 57 3.193199	32 40 52.518000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	880	MSW03411-0880	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.955296	32.636078	-90 57 19.065599	32 38 9.880800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	881	MSW03411-0881	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.549794	33.198000	-90 32 59.258397	33 11 52.800000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	882	MSW03411-0882	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.023738	32.721333	-91 1 25.456799	32 43 16.798800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	883	MSW03411-0883	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.649595	32.989912	-90 38 58.541998	32 59 23.683200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	884	MSW03411-0884	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.706519	32.821502	-90 42 23.468398	32 49 17.407200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	885	MSW03411-0885	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.715114	33.170708	-90 42 54.410398	33 10 14.548800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	886	MSW03411-0886	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.806952	33.002615	-90 48 25.027199	33 0 9.414000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	887	MSW03411-0887	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.874150	32.886162	-90 52 26.939999	32 53 10.183200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	888	MSW03411-0888	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.004222	32.838637	-91 0 15.199199	32 50 19.093200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	889	MSW03411-0889	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.639331	33.189348	-90 38 21.591598	33 11 21.652800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	890	MSW03411-0890	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.780887	33.022173	-90 46 51.193199	33 1 19.822800	NonWet	0	0	0	in	in	out	out	in
MSW03411-	891	MSW03411-0891	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.539296	33.122842	-90 32 21.465597	33 7 22.231200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	892	MSW03411-0892	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.671909	32.783851	-90 40 18.872398	32 47 1.863600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	893	MSW03411-0893	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.654241	33.134609	-90 39 15.267598	33 8 4.592400	NonWet	0	0	0	in	in	out	out	in

MSW03411-	894	MSW03411-0894	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.929521	33.013838	-90 55 46.275599	33 0 49.816800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	895	MSW03411-0895	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.981850	32.834969	-90 58 54.659999	32 50 5.888400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	896	MSW03411-0896	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.858941	32.576738	-90 51 32.187599	32 34 36.256800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	897	MSW03411-0897	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.803106	33.222253	-90 48 11.181599	33 13 20.110800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	898	MSW03411-0898	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.852762	32.918857	-90 51 9.943199	32 55 7.885200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	899	MSW03411-0899	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.622034	33.019059	-90 37 19.322398	33 1 8.612400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	900	MSW03411-0900	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.671421	32.792213	-90 40 17.115598	32 47 31.966800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	901	MSW03411-0901	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.782488	33.167994	-90 46 56.956799	33 10 4.778400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	902	MSW03411-0902	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.920005	32.892191	-90 55 12.017999	32 53 31.887600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	903	MSW03411-0903	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.003302	32.802143	-91 0 11.887199	32 48 7.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	904	MSW03411-0904	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.030039	32.730743	-91 1 48.140399	32 43 50.674800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	905	MSW03411-0905	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.819275	33.239738	-90 49 9.389999	33 14 23.056800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	906	MSW03411-0906	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.721767	33.043029	-90 43 18.361198	33 2 34.904400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	907	MSW03411-0907	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.844632	32.655224	-90 50 40.675199	32 39 18.806400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	908	MSW03411-0908	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.650781	32.954911	-90 39 2.811598	32 57 17.679600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	909	MSW03411-0909	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.625261	33.133598	-90 37 30.939598	33 8 0.952800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	910	MSW03411-0910	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.666967	32.950005	-90 40 1.081198	32 57 0.018000	NonWet	0	0	0	in	out	in	out	out
MSW03411-	911	MSW03411-0911	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.990568	32.654274	-90 59 26.044799	32 39 15.386400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	912	MSW03411-0912	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.034689	32.551760	-91 2 4.880399	32 33 6.408000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	913	MSW03411-0913	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.760937	33.229258	-90 45 39.373199	33 13 45.328800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	914	MSW03411-0914	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.796544	32.951406	-90 47 47.558399	32 57 5.061600	NonWet	0	0	0	out	out	out	in	out
MSW03411-	915	MSW03411-0915	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.625506	33.046511	-90 37 31.821598	33 2 47.439600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	916	MSW03411-0916	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.660455	32.816843	-90 39 37.637998	32 49 0.634800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	917	MSW03411-0917	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.716354	33.109763	-90 42 58.874398	33 6 35.146800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	918	MSW03411-0918	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.810756	33.017011	-90 48 38.721599	33 1 1.239600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	919	MSW03411-0919	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.944876	32.835390	-90 56 41.553599	32 50 7.404000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	920	MSW03411-0920	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.044825	32.858345	-91 2 41.370000	32 51 30.042000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	921	MSW03411-0921	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.701177	33.176782	-90 42 4.237198	33 10 36.415200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	922	MSW03411-0922	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.718787	33.015318	-90 43 7.633198	33 0 55.144800	NonWet	0	0	0	in	in	out	out	in
MSW03411-	923	MSW03411-0923	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.543786	33.146774	-90 32 37.629597	33 8 48.386400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	924	MSW03411-0924	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.605256	32.903798	-90 36 18.921598	32 54 13.672800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	925	MSW03411-0925	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.633378	33.099126	-90 38 0.160798	33 5 56.853600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	926	MSW03411-0926	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.754026	32.956860	-90 45 14.493598	32 57 24.696000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	927	MSW03411-0927	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.920932	32.750815	-90 55 15.355199	32 45 2.934000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	928	MSW03411-0928	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.987033	32.626155	-90 59 13.318799	32 37 34.158000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	929	MSW03411-0929	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.618989	33.169669	-90 37 8.360398	33 10 10.808400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	930	MSW03411-0930	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.797872	33.100301	-90 47 52.339199	33 6 1.083600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	931	MSW03411-0931	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.540596	32.981291	-90 32 26.145597	32 58 52.647600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	932	MSW03411-0932	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.676700	32.760081	-90 40 36.119998	32 45 36.291600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	933	MSW03411-0933	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.876382	33.102329	-90 52 34.975199	33 6 8.384400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	934	MSW03411-0934	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.959695	32.915236	-90 57 34.901999	32 54 54.849600	NonWet	0	0	0	out	out	out	in	in
MSW03411-	935	MSW03411-0935	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.944309	32.820906	-90 56 39.512399	32 49 15.261600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	936	MSW03411-0936	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.013989	32.666607	-91 0 50.360400	32 39 59.785200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	937	MSW03411-0937	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.847723	33.133195	-90 50 51.802799	33 7 59.502000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	938	MSW03411-0938	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.684248	33.028631	-90 41 3.292798	33 1 43.071600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	939	MSW03411-0939	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.905828	32.674825	-90 54 20.980799	32 40 29.370000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	940	MSW03411-0940	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.997931	32.929273	-90 59 52.551599	32 55 45.382800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	941	MSW03411-0941	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.555043	33.087565	-90 33 18.154797	33 5 15.234000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	942	MSW03411-0942	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.678634	32.866369	-90 40 43.082398	32 51 58.928400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	943	MSW03411-0943	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.983278	32.725089	-90 58 59.800799	32 43 30.320400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	944	MSW03411-0944	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.039348	32.566610	-91 2 21.652799	32 33 59.796000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	945	MSW03411-0945	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.760076	33.181684	-90 45 36.273598	33 10 54.062400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	946	MSW03411-0946	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.838649	32.888437	-90 50 19.136399	32 53 18.373200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	947	MSW03411-0947	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.649801	33.030744	-90 38 59.283598	33 1 50.678400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	948	MSW03411-0948	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.677406	32.850744	-90 40 38.661598	32 51 2.678400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	949	MSW03411-0949	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.757116	33.105399	-90 45 25.617599	33 6 19.436400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	950	MSW03411-0950	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.782772	33.010979	-90 46 57.979199	33 0 39.524400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	951	MSW03411-0951	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.910951	32.803227	-90 54 39.423599	32 48 11.617200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	952	MSW03411-0952	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.000820	32.939324	-91 0 2.951999	32 56 21.566400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	953	MSW03411-0953	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.615893	33.226475	-90 36 57.214798	33 13 35.310000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	954	MSW03411-0954	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.697474	33.041855	-90 41 50.906398	33 2 30.678000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	955	MSW03411-0955	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.593567	33.181734	-90 35 36.841197	33 10 54.242400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	956	MSW03411-0956	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.578754	32.875555	-90 34 43.514398	32 52 31.998000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	957	MSW03411-0957	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.682400	33.077432	-90 40 56.639998	33 4 38.755200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	958	MSW03411-0958	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.704514	32.973150	-90 42 16.250398	32 58 23.340000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	959	MSW03411-0959	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.926833	32.787954	-90 55 36.598799	32 47 16.634400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	960	MSW03411-0960	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.849029	32.550436	-90 50 56.504399	32 33 1.569600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	961	MSW03411-0961	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.633045	33.173754	-90 37 58.961998	33 10 25.514400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	962	MSW03411-0962	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.780284	33.083208	-90 46 49.022399	33 4 59.548800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	963	MSW03411-0963	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.560866	32.956944	-90 33 39.117597	32 57 24.998400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	964	MSW03411-0964	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.684530	32.720604	-90 41 4.307998	32 43 14.174400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	965	MSW03411-0965	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.792236	33.136648	-90 47 32.049599	33 8 11.932800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	966	MSW03411-0966	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.938094	32.913568	-90 56 17.138399	32 54 48.844800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	967	MSW03411-0967	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.959941	32.812255	-90 57 35.787599	32 48 44.118000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	968	MSW03411-0968	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.035737	32.709158	-91 2 8.653199	32 42 32.968800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	969	MSW03411-0969	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.787461	33.147660	-90 47 14.859599	33 8 51.576000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	970	MSW03411-0970	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.706063	33.030370	-90 42 21.826798	33 1 49.332000	EPAnot	2	0	0	out	in	out	out	out
MSW03411-	971	MSW03411-0971	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.856946	32.653546	-90 51 25.005599	32 39 12.765600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	972	MSW03411-0972	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.976703	32.892712	-90 58 36.130799	32 53 33.763200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	973	MSW03411-0973	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.513251	33.054160	-90 30 47.703597	33 3 14.976000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	974	MSW03411-0974	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.686490	32.893525	-90 41 11.363998	32 53 36.690000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	975	MSW03411-0975	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.971282	32.687695	-90 58 16.615199	32 41 15.702000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	976	MSW03411-0976	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.039965	32.541433	-91 2 23.874000	32 32 29.158800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	977	MSW03411-0977	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.776249	33.245015	-90 46 34.496398	33 14 42.054000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	978	MSW03411-0978	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.851932	32.927908	-90 51 6.955199	32 55 40.468800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	979	MSW03411-0979	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.607332	33.002571	-90 36 26.395198	33 0 9.255600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	980	MSW03411-0980	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.704464	32.791851	-90 42 16.070398	32 47 30.663600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	981	MSW03411-0981	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.700213	33.150486	-90 42 0.766798	33 9 1.749600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	982	MSW03411-0982	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.921528	32.912046	-90 55 17.500799	32 54 43.365600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	983	MSW03411-0983	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.755988	32.825766	-90 45 21.556798	32 49 32.757600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	984	MSW03411-0984	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.052862	32.792891	-91 3 10.303200	32 47 34.407600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	985	MSW03411-0985	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.839995	33.234998	-90 50 23.981999	33 14 5.992800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	986	MSW03411-0986	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.731032	33.061239	-90 43 51.715198	33 3 40.460400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	987	MSW03411-0987	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.848873	32.620875	-90 50 55.942799	32 37 15.150000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	988	MSW03411-0988	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.621583	32.940397	-90 37 17.698798	32 56 25.429200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	989	MSW03411-0989	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.608293	33.097956	-90 36 29.854798	33 5 52.641600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	990	MSW03411-0990	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.749530	32.962857	-90 44 58.307999	32 57 46.285200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	991	MSW03411-0991	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.944933	32.668140	-90 56 41.758799	32 40 5.304000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	992	MSW03411-0992	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.927405	32.634822	-90 55 38.657999	32 38 5.359200	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	993	MSW03411-0993	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.589190	33.196397	-90 35 21.083997	33 11 47.029200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	994	MSW03411-0994	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.815276	33.106252	-90 48 54.993599	33 6 22.507200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	995	MSW03411-0995	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.567329	33.103280	-90 34 2.384397	33 6 11.808000	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	996	MSW03411-0996	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.721263	32.774102	-90 43 16.546798	32 46 26.767200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	997	MSW03411-0997	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.691020	32.716317	-90 41 27.671998	32 42 58.741200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	998	MSW03411-0998	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.883922	32.998854	-90 53 2.119199	32 59 55.874400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	999	MSW03411-0999	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.951095	32.777742	-90 57 3.941999	32 46 39.871200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1000	MSW03411-1000	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.836122	32.587365	-90 50 10.039199	32 35 14.514000	NonWet	0	0	0	out	out	in	out	out
MSW03411-	1001	MSW03411-1001	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.738388	33.154559	-90 44 18.196799	33 9 16.412400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1002	MSW03411-1002	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.771686	32.980663	-90 46 18.069599	32 58 50.386800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1003	MSW03411-1003	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.921504	32.872665	-90 55 17.414399	32 52 21.594000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1004	MSW03411-1004	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.958283	32.895595	-90 57 29.818799	32 53 44.142000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1005	MSW03411-1005	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.497472	33.014223	-90 29 50.899197	33 0 51.202800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1006	MSW03411-1006	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.719262	32.861395	-90 43 9.343198	32 51 41.022000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1007	MSW03411-1007	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.930075	32.693088	-90 55 48.269999	32 41 35.116800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1008	MSW03411-1008	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.985826	32.464936	-90 59 8.973599	32 27 53.769600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1009	MSW03411-1009	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.772446	33.189846	-90 46 20.805599	33 11 23.445600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1010	MSW03411-1010	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.817957	32.862097	-90 49 4.645199	32 51 43.549200	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1011	MSW03411-1011	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.657354	33.048071	-90 39 26.474398	33 2 53.055600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1012	MSW03411-1012	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.669540	32.830749	-90 40 10.343998	32 49 50.696400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1013	MSW03411-1013	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.742242	33.176942	-90 44 32.071199	33 10 36.981200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1014	MSW03411-1014	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.791261	33.005701	-90 47 28.539599	33 0 20.523600	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1015	MSW03411-1015	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.890194	32.855124	-90 53 24.698399	32 51 18.446400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1016	MSW03411-1016	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.007611	32.852672	-91 0 27.399599	32 51 9.619200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1017	MSW03411-1017	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.652093	33.176445	-90 39 7.534798	33 10 35.202000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1018	MSW03411-1018	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.690148	33.041849	-90 41 24.532798	33 2 30.656400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1019	MSW03411-1019	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.589091	33.163874	-90 35 20.727597	33 9 49.946400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1020	MSW03411-1020	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.574592	32.893809	-90 34 28.531197	32 53 37.712400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1021	MSW03411-1021	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.684599	33.090793	-90 41 4.556398	33 5 26.854800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1022	MSW03411-1022	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.732625	32.960758	-90 43 57.449998	32 57 38.728800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1023	MSW03411-1023	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.933935	32.768450	-90 56 2.165999	32 46 6.420000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1024	MSW03411-1024	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.865226	32.607259	-90 51 54.813599	32 36 26.132400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1025	MSW03411-1025	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.629625	33.161667	-90 37 46.649998	33 9 42.001200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1026	MSW03411-1026	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.807719	33.047750	-90 48 27.788399	33 2 51.900000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1027	MSW03411-1027	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.644823	32.966024	-90 38 41.362798	32 57 57.686400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1028	MSW03411-1028	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.712148	32.721320	-90 42 43.732798	32 43 16.752000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1029	MSW03411-1029	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.768911	33.131770	-90 46 8.079598	33 7 54.372000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1030	MSW03411-1030	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.860105	32.916904	-90 51 36.377999	32 55 0.854400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1031	MSW03411-1031	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.983885	32.766066	-90 59 1.985999	32 45 57.837600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1032	MSW03411-1032	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.069358	32.787770	-91 4 9.688799	32 47 15.972000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1033	MSW03411-1033	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.809978	33.154759	-90 48 35.920799	33 9 17.132400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	1034	MSW03411-1034	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.755608	33.076315	-90 45 20.188798	33 4 34.734000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1035	MSW03411-1035	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.876127	32.687815	-90 52 34.057199	32 41 16.134000	NonWet	0	0	0	in	in	in	in	in
MSW03411-	1036	MSW03411-1036	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.054295	32.871276	-91 3 15.461999	32 52 16.593600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1037	MSW03411-1037	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.528208	33.101747	-90 31 41.548797	33 6 6.289200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1038	MSW03411-1038	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.693020	32.881791	-90 41 34.871998	32 52 54.447600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1039	MSW03411-1039	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.991016	32.684492	-90 59 27.657599	32 41 4.171200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1040	MSW03411-1040	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.009103	32.524575	-91 0 32.770799	32 31 28.470000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1041	MSW03411-1041	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.698715	33.219679	-90 41 55.373998	33 13 10.844400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1042	MSW03411-1042	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.809303	32.926138	-90 48 33.490799	32 55 34.096800	NonWet	0	0	0	in	in	out	out	out

MSW03411-	1043	MSW03411-1043	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.591542	33.011317	-90 35 29.551198	33 0 40.741200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1044	MSW03411-1044	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.654713	32.836131	-90 39 16.966798	32 50 10.071600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1045	MSW03411-1045	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.686158	33.102175	-90 41 10.168798	33 6 7.830000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1046	MSW03411-1046	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.918902	32.927983	-90 55 8.047199	32 55 40.738800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1047	MSW03411-1047	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.918968	32.849104	-90 55 8.284799	32 50 56.774400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1048	MSW03411-1048	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.084371	32.790872	-91 5 3.735600	32 47 27.139200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1049	MSW03411-1049	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.670178	33.210875	-90 40 12.640798	33 12 39.150000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1050	MSW03411-1050	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.735903	33.082044	-90 44 9.250798	33 4 55.358400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1051	MSW03411-1051	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.845537	32.627382	-90 50 43.933199	32 37 38.575200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1052	MSW03411-1052	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.590527	32.917522	-90 35 25.897197	32 55 3.079200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1053	MSW03411-1053	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.649324	33.064984	-90 38 57.566398	33 3 53.942400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1054	MSW03411-1054	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.758166	32.986360	-90 45 29.397599	32 59 10.896000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1055	MSW03411-1055	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.839085	32.769413	-90 50 20.705999	32 46 9.886800	NonWet	0	0	0	in	in	in	out	out
MSW03411-	1056	MSW03411-1056	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.961878	32.629009	-90 57 42.760799	32 37 44.432400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1057	MSW03411-1057	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.635338	33.147252	-90 38 7.216798	33 8 50.107200	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1058	MSW03411-1058	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.806063	33.114633	-90 48 21.826799	33 6 52.678800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1059	MSW03411-1059	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.597380	33.125999	-90 35 50.567998	33 7 33.596400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1060	MSW03411-1060	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.684354	32.742142	-90 41 3.674398	32 44 31.711200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1061	MSW03411-1061	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.715347	32.705943	-90 42 55.249198	32 42 21.394800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1062	MSW03411-1062	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.897418	32.996481	-90 53 50.704799	32 59 47.331600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1063	MSW03411-1063	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.963194	32.770982	-90 57 47.498399	32 46 15.535200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1064	MSW03411-1064	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.979198	32.477717	-90 58 45.112799	32 28 39.781200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1065	MSW03411-1065	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.795109	33.178292	-90 47 42.392398	33 10 41.851200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1066	MSW03411-1066	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.798253	32.963827	-90 47 53.710799	32 57 49.777200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1067	MSW03411-1067	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.917708	32.876524	-90 55 3.748799	32 52 35.486400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1068	MSW03411-1068	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.967893	32.857468	-90 58 4.414799	32 51 26.884800	NonWet	0	0	0	out	out	out	in	in
MSW03411-	1069	MSW03411-1069	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.482838	33.029021	-90 28 58.216797	33 1 44.475600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1070	MSW03411-1070	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.692009	32.852001	-90 41 31.232398	32 51 7.203600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1071	MSW03411-1071	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.921827	32.720574	-90 55 18.577199	32 43 14.066400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	1072	MSW03411-1072	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.053942	32.477327	-91 3 14.191200	32 28 38.377200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1073	MSW03411-1073	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.748472	33.233981	-90 44 54.499198	33 14 2.331600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1074	MSW03411-1074	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.866218	32.897055	-90 51 58.384799	32 53 49.398000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1075	MSW03411-1075	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.616831	33.034892	-90 37 0.591598	33 2 5.611200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1076	MSW03411-1076	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.649573	32.801314	-90 38 58.462798	32 48 4.730400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1077	MSW03411-1077	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.722991	33.096931	-90 43 22.767598	33 5 48.951600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1078	MSW03411-1078	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.790667	33.025484	-90 47 26.401199	33 1 31.742400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1079	MSW03411-1079	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.891724	32.813024	-90 53 30.206399	32 48 46.886400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1080	MSW03411-1080	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.973280	32.940000	-90 58 23.807999	32 56 24.000000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1081	MSW03411-1081	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.668984	33.187517	-90 40 8.342398	33 11 15.061200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1082	MSW03411-1082	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.725427	33.006565	-90 43 31.537198	33 0 23.634000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1083	MSW03411-1083	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.557437	33.145139	-90 33 26.773197	33 8 42.500400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1084	MSW03411-1084	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.625908	32.886218	-90 37 33.268798	32 53 10.384800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1085	MSW03411-1085	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.627041	33.095373	-90 37 37.347598	33 5 43.342800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1086	MSW03411-1086	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.696309	32.997129	-90 41 46.712398	32 59 49.664400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1087	MSW03411-1087	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.945343	32.732490	-90 56 43.234799	32 43 56.964000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1088	MSW03411-1088	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.856034	32.528981	-90 51 21.722399	32 31 44.331600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1089	MSW03411-1089	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.611479	33.157719	-90 36 41.324398	33 9 27.788400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1090	MSW03411-1090	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.782368	33.103437	-90 46 56.524798	33 6 12.373200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1091	MSW03411-1091	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.500503	33.011273	-90 30 1.810797	33 0 40.582800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1092	MSW03411-1092	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.724896	32.721440	-90 43 29.625598	32 43 17.184000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1093	MSW03411-1093	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.772477	33.112182	-90 46 20.917199	33 6 43.855200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1094	MSW03411-1094	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.942959	32.944710	-90 56 34.652399	32 56 40.956000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1095	MSW03411-1095	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.947053	32.786924	-90 56 49.390799	32 47 12.926400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1096	MSW03411-1096	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.062966	32.670654	-91 3 46.677599	32 40 14.354400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1097	MSW03411-1097	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.817571	33.158304	-90 49 3.255599	33 9 29.894400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1098	MSW03411-1098	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.696210	33.005957	-90 41 46.355998	33 0 21.445200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1099	MSW03411-1099	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.877312	32.640890	-90 52 38.323199	32 38 27.204000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1100	MSW03411-1100	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.981242	32.880407	-90 58 52.471199	32 52 49.465200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1101	MSW03411-1101	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.580853	33.079639	-90 34 51.070797	33 4 46.700400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1102	MSW03411-1102	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.677225	32.867701	-90 40 38.009998	32 52 3.723600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1103	MSW03411-1103	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.973320	32.697936	-90 58 23.951999	32 41 52.569600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1104	MSW03411-1104	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.043015	32.564337	-91 2 34.853999	32 33 51.613200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1105	MSW03411-1105	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.771260	33.218469	-90 46 16.535998	33 13 6.488400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1106	MSW03411-1106	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.827576	32.928517	-90 49 39.273599	32 55 42.661200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1107	MSW03411-1107	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.623203	33.001139	-90 37 23.530798	33 0 4.100400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1108	MSW03411-1108	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.672327	32.811944	-90 40 20.377198	32 48 42.998400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1109	MSW03411-1109	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.703240	33.157031	-90 42 11.663998	33 9 25.311600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1110	MSW03411-1110	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.906467	32.913445	-90 54 23.281199	32 54 48.402000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1111	MSW03411-1111	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.967147	32.786770	-90 58 1.729199	32 47 12.372000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1112	MSW03411-1112	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.058533	32.857482	-91 3 30.718800	32 51 26.935200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1113	MSW03411-1113	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.821444	33.248601	-90 49 17.198399	33 14 54.963600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1114	MSW03411-1114	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.715762	33.054171	-90 42 56.743198	33 3 15.015600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1115	MSW03411-1115	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.901444	32.645007	-90 54 5.198399	32 38 42.025200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1116	MSW03411-1116	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.642273	32.922996	-90 38 32.182798	32 55 22.785600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1117	MSW03411-1117	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.612169	33.142123	-90 36 43.808398	33 8 31.642800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1118	MSW03411-1118	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.652464	32.955070	-90 39 8.870398	32 57 18.252000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1119	MSW03411-1119	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.940413	32.655624	-90 56 25.486799	32 39 20.246400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1120	MSW03411-1120	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.000432	32.596039	-91 0 1.555199	32 35 45.740400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1121	MSW03411-1121	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.600232	33.183292	-90 36 0.835197	33 10 59.851200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1122	MSW03411-1122	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.768450	33.029288	-90 46 6.419998	33 1 45.436800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1123	MSW03411-1123	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.573001	33.122262	-90 34 22.803597	33 7 20.143200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1124	MSW03411-1124	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.739041	32.794581	-90 44 20.547599	32 47 40.491600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1125	MSW03411-1125	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.810513	32.523980	-90 48 37.846799	32 31 26.328000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	1126	MSW03411-1126	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.878011	33.003263	-90 52 40.839599	33 0 11.746800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1127	MSW03411-1127	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.937437	32.777903	-90 56 14.773199	32 46 40.450800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1128	MSW03411-1128	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.814947	32.586518	-90 48 53.809199	32 35 11.464800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1129	MSW03411-1129	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.729404	33.128314	-90 43 45.854398	33 7 41.930400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1130	MSW03411-1130	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.853536	33.021119	-90 51 12.729599	33 1 16.028400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1131	MSW03411-1131	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.859916	32.800590	-90 51 35.697599	32 48 2.124000	NonWet	0	0	0	in	in	in	out	in
MSW03411-	1132	MSW03411-1132	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.950484	32.885444	-90 57 1.742399	32 53 7.598400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1133	MSW03411-1133	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.672875	32.986641	-90 40 22.349998	32 59 11.907600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1134	MSW03411-1134	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.710283	32.821001	-90 42 37.018798	32 49 15.603600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1135	MSW03411-1135	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.029321	32.674424	-91 1 45.555600	32 40 27.926400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1136	MSW03411-1136	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.012331	32.477447	-91 0 44.391599	32 28 38.809200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1137	MSW03411-1137	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.773130	33.195727	-90 46 23.267998	33 11 44.617200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1138	MSW03411-1138	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.017847	32.727200	-91 1 4.249200	32 43 37.920000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1139	MSW03411-1139	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.675797	33.018140	-90 40 32.869198	33 1 5.304000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1140	MSW03411-1140	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.664139	32.836258	-90 39 50.900398	32 50 10.528800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1141	MSW03411-1141	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.721985	33.180705	-90 43 19.145998	33 10 50.538000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1142	MSW03411-1142	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.817066	33.005662	-90 49 1.437599	33 0 20.383200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1143	MSW03411-1143	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.887975	32.836126	-90 53 16.709999	32 50 10.053600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1144	MSW03411-1144	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.995168	32.853177	-90 59 42.604799	32 51 11.437200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1145	MSW03411-1145	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.638705	33.182244	-90 38 19.337998	33 10 56.078400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1146	MSW03411-1146	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.746079	33.026807	-90 44 45.884398	33 1 36.505200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1147	MSW03411-1147	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.551172	33.173078	-90 33 4.219197	33 10 23.080800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1148	MSW03411-1148	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.643863	32.783852	-90 38 37.906798	32 47 1.867200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1149	MSW03411-1149	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.646187	33.120053	-90 38 46.273198	33 7 12.190800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1150	MSW03411-1150	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.722582	32.941717	-90 43 21.295198	32 56 30.181200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1151	MSW03411-1151	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.746447	32.739224	-90 44 47.209198	32 44 21.206400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1152	MSW03411-1152	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.856637	32.581462	-90 51 23.893199	32 34 53.263200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1153	MSW03411-1153	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.789223	33.237741	-90 47 21.202799	33 14 15.867600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1154	MSW03411-1154	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.815893	33.091860	-90 48 57.214799	33 5 30.696000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	1155	MSW03411-1155	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.618551	32.983193	-90 37 6.783598	32 58 59.494800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1156	MSW03411-1156	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.733663	32.745157	-90 44 1.186798	32 44 42.565200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1157	MSW03411-1157	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.749066	33.162370	-90 44 56.637599	33 9 44.532000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1158	MSW03411-1158	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.911289	32.960372	-90 54 40.640399	32 57 37.339200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1159	MSW03411-1159	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.989147	32.784243	-90 59 20.929199	32 47 3.274800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1160	MSW03411-1160	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.019618	32.741923	-91 1 10.624799	32 44 30.922800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1161	MSW03411-1161	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.824556	33.216948	-90 49 28.401599	33 13 1.012800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1162	MSW03411-1162	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.753977	33.065355	-90 45 14.317198	33 3 55.278000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1163	MSW03411-1163	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.815984	32.658220	-90 48 57.542399	32 39 29.592000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1164	MSW03411-1164	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.659279	32.947195	-90 39 33.404398	32 56 49.902000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1165	MSW03411-1165	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.597325	33.085748	-90 35 50.369998	33 5 8.692800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1166	MSW03411-1166	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.673354	32.977248	-90 40 24.074398	32 58 38.092800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1167	MSW03411-1167	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.996804	32.659600	-90 59 48.494399	32 39 34.560000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1168	MSW03411-1168	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.068722	32.508846	-91 4 7.399199	32 30 31.845600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1169	MSW03411-1169	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.704655	33.199776	-90 42 16.757998	33 11 59.193600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1170	MSW03411-1170	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.781261	32.927303	-90 46 52.539599	32 55 38.290800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1171	MSW03411-1171	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.613247	32.980622	-90 36 47.689198	32 58 50.239200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1172	MSW03411-1172	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.596213	32.862143	-90 35 46.366798	32 51 43.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1173	MSW03411-1173	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.700768	33.108961	-90 42 2.764798	33 6 32.259600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1174	MSW03411-1174	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.789138	33.032026	-90 47 20.896799	33 1 55.293600	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1175	MSW03411-1175	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.947810	32.834486	-90 56 52.115999	32 50 4.149600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1176	MSW03411-1176	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.028754	32.846625	-91 1 43.514399	32 50 47.850000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1177	MSW03411-1177	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.670495	33.200797	-90 40 13.781998	33 12 2.869200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1178	MSW03411-1178	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.721492	33.074544	-90 43 17.371198	33 4 28.358400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1179	MSW03411-1179	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.856674	32.630318	-90 51 24.026399	32 37 49.144800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1180	MSW03411-1180	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.578524	32.907339	-90 34 42.686397	32 54 26.420400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1181	MSW03411-1181	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.660943	33.065619	-90 39 39.394798	33 3 56.228400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1182	MSW03411-1182	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.747319	32.937300	-90 44 50.348398	32 56 14.280000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1183	MSW03411-1183	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.885391	32.708629	-90 53 7.407599	32 42 31.064400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1184	MSW03411-1184	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.952037	32.646262	-90 57 7.333199	32 38 46.543200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1185	MSW03411-1185	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.653179	33.137476	-90 39 11.444398	33 8 14.913600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1186	MSW03411-1186	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.816889	33.135094	-90 49 0.800399	33 8 6.338400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1187	MSW03411-1187	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.577180	33.155134	-90 34 37.847997	33 9 18.482400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1188	MSW03411-1188	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.680630	32.734640	-90 40 50.267998	32 44 4.704000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1189	MSW03411-1189	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.827439	32.652621	-90 49 38.780399	32 39 9.435600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1190	MSW03411-1190	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.940417	32.946164	-90 56 25.501199	32 56 46.190400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1191	MSW03411-1191	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.014930	32.820106	-91 0 53.748000	32 49 12.381600	NonWet	0	0	0	in	in	out	in	in

MSW03411-	1192	MSW03411-1192	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.978453	32.510384	-90 58 42.430799	32 30 37.362400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1193	MSW03411-1193	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.783302	33.176798	-90 46 59.887199	33 10 36.465600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1194	MSW03411-1194	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.832417	32.941478	-90 49 58.701199	32 56 29.313600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1195	MSW03411-1195	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.923985	32.862286	-90 55 26.273999	32 51 44.229600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1196	MSW03411-1196	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.982875	32.846608	-90 58 58.349999	32 50 47.788800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1197	MSW03411-1197	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.525971	33.033774	-90 31 33.495597	33 2 1.586400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1198	MSW03411-1198	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.701628	32.842955	-90 42 5.853598	32 50 34.638000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1199	MSW03411-1199	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.970778	32.736444	-90 58 14.793599	32 44 11.198400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1200	MSW03411-1200	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.045447	32.503468	-91 2 43.609199	32 30 12.477600	NonWet	0	0	0	out	out	out	out	out

Yazoo EMAP Points

Corps	EMAP Coordinates Latitude	EMAP Coordinates Longitude	Actual Location Latitude	Actual Location Longitude	Date	Team	Sample Status	Canopy	Shrub	Herb	Vines	Hydrology Primary	Hydrology Secondary	Soils	Wet Final	NRCS Determination	Comments	EPA5yr pts	EPA2yr pts	Pt in 2yr Floodplain	Pt in 5yr Floodplain	Wet? Site(1)	Potential Impact	Potential Impact +	QA
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003	1	Sampled			CARA/BRO		P6	S2	Hydric	yes	FW				1	1				WBA
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003	1	Sampled	CELA/ACNE	ILDE/ACNE	CARA/SMRO/TOVI/FAQU/TORA	VIRO		S1/S4	Hydric	yes		Soil-subang blocky; area outside greentree but in			2	2		Yes	Yes	WBA
3	[illegible]	[illegible]					Inaccessible										X-Water			3	3				
4	32.765406	90.801334	32 47.126	90 46.085	6/6/2003	2	Sampled	FRPE/CELA	ILDE/QULY/CARA	TORA/SMSP/BOCY		P3/P5	S2/S3/S4	Hydric	yes		Drainage feature 50' W of pt., organic stains on ped faces			4	4				WBA
5	32.591397	90.89363			6/11/2003	1	Sampled			CARA/BRO/AMTR		P2/P3/P6		Hydric	yes	PC	WRP			5	5				WBA
6	32.721975	90.645267	32 43.316	90 50.715	6/11/2003	2	Sampled		QUNU	TOVI/CARA/SEEX		P2/P3/P6		Hydric	yes		On concave landscape position			6	6				WBA
7	32.802933	90.626694	32 48.184	90 37.620	6/5/2003	2	Sampled	QUPH	UST/ULAM/ACRU/ILDE/ULCR		BESC/TORA/AMBR	P3/P5	S1/S3/S4	Hydric	yes		Panther Swamp WMA			7	7		Yes	Yes	WBA
8	32.741187	90.803771	32 44.477	90 46.228	6/12/2003	2	Sampled	QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S2/S3/S4	Hydric	yes					8	8				WBA
9	32.49847	90.858535	32 29.906	90 51.392	6/13/2003	1	Sampled	CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5		Hydric	yes		"Forced March"			9	9				WBA
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003	2	Sampled			Soybeans			S2/S3	Hydric	yes	FW	WRP 250'W of pt; End of water fall in ditch (silt deposits)			10	10				WBA
11	33.213506	90.768058			6/13/2003	Wiseman	Sited			Open water					no						11				WBA
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003	2	Sampled	QULY/QUNU/CELA	ILDE/CELA/FRPE	CARA/TORA		P3	S3/S4	Hydric	yes					12	12				WBA
13	[illegible]	[illegible]					Inaccessible										X-Water			13	13				
14	32.617195	90.893849	32 37.032	90 53.631	6/11/2003	1	Sampled			SOAL/RUCR/VEHA/DEIL		NI	NI	Hydric	no		Old field pl'd w/ QUNU			14	14				WBA
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003	1	Sampled			Cotton					no	PC	"Dave's Wetland" H. bank of Big Sunflower			15	15				WBA
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003	2	Sampled	CAAQ/CELA/QUNU/SANI	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3	S3/S4	Hydric	yes					16	16		yes	yes	WBA
17	32.611306	90.934277	32 36.702	90 56.367	6/13/2003	3	Sampled			CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P6		Hydric	yes		Coordinate evaluated 0.2mi from pt due to hi water			17	17				WBA
18	32.701446	90.994111	32 42.087	90 59.647	6/9/2003	1	Sampled			VEHA/SOAL/DEIL		NI	NI	Hydric	no					18	18				WBA
19	32.456946	90.953467	32 27.417	90 57.208	6/11/2003	1	Sampled	ULAM/CELA		IVAN/POPE		P3/P5	S2	Hydric	yes		Recent cutover (QUNU tops)			19	19				WBA
20	32.785036	90.828385	32 47.103	90 49.706	6/6/2003	2	Sampled	ULCR/CAAQ/CELA	CELA/ILDE	CARA/TORA/SMSP/BOCY		P1/P2/P3/P4/P6		Hydric	yes		Inundation prevented horizon ID			20	20				WBA
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003	3	Sampled			SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5	S1/S4/S6	Hydric	yes					21	21				WBA
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003	2	Sampled	QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P5	S2/S3	Hydric	yes		Edge of clearcut			22	22				WBA
23	32.762376	90.750511	32 45.743	90 45.031	6/5/2003	2	Sampled	QULY/CELA/QUNU/QUPH	ILDE/CRSP	BOCY/BICA		P3/P5		Hydric	yes					23	23				WBA
24	32.68517	90.779562	32 41.112	90 46.774	6/12/2003	2	Sampled	QUNU/QUPH/CAAQ	ILDE	VISP	TORA/SMSP	P3	S3/S4	Hydric	yes		Lichen lines @ 14"			24	24				WBA
25	[illegible]	[illegible]					Inaccessible										X-Water			25	25				
26	32.749034	90.852285	32 44.944	90 51.137	6/10/2003	2	Sampled		QUNU/QUNU	HIMO/SOSP/POSP			S2/S3/S5	Hydric	yes		S5 = crayfish chimneys			26	26				WBA
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003	1	Sited			Open water					no		Lake Washington			27	27				WBA
28	32.681403	90.752385	32 40.801	90 45.140	6/11/2003	2	Sampled	QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P6	S2/S3/S4	Hydric	yes					28	28				WBA
29	32.530351	90.911339			6/12/2003	1	Sampled	QULY/CAAQ/CELA	ILDE/CELA/ULAM			P1/P3/P4/P6/P6		Hydric	yes		Mahannah WMA			29	29				WBA
30	32.837883	90.823288	32 50.273	90 49.397	6/6/2003	1	Sampled	QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1	Hydric	yes					30	30				WBA
31	32.883326	90.807604	32 53.000	90 48.456	6/6/2003	1	Sampled	CELA/CAAQ/ULAM	ILDE/FRPE	BRCI/VEHA/POPE		P3/P5	S1	Hydric	yes					31	31				WBA
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003	1	Sampled	CAAQ/QULY/FRPE	FOAC			P1/P2		Hydric	yes					32	32				WBA
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003	1	Sited			Open water					no		Pt 471 ft from coordinates			33	33				WBA
34	32.956426	90.739268			6/3/2003	WG	Sited			Open water					no		Slough			34	34				WBA
35	32.477146	90.965723	32 28.721	90 56.106	6/13/2003	3	Sampled	SANI				P1/P2/P3/P6/P6		Hydric	yes		Representative sample taken 0.19 mi from pt @ 124O			35	35				WBA
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003	2	Sampled	QUNU/CELA/ULCR	ILDE/ACNE	TORA/CARA		P2/P3	S2/S3/S4	Hydric	yes					36	36				WBA
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003	1	Sampled	FRPE/QULY	HIMO/CEOC/FOAC	POHY		P1/P2/P3/P6	S1	Hydric	yes		Reporter			37	37				WBA
38	32.837817	90.974408	32 50.266	90 58.471	6/12/2003	1	Sampled	ACNE/FRPE/ULAM	CODR	TORA/AMAR		NI	NI	Hydric	no		Spoil bank of Steele Bayou			38	38				WBA
39	32.876854	90.747869	32 52.611	90 44.073	6/6/2003	1	Sampled	QUNU/ULAM/QULY	CELA/ILDE	CARA			S1/S4	Hydric	yes					39	39				WBA
40	32.721243	90.778592	32 43.212	90 46.607	6/11/2003	2	Sampled	QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4	Hydric	yes					40	40				WBA
41	32.506255	90.872116			6/13/2003	1	Sampled	CAAQ/QUPH/CELA	CELA/CRVI	FRPE/CARA		P3/P5		Hydric	yes		"Forced March"			41	41				WBA
42	32.72746	90.693222	32 43.649	90 53.595	6/13/2003	2	Sampled		QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2	S3/S4	Hydric	yes		Draining rapidly???			42	42				WBA
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003	1	Sited			Open water					no		Lake Washington			43	43				WBA
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003	2	Sampled	QUNU/CELA/QULY	ILDE/FRPE	QULY/AMAR		P1/P3	S2/S3/S4	Hydric	yes		Evidence of recent subsidence/ 2ry watermark @ 3'			44	44				WBA
45	[illegible]	[illegible]					Inaccessible										X-Water			45	45				
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003	2	Sampled	QUNU/FRPE/CELA	ILDE/CAAQ/RUSP	CARA/JURE		P3	S3/S4	Hydric	yes		Twin Oaks WMA			46	46				WBA
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003	1	Sampled			Corn					no	PC				47	47				WBA
48	32.59803	90.790894	32 35.762	90 47.454	6/10/2003	1	Sampled	GLTR/CELA/FRPE/QUNU/UL	ILDE/CELA/ULAM	IVAN/TORA/BRCI		P3	S2	Hydric	yes					48	48				WBA
49	32.618424	90.983151			6/10/2003	1	Sited			Open water					no		Pt in middle of Steele Bayou channel			49	49				WBA
50	32.786186	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled	QULY/CAAQ/FRPE/TADI	CEOC/CAAQ	CEOC/FRPE/AMAR		P1/P2/P3/P6	S2/S3/S4	Hydric	yes					50	50				WBA
51	32.524526	91.063206			6/13/2003	1	Sampled			Zizania		P1		Hydric	yes		Edge of Eagle Lake			51	51				WBA
52	32.784146	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled	QULY/QUNU/FRPE	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4	Hydric	yes		Microtopography			52	52				WBA
53	[illegible]	[illegible]					Inaccessible										X-Water			53	53				
54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled	CELA/QUNU/FRPE/ULAM	ULAM/ILDE	CARA/TRDI	BESC	P3/P5		Hydric	yes					54	54				WBA
55	32.763145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled	QUNU/CAAQ/CELA/QUPH	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3	S2/S3/S4	Hydric	yes					55	55				WBA
57	32.553866	90.913438	32 33.232	90 54.806	6/13/2003	1	Sited			Sudan grass		P1		Hydric	yes		Site 0.34 mi from coord in inundated field; homogeneous			57	57				WBA
66	32.932167	90.698063	32 55.930	90 41.880	6/3/2003	WG	Sampled	QULY/FRPE/QUNU	ILDE	DIVI/SAM	VIRO/BESC/TORA	P3/	S1/S2/S4	Hydric	yes					66	66				WBA
EPA																									
401	32.71867	90.940061			6/13/2003	Wiseman	Sampled	QUPH	CAIL/FRPE/CELA/CODR	TORA		P3	S3/S4	Hydric	yes		Ponded due to location								WBA
402	33.008813	90.917894	33 00.515	90 55.074	6/4/2003	WG	Sampled	CELA/CAIL/FRPE/ULAM	CELA/ACRU	LELE/TORA		P3/P4	S1/S4	Hydric	yes										WBA
403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled	TADI/PLAQ	TADI/PLAQ/CEOC	Lemna sp		P1/P2		Hydric	yes			403	403	403	403	yes	yes	yes	WBA
404	33.214996	90.745053	33 12.816	90 44.675	6/4/2003	WG	Sampled			Soybeans					no	PC		404	404	404	404	no			WBA
405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled	QUNU/QULY/FRPE	ILDE	CARA/AMAR		P3/P5		Hydric	yes		reference std. (Typical of undisturbed- Wiseman)	405	405	405	405	yes	yes	yes	WBA
406	32.643873	90.731969	32 38.626	90 43.918	6/13/2003	1	Sampled	CELA/ULAM/UST	ULAM/FRPE/UST	CARA/AMBR/SMRO/SMBO/RUTR			S4	Hydric	no		top of ridge in ridge swale topography	406	406	406	406	no			WBA
407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003	WG	Sampled	FRPE/CAAQ	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P6	S4	Hydric	yes									yes	WBA
408	32.541829	90.962297	32 32.496	90 57.738	6/12/2003	1	Sampled	CAIL/CELA	UST/CRVI	AMBR/SMRO/CARA			S4	Hydric	no		Site on more high	408	408	408	408	no			WBA
409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled	QUNU/QUPH/CELA	ILDE	TORA/CARA			S3/S4	Hydric	yes			409	409	409	409	yes	yes	yes	WBA
410	32.626764	90.822305	32 37.606	90 49.338	6/10/2003	1	Sampled	UST/QUPH/CELA/CAIL	CODR/ILDE/CELA	AMAR/TORA/BRCI			S1/S4	Hydric	yes			410	410	410	410	yes	yes	yes	WBA
411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003	WG	Sampled	CAAQ/QULY/FRPE	ACNE/ACRU/CELA	SAMI/SACE		P3	S2/S4	Hydric	yes		Close to flood line/ area saturated							yes	WBA
412	33.056412	90.96179	33 05.183	90 57.708	6/4/2003	WG	Sampled	CELA/TADI	CELA	BOCY/TORA/AMAR/CARA		P6	S2/S4	Hydric	yes										WBA
413	32.770721	91.011064	32 46.246	91 00.673	6/9/2003	2	Sampled	QUPH/QUNU/FRPE	ILDE/CELA/COST	TORA/JURE/CARA			S3/S4	Hydric	yes		Bryophyte/lichen line 8"	413			413	yes			WBA
414	33.104031	90.669452	33 06.243	90 40.163	6/8/2003	2	Sampled	QUNU/CELA/FRPE/ULAM	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P6	S2/S4	Hydric	yes			414	414	414	414	yes	yes	yes	WBA
415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003	WG	Sampled			ASPE/RUCR/AMTR/IVAN/EOCR			S1/S4	Hydric	yes			415	415	415	415	yes	yes	yes	WBA
416	32.567586	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled	QUNI/CELA/ACNE/UST	CODR	OPHI/RUAR			S1	NON-HYDRIC	no			416			416	no			WBA
417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled	QUPH/QUNU	ILDE/FRPE/UST	TORA/CARA			S3/S4	Hydric	yes		NRCS confirmed soil (DJ)								WBA
418	32.534032	90.805779	32 32.042	90 46.347	6/11/2003	1	Sampled			SOHA/AMAR/DEIL/SOAL		P6			no		Ordinary High Water- pt fell on incline of ditch bank								WBA
419	32.869081	91.041462	32 52.134	91 02.489	6/8/2003	1	Sampled	QULY/CELA/ULAM/SANI/FR	ILDE/CELA/FOAC	LELE/TORA/AMAR CARA		P2/P4/P6	S2	Hydric	yes			419	419	419	419	yes	yes	yes	WBA
420	33.166359	90.68845	33 16.636	90 66.844	6/4/2003	WG	Sited			Catfish Pond					no	PC		420	420	420	420	no			WBA
421	[illegible]	[illegible]					Inaccessible								[illegible]		[illegible]	[illegible]	[illegible]	421	421	[illegible]			[illegible]
422	33.153246	90.659165	33 07.991	90 39.545	6/4/2003	WG	Sampled	CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4	Hydric	no		subangular blocky struc.	422	422	422	422	no			WBA
423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003	WG	Sampled	QUNU/ULAM/FRPE/CELA	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC		S3/S4	Hydric	yes			423			423	yes			WBA
424	32.566737	90.980214			6/10/2003	1	Sampled	QUNU/TADI/CELA/CAAQ/	ILDE			P2/P3/P4/P6/P6		Hydric	yes			424	424	424	424	yes	yes	yes	WBA
425	32.666751	90.808321	32 40.006	90 48.501	6/12/2003	2	Sampled	QUNU/UST/CELA	ILDE	TORA/CARA			S3/S4	Hydric	yes			425			425	yes			WBA
426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled	UST/QUPH/CELA/CAIL	ACRU/ULAM/ILDE	AMBR/FAQU/OPHI/TORA	SMRO		S4	Hydric	no		Adj 3 sloughs w/in 200' (E, W, N)	426	426	426	426	no			WBA
427	32.76243	90.698168	32 45.747	90 41.770	6/5/2003	2	Sampled	UST/CAIL	ILDE/CODR	GATR	TORA/AMBR/AMBR		S4	NON-HYDRIC	no		DJ to classify soil (Response rec'd 6-30-03)	427			427	no			WBA
428	32.528961	90.940237	32 31.736	90 56.414	6/11/2003	1	Sampled	CELA/UST/CAIL	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI	S4	Hydric	no		Soil sub-angular blocky								WBA
429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled	QUNU/ACRU/CAAQ	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4	Hydric	yes										WBA
430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003	WG	Sampled		FRPE/BAHA	CARA/SOAL		NI	NI	Hydric	no	PC	WRP/Dry side Sharkey	430			430	no			WBA
431	32.936179	90.801992			6/5/2003	1	Sited			catfish pond					no			431	431	431	431	no			WBA
432	32.664974	91.046676	32 39.896	91 02.801	6/9/2003	1	Sampled			VEHA/SOAL		NI	NI	NON-HYDRIC	no			432			432	no			WBA
434	32.69994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled	QUNU/CELA	CARYA SP	CARA/TORA/FOAC		P3	S4	Hydric	yes		Area sloped away from pt., ditches on 2 sides	434	434	434	434	yes	yes	yes	WBA
435	32.865015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled	UST/QUNI/CAIL	CELA/COST	TOVI/GECA/FOAC		NI	NI	Hydric	no										WBA
436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled		CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI	NI	Hydric	no		Subangular blocky, ditched on 2 sides-drained	436			436	no			WBA
437	32.732014	90.883177	32 43.929	90 52.990	6/10/2003	2	Sampled		QUNU/CEOC	IMCA/ASSP			S3/S4	Hydric	yes		Subangular blocky	437	437	437	437	yes	yes	yes	WBA
438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled	UST/CAAQ/QULY/ULCR	CELA/ULAM	GECA/TORA/CARA/AMAR			S4	Hydric	no		ditched on 2 sides-drained	438	438	438	438	no			WBA
439	32.910041	90.66088	32 91.004	90 66.086	6/4/2003	WG	Sampled			Soybeans			S3	Hydric	no	PC									WBA
440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled	QUNU/FRPE/CELA/QUPH	ULAM/ULCR	AMAR/CICA/CH		P6	S1/S4	Hydric	yes			440			440	yes			WBA
441	[illegible]	[illegible]					Inaccessible								[illegible]		[illegible]	[illegible]	[illegible]		[illegible]	[illegible]			[illegible]
442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003	1	Sampled	CELA/ULAM/UST/QUPH	CELA	TORA/CARA/AMBR			S4	Hydric	no		top of ridge in ridge swale topography	442	442	442	442	no			WBA
443	32.83555	90.599405	32 50.133	90 35.964	6/5/2003	2	Sampled	QUNU/QUNI	ULCR/QUPH	SOSP	CARA/TORA		S3/S4	Hydric	no (070603)		Adjacent forest w/water lines - Panther Swamp	443	443	443	443	no			WBA
444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003	1	Sampled	CELA/UST/QUNU/ULAM	ILDE/ULCR/CELA	AMAR/BRCI/TRDE/TORA			S3/S4	Hydric	yes			444	444	444	444	yes	yes	yes	WBA
445	32.799895	91.057693	32 47.981	91 03.461	6/9/2003	2	Sampled			Soybeans				Hydric	no	PC		445	445	445	445	no			WBA
446	33.051829	90.50243	33 03.096	90 30.146	6/5/2003	1	Sampled			CARA/SOAL/VEHA/JUTE/IVAN		NI	NI	NON-HYDRIC	no		Fallow field								WBA
447	32.913414	90.611267			6/5/2003	1	Sampled								yes	FW	Road beside field adjacent to forested area (based on map NRCS t	447	447	447	447	yes	yes	yes	WBA
448	32.693421	91.039607	32 41.605	91 02.376	6/9/2003	1	Sampled	CELA/CAIL/UST	FRPE/CELA	TORA/CARA/AMPO/VICI/CAFR		NI	NI	Hydric	no		Pt. Fell between cottonwood plantat and QULY slough	448			448	no			WBA
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003	2	Sampled	QUPH/QULY/QUNU	UST/ILDE/FRPE	TORA/JURE/CARA			S3/S4	Hydric	Yes		NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03	449			449	yes			WBA
450	[illegible]	[illegible]					Inaccessible								[illegible]		[illegible]	[illegible]	[illegible]	450	450	[illegible]			[illegible]
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG	Sampled	QULY/QUPH/UST	ULAM/CELA	SACE/COVI/CARA		P3	S1/S4	Hydric	yes									yes	WBA
452	33.1476	90.986276			6/5/2003	1	Sampled		CELA	CARA/TORA/DEIL/VEHA/SOHA			S4	Hydric	no		40' from standing water wetland; soil sub-ang blocky	452	452	452	452	no			WBA
453	32.749506	91.000253	32 44.976	91 00.014	6/9/2003	1	Sampled	QUNU/CAIL/UST	CAIL	VEHA/SOHA	SMBO	NI	NI	Hydric	no		Adjacent to slough (100') but on hi grd	453			453	no			WBA
454	33.070527	90.616767	33 414.005	90 3700.38	6/5/2003	1	Sited			Open water					no		20' from coordinate into open water		454	454		no			WBA
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG	Sampled			SOSP/CARA/VEBR/TORA		NI	NI	NON-HYDRIC	no	PC	Former crop field	455			455	no			WBA
456	32.58609	91.019853	32 35.172	91 01.215	6/10/2003	1	Sampled	CELA/UST/FRPE	ILDE	CACH/LELE		P5/P5		Hydric	yes			456			456	yes			WBA
457	32.800081	90.905961	32 48.039	90 54.354	6/13/2003	2	Sampled	CAAQ/FRPE	FOAQ/SANI/FRPE/COST	AMAR/CARA		P1/P2/P3/P4	S3/S4	Hydric	yes		50-60' wide drainage pattern	457	457	457	457	yes	yes	yes	WBA
458	32.631939	-90.77918	32 37.916	90 46.750	6/10/2003	1	Sampled	QUPH/UST	ILDE	AMBR/SMRO/OPHI/TORA			S4	Hydric	no		Pt on ridge between sloughs	458			458	no			WBA
801	33.219145	90.751069	33 13.246	90 45.046	6/7/2003	2	Sampled			Rice				Hydric	no	PC									WBA
802	32.862412	90.854264	32 52 56.6	90 51 15.3	6/10/2003	3	Sampled			Fallow field				Hydric	no	PC					802				WBA
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003	2	Sited			Catfish ponds					no	PC	open water - aquaculture			803	803				WBA
804	32.816597	90.615165	32 48 59.7	90 36 54.6	6/10/2003	3	Sampled		QUNU/CEOC	CARA/JURE/CARYO/PHIR/HYNCOS			S3/S4	Hydric	yes	PC	site appears connected to meander cut-off of Big Sun			804	804		yes	yes	WBA
805	33.105626	90.741057	33 06.336	90 44.464	6/8/2003	2	Sampled			Soybeans		NI	NI	Hydric	no	PC									WBA
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003	1	Sampled			Cotton				Hydric	no	PC									WBA
807	32.807157	90.907368	32 48 25.7	90 54 26.4	6/10/2003	3	Sampled			Corn				Hydric	no	PC									WBA
808	32.987145	91.001767	32 59.227	91 00.104	6/9/2003	3	Sampled			Cotton				Hydric	no	PC									WBA
809	33.227605	90.654674	33 13.656	90 39.280	6/7/2003	3	Sampled			Soybeans				Hydric	no	PC					809				WBA
810	32.99897	90.750527	32 59.936	90 45.032	6/8/2003	1	Sampled			Cotton				Hydric	no	PC	Soils heavily compacted								WBA
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003	2	Sampled			Soybeans		P4		Hydric	no	PC	No hydrophytic veg								WBA
812	32.870581	90.625453	32 52 14.2	90 37 28.5	6/10/2003	3	Sampled			Catfish ponds					no	OW	Pt. 230' from coordinate @ 267O				812				WBA
813	33.064745	90.645731	33 05.085	90 36.737	6/7/2003	2	Sampled			Catfish ponds					no	OW	open water - aquaculture				813				WBA
814	32.973342	90.693864	32 58.401	90 41.632	6/3/2003	WG	Sampled			BRCI		NI	NI	Hydric	no	PC				814	814				WBA
815	32.74349	90.940417	32 44.594	90 56.357	6/11/2003	3	Sampled			Cotton				NON-HYDRIC	no	PC									WBA
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003	3	Sampled			Corn				NON-HYDRIC	no	PC/HW					816				WBA
817	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	WG	Sampled			[illegible]				[illegible]	no	PC	817 & 817.1 same site [illegible]			817	817				[illegible]
817.1			[illegible]	[illegible]	[illegible]	2																			
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC									WBA
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003	3	Sampled			Rice				Hydric	no	PC	Pt. Located in rice field 300' S of coordinates								WBA
820	32.765865	90.694156	32 76.590	90 69.418	6/5/2003	2	Sited			Cotton					no	PC	Pt. 962 ft at 36oN into cotton field				820				WBA
821	32.63494	90.82267	32 38 05.7	90 49 21.6	6/11/2003	3	Sampled			Corn				Hydric	no	PC					821				WBA
822	32.951234	90.948564	32 57.0446	90 56.4769	6/10/2003	3	Sampled			Road					no	OW	Road between catfish ponds				822				WBA
823	[illegible]	[illegible]					Inaccessible														823				
824	32.527506	90.991765	32 31 39.0	90 59 30.3	6/11/2003	3	Sampled			Cotton				NON HYDRIC	no	PC/HW									WBA
825	33.198496	90.797275	33 11.922	90 47.827	6/7/2003	2	Sampled			Rice				Hydric	no	PC									WBA
826	32.951544	90.821376	32 57 05.5	90 49 17.0	6/10/2003	3	Sampled			Cotton				NON-HYDRIC	no	PC									WBA
827	32.694192	90.919654	32 41.649	90 55.180	6/11/2003	3	Sampled			Corn				NON-HYDRIC	no	PC				827	827				WBA
828	32.935509	90.987067	32 56.126	90 59.225	6/10/2003	3	Sampled			Corn			S3	Hydric	no	OW	Site located between cornfield and depressional drain								WBA
829	33.045206	90.59165	33 02.713	90 35.464	6/7/2003	2	Sampled			Corn				Hydric	no	PC	Soil very compacted								WBA
830	[illegible]	[illegible]					Inaccessible									PC									
831	32.747124	90.961868	32 44 49.4	90 57 42.7	6/11/2003	3	Sampled			Corn				NON-HYDRIC	no	PC					831				WBA
832	[illegible]	[illegible]					Inaccessible														832				
833	33.229689	90.658305	33 13.783	90 39.500	6/7/2003	2	Sited			Levee of Catfish pond					no	PC	Ditch at 152o of pt at 80'			833	833				WBA
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC									WBA
835	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	2	Sampled			[illegible]		NI	NI	[illegible]	no		835 & 835.1 same site [illegible]								[illegible]
835.1					[illegible]	WG																			
836	32.744837	90.715266	32 44 41.4	90 42 54.9	6/11/2003	3	Sampled			Fallow field				Hydric	no	PC					836				WBA
837	33.153119	90.784068	33 09.185	90 47.043	6/7/2003	2	Sampled			Cotton			S1	Hydric	no	PC				837	837				WBA
838	32.974159	90.90942	32 58 26.9	90 54 33.9	6/10/2003	3	Sampled			Soybeans			S1	Hydric	no	PC									WBA
839	[illegible]	[illegible]					Inaccessible													839	839				
840	32.765489	91.050297			6/9/2003	2	Sampled			Corn		P4	S3	Hydric	no	PC	Drift lines in concave surfaces				840				WBA
841	33.214101	90.81356	33 12.850	90 46.799	6/7/2003	2	Sited			Catfish ponds					no	PC									WBA
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003	3	Sampled	CAIL		SOHA				Hydric	no	PC	Edge of spoil bank of ditch				842				WBA
843	32.631199	90.881465	32 37 52.3	90 52 53.3	6/11/2003	3	Sampled			Soybeans				Hydric	yes	FW	Farmed wetland			843	843		yes	yes	WBA
844	32.67113	91.039656	32 52.266	91 02.379	6/9/2003	1	Sampled			Soybeans		NI	NI	Hydric	no	PC									WBA
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003	2	Sited			Catfish ponds					no	OW	Open water - aquaculture								WBA
846	32.851185	90.727543	32 51 04.3	90 43 39.1	6/10/2003	3	Sampled			Cotton				Hydric	no	PC				846	846				WBA
847	32.663892	91.00143	32 39 50.0	91 00 05.2	6/11/2003	3	Sampled			Cotton		NI	NI	Hydric	no	PC					847				WBA
848	32.535879	91.035833	32 32 09.1	91 02 08.9	6/11/2003	3	Sampled			Cotton				NON HYDRIC	no	PC/HW					848				WBA
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003	2	Sited			Catfish ponds					no	PC	open water - aquaculture			849	849				WBA
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003	2	Sampled			Corn				Hydric	no	PC	Very compacted soil								WBA
851	33.108834	90.548094	33 06.531	90 32.765	6/12/2003	3	Sampled			Soybeans				Hydric	no	PC				851	851				WBA
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003	3	Sampled	QUNI		SOAL/CARA/AMI				Hydric	no	PC				852	852				WBA
853	32.541726	90.8057	32 32.505	90 46.339	6/12/2003	3	Sampled			Corn				Hydric	no	PC/HW									WBA
861	32.990902	90.666738			6/3/2003	WG	Sampled			Soybeans		NI	NI	NI	no										WBA
868	32.806345	90.705699	32 48 22.8	90 42 20.4	6/11/2003	3	Sampled			Cotton				NON-HYDRIC	no						868				
170																				97	129				

Key to Hydrology Indicators
Primary Indicators

P1 = Inundated
P2 = Saturated in the upper 12 inches
P3 = Water marks
P4 = Drift Lines
P5 = Sediment desposits
P6 = Drainage patterns in the wetland

Secondary Indicators
S1 = Oxidized root channels in upper 12 inches
S2 = Water stained leaves
S3 = Local soil survey data
S4 = FAC-neutral test
S5 = Other (explained)

WG = Whole Group

NI = Not Indicated

Note: On 06/02/03 Steele Bayou gates were closed. On 06/05/03 at 1000 hrs gates were opened.

Yazoo EMAP Points

These columns represent the intersection of EMAP wetland (Wet) and nonwetland (Nonwet) points with the 2-year w/ and w/o project floodplain and the 5% duration w/ and w/o project floodplain.

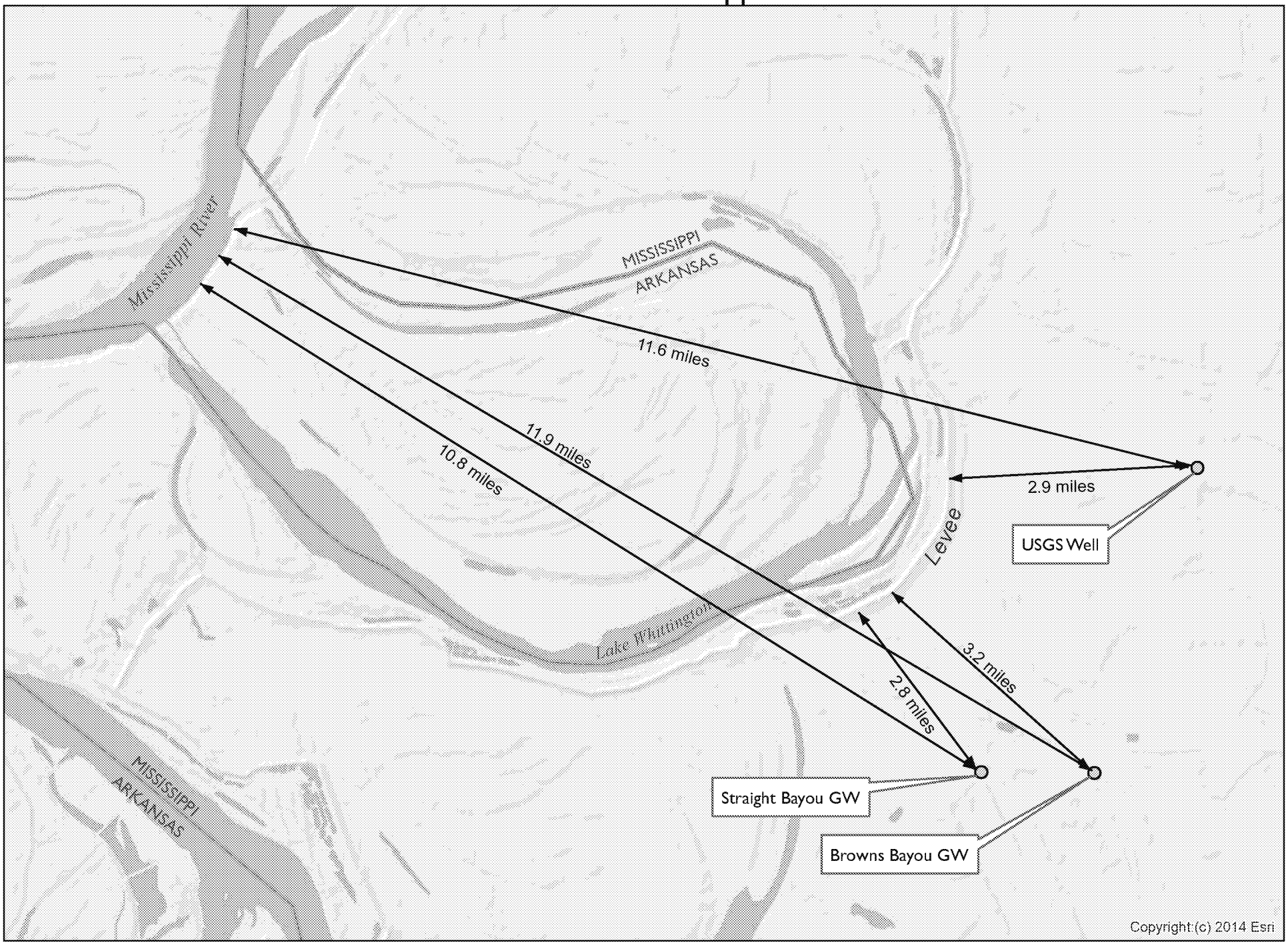
Corps	EMAP Coordinates Latitude (d	Longitude (	Actual Location Latitude	Longitude	Date	Team	Sample Status	Hydroveg Canopy	Shrub	Herb	Vines	Hydrology Primary	Secondary	Soils	Wet Final	NRCS Determinatio	Comments	Base 2 yr Wet	Base 2 yr Nonwet	P5 2yr Wet	P5 2yr Nonwet	Base 5% Wet	Base 5% nonwet	B1 plan5 Wet	B1 plan5 Nonwet	B2 plan5 Wet	B2 plan5 Nonwet
1	32.60352	90.95328	32 36.211	90 57.197	6/11/2003	1	Sampled			CARA/BRCI		P5	S2	Hydric	yes	FW		Yes		Yes		Yes		Yes		Yes	
2	32.89925	90.76618	32 53.955	90 45.970	6/6/2003	1	Sampled	CELA/ACNE	ILDE/ACNE/	CARA/SMRC	VIRO		S1/S4	Hydric	yes		Soil-subang blocky; area outside greentree but hi	Yes		Yes		Yes		Yes		Yes	
3	32.5469	90.97209					Inaccessible										Hi water										
4	32.78541	90.80133	32 47.128	90 48.085	6/6/2003	2	Sampled	FRPE/CELA	ILDE/QULY/I	TORA/SMISP/BOCY		P3/P6	S2/S3/S4	Hydric	yes		Drainage feature 50' W of pt., organic stains on ped faces	Yes		Yes		Yes		Yes		Yes	
5	32.5914	90.89303			6/11/2003	1	Sampled			CARA/BRCI/AMTR		P2/P3/P5		Hydric	yes	PC	WRP	Yes		Yes		Yes		Yes		Yes	
6	32.72198	90.84527	32 43.318	90 50.715	6/11/2003	2	Sampled		QUNU/	TOVI/CARA/SEEX		P2/P3/P5		Hydric	yes		On concave landscape position	Yes		Yes		Yes		Yes		Yes	
7	32.80293	90.62668	32 48.184	90 37.620	6/5/2003	2	Sampled	QUPH	LIST/ULAM/ACRU/ILDE/IL		BESC/TORA	P3/P6	S1/S3/S4	Hydric	yes		Panther Swamp WMA	Yes		Yes		Yes		Yes		Yes	
8	32.74119	90.80377	32 44.477	90 48.228	6/12/2003	2	Sampled	QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
9	32.49847	90.85654	32 29.908	90 51.392	6/13/2003	1	Sampled	CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5		Hydric	yes		"Forced March"	Yes		Yes		Yes		Yes		Yes	
10	32.78408	90.88612	32 47.045	90 53.169	6/9/2003	2	Sampled			Soybeans			S2/S3	Hydric	yes	FW	WRP 250'W of pt; Evid of water fall in ditch (silt deposits)	Yes		Yes		Yes		Yes		Yes	
11	33.21351	90.76606			6/13/2003	Wiseman	Sited			Open water					no								Yes				
12	32.77272	90.75052	32 46.363	90 45.031	6/5/2003	2	Sampled	QULY/QUNL	ILDE/CELA/	CARA/TORA		P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
13	32.5004	90.91514					Inaccessible										Hi water										
14	32.6172	90.89385	32 37.032	90 53.631	6/11/2003	1	Sampled			SOAL/RUCR/VEHA/DEIL		NI	NI	Hydric	no		Old field plt'd w/ QUNU		Yes		Yes		Yes		Yes		Yes
15	32.95395	90.78217	32 57.236	90 46.932	6/5/2003	1	Sampled			Cotton				Hydric	no	PC	"Dave's Wetland" Hi bank of Big Sunflower		Yes		Yes		Yes		Yes		Yes
16	32.81458	91.03835	32 48.875	91 02.276	6/10/2003	2	Sampled	CAAQ/CELA	CRSP/CELA	AMAR/TORA/CAAQ		P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
17	32.61131	90.93428	32 36.702	90 56.367	6/13/2003	3	Sampled			CARA/AMTR/QUNU/CEOC		P1/P2/P3/P5		Hydric	yes		Coordinate evaluated 0.2mi from pt due to hi water	Yes		Yes		Yes		Yes		Yes	
18	32.70145	90.99411	32 42.087	90 59.647	6/9/2003	1	Sampled			VEHA/SOAL/DEIL		NI	NI	Hydric	no				Yes		Yes		Yes		Yes		Yes
19	32.45695	90.95347	32 27.417	90 57.208	6/11/2003	1	Sampled	ULAM/CELA		IVAN/POPE		P3/P5	S2	Hydric	yes		Recent cutover (QUNU tops)	Yes		Yes		Yes		Yes		Yes	
20	32.78504	90.82837	32 47.103	90 49.706	6/6/2003	2	Sampled	ULCR/CAAQ	CELA/ILDE/	CARA/TORA/SMISP/BOC'		P1/P2/P3/P4/P6		Hydric	yes		Inundation prevented horizon ID	Yes		Yes		Yes		Yes		Yes	
21	32.57555	90.88723	32 34.531	90 53.237	6/13/2003	3	Sampled			SEEX/POPU/ELSP/CYSP		P1/P2/P5	S1/S4/S6	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
22	32.8262	90.86191	32 49.572	90 51.715	6/9/2003	2	Sampled	QUNU/QULY	FOAC/ILDE/	JURE/CARA		P3/P6	S2/S3	Hydric	yes		Edge of clearcut	Yes		Yes		Yes		Yes		Yes	
23	32.76238	90.75051	32 45.743	90 45.031	6/5/2003	2	Sampled	QULY/CELA	ILDE/CRSP/	BOCY/BICA		P3/P6		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
24	32.68517	90.77958	32 41.112	90 46.774	6/12/2003	2	Sampled	QUNU/QUPH	ILDE	VISP/	TORA/SMSP	P3	S3/S4	Hydric	yes		Lichen lines @ 14"	Yes		Yes		Yes		Yes		Yes	
25	32.50259	90.89896					Inaccessible										Hi water										
26	32.74903	90.85229	32 44.944	90 51.137	6/10/2003	2	Sampled		QUNI/QUNU	HIMI/SOSP/POSP			S2/S3/S5	Hydric	yes		S5 = crayfish chimneys	Yes		Yes		Yes		Yes		Yes	
27	33.09793	91.06815	33 05.876	91 04.089	6/5/2003	1	Sited			Open water					no		Lake Washington		Yes		Yes		Yes		Yes		Yes
28	32.6814	90.75237	32 40.801	90 45.140	6/11/2003	2	Sampled	QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
29	32.53035	90.91134			6/12/2003	1	Sampled	QULY/CAAQ	ILDE/CELA/ULAM			P1/P3/P4/P5/P6		Hydric	yes		Mahannah WMA	Yes		Yes		Yes		Yes		Yes	
30	32.83788	90.82329	32 50.273	90 49.397	6/6/2003	1	Sampled	QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
31	32.88333	90.8076	32 53.000	90 48.456	6/6/2003	1	Sampled	CELA/CAAQ	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5	S1	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
32	32.62309	90.73862	32 37.386	90 44.317	6/10/2003	1	Sampled	CAAQ/QULY	FOAC			P1/P2		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
33	32.59127	90.92568	32 35.476	90 55.540	6/11/2003	1	Sited			Open water					no		Pt 471 ft from coordinates		Yes		Yes		Yes		Yes		Yes
34	32.90643	90.73927			6/3/2003	WG	Sited			Open water					no		Slough		Yes		Yes		Yes		Yes		Yes
35	32.47715	90.96572	32 28.721	90 58.106	6/13/2003	3	Sampled	SANI				P1/P2/P3/P5/P6		Hydric	yes		Representative sample taken 0.19 mi from pt @ 124O	Yes		Yes		Yes		Yes		Yes	
36	32.80084	90.80768	32 48.041	90 48.482	6/12/2003	2	Sampled	QUNU/CELA	ILDE/ACNE/	TORA/CARA		P2/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
37	32.53275	90.87026	32 31.965	90 52.261	6/11/2003	1	Sampled	FRPE/QULY	HIMI/CEOC/I	POHY		P1/P2/P3/P5	S1	Hydric	yes		Reporter	Yes		Yes		Yes		Yes		Yes	
38	32.83782	90.97441	32 50.268	90 58.471	6/12/2003	1	Sampled	ACNE/FRPE	CODR	TORA/AMAR		NI	NI	Hydric	no		Spoil bank of Steele Bayou		Yes				Yes				
39	32.87685	90.74789	32 52.611	90 44.073	6/6/2003	1	Sampled	QUNU/ULAM	CELA/ILDE	CARA			S1/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
40	32.72124	90.77659	32 43.212	90 46.607	6/11/2003	2	Sampled	QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
41	32.50626	90.87212			6/13/2003	1	Sampled	CAAQ/QUPH	CELA/CRVI	FRPE/CARA		P3/P5		Hydric	yes		"Forced March"	Yes		Yes		Yes		Yes		Yes	
42	32.72748	90.89322	32 43.649	90 53.595	6/13/2003	2	Sampled		QUNU/CEOC	ASSP/POSP/CAREX		P1/P2	S3/S4	Hydric	yes		Draining rapidly???	Yes		Yes		Yes		Yes		Yes	
43	33.03978	91.04014	33 255.138	91 246.646	6/5/2003	1	Sited			Open water					no		Lake Washington		Yes		Yes		Yes		Yes		Yes
44	32.74478	90.76817	32 44.689	90 46.091	6/13/2003	2	Sampled	QUNU/CELA	ILDE/FRPE	QULY/AMAR		P1/P3	S2/S3/S4	Hydric	yes		Evidence of recent subsidence/ 2ry watermark @ 3'	Yes		Yes		Yes		Yes		Yes	
45	32.52482	90.92571					Inaccessible										Hi water										
46	32.8216	90.8395	32 49.295	90 50.370	6/6/2003	2	Sampled	QUNU/FRPE	ILDE/CAAQ/	CARA/JURE		P3	S3/S4	Hydric	yes		Twin Oaks WMA	Yes		Yes		Yes		Yes		Yes	
47	32.91165	90.83865	32 54.699	90 50.319	6/5/2003	1	Sampled			Corn					no	PC			Yes		Yes		Yes		Yes		Yes
48	32.59603	90.79089	32 35.762	90 47.454	6/10/2003	1	Sampled	GLTR/CELA	ILDE/CELA/I	IVAN/TORA/BRCI		P3	S2	Hydric	yes			Yes				Yes					
49	32.61842	90.98315			6/10/2003	1	Sited			Open water					no		Pt in middle of Steele Bayou channel		Yes		Yes		Yes		Yes		Yes
50	32.78619	90.85916	32 47.170	90 51.551	6/9/2003	2	Sampled	QULY/CAAQ	CEOC/CAAC	CEOC/FRPE/AMAR		P1/P2/P3/P6	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
51	32.52453	91.06321			6/13/2003	1	Sampled			Zizania		P1		Hydric	yes		Edge of Eagle Lake	Yes				Yes					
52	32.78415	90.75141	32 47.050	90 45.086	6/5/2003	2	Sampled	QULY/QUNL	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4	Hydric	yes		Microtopography	Yes		Yes		Yes		Yes		Yes	
53	32.47811	90.93191					Inaccessible										Hi water										
54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled	CELA/QUNU	ULAM/ILDE	CARA/TRDI	BESC	P3/P5		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
55	32.78315	90.7289	32 46.984	90 43.753	6/13/2003	2	Sampled	QUNU/CAAQ	ILDE/FRPE/I	JURE/CARA/AMAR		P1/P2/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
57	32.55387	90.91344	32 33.232	90 54.806	6/13/2003	1	Sited			Sudan grass		P1		Hydric	yes		Site 0.34 mi from coord in inundated field; homogeneous	Yes		Yes		Yes		Yes		Yes	
66	32.93217	90.698	32 55.930	90 41.880	6/3/2003	WG	Sampled	QULY/FRPE	ILDE	DIVI/SAMI	VIRO/BESC/	P3/	S1/S2/S4	Hydric	yes			Yes		Yes		Yes					
EPA																											
401	32.71867	90.94008			6/13/2003	Wiseman	Sampled	QUPH	CAIL/FRPE/I	TORA		P3	S2/S4	Hydric	yes		Ponded due to location										
402	33.00861	90.91789	33 00.515	90 55.074	6/4/2003	WG	Sampled	CELA/CAIL/F	CELA/ACRU	LELE/TORA		P3/P4	S1/S4	Hydric	yes												
403	33.02911	91.05438	33 01.792	91 03.320	6/5/2003	1	Sampled	TADI/PLAQ	TADI/PLAQ/(	Lemmna sp		P1/P2		Hydric	yes			Yes		Yes				Yes		Yes	
404	33.215	90.74505	33 12.810	90 44.675	6/4/2003	WG	Sampled			Soybeans					no	PC			Yes		Yes						
405	32.84212	90.85649	32 50.527	90 51.384	6/6/2003	1	Sampled	QUNU/QULY	ILDE	CARA/AMAR		P3/P5		Hydric	yes		reference std.(Typical of undisturbed- Wiseman)	Yes		Yes				Yes			
406	32.64367	90.73197	32 38.620	90 43.918	6/13/2003	1	Sampled	CELA/ULAM,	ULAM/FRPE	CARA/AMBR/SMRO/SMBO/RUTR			S4	Hydric	no		top of ridge in ridge swale topography		Yes						Yes		Yes
407	32.92706	90.64238	32 55.623	90 38.543	6/4/2003	WG	Sampled	FRPE/CAAQ	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5	S4	Hydric	yes												
408	32.54163	90.9623	32 32.498	90 57.738	6/12/2003	1	Sampled	CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA			S4	Hydric	no		Site on micro high		Yes		Yes				Yes		Yes
409	32.66584	90.83098	32 39.951	90 49.862	6/12/2003	2	Sampled	QUNU/QUPH	ILDE	TORA/CARA			S3/S4	Hydric	yes			Yes						Yes		Yes	
410	32.62676	90.82231	32 37.606	90 49.338	6/10/2003	1	Sampled	LIST/QUPH/	CODR/ILDE/	AMAR/TORA/BRCI			S1/S4	Hydric	yes			Yes									
411	32.90241	90.67943	32 54.152	90 40.774	6/4/2003	WG	Sampled	CAAQ/QULY	ACNE/ACRU	SAMI/SACE		P3	S2/S4	Hydric	yes		Close to flood line/ area saturated										
412	33.08641	90.96179	33 05.183	90 57.708	6/4/2003	WG	Sampled	CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5	S2/S4	Hydric	yes									Yes		Yes	
413	32.77072	91.01106	32 46.248	91 00.673	6/9/2003	2	Sampled	QUPH/QUNL	ILDE/CELA/(	TORA/JURE/CARA			S3/S4	Hydric	yes		Bryophyte/lichen line 8"										
414	33.10403	90.66943	33 06.243	90 40.163	6/8/2003	2	Sampled	QUNU/CELA	COST/ILDE/	AMBR/TORA		P5	S2/S4	Hydric	yes			Yes		Yes							
415	32.96246	90.7048	32 57.747	90 42.288	6/3/2003	WG	Sampled			ASPE/RUCR/AMTR/IVAN/ECCR			S1/S4	Hydric	yes			Yes		Yes				Yes		Yes	
416	32.56759	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled	QUNI/CELA/	CODR	OPHI/RUAR			S1	NON-HYDF	no												
417	32.6627	90.88065	32 39.762	90 52.837	6/6/2003	2	Sampled	QUPH/QUNL	ILDE/FRPE/I	TORA/CARA			S3/S4	Hydric	yes		NRCS confirmed soil (DJ)										
418	32.53403	90.80578	32 32.042	90 48.347	6/11/2003	1	Sampled			SOHA/AMAR/DEIL/SOAL		P5			no		Ordinary High Water- pt fell on incline of ditch bank										
419	32.86908	91.04148	32 52.134	91 02.489	6/8/2003	1	Sampled	QULY/CELA	ILDE/CELA/I	LELE/TORA/AMAR.CARA		P2/P4/P6	S2	Hydric	yes			Yes									
420	33.16636	90.66845	33 16.636	90 66.844	6/4/2003	WG	Sited			Catfish Pond					no	PC			Yes								
421	32.80582	91.00128					Inaccessible								xxxx		Behind locked gate										
422	33.13325	90.65917	33 07.991	90 39.545	6/4/2003	WG	Sampled	CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4	Hydric	no		subangular blocky struc.		Yes		Yes						
423	32.91778	90.74132	32 55.067	90 44.475	6/3/2003	WG	Sampled	QUNU/ULAM	ILDE/ACRU/	TORA/AMAR	VIRO/BESC		S2/S4	Hydric	yes												
424	32.58674	90.98021			6/10/2003	1	Sampled	QUNU/TADI/	ILDE			P2/P3/P4/P5/P6		Hydric	yes			Yes		Yes				Yes		Yes	
425	32.66675	90.80832	32 40.000	90 48.501	6/12/2003	2	Sampled	QUNU/LIST/	ILDE	TORA/CARA			S3/S4	Hydric	yes												
426	32.61995	90.78183	32 37.197	90 46.910	6/10/2003	1	Sampled	LIST/QUPH/	ACRU/ULAM	AMBR/PAQL	SMRO		S4	Hydric	no		Adj 3 sloughs w/in 200' (E, W, N)		Yes		Yes				Yes		Yes
427	32.76243	90.69617	32 45.747	90 41.770	6/5/2003	2	Sampled	LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR		S4	NON-HYDF	no		DJ to classify soil (Response rec'd 6-30-03)										
428	32.52896	90.84024	32 31.738	90 50.414	6/11/2003	1	Sampled	CELA/LIST/(	QUNI	PAQU/GECA/COCA/TORA		NI	S4	Hydric	no		Soil sub-angular blocky										
429	32.8132	91.08038	32 48.794	91 04.822	6/9/2003	2	Sampled	QUNU/ACRL	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4	Hydric	yes												
430	32.97148	90.65399	32 58.287	90 39.237	6/3/2003	WG	Sampled		FRPE/BAHA	CARA/SOAL		NI	NI	Hydric	no	PC	WRP/Dry side Sharkey										
431	32.93618	90.80199			6/5/2003	1	Sited			catfish pond					no				Yes		Yes				Yes		Yes
432	32.66497	91.04668	32 39.898	91 02.801	6/9/2003	1	Sampled			VEHA/SOAL		NI	NI	NON-HYDF	no												
434	32.89994	90.92142	32 53.996	90 55.285	6/6/2003	1	Sampled	QUNU/CELA	CARYA SP	CARA/TORA/FOAC		P3	S4	Hydric	yes		Area sloped away from pt., ditches on 2 sides	Yes		Yes							
435	32.88502	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled	LIST/QUNI/C	CELA/COST	TOVI/GECA/PAQU		NI	NI	Hydric	no												
436	33.11024	90.75544	33 06.614	90 45.326	6/5/2003	1	Sampled		CELA/FRPE	CARA/RUAR/SOAL/TORA/		NI	NI	Hydric	no		Subangular blocky, ditched on 2 sides-drained										
437	32.73201	90.88318	32 43.920	90 52.990	6/10/2003	2	Sampled		QUNU/CEOC	IMCA/ASSP			S3/S4	Hydric	yes		Subangular blocky	Yes		Yes				Yes		Yes	
438	33.13056	90.58712	33 07.833	90 35.227	6/5/2003	1	Sampled	LIST/CAAQ/	CELA/ULAM	GECA/TORA/CARA/AMAR		NI	S4	Hydric	no		ditched on 2 sides-drained		Yes		Yes						
439	32.91004	90.66088	32 91.004	90 66.086	6/4/2003	WG	Sampled			Soybeans			S3	Hydric	no	PC											
440	32.61334	90.98928	32 36.799	90 59.359	6/10/2003	1	Sampled	QUNU/FRPE	ULAM/ULCR	AMAR/MICI/CACH		P5	S1/S4	Hydric	yes												
441	32.73519	90.76043			6/10/2003	2	Inaccessible								xxxx		Inaccessible due to deep ditch beside road										
442	32.64657	90.74634	32 38.794	90 44.780	6/13/2003	1	Sampled	CELA/ULAM,	CELA/	TORA/CARA/AMBR			S4	Hydric	no		top of ridge in ridge swale topography		Yes						Yes		Yes
443	32.83555	90.59941	32 50.133	90 35.964	6/5/2003	2	Sampled	QUNU/QUNI	ULCR/QUPH	SOSP	CARA/TORA		S3/S4	Hydric	no (070803)		Adjacent forest w/water lines - Panther Swamp		Yes		Yes						
444	32.59925	90.9104	32 35.955	90 54.624	6/11/2003	1	Sampled	CELA/LIST/(	ILDE/ULCR/I	AMAR/BRCI/TRDE/TORA			S2/S4	Hydric	yes			Yes		Yes				Yes		Yes	
445	32.7997	91.05769	32 47.981	91 03.461	6/9/2003	2	Sampled			Soybeans				Hydric	no	PC			Yes								
446	33.05163	90.50243	33 03.098	90 30.146	6/5/2003	1	Sampled			CARA/SOAL/VEHA/JUTE/I		NI	NI	NON-HYDF	no		Fallow field										
447	32.91341	90.81129			6/5/2003	1	Sampled								yes	FW	Road beside field adjacent to forested area (based on map N	Yes		Yes							
448	32.69342	91.03961	32 41.605	91 02.376	6/9/2003	1	Sampled	CELA/CAIL/I	FRPE/CELA	TORA/CARA/VIRO/MICI/C/		NI	NI	Hydric	no		Pt. Fell between cottonwood plantal and QULY slough										
449	32.65871	90.90515	32 39.522	90 54.313	6/6/2003	2	Sampled	QUPH/QULY	LIST/ILDE/F	TORA/JURE/CARA			S3/S4	Hydric	Yes		NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03										
450	32.88843	90.72992					Inaccessible								xxxx												
451	32.87985	90.71823	32 52.971	90 43.096	6/4/2003	WG	Sampled	QULY/QUPH	ULAM/CELA	SACE/COVI/CARA		P3	S1/S4	Hydric	yes												
452	33.1476	90.98628			6/5/2003	1	Sampled		CELA	CARA/TORA/DEIL/VEHA/SOHA			S4	Hydric	no		40' from siding water wetland; soil sub-ang blocky		Yes								
453	32.74951	91.00025	32 44.970	91 00.014	6/9/2003	1	Sampled	QUNU/CAIL/	CAIL/	VEHA/SOHA	SMBO	NI	NI	Hydric	no		Adjacent to slough (100') but on hi grd				Yes				Yes		Yes
454	33.07053	90.61679	33 414.005	90 3700.38	6/5/2003	1	Sited			Open water					no		20' from coordinate into open water		Yes								
455	32.96233	90.74464	32 57.741	90 44.675	6/3/2003	WG	Sampled			SOSP/CARA/VEBR/TORA		NI	NI	NON-HYDF	no	PC	Former crop field				Yes				Yes		Yes
456	32.58609	91.01983	32 35.172	90 01.215	6/10/2003	1	Sampled	CELA/LIST/F	ILDE/	CACH/LELE		P5/P6		Hydric	yes												
457	32.80068	90.9059	32 48.039	90 54.354	6/13/2003	2	Sampled	CAAQ/FRPE	FOAC/SANI/	AMAR/CARA		P1/P2/P3/P4	S3/S4	Hydric	yes		50-60' wide drainage pattern	Yes									
458	32.63194	-90.77918	32 37.916	90 46.750	6/10/2003	1	Sampled	QUPH/LIST	ILDE/	AMBR/SMRO/OPHI/TORA			S4	Hydric	no		Pt on ridge between sloughs										
801	33.21915	90.75107	33 13.248	90 45.046	6/7/2003	2	Sampled			Rice				Hydric	no	PC											
802	32.88241	90.85426	32 52 56.6(	90 51 15.3	6/10/2003	3	Sampled			Fallow field				Hydric	no	PC											
803	33.02378	90.63367	33 01.397	90 38.037	6/7/2003	2	Sited			Catfish ponds					no	PC	open water - aquaculture		Yes		Yes						
804	32.8166	90.61517	32 48 59.7	90 36 54.6(	6/10/2003	3	Sampled		QUNU/CEOC	CARA/JUEF/CARYOPH/RHYNCOS			S3/S4	Hydric	yes	PC	site appears connected to meander cut-off of Big Sun	Yes		Yes				Yes			
805	33.10563	90.74106	33 06.338	90 44.464	6/8/2003	2	Sampled			Soybeans		NI	NI	Hydric	no	PC											
806	32.99945	90.77612	32 59.967	90 46.567	6/8/2003	1	Sampled			Cotton				Hydric	no	PC											
807	32.80716	90.90737	32 48 25.7(	90 54 26.4(	6/10/2003	3	Sampled			Corn				Hydric	no	PC											
808	32.98715	91.00177	32 59.227	91 00.104	6/10/2003	3	Sampled			Cotton				Hydric	no	PC											
809	33.22761	90.65467	33 13.656	90 39.280	6/7/2003	2	Sampled			Soybeans				Hydric	no	PC											
810	32.99897	90.75053	32 59.938	90 45.032	6/8/2003	1	Sampled			Cotton				Hydric	no	PC	Soils heavily compacted										
811	33.1759	90.57937	33 10.554	90 34.763	6/7/2003	2	Sampled			Soybeans		P4		Hydric	no	PC	No hydrophytic veg										
812	32.87058	90.62543	32 52 14.2	90 37 28.5	6/10/2003	3	Sampled			Catfish ponds					no	OW	Pt. 230' from coordinate @ 267O										
813	33.08474	90.64573	33 05.083	90 36.737	6/7/2003	2	Sampled			Catfish ponds					no	OW	open water - aquaculture										
814	32.97334	90.69388	32 58.401	90 41.632	6/3/2003	WG	Sampled			BRCI		NI	NI	Hydric	no	PC			Yes		Yes						
815	32.74349	90.94042	32 44.594	90 56.357	6/11/2003	3	Sampled			Cotton				NON-HYDF	no	PC											
816	32.52178	90.83587	32 31.309	90 50.154	6/12/2003	3	Sampled			Corn				NON-HYDF	no	PC/NW											
817	32.14697	90.86229	33 08.620	90 39.733	6/4/2003	WG	Sampled			Corn				Hydric	no	PC	817 & 817.1 same site revisited for soil sample		Yes		Yes						
817.1			33 08.818	90 38.737	6/8/2003	2																					
818	33.09911	90.85183	33 05.946	90 51.110	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC											
819	32.97577	90.52934	32 58.596	90 31.768	6/10/2003	3	Sampled			Rice				Hydric	no	PC	Pt. Located in rice field 300' S of coordinates										
820	32.76587	90.69416	32 76.590	90 69.418	6/5/2003	2	Sited			Cotton					no	PC	Pt. 982 ft at 36oN into cotton field										
821	32.63494	90.82267	32 38 05.7	90 49 21.6	6/11/2003	3	Sampled			Corn				Hydric	no	PC											
822	32.95123	90.94658	32 57.0446	90 56.4769	6/10/2003	3	Sampled			Road					no	OW	Road between catfish ponds										
823	32.79169	91.00922					Inaccessible																				
824	32.52751	90.99177	32 31 39.0	90 59 30.3	6/11/2003	3	Sampled			Cotton				NON HYD	no	PC/NW											
825	33.1985	90.79728	33 11.922	90 47.827	6/7/2003	2	Sampled			Rice				Hydric	no	PC											
826	32.95154	90.82138	32 57 05.5	90 49 17.0	6/10/2003	3	Sampled			Cotton				NON-HYDF	no	PC											
827	32.69419	90.91965	32 41.649	90 55,180	6/11/2003	3	Sampled			Corn				NON-HYDF	no	PC			Yes		Yes						
828	32.93551	90.98709	32 56.128	90 59.225	6/10/2003	3	Sampled			Corn			S3	Hydric	no	OW	Site located between cornfield and depressional drain										
829	33.04521	90.59105	33 02.713	90 35.464	6/7/2003	2	Sampled			Corn				Hydric	no	PC	Soil very compacted										
830	32.88256	90.67159					Inaccessible									PC											
831	32.74712	90.96187	32 44 49.4	90 57 42.7	6/11/2003	3	Sampled			Corn				NON-HYDF	no	PC											
832	32.4969	91.02346					Inaccessible																				
833	33.22969	90.65831	33 13.783	90 39.500	6/7/2003	2	Sited			Levee of Catfish pond					no	PC	Ditch at 152o of pt at 80'		Yes								
834	33.04412	90.7983	33 02.654	90 47.899	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC					Yes						
835	32.88322	90.63209	32 58 59.5	90 27 59.2	6/10/2003	3	Sampled			Cotton		NI	NI	Hydric	no		835 & 835.1 same site revisited for soil sample										
835.1					6/3/2003	WG																					
836	32.74484	90.71527	32 44 41.4	90 42 54.9	6/11/2003	3	Sampled			Fallow field				Hydric	no	PC											
837	33.15312	90.78401	33 09.185	90 47.043	6/7/2003	2	Sampled			Cotton			S1	Hydric	no	PC			Yes		Yes						
838	32.97416	90.90942	32 58 26.9	90 54 33.9	6/10/2003	3	Sampled			Soybeans			S1	Hydric	no	PC											
839	32.75527	91.00641					Inaccessible																				
840	32.78549	91.0503			6/9/2003	2	Sampled			Corn		P4	S3	Hydric	no	PC	Drift lines in concave surfaces										
841	33.2141	90.81356	33 12.850	90 48.799	6/7/2003	2	Sited			Catfish ponds					no	PC											

842	33.05854	90.74232	33 03.512	90 44.539	6/8/2003	3	Sampled	GAIL	SOHA			Hydric	no	PC	Edge of spoil bank of ditch												
843	32.6312	90.88149	32 37 52.3	90 52 53.3	6/11/2003	3	Sampled		Soybeans			Hydric	yes	FW	Farmed wetland	Yes		Yes				Yes					
844	32.87113	91.03966	32 52.268	91 02.379	6/9/2003	1	Sampled		Soybeans	NI	NI	Hydric	no	PC													
845	33.07787	90.58473	33 04.643	90 35.095	6/7/2003	2	Sited		Catfish ponds				no	OW	Open water - aquaculture												
846	32.85119	90.72754	32 51 04.3	90 43 39.1	6/10/2003	3	Sampled		Cotton			Hydric	no	PC			Yes		Yes					Yes			
847	32.66389	91.00143	32 39 50.0	90 00 05.2	6/11/2003	3	Sampled		Cotton	NI	NI	Hydric	no	PC													
848	32.53588	91.03583	32 32 08.1	91 02 08.9	6/11/2003	3	Sampled		Cotton			NON-HYD	no	PC/NW													
849	33.19716	90.6459	33 11.813	90 39.001	6/7/2003	2	Sited		Catfish ponds				no	PC	open water - aquaculture		Yes		Yes								
850	33.02577	90.76075	33 01.546	90 45.645	6/8/2003	2	Sampled		Corn			Hydric	no	PC	Very compacted soil												
851	33.10883	90.54603	33 06.531	90 32.765	6/12/2003	3	Sampled		Soybeans			Hydric	no	PC			Yes		Yes								
852	32.77174	90.65402	32 46.304	90 39.240	6/12/2003	3	Sampled	QUNI	SOALC/ARA/AMA			Hydric	no	PC			Yes		Yes					Yes		Yes	
853	32.54173	90.8057	32 32.505	90 48.339	6/12/2003	3	Sampled		Corn			Hydric	no	PC/NW													
861	32.9909	90.66674			6/3/2003	WG	Sampled		Soybeans	NI	NI	NI	no														
868	32.80635	90.70569	32 48 22.8	90 42 20.4	6/11/2003	3	Sampled		Cotton			NON-HYD	no														
170																											
Total																56	33	50	28	41	11	48	18	45	17		

Attachment B

Conservation Organizations Comments on the
Final Supplement No. 2 to the 1982 Yazoo Area Pump Project
Final Environmental Impact Statement

Distances from Wells to Mississippi River and Levee



Yazoo EMAP Points

Corps	EMAP Coordinates Latitude (dd	Longitude (dd)	Actual Location Latitude	Longitude	Date	Team		Sample Status
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003		1	Sampled
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003		1	Sampled
3	32.546897	90.978034						**Inaccessible**
4	32.785408	90.801334	32 47.128	90 48.085	6/6/2003		2	Sampled
5	32.591397	90.89303			6/11/2003		1	Sampled
6	32.721975	90.845267	32 43.318	90 50.715	6/11/2003		2	Sampled
7	32.802933	90.626684	32 48.184	90 37.620	6/5/2003		2	Sampled
8	32.741187	90.803771	32 44.477	90 48.228	6/12/2003		2	Sampled
9	32.49847	90.856535	32 29.908	90 51.392	6/13/2003		1	Sampled
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003		2	Sampled
11	33.213506	90.766058			6/13/2003	Wiseman		**Sited**
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003		2	Sampled
13	32.500399	90.915135						**Inaccessible**
14	32.617195	90.893849	32 37.032	90 53.631	6/11/2003		1	Sampled
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003		1	Sampled
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003		2	Sampled
17	32.611308	90.934277	32 36.702	90 56.367	6/13/2003		3	Sampled
18	32.701448	90.994111	32 42.087	90 59.647	6/9/2003		1	Sampled
19	32.456948	90.953467	32 27.417	90 57.208	6/11/2003		1	Sampled
20	32.785036	90.828365	32 47.103	90 49.706	6/6/2003		2	Sampled
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003		3	Sampled
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003		2	Sampled
23	32.762378	90.750511	32 45.743	90 45.031	6/5/2003		2	Sampled
24	32.68517	90.779582	32 41.112	90 46.774	6/12/2003		2	Sampled
25	32.502548	90.889858						**Inaccessible**
26	32.749034	90.852285	32 44.944	90 51.137	6/10/2003		2	Sampled
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003		1	**Sited**
28	32.681403	90.752365	32 40.801	90 45.140	6/11/2003		2	Sampled
29	32.530351	90.911339			6/12/2003		1	Sampled
30	32.837883	90.823288	32 50.273	90 49 397	6/6/2003		1	Sampled
31	32.883326	90.807604	32 53.000	90 48.456	6/6/2003		1	Sampled
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003		1	Sampled
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003		1	**Sited**
34	32.906428	90.739268			6/3/2003	WG		**Sited**
35	32.477146	90.965723	32 28.721	90 58.106	6/13/2003		3	Sampled
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003		2	Sampled
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003		1	Sampled
38	32.837817	90.974408	32 50.268	90 58.471	6/12/2003		1	Sampled
39	32.876854	90.747889	32 52.611	90 44.073	6/6/2003		1	Sampled
40	32.721243	90.776592	32 43.212	90 46.607	6/11/2003		2	Sampled
41	32.506255	90.872116			6/13/2003		1	Sampled
42	32.72748	90.893222	32 43.649	90 53.595	6/13/2003		2	Sampled
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003		1	**Sited**
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003		2	Sampled
45	32.524618	90.935732						**Inaccessible**
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003		2	Sampled
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003		1	Sampled
48	32.59603	90.790894	32 35.762	90 47.454	6/10/2003		1	Sampled
49	32.618424	90.983151			6/10/2003		1	**Sited**

Hydroveg				Hydrol
Canopy	Shrub	Herb	Vines	Primary
		CARA/BRCI		P5
CELA/ACNE	ILDE/ACNE/	CARA/SMRO/TOVI/PAQU/TORA	VIRO	
FRPE/CELA	ILDE/QULY/CARA	TORA/SMISP/BOCY		P3/P6
		CARA/BRCI/AMTR		P2/P3/P5
	QUNU/	TOVI/CARA/SEEX		P2/P3/P5
QUPH	LIST/ULAM/ACRU/ILDE/ILCR		BESC/TORA/AMBR	P3/P6
QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3
CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5
		Soybeans		
		Open water		
QULY/QUNU/CELA	ILDE/CELA/FRPE	CARA/TORA		P3
		SOAL/RUCR/VEHA/DEIL		NI
		Cotton		
CAAQ/CELA/QUNU/SANI	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3
		CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P5
		VEHA/SOAL/DEIL		NI
ULAM/CELA		IVAN/POPE		P3/P5
ULCR/CAAQ/CELA	CELA/ILDE/	CARA/TORA/SMISP/BOCY		P1/P2/P3/P4/P6
		SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5
QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P6
QULY/CELA/QUNU/QUPH	ILDE/CRSP/	BOCY/BICA		P3/P6
QUNU/QUPH/CAAQ	ILDE	VISP/	TORA/SMSP	P3
	QUNI/QUNU	HIMI/SOSP/POSP		
		Open water		
QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5/P6
QULY/CAAQ/CELA	ILDE/CELA/ULAM			P1/P3/P4/P5/P6
QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4
CELA/CAAQ/ULAM	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5
CAAQ/QULY/FRPE	FOAC			P1/P2
		Open water		
		Open water		
SANI				P1/P2/P3/P5/P6
QUNU/CELA/ULCR/	ILDE/ACNE/	TORA/CARA		P2/P3
FRPE/QULY	HIMI/CEOC/FOAC	POHY		P1/P2/P3/P5
ACNE/FRPE/ULAM	CODR	TORA/AMAR		NI
QUNU/ULAM/QULY	CELA/ILDE	CARA		
QUNU/QULY	ILDE/CAAQ	CARA		P2/P3
CAAQ/QUPH/CELA	CELA/CRVI	FRPE/CARA		P3/P5
	QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2
		Open water		
QUNU/CELA/QULY	ILDE/FRPE	QULY/AMAR		P1/P3
QUNU/FRPE/CELA	ILDE/CAAQ/RUSP/	CARA/JURE		P3
		Corn		
GLTR/CELA/FRPE/QUNU/L	ILDE/CELA/ULAM/	IVAN/TORA/BRCI		P3
		Open water		

ogy Secondary	Soils	**Wet Final**	NRCS Determination
S2	Hydric	yes	FW
S1/S4	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	PC
	Hydric	yes	
S1/S3/S4	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S2/S3	Hydric	yes	FW
		no	
S3/S4	Hydric	yes	
NI	Hydric	no	
		no	PC
S3/S4	Hydric	yes	
	Hydric	yes	
NI	Hydric	no	
S2	Hydric	yes	
	Hydric	yes	
S1/S4/S6	Hydric	yes	
S2/S3	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
S2/S3/S5	Hydric	yes	
		no	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S1	Hydric	yes	
S1	Hydric	yes	
	Hydric	yes	
		no	
		no	
	Hydric	yes	
S2/S3/S4	Hydric	yes	
S1	Hydric	yes	
NI	Hydric	no	
S1/S4	Hydric	yes	
S3/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
		no	
S2/S3/S4	Hydric	yes	
S3/S4	Hydric	yes	
		no	PC
S2	Hydric	yes	
		no	

Comments	EPA5yr pts
Soil-subang blocky; area outside greentree but hi	
Hi water	
Drainage feature 50' W of pt., organic stains on ped faces	
WRP	
On concave landscape position	
Panther Swamp WMA	
"Forced March"	
WRP 250'W of pt; Evid of water fall in ditch (silt deposits)	
Hi water	
Old field plt'd w/ QUNU	
"Dave's Wetland" Hi bank of Big Sunflower	
Coordinate evaluated 0.2mi from pt due to hi water	
Recent cutover (QUNU tops)	
Inundation prevented horizon ID	
Edge of clearcut	
Lichen lines @ 14"	
Hi water	
S5 = crayfish chimneys	
Lake Washington	
Mahannah WMA	
Pt 471 ft from coordinates	
Slough	
Representative sample taken 0.19 mi from pt @ 124O	
Reporter	
Spoil bank of Steele Bayou	
"Forced March"	
Draining rapidly???	
Lake Washington	
Evidence of recent subsidence/ 2ry watermark @ 3'	
Hi water	
Twin Oaks WMA	
Pt in middle of Steele Bayou channel	

EPA2yr pts	Pt in 2yr Floodplain	Pt in 5yr Floodplain	Wet? Site(1)	Potential Impact	Potential Impact +	QA
	1	1				WBA
	2	2		Yes	Yes	WBA
	3	3				
	4	4				WBA
	5	5				WBA
	6	6				WBA
	7	7		Yes	Yes	WBA
	8	8				WBA
	9	9				WBA
	10	10				WBA
		11				WBA
	12	12				WBA
	13	13				
	14	14				WBA
	15	15				WBA
	16	16		yes	yes	WBA
	17	17				WBA
	18	18				WBA
	19	19				WBA
	20	20				WBA
	21	21				WBA
	22	22				WBA
	23	23				WBA
	24	24				WBA
	25	25				
	26	26				WBA
	27	27				WBA
	28	28				WBA
	29	29				WBA
	30	30				WBA
	31	31				WBA
	32	32				WBA
	33	33				WBA
	34	34				WBA
	35	35				WBA
	36	36				WBA
	37	37				WBA
	38	38				WBA
	39	39				WBA
	40	40				WBA
	41	41				WBA
	42	42				WBA
	43	43				WBA
	44	44				WBA
	45	45				
	46	46				WBA
	47	47				WBA
	48	48				WBA
	49	49				WBA

Key to Hydrology Indicators

Primary Indicators

P1 = Inundated
P2 = Saturated in the upper 12 inches
P3 = Water marks
P4 = Drift Lines
P5 = Sediment desposits
P6 = Drainage patterns in the wetland

Secondary Indicators

S1 = Oxidized root channels in upper 12 inches
S2 = Water stained leaves
S3 = Local soil survey data
S4 = FAC-neutral test
S5 = Other (explained)

WG = Whole Group

NI = Not Indicated

Note: On 06/02/03 Steele Bayou gates were closed. On 06/05/03 at 1000 hrs gates were opened.

	50	32.786188	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled
	51	32.524526	91.063206			6/13/2003	1	Sampled
	52	32.784148	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled
	53	32.478106	90.931911					**Inaccessible**
	54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled
	55	32.783145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled
	57	32.553868	90.913438	32 33.232	90 54.806	6/13/2003	1	**Sited**
	66	32.932167	90.698003	32 55.930	90 41.880	6/3/2003 WG		Sampled
EPA								
	401	32.71867	90.940081			6/13/2003 Wiseman		Sampled
	402	33.008613	90.917894	33 00.515	90 55.074	6/4/2003 WG		Sampled
	403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled
	404	33.214996	90.745053	33 12.810	90 44.675	6/4/2003 WG		Sampled
	405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled
	406	32.643673	90.731969	32 38.620	90 43.918	6/13/2003	1	Sampled
	407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003 WG		Sampled
	408	32.541629	90.962297	32 32.498	90 57.738	6/12/2003	1	Sampled
	409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled
	410	32.626764	90.822305	32 37.606	90 49.338	6/10/2003	1	Sampled
	411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003 WG		Sampled
	412	33.086412	90.96179	33 05.183	90 57.708	6/4/2003 WG		Sampled
	413	32.770721	91.011064	32 46.248	91 00.673	6/9/2003	2	Sampled
	414	33.104031	90.669432	33 06.243	90 40.163	6/8/2003	2	Sampled
	415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003 WG		Sampled
	416	32.567588	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled
	417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled
	418	32.534032	90.805779	32 32.042	90 48.347	6/11/2003	1	Sampled
	419	32.869081	91.041482	32 52.134	91 02.489	6/8/2003	1	Sampled
	420	33.166359	90.66845	33 16.636	90 66.844	6/4/2003 WG		**Sited**
	421	32.805621	91.001358					**Inaccessible**
	422	33.133248	90.659165	33 07.991	90 39.545	6/4/2003 WG		Sampled
	423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003 WG		Sampled
	424	32.586737	90.980214			6/10/2003	1	Sampled
	425	32.666751	90.808321	32 40.000	90 48.501	6/12/2003	2	Sampled
	426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled
	427	32.76243	90.696168	32 45.747	90 41.770	6/5/2003	2	Sampled
	428	32.528961	90.840237	32 31.738	90 50.414	6/11/2003	1	Sampled
	429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled
	430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003 WG		Sampled
	431	32.936179	90.801992			6/5/2003	1	**Sited**
	432	32.664974	91.046676	32 39.898	91 02.801	6/9/2003	1	Sampled
	434	32.89994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled
	435	32.885015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled
	436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled
	437	32.732014	90.883177	32 43.920	90 52.990	6/10/2003	2	Sampled
	438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled
	439	32.910041	90.66088	32 91.004	90 66.086	6/4/2003 WG		Sampled
	440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled
	441	32.735158	90.760427			6/10/2003	2	**Inaccessible**
	442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003	1	Sampled
	443	32.83555	90.599405	32 50.133	90 35.964	6/5/2003	2	Sampled
	444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003	1	Sampled

QULY/CAAQ/FRPE/TADI	CEOC/CAAQ/	CEOC/FRPE/AMAR		P1/P2/P3/P6
		Zizania		P1
QULY/QUNU/FRPE	ILDE/CAAQ	CARA/JURE/MORU		P3
CELA/QUNU/FRPE/ULAM	ULAM/ILDE	CARA/TRDI	BESC	P3/P5
QUNU/CAAQ/CELA/QUPH	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3
		Sudan grass		P1
QULY/FRPE/QUNU	ILDE	DIVI/SAMI	VIRO/BESC/TORA	P3/
QUPH	CAIL/FRPE/CELA/CODR	TORA		P3
CELA/CAIL/FRPE/ULAM	CELA/ACRU	LELE/TORA		P3/P4
TADI/PLAQ	TADI/PLAQ/CEOC	Lemmna sp		P1/P2
		Soybeans		
QUNU/QULY/FRPE	ILDE	CARA/AMAR		P3/P5
CELA/ULAM/LIST	ULAM/FRPE/LIST	CARA/AMBR/SMRO/SMBO/RUTR		
FRPE/CAAQ/	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5
CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA		
QUNU/QUPH/CELA	ILDE	TORA/CARA		
LIST/QUPH/CELA/CAIL	CODR/ILDE/CELA	AMAR/TORA/BRCI		
CAAQ/QULY/FRPE	ACNE/ACRU/CELA	SAMI/SACE		P3
CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5
QUPH/QUNU/FRPE	ILDE/CELA/COST/	TORA/JURE/CARA		
QUNU/CELA/FRPE/ULAM	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P5
		ASPE/RUCR/AMTR/IVAN/ECCR		
QUNI/CELA/ACNE/LIST	CODR	OPHI/RUAR		
QUPH/QUNU	ILDE/FRPE/LIST	TORA/CARA		
		SOHA/AMAR/DEIL/SOAL		P5
QULY/CELA/ULAM/SANI/FF	ILDE/CELA/FOAC	LELE/TORA/AMAR.CARA		P2/P4/P6
		Catfish Pond		
CELA/QUPH	CELA	CATA/GECA/COCA/BESC		
QUNU/ULAM/FRPE/CELA	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC	
QUNU/TADI/CELA/CAAQ/	ILDE			P2/P3/P4/P5/P6
QUNU/LIST/CELA	ILDE	TORA/CARA		
LIST/QUPH/CELA/CAIL	ACRU/ULAM/LIDE/	AMBR/PAQU/OPHI/TORA/	SMRO	
LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR	
CELA/LIST/CAIL/	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI
QUNU/ACRU/CAAQ	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC		
	FRPE/BAHA	CARA/SOAL		NI
		catfish pond		
		VEHA/SOAL		NI
QUNU/CELA	CARYA SP.	CARA/TORA/FOAC		P3
LIST/QUNI/CAIL	CELA/COST	TOVI/GECA/PAQU		NI
	CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI
	QUNU/CEOC	IMCA/ASSP		
LIST/CAAQ/QULY/ULCR	CELA/ULAM	GECA/TORA/CARA/AMAR		NI
		Soybeans		
QUNU/FRPE/CELA/QUPH	ULAM/ULCR	AMAR/VICI/CACH		P5
CELA/ULAM/LIST/QUPH	CELA/	TORA/CARA/AMBR		
QUNU/QUNI	ULCR/QUPH/	SOSP	CARA/TORA	
CELA/LIST/QUNU/ULAM	ILDE/ULCR/CELA	AMAR/BRCI/TRDE/TORA		

S2/S3/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S1/S2/S4	Hydric	yes	
S2/S4	Hydric	yes	
S1/S4	Hydric	yes	
	Hydric	yes	
		no	PC
	Hydric	yes	
S4	Hydric	no	
S4	Hydric	yes	
S4	Hydric	no	
S3/S4	Hydric	yes	
S1/S4	Hydric	yes	
S2/S4	Hydric	yes	
S2/S4	Hydric	yes	
S3/S4	Hydric	yes	
S2/S4	Hydric	yes	
S1/S4	Hydric	yes	
S1	NON-HYDRIC	no	
S3/S4	Hydric	yes	
		no	
S2	Hydric	yes	
		no	PC
		xxxxx	
S4	Hydric	no	
S2/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
S4	Hydric	no	
S4	NON-HYDRIC	no	
S4	Hydric	no	
S3/S4	Hydric	yes	
NI	Hydric	no	PC
		no	
NI	NON-HYDRIC	no	
S4	Hydric	yes	
NI	Hydric	no	
NI	Hydric	no	
S3/S4	Hydric	yes	
S4	Hydric	no	
S3	Hydric	no	PC
S1/S4	Hydric	yes	
		xxxxx	
S4	Hydric	no	
S3/S4	Hydric	no (070803)	
S2/S4	Hydric	yes	

Edge of Eagle Lake
Microtopography
Hi water

Site 0.34 mi from coord in inundated field; homogeneous

Ponded due to location

403
404
reference std.(Typical of undisturbed- Wiseman) 405
top of ridge in ridge swale topography 406

Site on micro high 408
409
410
Close to flood line/ area saturated

Bryophyte/lichen line 8" 413
414
415
416
NRCS confirmed soil (DJ)
Ordinary High Water- pt fell on incline of ditch bank
419
420
Behind locked gate 421
subangular blocky struc. 422
423
424
425
Adj 3 sloughs w/in 200' (E, W, N) 426
DJ to classify soil (Response rec'd 6-30-03) 427
Soil sub-angular blocky

WRP/Dry side Sharkey 430
431
432
Area sloped away from pt., ditches on 2 sides 434

Subangular blocky; ditched on 2 sides-drained 436
Subangular blocky 437
ditched on 2 sides-drained 438

440
Inaccessible due to deep ditch beside road
top of ridge in ridge swale topography 442
Adjacent forest w/water lines - Panther Swamp 443
444

	50	50				WBA
	51	51				WBA
	52	52				WBA
	53	53				
	54	54				WBA
	55	55				WBA
	57	57				WBA
	66	66				WBA
						WBA
						WBA
403	403	403	yes	yes	yes	WBA
404	404	404	no			WBA
405	405	405	yes	yes	yes	WBA
406	406	406	no			WBA
					yes	WBA
408	408	408	no			WBA
409	409	409	yes	yes	yes	WBA
410	410	410	yes	yes	yes	WBA
					yes	WBA
						WBA
		413	yes			WBA
414	414	414	yes	yes	yes	WBA
415	415	415	yes	yes	yes	WBA
		416	no			WBA
						WBA
						WBA
419	419	419	yes	yes	yes	WBA
420	420	420	no			WBA
421	421	421	xxxxx			WBA
422	422	422	no			WBA
		423	yes			WBA
424	424	424	yes	yes	yes	WBA
		425	yes			WBA
426	426	426	no			WBA
		427	no			WBA
						WBA
						WBA
		430	no			WBA
431	431	431	no			WBA
		432	no			WBA
434	434	434	yes	yes	yes	WBA
						WBA
		436	no			WBA
437	437	437	yes	yes	yes	WBA
438	438	438	no			WBA
						WBA
		440	yes			WBA
						WBA
442	442	442	no			WBA
443	443	443	no			WBA
444	444	444	yes	yes	yes	WBA

445	32.799695	91.057693	32 47.981	91 03.461	6/9/2003		2	Sampled
446	33.051629	90.50243	33 03.098	90 30.146	6/5/2003		1	Sampled
447	32.913414	90.811287			6/5/2003		1	Sampled
448	32.693421	91.039607	32 41.605	91 02.376	6/9/2003		1	Sampled
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003		2	Sampled
450	32.686434	90.720622						**Inaccessible**
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG		Sampled
452	33.1476	90.986276			6/5/2003		1	Sampled
453	32.749506	91.000253	32 44.970	91 00.014	6/9/2003		1	Sampled
454	33.070527	90.616787	33 414.005	90 3700.383	6/5/2003		1	**Sited**
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG		Sampled
456	32.58609	91.019833	32 35.172	90 01.215	6/10/2003		1	Sampled
457	32.800681	90.905901	32 48.039	90 54.354	6/13/2003		2	Sampled
458	32.631939	-90.779176	32 37.916	90 46.750	6/10/2003		1	Sampled
Non								
801	33.219145	90.751069	33 13.248	90 45.046	6/7/2003		2	Sampled
802	32.882412	90.854264	32 52 56.667	90 51 15.342	6/10/2003		3	Sampled
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003		2	**Sited**
804	32.816597	90.615165	32 48 59.71	90 36 54.66	6/10/2003		3	Sampled
805	33.105626	90.741057	33 06.338	90 44.464	6/8/2003		2	Sampled
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003		1	Sampled
807	32.807157	90.907368	32 48 25.760	90 54 26.468	6/10/2003		3	Sampled
808	32.987145	91.001767	32 59.227	91 00.104	6/10/2003		3	Sampled
809	33.227605	90.654674	33 13.656	90 39.280	6/7/2003		2	Sampled
810	32.99897	90.750527	32 59.938	90 45.032	6/8/2003		1	Sampled
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003		2	Sampled
812	32.870581	90.625433	32 52 14.258	90 37 28.588	6/10/2003		3	Sampled
813	33.084743	90.645731	33 05.083	90 36.737	6/7/2003		2	Sampled
814	32.973342	90.693884	32 58.401	90 41.632	6/3/2003	WG		Sampled
815	32.74349	90.940417	32 44.594	90 56.357	6/11/2003		3	Sampled
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003		3	Sampled
817	33.146973	90.662281	33 08.820	90 39.733	6/4/2003	WG		Sampled
817.1			33 08.818	90 39.737	6/8/2003		2	
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003		2	Sampled
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003		3	Sampled
820	32.765865	90.694156	32 76.590	90 69.418	6/5/2003		2	**Sited**
821	32.63494	90.82267	32 38 05.751	90 49 21.658	6/11/2003		3	Sampled
822	32.951234	90.946584	32 57.0446	90 56.4769	6/10/2003		3	Sampled
823	32.791688	91.005325						**Inaccessible**
824	32.527508	90.991765	32 31 39.040	90 59 30.370	6/11/2003		3	Sampled
825	33.198498	90.797275	33 11.922	90 47.827	6/7/2003		2	Sampled
826	32.951544	90.821376	32 57 05.522	90 49 17.002	6/10/2003		3	Sampled
827	32.694192	90.919654	32 41.649	90 55,180	6/11/2003		3	Sampled
828	32.935509	90.987087	32 56.128	90 59.225	6/10/2003		3	Sampled
829	33.045206	90.59105	33 02.713	90 35.464	6/7/2003		2	Sampled
830	32.852577	90.671592						**Inaccessible**
831	32.747124	90.961868	32 44 49.431	90 57 42.741	6/11/2003		3	Sampled
832	32.496596	91.033456						**Inaccessible**
833	33.229689	90.658305	33 13.783	90 39.500	6/7/2003		2	**Sited**
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003		2	Sampled
835	32.983217	90.633087	32 58 59.523	90 37 59.211	6/10/2003		3	Sampled
835.1					6/3/2003	WG		

		Soybeans		
		CARA/SOAL/VEHA/JUTE/IVAN		NI
CELA/CAIL/LIST	FRPE/CELA	TORA/CARA/VIRO/VICI/CAFR		NI
QUPH/QULY/QUNU	LIST/ILDE/FRPE	TORA/JURE/CARA		
QULY/QUPH/LIST	ULAM/CELA	SACE/COVI/CARA		P3
	CELA	CARA/TORA/DEIL/VEHA/SOHA		
QUNU/CAIL/LIST	CAIL/	VEHA/SOHA	SMBO	NI
		Open water		
		SOSP/CARA/VEBR/TORA		NI
CELA/LIST/FRPE/	ILDE/	CACH/LELE		P5/P6
CAAQ/FRPE	FOAC/SANI/FRPE/COST	AMAR/CARA		P1/P2/P3/P4/P6
QUPH/LIST	ILDE/	AMBR/SMRO/OPHI/TORA		
		Rice		
		Fallow field		
		Catfish ponds		
	QUNU/CEOC/	CARA/JUEF/CARYOPH/RHYNCOS		
		Soybeans		NI
		Cotton		
		Corn		
		Cotton		
		Soybeans		
		Cotton		
		Soybeans		P4
		Catfish ponds		
		Catfish ponds		
		BRCI		NI
		Cotton		
		Corn		
		Corn		
		Soybeans		
		Rice		
		Cotton		
		Corn		
		Road		
		Cotton		
		Rice		
		Cotton		
		Corn		
		Corn		
		Corn		
		Corn		
		Levee of Catfish pond		
		Soybeans		
		Cotton		NI

	Hydric	no	PC
NI	NON-HYDRIC	no	
		yes	FW
NI	Hydric	no	
S3/S4	Hydric	Yes	
		xxxxx	
S1/S4	Hydric	yes	
S4	Hydric	no	
NI	Hydric	no	
		no	
NI	NON-HYDRIC	no	PC
	Hydric	yes	
S3/S4	Hydric	yes	
S4	Hydric	no	
	Hydric	no	PC
	Hydric	no	PC
		no	PC
S3/S4	Hydric	yes	PC
NI	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
		no	OW
		no	OW
NI	Hydric	no	PC
	NON-HYDRIC	no	PC
	NON-HYDRIC	no	PC/NW
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
		no	PC
	Hydric	no	PC
		no	OW
	NON_HYDRIC	no	PC/NW
	Hydric	no	PC
	NON-HYDRIC	no	PC
	NON-HYDRIC	no	PC
S3	Hydric	no	OW
	Hydric	no	PC
			PC
	NON-HYDRIC	no	PC
		no	PC
	Hydric	no	PC
NI	Hydric	no	

445

Fallow field

Road beside field adjacent to forested area (based on map NRCS thought point fell in forested wetland) 447

Pt. Fell between cottonwood plantat and QULY slough 448

NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03 449

450

40' from stding water wetland; soil sub-ang blocky 452

Adjacent to slough (100') but on hi grd 453

20' from coordinate into open water

Former crop field 455

456

50-60' wide drainage pattern 457

Pt on ridge between sloughs 458

open water - aquaculture

site appears connected to meander cut-off of Big Sun

Soils heavily compacted

No hydrophytic veg

Pt. 230' from coordinate @ 267O

open water - aquaculture

817 & 817.1 same site revisited for soil sample

Pt. Located in rice field 300' S of coordinates

Pt. 982 ft at 36oN into cotton field

Road between catfish ponds

Site located between cornfield and depressional drain

Soil very compacted

Ditch at 152o of pt at 80'

835 & 835.1 same site revisited for soil sample

445	445	445	no			WBA
						WBA
447	447	447	yes	yes	yes	WBA
		448	no			WBA
		449	yes			WBA
450	450	450	xxxxx			WBA
					yes	WBA
452	452	452	no			WBA
		453	no			WBA
454	454		no			WBA
		455	no			WBA
		456	yes			WBA
457	457	457	yes	yes	yes	WBA
		458	no			WBA
						WBA
		802				WBA
	803	803				WBA
	804	804		yes	yes	WBA
						WBA
						WBA
						WBA
						WBA
		809				WBA
						WBA
						WBA
		812				WBA
		813				WBA
	814	814				WBA
						WBA
		816				WBA
	817	817				WBA
						WBA
						WBA
		820				WBA
		821				WBA
		822				WBA
		823				
						WBA
						WBA
						WBA
	827	827				WBA
						WBA
						WBA
		831				WBA
		832				
	833	833				WBA
						WBA
						WBA

836	32.744837	90.715266	32 44 41.425	90 42 54.941	6/11/2003		3	Sampled
837	33.153119	90.784008	33 09.185	90 47.043	6/7/2003		2	Sampled
838	32.974159	90.90942	32 58 26.926	90 54 33.955	6/10/2003		3	Sampled
839	32.755269	91.006409						**Inaccessible**
840	32.785489	91.050297			6/9/2003		2	Sampled
841	33.214101	90.81356	33 12.850	90 48.799	6/7/2003		2	**Sited**
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003		3	Sampled
843	32.631199	90.881485	32 37 52.329	90 52 53.341	6/11/2003		3	Sampled
844	32.87113	91.039656	32 52.268	91 02.379	6/9/2003		1	Sampled
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003		2	**Sited**
846	32.851185	90.727543	32 51 04.311	90 43 39.131	6/10/2003		3	Sampled
847	32.663892	91.00143	32 39 50.016	90 00 05.219	6/11/2003		3	Sampled
848	32.535879	91.035833	32 32 09.164	91 02 08.975	6/11/2003		3	Sampled
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003		2	**Sited**
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003		2	Sampled
851	33.108834	90.546094	33 06.531	90 32.765	6/12/2003		3	Sampled
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003		3	Sampled
853	32.541728	90.8057	32 32.505	90 48.339	6/12/2003		3	Sampled
861	32.990902	90.666738			6/3/2003	WG		Sampled
868	32.806345	90.705689	32 48 22.889	90 42 20.459	6/11/2003		3	Sampled

	Fallow field	
	Cotton	
	Soybeans	
	Corn	P4
	Catfish ponds	
CAIL	SOHA	
	Soybeans	
	Soybeans	NI
	Catfish ponds	
	Cotton	
	Cotton	NI
	Cotton	
	Catfish ponds	
	Corn	
	Soybeans	
QUNI	SOAL/CARA/ANVI	
	Corn	
	Soybeans	NI
	Cotton	

	Hydric	no	PC
S1	Hydric	no	PC
S1	Hydric	no	PC
S3	Hydric	no	PC
		no	PC
	Hydric	no	PC
	Hydric	yes	FW
NI	Hydric	no	PC
		no	OW
	Hydric	no	PC
NI	Hydric	no	PC
	NON_HYDRIC	no	PC/NW
		no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC/NW
NI	NI	no	
	NON-HYDRIC	no	

Drift lines in concave surfaces

Edge of spoil bank of ditch
Farmed wetland

Open water - aquaculture

open water - aquaculture
Very compacted soil

	836			WBA
837	837			WBA
				WBA
839	839			
	840			WBA
				WBA
	842			WBA
843	843	yes	yes	WBA
				WBA
				WBA
846	846			WBA
	847			WBA
	848			WBA
849	849			WBA
				WBA
851	851			WBA
852	852			WBA
				WBA
				WBA
	868			
97	129			

Yazoo EMAP Points

Corps	EMAP Coordinates Latitude (dd	Longitude (dd)	Actual Location Latitude	Longitude	Date	Team	Sample Status
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003	1	Sampled
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003	1	Sampled
3	32.546897	90.978034					**Inaccessible**
4	32.785408	90.801334	32 47.128	90 48.085	6/6/2003	2	Sampled
5	32.591397	90.89303			6/11/2003	1	Sampled
6	32.721975	90.845267	32 43.318	90 50.715	6/11/2003	2	Sampled
7	32.802933	90.626684	32 48.184	90 37.620	6/5/2003	2	Sampled
8	32.741187	90.803771	32 44.477	90 48.228	6/12/2003	2	Sampled
9	32.49847	90.856535	32 29.908	90 51.392	6/13/2003	1	Sampled
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003	2	Sampled
11	33.213506	90.766058			6/13/2003	Wiseman	**Sited**
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003	2	Sampled
13	32.500399	90.915135					**Inaccessible**
14	32.617195	90.893849	32 37.032	90 53.631	6/11/2003	1	Sampled
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003	1	Sampled
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003	2	Sampled
17	32.611308	90.934277	32 36.702	90 56.367	6/13/2003	3	Sampled
18	32.701448	90.994111	32 42.087	90 59.647	6/9/2003	1	Sampled
19	32.456948	90.953467	32 27.417	90 57.208	6/11/2003	1	Sampled
20	32.785036	90.828365	32 47.103	90 49.706	6/6/2003	2	Sampled
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003	3	Sampled
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003	2	Sampled
23	32.762378	90.750511	32 45.743	90 45.031	6/5/2003	2	Sampled
24	32.68517	90.779582	32 41.112	90 46.774	6/12/2003	2	Sampled
25	32.502548	90.889858					**Inaccessible**
26	32.749034	90.852285	32 44.944	90 51.137	6/10/2003	2	Sampled
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003	1	**Sited**
28	32.681403	90.752365	32 40.801	90 45.140	6/11/2003	2	Sampled
29	32.530351	90.911339			6/12/2003	1	Sampled
30	32.837883	90.823288	32 50.273	90 49 397	6/6/2003	1	Sampled
31	32.883326	90.807604	32 53.000	90 48.456	6/6/2003	1	Sampled
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003	1	Sampled
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003	1	**Sited**
34	32.906428	90.739268			6/3/2003	WG	**Sited**
35	32.477146	90.965723	32 28.721	90 58.106	6/13/2003	3	Sampled
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003	2	Sampled
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003	1	Sampled
38	32.837817	90.974408	32 50.268	90 58.471	6/12/2003	1	Sampled
39	32.876854	90.747889	32 52.611	90 44.073	6/6/2003	1	Sampled
40	32.721243	90.776592	32 43.212	90 46.607	6/11/2003	2	Sampled
41	32.506255	90.872116			6/13/2003	1	Sampled
42	32.72748	90.893222	32 43.649	90 53.595	6/13/2003	2	Sampled
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003	1	**Sited**
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003	2	Sampled
45	32.524618	90.935732					**Inaccessible**
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003	2	Sampled
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003	1	Sampled

Hydroveg				Hydrology	
Canopy	Shrub	Herb	Vines	Primary	Secondary
		CARA/BRCI		P5	S2
CELA/ACNE	ILDE/ACNE/	CARA/SMRO/TOVI/PAQU/TORA	VIRO		S1/S4
FRPE/CELA	ILDE/QULY/CARA	TORA/SMISP/BOCY		P3/P6	S2/S3/S4
		CARA/BRCI/AMTR		P2/P3/P5	
	QUNU/	TOVI/CARA/SEEX		P2/P3/P5	
QUPH	LIST/ULAM/ACRU/ILDE/ILCR		BESC/TORA/AMBR	P3/P6	S1/S3/S4
QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S2/S3/S4
CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5	
		Soybeans			S2/S3
		Open water			
QULY/QUNU/	ILDE/CELA/FRPE	CARA/TORA		P3	S3/S4
		SOAL/RUCR/VEHA/DEIL		NI	NI
		Cotton			
CAAQ/CELA/	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3	S3/S4
		CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P5	
		VEHA/SOAL/DEIL		NI	NI
ULAM/CELA		IVAN/POPE		P3/P5	S2
ULCR/CAAQ/	CELA/ILDE/	CARA/TORA/SMISP/BOCY		P1/P2/P3/P4/P6	
		SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5	S1/S4/S6
QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P6	S2/S3
QULY/CELA/	ILDE/CRSP/	BOCY/BICA		P3/P6	
QUNU/QUPH	ILDE	VISP/	TORA/SMSP	P3	S3/S4
	QUNI/QUNU	HIMI/SOSP/POSP			S2/S3/S5
		Open water			
QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5/P6	S2/S3/S4
QULY/CAAQ/	ILDE/CELA/ULAM			P1/P3/P4/P5/P6	
QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1
CELA/CAAQ/	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5	S1
CAAQ/QULY/	FOAC			P1/P2	
		Open water			
		Open water			
SANI				P1/P2/P3/P5/P6	
QUNU/CELA/	ILDE/ACNE/	TORA/CARA		P2/P3	S2/S3/S4
FRPE/QULY	HIMI/CEOC/FOAC	POHY		P1/P2/P3/P5	S1
ACNE/FRPE/	CODR	TORA/AMAR		NI	NI
QUNU/ULAM/	CELA/ILDE	CARA			S1/S4
QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4
CAAQ/QUPH/	CELA/CRVI	FRPE/CARA		P3/P5	
	QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2	S3/S4
		Open water			
QUNU/CELA/	ILDE/FRPE	QULY/AMAR		P1/P3	S2/S3/S4
QUNU/FRPE/	ILDE/CAAQ/RUSP/	CARA/JURE		P3	S3/S4
		Corn			

Soils	**Wet Final**	NRCS Determination
Hydric	yes	FW
Hydric	yes	
Hydric	yes	
Hydric	yes	PC
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	FW
	no	
Hydric	yes	
Hydric	no	
	no	PC
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
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Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	
	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	
Hydric	yes	
Hydric	yes	
	no	PC

Comments

Soil-subang blocky; area outside greentree but hi
Hi water
Drainage feature 50' W of pt., organic stains on ped faces
WRP
On concave landscape position
Panther Swamp WMA

"Forced March"
WRP 250'W of pt; Evid of water fall in ditch (silt deposits)

Hi water
Old field plt'd w/ QUNU
"Dave's Wetland" Hi bank of Big Sunflower

Coordinate evaluated 0.2mi from pt due to hi water

Recent cutover (QUNU tops)
Inundation prevented horizon ID

Edge of clearcut

Lichen lines @ 14"
Hi water
S5 = crayfish chimneys
Lake Washington

Mahannah WMA

Pt 471 ft from coordinates
Slough
Representative sample taken 0.19 mi from pt @ 124O

Reporter
Spoil bank of Steele Bayou

"Forced March"
Draining rapidly???
Lake Washington
Evidence of recent subsidence/ 2ry watermark @ 3'
Hi water
Twin Oaks WMA

These columns represent the intersection of EMAP wetland (Wet) and nonwetland (Nonwet) points with the 2-year w/ and w/o project floodplain and the 5% duration w/ and w/o project floodplain.

Base 2 yr Wet	Base 2 yr Nonwet
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
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	Yes
Yes	
Yes	
	Yes

P5 2yr Wet	P5 2yr Nonwet	Base 5% Wet	Base 5% nonwet	B1_plan5 Wet	B1_plan5 Nonwet	B2_plan5 Wet	B2_plan5 Nonwet
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
			Yes				
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
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Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
			Yes				
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes

	48	32.59603	90.790894	32 35.762	90 47.454	6/10/2003	1	Sampled
	49	32.618424	90.983151			6/10/2003	1	**Sited**
	50	32.786188	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled
	51	32.524526	91.063206			6/13/2003	1	Sampled
	52	32.784148	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled
	53	32.478106	90.931911					**Inaccessible**
	54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled
	55	32.783145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled
	57	32.553868	90.913438	32 33.232	90 54.806	6/13/2003	1	**Sited**
	66	32.932167	90.698003	32 55.930	90 41.880	6/3/2003 WG		Sampled
EPA								
	401	32.71867	90.940081			6/13/2003 Wiseman		Sampled
	402	33.008613	90.917894	33 00.515	90 55.074	6/4/2003 WG		Sampled
	403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled
	404	33.214996	90.745053	33 12.810	90 44.675	6/4/2003 WG		Sampled
	405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled
	406	32.643673	90.731969	32 38.620	90 43.918	6/13/2003	1	Sampled
	407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003 WG		Sampled
	408	32.541629	90.962297	32 32.498	90 57.738	6/12/2003	1	Sampled
	409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled
	410	32.626764	90.822305	32 37.606	90 49.338	6/10/2003	1	Sampled
	411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003 WG		Sampled
	412	33.086412	90.96179	33 05.183	90 57.708	6/4/2003 WG		Sampled
	413	32.770721	91.011064	32 46.248	91 00.673	6/9/2003	2	Sampled
	414	33.104031	90.669432	33 06.243	90 40.163	6/8/2003	2	Sampled
	415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003 WG		Sampled
	416	32.567588	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled
	417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled
	418	32.534032	90.805779	32 32.042	90 48.347	6/11/2003	1	Sampled
	419	32.869081	91.041482	32 52.134	91 02.489	6/8/2003	1	Sampled
	420	33.166359	90.66845	33 16.636	90 66.844	6/4/2003 WG		**Sited**
	421	32.805621	91.001358					**Inaccessible**
	422	33.133248	90.659165	33 07.991	90 39.545	6/4/2003 WG		Sampled
	423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003 WG		Sampled
	424	32.586737	90.980214			6/10/2003	1	Sampled
	425	32.666751	90.808321	32 40.000	90 48.501	6/12/2003	2	Sampled
	426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled
	427	32.76243	90.696168	32 45.747	90 41.770	6/5/2003	2	Sampled
	428	32.528961	90.840237	32 31.738	90 50.414	6/11/2003	1	Sampled
	429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled
	430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003 WG		Sampled
	431	32.936179	90.801992			6/5/2003	1	**Sited**
	432	32.664974	91.046676	32 39.898	91 02.801	6/9/2003	1	Sampled
	434	32.89994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled
	435	32.885015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled
	436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled
	437	32.732014	90.883177	32 43.920	90 52.990	6/10/2003	2	Sampled
	438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled
	439	32.910041	90.66088	32 91.004	90 66.086	6/4/2003 WG		Sampled
	440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled
	441	32.735158	90.760427			6/10/2003	2	**Inaccessible**

GLTR/CELA/F	ILDE/CELA/ULAM/	IVAN/TORA/BRCI		P3	S2
		Open water			
QULY/CAAQ/	CEOC/CAAQ/	CEOC/FRPE/AMAR		P1/P2/P3/P6	S2/S3/S4
		Zizania		P1	
QULY/QUNU/	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4
CELA/QUNU/	ULAM/ILDE	CARA/TRDI	BESC	P3/P5	
QUNU/CAAQ	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3	S2/S3/S4
		Sudan grass		P1	
QULY/FRPE/(	ILDE	DIVI/SAMI	VIRO/BESC/TORA	P3/	S1/S2/S4
QUPH	CAIL/FRPE/CELA/CODR	TORA		P3	S2/S4
CELA/CAIL/FI	CELA/ACRU	LELE/TORA		P3/P4	S1/S4
TADI/PLAQ	TADI/PLAQ/CEOC	Lemmna sp		P1/P2	
		Soybeans			
QUNU/QULY/	ILDE	CARA/AMAR		P3/P5	
CELA/ULAM/I	ULAM/FRPE/LIST	CARA/AMBR/SMRO/SMBO/RUTR			S4
FRPE/CAAQ/	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5	S4
CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA			S4
QUNU/QUPH	ILDE	TORA/CARA			S3/S4
LIST/QUPH/C	CODR/ILDE/CELA	AMAR/TORA/BRCI			S1/S4
CAAQ/QULY/	ACNE/ACRU/CELA	SAMI/SACE		P3	S2/S4
CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5	S2/S4
QUPH/QUNU	ILDE/CELA/COST/	TORA/JURE/CARA			S3/S4
QUNU/CELA/	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P5	S2/S4
		ASPE/RUCR/AMTR/IVAN/ECCR			S1/S4
QUNI/CELA/A	CODR	OPHI/RUAR			S1
QUPH/QUNU	ILDE/FRPE/LIST	TORA/CARA			S3/S4
		SOHA/AMAR/DEIL/SOAL		P5	
QULY/CELA/(	ILDE/CELA/FOAC	LELE/TORA/AMAR.CARA		P2/P4/P6	S2
		Catfish Pond			
CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4
QUNU/ULAM/	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC		S2/S4
QUNU/TADI/(	ILDE			P2/P3/P4/P5/P6	
QUNU/LIST/C	ILDE	TORA/CARA			S3/S4
LIST/QUPH/C	ACRU/ULAM/LIDE/	AMBR/PAQU/OPHI/TORA/	SMRO		S4
LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR		S4
CELA/LIST/C/	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI	S4
QUNU/ACRU	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4
	FRPE/BAHA	CARA/SOAL		NI	NI
		catfish pond			
		VEHA/SOAL		NI	NI
QUNU/CELA	CARYA SP.	CARA/TORA/FOAC		P3	S4
LIST/QUNI/C/	CELA/COST	TOVI/GECA/PAQU		NI	NI
	CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI	NI
	QUNU/CEOC	IMCA/ASSP			S3/S4
LIST/CAAQ/C	CELA/ULAM	GECA/TORA/CARA/AMAR		NI	S4
		Soybeans			S3
QUNU/FRPE/	ULAM/ULCR	AMAR/VICI/CACH		P5	S1/S4

Hydric	yes	
	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
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Hydric	yes	
Hydric	yes	
	no	PC
Hydric	yes	
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Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
NON-HYDRIC	no	
Hydric	yes	
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Hydric	yes	
Hydric	no	
NON-HYDRIC	no	
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Hydric	yes	
Hydric	no	PC
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NON-HYDRIC	no	
Hydric	yes	
Hydric	no	
Hydric	no	
Hydric	yes	
Hydric	no	
Hydric	no	PC
Hydric	yes	
	xxxxx	

Pt in middle of Steele Bayou channel

Edge of Eagle Lake
Microtopography
Hi water

Site 0.34 mi from coord in inundated field; homogeneous

Ponded due to location

reference std.(Typical of undisturbed- Wiseman)
top of ridge in ridge swale topography

Site on micro high

Close to flood line/ area saturated

Bryophyte/lichen line 8"

NRCS confirmed soil (DJ)
Ordinary High Water- pt fell on incline of ditch bank

Behind locked gate
subangular blocky struc.

Adj 3 sloughs w/in 200' (E, W, N)
DJ to classify soil (Response rec'd 6-30-03)
Soil sub-angular blocky

WRP/Dry side Sharkey

Area sloped away from pt., ditches on 2 sides

Subangular blocky; ditched on 2 sides-drained
Subangular blocky
ditched on 2 sides-drained

Inaccessible due to deep ditch beside road

Yes

Yes

Yes
Yes
Yes

Yes
Yes
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442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003		1	Sampled
443	32.83555	90.599405	32 50.133	90 35.964	6/5/2003		2	Sampled
444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003		1	Sampled
445	32.799695	91.057693	32 47.981	91 03.461	6/9/2003		2	Sampled
446	33.051629	90.50243	33 03.098	90 30.146	6/5/2003		1	Sampled
447	32.913414	90.811287			6/5/2003		1	Sampled
448	32.693421	91.039607	32 41.605	91 02.376	6/9/2003		1	Sampled
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003		2	Sampled
450	32.686434	90.720622						**Inaccessible**
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG		Sampled
452	33.1476	90.986276			6/5/2003		1	Sampled
453	32.749506	91.000253	32 44.970	91 00.014	6/9/2003		1	Sampled
454	33.070527	90.616787	33 414.005	90 3700.383	6/5/2003		1	**Sited**
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG		Sampled
456	32.58609	91.019833	32 35.172	90 01.215	6/10/2003		1	Sampled
457	32.800681	90.905901	32 48.039	90 54.354	6/13/2003		2	Sampled
458	32.631939	-90.779176	32 37.916	90 46.750	6/10/2003		1	Sampled
Non								
801	33.219145	90.751069	33 13.248	90 45.046	6/7/2003		2	Sampled
802	32.882412	90.854264	32 52 56.667	90 51 15.342	6/10/2003		3	Sampled
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003		2	**Sited**
804	32.816597	90.615165	32 48 59.71	90 36 54.66	6/10/2003		3	Sampled
805	33.105626	90.741057	33 06.338	90 44.464	6/8/2003		2	Sampled
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003		1	Sampled
807	32.807157	90.907368	32 48 25.760	90 54 26.468	6/10/2003		3	Sampled
808	32.987145	91.001767	32 59.227	91 00.104	6/10/2003		3	Sampled
809	33.227605	90.654674	33 13.656	90 39.280	6/7/2003		2	Sampled
810	32.99897	90.750527	32 59.938	90 45.032	6/8/2003		1	Sampled
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003		2	Sampled
812	32.870581	90.625433	32 52 14.258	90 37 28.588	6/10/2003		3	Sampled
813	33.084743	90.645731	33 05.083	90 36.737	6/7/2003		2	Sampled
814	32.973342	90.693884	32 58.401	90 41.632	6/3/2003	WG		Sampled
815	32.74349	90.940417	32 44.594	90 56.357	6/11/2003		3	Sampled
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003		3	Sampled
817	33.146973	90.662281	33 08.820	90 39.733	6/4/2003	WG		Sampled
817.1			33 08.818	90 39.737	6/8/2003		2	
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003		2	Sampled
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003		3	Sampled
820	32.765865	90.694156	32 76.590	90 69.418	6/5/2003		2	**Sited**
821	32.63494	90.82267	32 38 05.751	90 49 21.658	6/11/2003		3	Sampled
822	32.951234	90.946584	32 57.0446	90 56.4769	6/10/2003		3	Sampled
823	32.791688	91.005325						**Inaccessible**
824	32.527508	90.991765	32 31 39.040	90 59 30.370	6/11/2003		3	Sampled
825	33.198498	90.797275	33 11.922	90 47.827	6/7/2003		2	Sampled
826	32.951544	90.821376	32 57 05.522	90 49 17.002	6/10/2003		3	Sampled
827	32.694192	90.919654	32 41.649	90 55,180	6/11/2003		3	Sampled
828	32.935509	90.987087	32 56.128	90 59.225	6/10/2003		3	Sampled
829	33.045206	90.59105	33 02.713	90 35.464	6/7/2003		2	Sampled
830	32.852577	90.671592						**Inaccessible**
831	32.747124	90.961868	32 44 49.431	90 57 42.741	6/11/2003		3	Sampled
832	32.496596	91.033456						**Inaccessible**

CELA/ULAM/I CELA/	TORA/CARA/AMBR			S4
QUNU/QUNI ULCR/QUPH/	SOSP	CARA/TORA		S3/S4
CELA/LIST/Q ILDE/ULCR/CELA	AMAR/BRCI/TRDE/TORA			S2/S4
	Soybeans			
	CARA/SOAL/VEHA/JUTE/IVAN		NI	NI
CELA/CAIL/LI FRPE/CELA	TORA/CARA/VIRO/VICI/CAFR		NI	NI
QUPH/QULY/ LIST/ILDE/FRPE	TORA/JURE/CARA			S3/S4
QULY/QUPH/ ULAM/CELA	SACE/COVI/CARA		P3	S1/S4
CELA	CARA/TORA/DEIL/VEHA/SOHA			S4
QUNU/CAIL/L CAIL/	VEHA/SOHA	SMBO	NI	NI
	Open water			
	SOSP/CARA/VEBR/TORA		NI	NI
CELA/LIST/FI ILDE/	CACH/LELE		P5/P6	
CAAQ/FRPE FOAC/SANI/FRPE/COST	AMAR/CARA		P1/P2/P3/P4/P6	S3/S4
QUPH/LIST ILDE/	AMBR/SMRO/OPHI/TORA			S4
	Rice			
	Fallow field			
	Catfish ponds			
QUNU/CEOC/	CARA/JUEF/CARYOPH/RHYNCOS			S3/S4
	Soybeans		NI	NI
	Cotton			
	Corn			
	Cotton			
	Soybeans			
	Cotton			
	Soybeans		P4	
	Catfish ponds			
	Catfish ponds			
	BRCI		NI	NI
	Cotton			
	Corn			
	Corn			
	Soybeans			
	Rice			
	Cotton			
	Corn			
	Road			
	Cotton			
	Rice			
	Cotton			
	Corn			
	Corn			S3
	Corn			
	Corn			

Hydric	no	
Hydric	no (070803)	
Hydric	yes	
Hydric	no	PC
NON-HYDRIC	no	
	yes	FW
Hydric	no	
Hydric	Yes	
	xxxxx	
Hydric	yes	
Hydric	no	
Hydric	no	
	no	
NON-HYDRIC	no	PC
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	yes	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	OW
	no	OW
Hydric	no	PC
NON-HYDRIC	no	PC
NON-HYDRIC	no	PC/NW
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	no	PC
	no	OW
NON_HYDRIC	no	PC/NW
Hydric	no	PC
NON-HYDRIC	no	PC
NON-HYDRIC	no	PC
Hydric	no	OW
Hydric	no	PC
		PC
NON-HYDRIC	no	PC

top of ridge in ridge swale topography
Adjacent forest w/water lines - Panther Swamp

Fallow field
Road beside field adjacent to forested area (based on map NRCS thought point fell in forested wetland)
Pt. Fell between cottonwood plantat and QULY slough
NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03

40' from stding water wetland; soil sub-ang blocky
Adjacent to slough (100') but on hi grd
20' from coordinate into open water
Former crop field

50-60' wide drainage pattern
Pt on ridge between sloughs

open water - aquaculture
site appears connected to meander cut-off of Big Sun

Soils heavily compacted
No hydrophytic veg
Pt. 230' from coordinate @ 267O
open water - aquaculture

817 & 817.1 same site revisited for soil sample

Pt. Located in rice field 300' S of coordinates
Pt. 982 ft at 36oN into cotton field

Road between catfish ponds

Site located between cornfield and depressional drain
Soil very compacted

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

Yes Yes
Yes
Yes Yes Yes

Yes

Yes Yes Yes

Yes Yes Yes

Yes
Yes Yes

Yes

Yes

Yes

833	33.229689	90.658305	33 13.783	90 39.500	6/7/2003		2	**Sited**
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003		2	Sampled
835	32.983217	90.633087	32 58 59.523	90 37 59.211	6/10/2003		3	Sampled
835.1					6/3/2003	WG		
836	32.744837	90.715266	32 44 41.425	90 42 54.941	6/11/2003		3	Sampled
837	33.153119	90.784008	33 09.185	90 47.043	6/7/2003		2	Sampled
838	32.974159	90.90942	32 58 26.926	90 54 33.955	6/10/2003		3	Sampled
839	32.755269	91.006409						**Inaccessible**
840	32.785489	91.050297			6/9/2003		2	Sampled
841	33.214101	90.81356	33 12.850	90 48.799	6/7/2003		2	**Sited**
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003		3	Sampled
843	32.631199	90.881485	32 37 52.329	90 52 53.341	6/11/2003		3	Sampled
844	32.87113	91.039656	32 52.268	91 02.379	6/9/2003		1	Sampled
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003		2	**Sited**
846	32.851185	90.727543	32 51 04.311	90 43 39.131	6/10/2003		3	Sampled
847	32.663892	91.00143	32 39 50.016	90 00 05.219	6/11/2003		3	Sampled
848	32.535879	91.035833	32 32 09.164	91 02 08.975	6/11/2003		3	Sampled
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003		2	**Sited**
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003		2	Sampled
851	33.108834	90.546094	33 06.531	90 32.765	6/12/2003		3	Sampled
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003		3	Sampled
853	32.541728	90.8057	32 32.505	90 48.339	6/12/2003		3	Sampled
861	32.990902	90.666738			6/3/2003	WG		Sampled
868	32.806345	90.705689	32 48 22.889	90 42 20.459	6/11/2003		3	Sampled

170

Total

	Levee of Catfish pond		
	Soybeans		
	Cotton	NI	NI
	Fallow field		
	Cotton		S1
	Soybeans		S1
	Corn	P4	S3
	Catfish ponds		
CAIL	SOHA		
	Soybeans		
	Soybeans	NI	NI
	Catfish ponds		
	Cotton		
	Cotton	NI	NI
	Cotton		
	Catfish ponds		
	Corn		
	Soybeans		
QUNI	SOAL/CARA/ANVI		
	Corn		
	Soybeans	NI	NI
	Cotton		

	no	PC
Hydric	no	PC
Hydric	no	
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	no	PC
Hydric	yes	FW
Hydric	no	PC
	no	OW
Hydric	no	PC
Hydric	no	PC
NON_HYDRIC	no	PC/NW
	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC/NW
NI	no	
NON-HYDRIC	no	

Ditch at 152o of pt at 80'

835 & 835.1 same site revisited for soil sample

Drift lines in concave surfaces

Edge of spoil bank of ditch
Farmed wetland

Open water - aquaculture

open water - aquaculture
Very compacted soil

Yes

Yes

Yes

Yes

Yes

Yes

Yes

56 33

Yes

Yes

Yes Yes

Yes Yes

Yes

Yes
Yes Yes Yes

50 28 41 11 48 18 45 17

DESIGN_ID	DESIGN_NO	SITE_ID	STRATUM	PANEL	OVERSAMP	DIVISION	MD_CATY	NEST_ID
MSW03411-	1	MSW03411-0001	1	1	0	1	1	1
MSW03411-	2	MSW03411-0002	1	1	0	1	1	1
MSW03411-	3	MSW03411-0003	1	1	0	1	1	1
MSW03411-	4	MSW03411-0004	1	1	0	1	1	1
MSW03411-	5	MSW03411-0005	1	1	0	1	1	1
MSW03411-	6	MSW03411-0006	1	1	0	1	1	1
MSW03411-	7	MSW03411-0007	1	1	0	1	1	1
MSW03411-	8	MSW03411-0008	1	1	0	1	1	1
MSW03411-	9	MSW03411-0009	1	1	0	1	1	1
MSW03411-	10	MSW03411-0010	1	1	0	1	1	1
MSW03411-	11	MSW03411-0011	1	1	0	1	1	1
MSW03411-	12	MSW03411-0012	1	1	0	1	1	1
MSW03411-	13	MSW03411-0013	1	1	0	1	1	1
MSW03411-	14	MSW03411-0014	1	1	0	1	1	1
MSW03411-	15	MSW03411-0015	1	1	0	1	1	1
MSW03411-	16	MSW03411-0016	1	1	0	1	1	1
MSW03411-	17	MSW03411-0017	1	1	0	1	1	1
MSW03411-	18	MSW03411-0018	1	1	0	1	1	1
MSW03411-	19	MSW03411-0019	1	1	0	1	1	1
MSW03411-	20	MSW03411-0020	1	1	0	1	1	1
MSW03411-	21	MSW03411-0021	1	1	0	1	1	1
MSW03411-	22	MSW03411-0022	1	1	0	1	1	1
MSW03411-	23	MSW03411-0023	1	1	0	1	1	1
MSW03411-	24	MSW03411-0024	1	1	0	1	1	1
MSW03411-	25	MSW03411-0025	1	1	0	1	1	1
MSW03411-	26	MSW03411-0026	1	1	0	1	1	1
MSW03411-	27	MSW03411-0027	1	1	0	1	1	1
MSW03411-	28	MSW03411-0028	1	1	0	1	1	1
MSW03411-	29	MSW03411-0029	1	1	0	1	1	1
MSW03411-	30	MSW03411-0030	1	1	0	1	1	1
MSW03411-	31	MSW03411-0031	1	1	0	1	1	1
MSW03411-	32	MSW03411-0032	1	1	0	1	1	1
MSW03411-	33	MSW03411-0033	1	1	0	1	1	1
MSW03411-	34	MSW03411-0034	1	1	0	1	1	1
MSW03411-	35	MSW03411-0035	1	1	0	1	1	1
MSW03411-	36	MSW03411-0036	1	1	0	1	1	1
MSW03411-	37	MSW03411-0037	1	1	0	1	1	1
MSW03411-	38	MSW03411-0038	1	1	0	1	1	1
MSW03411-	39	MSW03411-0039	1	1	0	1	1	1
MSW03411-	40	MSW03411-0040	1	1	0	1	1	1
MSW03411-	41	MSW03411-0041	1	1	0	1	1	1
MSW03411-	42	MSW03411-0042	1	1	0	1	1	1
MSW03411-	43	MSW03411-0043	1	1	0	1	1	1
MSW03411-	44	MSW03411-0044	1	1	0	1	1	1
MSW03411-	45	MSW03411-0045	1	1	0	1	1	1
MSW03411-	46	MSW03411-0046	1	1	0	1	1	1
MSW03411-	47	MSW03411-0047	1	1	0	1	1	1
MSW03411-	48	MSW03411-0048	1	1	0	1	1	1
MSW03411-	49	MSW03411-0049	1	1	0	1	1	1
MSW03411-	50	MSW03411-0050	1	1	0	1	1	1

NEST1	NEST1_N	NEST1_WT	STRAT_NAME	LONG_DD	LAT_DD	LONG_DMS	LAT_DMS
1	80	7.83390141	Corps	-90.953280	32.603523	-90 57 11.807999	32 36 12.682800
1	80	7.83390141	Corps	-90.766177	32.899246	-90 45 58.237198	32 53 57.285600
1	80	7.83390141	Corps	-90.978034	32.546897	-90 58 40.922399	32 32 48.829200
1	80	7.83390141	Corps	-90.801334	32.785408	-90 48 4.802399	32 47 7.468800
1	80	7.83390141	Corps	-90.893030	32.591397	-90 53 34.907999	32 35 29.029200
1	80	7.83390141	Corps	-90.845267	32.721975	-90 50 42.961199	32 43 19.110000
1	80	7.83390141	Corps	-90.626684	32.802933	-90 37 36.062398	32 48 10.558800
1	80	7.83390141	Corps	-90.803771	32.741187	-90 48 13.575599	32 44 28.273200
1	80	7.83390141	Corps	-90.856535	32.498470	-90 51 23.525999	32 29 54.492000
1	80	7.83390141	Corps	-90.886115	32.784079	-90 53 10.013999	32 47 2.684400
1	80	7.83390141	Corps	-90.766058	33.213506	-90 45 57.808799	33 12 48.621600
1	80	7.83390141	Corps	-90.750520	32.772719	-90 45 1.871998	32 46 21.788400
1	80	7.83390141	Corps	-90.915135	32.500399	-90 54 54.485999	32 30 1.436400
1	80	7.83390141	Corps	-90.893849	32.617195	-90 53 37.856399	32 37 1.902000
1	80	7.83390141	Corps	-90.782173	32.953953	-90 46 55.822798	32 57 14.230800
1	80	7.83390141	Corps	-91.038348	32.814583	-91 2 18.052799	32 48 52.498800
1	80	7.83390141	Corps	-90.934277	32.611308	-90 56 3.397199	32 36 40.708800
1	80	7.83390141	Corps	-90.994111	32.701448	-90 59 38.799599	32 42 5.212800
1	80	7.83390141	Corps	-90.953467	32.456948	-90 57 12.481199	32 27 25.012800
1	80	7.83390141	Corps	-90.828365	32.785036	-90 49 42.113999	32 47 6.129600
1	80	7.83390141	Corps	-90.887230	32.575552	-90 53 14.027999	32 34 31.987200
1	80	7.83390141	Corps	-90.861907	32.826201	-90 51 42.865199	32 49 34.323600
1	80	7.83390141	Corps	-90.750511	32.762378	-90 45 1.839598	32 45 44.560800
1	80	7.83390141	Corps	-90.779582	32.685170	-90 46 46.495199	32 41 6.612000
1	80	7.83390141	Corps	-90.889858	32.502548	-90 53 23.488799	32 30 9.172800
1	80	7.83390141	Corps	-90.852285	32.749034	-90 51 8.225999	32 44 56.522400
1	80	7.83390141	Corps	-91.068145	33.097930	-91 4 5.321999	33 5 52.548000
1	80	7.83390141	Corps	-90.752365	32.681403	-90 45 8.513998	32 40 53.050800
1	80	7.83390141	Corps	-90.911339	32.530351	-90 54 40.820399	32 31 49.263600
1	80	7.83390141	Corps	-90.823288	32.837883	-90 49 23.836799	32 50 16.378800
1	80	7.83390141	Corps	-90.807604	32.883326	-90 48 27.374399	32 52 59.973600
1	80	7.83390141	Corps	-90.738619	32.623094	-90 44 19.028398	32 37 23.138400
1	80	7.83390141	Corps	-90.925678	32.591267	-90 55 32.440799	32 35 28.561200
1	80	7.83390141	Corps	-90.739268	32.906428	-90 44 21.364798	32 54 23.140800
1	80	7.83390141	Corps	-90.965723	32.477146	-90 57 56.602799	32 28 37.725600
1	80	7.83390141	Corps	-90.807675	32.800842	-90 48 27.629999	32 48 3.031200
1	80	7.83390141	Corps	-90.870262	32.532745	-90 52 12.943199	32 31 57.882000
1	80	7.83390141	Corps	-90.974408	32.837817	-90 58 27.868799	32 50 16.141200
1	80	7.83390141	Corps	-90.747889	32.876854	-90 44 52.400398	32 52 36.674400
1	80	7.83390141	Corps	-90.776592	32.721243	-90 46 35.731199	32 43 16.474800
1	80	7.83390141	Corps	-90.872116	32.506255	-90 52 19.617599	32 30 22.518000
1	80	7.83390141	Corps	-90.893222	32.727480	-90 53 35.599199	32 43 38.928000
1	80	7.83390141	Corps	-91.040142	33.039776	-91 2 24.511199	33 2 23.193600
1	80	7.83390141	Corps	-90.768170	32.744782	-90 46 5.411999	32 44 41.215200
1	80	7.83390141	Corps	-90.935732	32.524618	-90 56 8.635199	32 31 28.624800
1	80	7.83390141	Corps	-90.839500	32.821599	-90 50 22.199999	32 49 17.756400
1	80	7.83390141	Corps	-90.838650	32.911654	-90 50 19.139999	32 54 41.954400
1	80	7.83390141	Corps	-90.790894	32.596030	-90 47 27.218399	32 35 45.708000
1	80	7.83390141	Corps	-90.983151	32.618424	-90 58 59.343599	32 37 6.326400
1	80	7.83390141	Corps	-90.859155	32.786188	-90 51 32.957999	32 47 10.276800

newSTRAT_NAME	newEPAWET	newWRP100	newACEWET	ext_base	ext_p5	base_5wet	b2_plan	b1_plan
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	out	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	out	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	out	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	out	out	in	in
Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	out	in
Corps	2	0	1	in	out	out	out	out
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in

MSW03411-	51	MSW03411-0051	1	1	0	1	1	1
MSW03411-	52	MSW03411-0052	1	1	0	1	1	1
MSW03411-	53	MSW03411-0053	1	1	0	1	1	1
MSW03411-	54	MSW03411-0054	1	1	0	1	1	1
MSW03411-	55	MSW03411-0055	1	1	0	1	1	1
MSW03411-	56	MSW03411-0056	1	1	0	1	1	1
MSW03411-	57	MSW03411-0057	1	1	0	1	1	1
MSW03411-	58	MSW03411-0058	1	1	0	1	1	1
MSW03411-	59	MSW03411-0059	1	1	0	1	1	1
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MSW03411-	61	MSW03411-0061	1	1	0	1	1	1
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MSW03411-	73	MSW03411-0073	1	1	0	1	1	1
MSW03411-	74	MSW03411-0074	1	1	0	1	1	1
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MSW03411-	76	MSW03411-0076	1	1	0	1	1	1
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MSW03411-	79	MSW03411-0079	1	1	0	1	1	1
MSW03411-	80	MSW03411-0080	1	1	0	1	1	1
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1	80	7.83390141	Corps	-90.931911	32.478106	-90 55 54.879599	32 28 41.181600
1	80	7.83390141	Corps	-90.840460	32.847150	-90 50 25.655999	32 50 49.740000
1	80	7.83390141	Corps	-90.728897	32.783145	-90 43 44.029198	32 46 59.322000
1	80	7.83390141	Corps	-90.823265	32.720035	-90 49 23.753999	32 43 12.126000
1	80	7.83390141	Corps	-90.913438	32.553868	-90 54 48.376799	32 33 13.924800
1	80	7.83390141	Corps	-90.864524	32.767750	-90 51 52.286399	32 46 3.900000
1	80	7.83390141	Corps	-90.670445	33.110799	-90 40 13.601998	33 6 38.876400
1	80	7.83390141	Corps	-90.762105	32.709220	-90 45 43.577999	32 42 33.192000
1	80	7.83390141	Corps	-90.939824	32.530289	-90 56 23.366399	32 31 49.040400
1	80	7.83390141	Corps	-90.801523	32.767223	-90 48 5.482799	32 46 2.002800
1	80	7.83390141	Corps	-90.821744	32.856691	-90 49 18.278399	32 51 24.087600
1	80	7.83390141	Corps	-90.803621	32.538527	-90 48 13.035599	32 32 18.697200
1	80	7.83390141	Corps	-90.978593	32.551009	-90 58 42.934799	32 33 3.632400
1	80	7.83390141	Corps	-90.698003	32.932167	-90 41 52.810798	32 55 55.801200
1	80	7.83390141	Corps	-90.997133	32.492877	-90 59 49.678799	32 29 34.357200
1	80	7.83390141	Corps	-90.801465	32.791277	-90 48 5.273999	32 47 28.597200
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1	80	7.83390141	Corps	-90.759845	32.840838	-90 45 35.441998	32 50 27.016800
1	80	7.83390141	Corps	-90.793630	32.730979	-90 47 37.067999	32 43 51.524400
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1	80	7.83390141	Corps	-90.892005	32.757490	-90 53 31.217999	32 45 26.964000
1	80	7.83390141	Corps	-90.984067	33.117973	-90 59 2.641199	33 7 4.702800
1	80	7.83390141	Corps	-90.782649	32.832652	-90 46 57.536399	32 49 57.547200
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1	80	7.83390141	Corps	-90.766809	32.862050	-90 46 0.512399	32 51 43.380000
1	80	7.83390141	Corps	-90.737633	32.666296	-90 44 15.478798	32 39 58.665600
1	80	7.83390141	Corps	-90.984492	32.599173	-90 59 4.171199	32 35 57.022800
1	80	7.83390141	Corps	-90.811183	32.871424	-90 48 40.258799	32 52 17.126400
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1	80	7.83390141	Corps	-90.825915	32.767297	-90 49 33.293999	32 46 2.269200
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1	80	7.83390141	Corps	-90.596336	33.112172	-90 35 46.809597	33 6 43.819200
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1	80	7.83390141	Corps	-90.854765	32.794157	-90 51 17.153999	32 47 38.965200
1	80	7.83390141	Corps	-91.060008	32.507667	-91 3 36.028800	32 30 27.601200
1	80	7.83390141	Corps	-90.780254	32.790940	-90 46 48.914398	32 47 27.384000
1	80	7.83390141	Corps	-90.910965	32.485248	-90 54 39.473999	32 29 6.892800
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1	80	7.83390141	Corps	-90.739001	32.778030	-90 44 20.403599	32 46 40.908000
1	80	7.83390141	Corps	-90.825151	32.715014	-90 49 30.543599	32 42 54.050400
1	80	7.83390141	Corps	-90.933616	32.589938	-90 56 1.017599	32 35 23.776800
1	80	7.83390141	Corps	-90.763636	32.940832	-90 45 49.089598	32 56 26.995200
1	80	7.83390141	Corps	-90.957787	32.464464	-90 57 28.033199	32 27 52.070400
1	80	7.83390141	Corps	-90.782161	32.807301	-90 46 55.779599	32 48 26.283600
1	80	7.83390141	Corps	-90.893440	32.527110	-90 53 36.383999	32 31 37.596000

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Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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Corps	0	0	1	in	in	in	in	in
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1	80	7.83390141	Corps	-90.802998	32.709100	-90 48 10.792799	32 42 32.760000
1	80	7.83390141	Corps	-90.859736	32.487524	-90 51 35.049599	32 29 15.086400
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1	80	7.83390141	Corps	-90.954650	33.095354	-90 57 16.739999	33 5 43.274400
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1	80	7.83390141	Corps	-90.638139	32.792468	-90 38 17.300398	32 47 32.884800
1	80	7.83390141	Corps	-90.807859	32.719173	-90 48 28.292399	32 43 9.022800

Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	out	in	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
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Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	in	out	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	out	out
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
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Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in

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MSW03411-	156	MSW03411-0156	1	0	1	5	1	1
MSW03411-	157	MSW03411-0157	1	0	1	5	1	1
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MSW03411-	161	MSW03411-0161	1	0	1	3	1	1
MSW03411-	162	MSW03411-0162	1	0	1	3	1	1
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MSW03411-	164	MSW03411-0164	1	0	1	3	1	1
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MSW03411-	167	MSW03411-0167	1	0	1	3	1	1
MSW03411-	168	MSW03411-0168	1	0	1	3	1	1
MSW03411-	169	MSW03411-0169	1	0	1	3	1	1
MSW03411-	170	MSW03411-0170	1	0	1	3	1	1
MSW03411-	171	MSW03411-0171	1	0	1	3	1	1
MSW03411-	172	MSW03411-0172	1	0	1	3	1	1
MSW03411-	173	MSW03411-0173	1	0	1	3	1	1
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MSW03411-	189	MSW03411-0189	1	0	1	2	1	1
MSW03411-	190	MSW03411-0190	1	0	1	2	1	1
MSW03411-	191	MSW03411-0191	1	0	1	2	1	1
MSW03411-	192	MSW03411-0192	1	0	1	2	1	1
MSW03411-	193	MSW03411-0193	1	0	1	4	1	1
MSW03411-	194	MSW03411-0194	1	0	1	4	1	1
MSW03411-	195	MSW03411-0195	1	0	1	4	1	1
MSW03411-	196	MSW03411-0196	1	0	1	4	1	1
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MSW03411-	201	MSW03411-0201	1	0	1	4	1	1
MSW03411-	202	MSW03411-0202	1	0	1	4	1	1
MSW03411-	203	MSW03411-0203	1	0	1	4	1	1

1	80	7.83390141	Corps	-90.844793	32.501356	-90 50 41.254799	32 30 4.881600
1	80	7.83390141	Corps	-90.888047	32.786526	-90 53 16.969199	32 47 11.493600
1	80	7.83390141	Corps	-90.714226	33.218587	-90 42 51.213598	33 13 6.913200
1	80	7.83390141	Corps	-90.765310	32.792085	-90 45 55.115999	32 47 31.506000
1	80	7.83390141	Corps	-90.939875	32.486212	-90 56 23.549999	32 29 10.363200
1	80	7.83390141	Corps	-90.815282	32.676094	-90 48 55.015199	32 40 33.938400
1	80	7.83390141	Corps	-90.768157	32.994579	-90 46 5.365198	32 59 40.484400
1	80	7.83390141	Corps	-90.829896	32.698780	-90 49 47.625599	32 41 55.608000
1	80	7.83390141	Corps	-90.942091	32.584721	-90 56 31.527599	32 35 4.995600
1	80	7.83390141	Corps	-90.724818	33.030776	-90 43 29.344798	33 1 50.793600
1	80	7.83390141	Corps	-90.943758	32.470128	-90 56 37.528799	32 28 12.460800
1	80	7.83390141	Corps	-90.830295	32.799274	-90 49 49.061999	32 47 57.386400
1	80	7.83390141	Corps	-90.887209	32.531366	-90 53 13.952399	32 31 52.917600
1	80	7.83390141	Corps	-90.849514	32.821799	-90 50 58.250399	32 49 18.476400
1	80	7.83390141	Corps	-90.739977	32.881912	-90 44 23.917198	32 52 54.883200
1	80	7.83390141	Corps	-90.782640	32.723311	-90 46 57.503999	32 43 23.919600
1	80	7.83390141	Corps	-90.900318	32.493795	-90 54 1.144799	32 29 37.662000
1	80	7.83390141	Corps	-90.891386	32.717578	-90 53 28.989599	32 43 3.280800
1	80	7.83390141	Corps	-91.000278	33.108411	-91 0 1.000799	33 6 30.279600
1	80	7.83390141	Corps	-90.772669	32.756742	-90 46 21.608398	32 45 24.271200
1	80	7.83390141	Corps	-90.908615	32.527039	-90 54 31.013999	32 31 37.340400
1	80	7.83390141	Corps	-90.826008	32.827547	-90 49 33.628799	32 49 39.169200
1	80	7.83390141	Corps	-90.804596	32.896397	-90 48 16.545599	32 53 47.029200
1	80	7.83390141	Corps	-90.815031	32.620727	-90 48 54.111599	32 37 14.617200
1	80	7.83390141	Corps	-90.951463	32.582813	-90 57 5.266799	32 34 58.126800
1	80	7.83390141	Corps	-90.719152	32.959299	-90 43 8.947198	32 57 33.476400
1	80	7.83390141	Corps	-90.955169	32.472793	-90 57 18.608399	32 28 22.054800
1	80	7.83390141	Corps	-90.803883	32.814958	-90 48 13.978799	32 48 53.848800
1	80	7.83390141	Corps	-90.909508	32.586675	-90 54 34.228799	32 35 12.030000
1	80	7.83390141	Corps	-90.916520	32.770377	-90 54 59.471999	32 46 13.357200
1	80	7.83390141	Corps	-90.751124	32.842761	-90 45 4.046398	32 50 33.939600
1	80	7.83390141	Corps	-90.787805	32.699057	-90 47 16.097999	32 41 56.605200
1	80	7.83390141	Corps	-90.892984	32.476589	-90 53 34.742399	32 28 35.720400
1	80	7.83390141	Corps	-90.875274	32.761027	-90 52 30.986399	32 45 39.697200
1	80	7.83390141	Corps	-90.945634	33.130903	-90 56 44.282399	33 7 51.250800
1	80	7.83390141	Corps	-90.776840	32.845162	-90 46 36.623999	32 50 42.583200
1	80	7.83390141	Corps	-90.948362	32.510599	-90 56 54.103199	32 30 38.156400
1	80	7.83390141	Corps	-90.851268	32.695601	-90 51 4.564799	32 41 44.163600
1	80	7.83390141	Corps	-90.761192	32.866930	-90 45 40.291199	32 52 0.948000
1	80	7.83390141	Corps	-90.793192	32.592490	-90 47 35.491199	32 35 32.964000
1	80	7.83390141	Corps	-90.936398	32.618487	-90 56 11.032799	32 37 6.553200
1	80	7.83390141	Corps	-90.913750	32.750776	-90 54 49.499999	32 45 2.793600
1	80	7.83390141	Corps	-91.016012	32.519155	-91 0 57.643199	32 31 8.958000
1	80	7.83390141	Corps	-90.843643	32.809511	-90 50 37.114799	32 48 34.239600
1	80	7.83390141	Corps	-90.830212	32.548347	-90 49 48.763199	32 32 54.049200
1	80	7.83390141	Corps	-90.877632	32.829388	-90 52 39.475199	32 49 45.796800
1	80	7.83390141	Corps	-90.735758	32.747733	-90 44 8.728799	32 44 51.838800
1	80	7.83390141	Corps	-90.838613	32.705024	-90 50 19.006799	32 42 18.086400
1	80	7.83390141	Corps	-90.908210	32.536491	-90 54 29.555999	32 32 11.367600
1	80	7.83390141	Corps	-90.847029	32.781661	-90 50 49.304399	32 46 53.979600
1	80	7.83390141	Corps	-91.029022	33.165323	-91 1 44.479199	33 9 55.162800

Corps	0	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	0	3	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	out	in
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Corps	2	0	1	in	in	in	in	in
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Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in

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MSW03411-	205	MSW03411-0205	1	0	1	4	1	1
MSW03411-	206	MSW03411-0206	1	0	1	4	1	1
MSW03411-	207	MSW03411-0207	1	0	1	4	1	1
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MSW03411-	227	MSW03411-0227	1	0	1	2	1	1
MSW03411-	228	MSW03411-0228	1	0	1	2	1	1
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MSW03411-	252	MSW03411-0252	1	0	1	5	1	1
MSW03411-	253	MSW03411-0253	1	0	1	5	1	1
MSW03411-	254	MSW03411-0254	1	0	1	5	1	1

1	80	7.83390141	Corps	-90.767924	32.694665	-90 46 4.526399	32 41 40.794000
1	80	7.83390141	Corps	-90.927260	32.536357	-90 55 38.135999	32 32 10.885200
1	80	7.83390141	Corps	-90.756859	32.795119	-90 45 24.692398	32 47 42.428400
1	80	7.83390141	Corps	-90.811628	32.845662	-90 48 41.860799	32 50 44.383200
1	80	7.83390141	Corps	-90.765400	32.654279	-90 45 55.439999	32 39 15.404400
1	80	7.83390141	Corps	-90.962443	32.611840	-90 57 44.794799	32 36 42.624000
1	80	7.83390141	Corps	-90.768253	32.917288	-90 46 5.710798	32 55 2.236800
1	80	7.83390141	Corps	-90.996863	32.547242	-90 59 48.706799	32 32 50.071200
1	80	7.83390141	Corps	-90.796595	32.771024	-90 47 47.741999	32 46 15.686400
1	80	7.83390141	Corps	-90.919333	32.547927	-90 55 9.598799	32 32 52.537200
1	80	7.83390141	Corps	-90.855835	32.730206	-90 51 21.005999	32 43 48.741600
1	80	7.83390141	Corps	-90.631589	32.838275	-90 37 53.720398	32 50 17.790000
1	80	7.83390141	Corps	-90.830511	32.735874	-90 49 49.839599	32 44 9.146400
1	80	7.83390141	Corps	-91.016421	32.490078	-91 0 59.115599	32 29 24.280800
1	80	7.83390141	Corps	-90.892218	32.785510	-90 53 31.984799	32 47 7.836000
1	80	7.83390141	Corps	-90.680428	33.193543	-90 40 49.540798	33 11 36.754800
1	80	7.83390141	Corps	-90.774323	32.795675	-90 46 27.562799	32 47 44.430000
1	80	7.83390141	Corps	-90.934880	32.487888	-90 56 5.567999	32 29 16.396800
1	80	7.83390141	Corps	-90.829235	32.684253	-90 49 45.245999	32 41 3.310800
1	80	7.83390141	Corps	-90.558535	32.912466	-90 33 30.725997	32 54 44.877600
1	80	7.83390141	Corps	-90.817401	32.696452	-90 49 2.643599	32 41 47.227200
1	80	7.83390141	Corps	-90.915964	32.575479	-90 54 57.470399	32 34 31.724400
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1	80	7.83390141	Corps	-90.851777	32.782506	-90 51 6.397199	32 46 57.021600
1	80	7.83390141	Corps	-90.889266	32.531472	-90 53 21.357599	32 31 53.299200
1	80	7.83390141	Corps	-90.971007	32.829361	-90 58 15.625199	32 49 45.699600
1	80	7.83390141	Corps	-90.740064	32.890730	-90 44 24.230398	32 53 26.628000
1	80	7.83390141	Corps	-90.783613	32.711953	-90 47 1.006798	32 42 43.030800
1	80	7.83390141	Corps	-90.886219	32.484831	-90 53 10.388399	32 29 5.391600
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1	80	7.83390141	Corps	-90.989351	33.118685	-90 59 21.663599	33 7 7.266000
1	80	7.83390141	Corps	-90.790047	32.750591	-90 47 24.169199	32 45 2.127600
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1	80	7.83390141	Corps	-90.833902	32.831801	-90 50 2.047199	32 49 54.483600
1	80	7.83390141	Corps	-90.815842	32.919818	-90 48 57.031199	32 55 11.344800
1	80	7.83390141	Corps	-90.819019	32.609558	-90 49 8.468399	32 36 34.408800
1	80	7.83390141	Corps	-90.984808	32.557251	-90 59 5.308799	32 33 26.103600
1	80	7.83390141	Corps	-90.745046	32.975866	-90 44 42.165598	32 58 33.117600
1	80	7.83390141	Corps	-91.014981	32.498580	-91 0 53.931599	32 29 54.888000
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1	80	7.83390141	Corps	-90.893448	32.459578	-90 53 36.412799	32 27 34.480800
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1	80	7.83390141	Corps	-90.952193	33.128278	-90 57 7.894799	33 7 41.800800
1	80	7.83390141	Corps	-90.769441	32.835782	-90 46 9.987598	32 50 8.815200
1	80	7.83390141	Corps	-90.950277	32.509876	-90 57 0.997199	32 30 35.553600
1	80	7.83390141	Corps	-90.881291	32.704319	-90 52 52.647599	32 42 15.548400

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1	80	7.83390141	Corps	-90.824577	32.802953	-90 49 28.477199	32 48 10.630800
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1	80	7.83390141	Corps	-90.847476	32.809881	-90 50 50.913599	32 48 35.571600
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1	80	7.83390141	Corps	-90.804388	32.674402	-90 48 15.796799	32 40 27.847200
1	80	7.83390141	Corps	-90.890311	32.556666	-90 53 25.119599	32 33 23.997600
1	80	7.83390141	Corps	-90.845607	32.743346	-90 50 44.185199	32 44 36.045600
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1	80	7.83390141	Corps	-90.759604	32.693823	-90 45 34.574398	32 41 37.762800
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1	80	7.83390141	Corps	-90.811215	32.616285	-90 48 40.373999	32 36 58.626000
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1	80	7.83390141	Corps	-90.766084	32.939926	-90 45 57.902399	32 56 23.733600
1	80	7.83390141	Corps	-90.943637	32.472060	-90 56 37.093199	32 28 19.416000
1	80	7.83390141	Corps	-90.794171	32.803664	-90 47 39.015599	32 48 13.190400
1	80	7.83390141	Corps	-90.878456	32.542176	-90 52 42.441599	32 32 31.833600
1	80	7.83390141	Corps	-90.985455	32.802261	-90 59 7.637999	32 48 8.139600
1	80	7.83390141	Corps	-90.725697	32.834700	-90 43 32.509198	32 50 4.920000
1	80	7.83390141	Corps	-90.774708	32.709648	-90 46 28.948799	32 42 34.732800
1	80	7.83390141	Corps	-90.867506	32.476578	-90 52 3.021599	32 28 35.680800
1	80	7.83390141	Corps	-90.885169	32.765293	-90 53 6.608399	32 45 55.054800
1	80	7.83390141	Corps	-91.045394	33.068422	-91 2 43.418399	33 4 6.319200
1	80	7.83390141	Corps	-90.780462	32.743796	-90 46 49.663198	32 44 37.665600
1	80	7.83390141	Corps	-90.945817	32.518206	-90 56 44.941199	32 31 5.541600
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1	80	7.83390141	Corps	-90.787858	32.583236	-90 47 16.288799	32 34 59.649600
1	80	7.83390141	Corps	-90.992229	32.639359	-90 59 32.024399	32 38 21.692400
1	80	7.83390141	Corps	-90.916060	32.732102	-90 54 57.815999	32 43 55.567200
1	80	7.83390141	Corps	-91.055343	32.505134	-91 3 19.234800	32 30 18.482400
1	80	7.83390141	Corps	-90.767049	32.770325	-90 46 1.376399	32 46 13.170000
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1	80	7.83390141	Corps	-90.562814	33.043925	-90 33 46.130397	33 2 38.130000
1	80	7.83390141	Corps	-90.743193	32.689613	-90 44 35.494798	32 41 22.606800
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1	80	7.83390141	Corps	-90.776537	32.642308	-90 46 35.533199	32 38 32.308800
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1	80	7.83390141	Corps	-90.955394	32.558004	-90 57 19.418399	32 33 28.814400
1	80	7.83390141	Corps	-90.797315	32.762127	-90 47 50.333998	32 45 43.657200
1	80	7.83390141	Corps	-90.911486	32.570541	-90 54 41.349599	32 34 13.947600
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1	80	7.83390141	Corps	-90.874604	32.801840	-90 52 28.574399	32 48 6.624000
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1	80	7.83390141	Corps	-90.760364	32.778802	-90 45 37.310398	32 46 43.687200
1	80	7.83390141	Corps	-90.926240	32.487007	-90 55 34.463999	32 29 13.225200
1	80	7.83390141	Corps	-90.916903	32.631507	-90 55 0.850799	32 37 53.425200
1	80	7.83390141	Corps	-90.738441	32.790480	-90 44 18.387598	32 47 25.728000
1	80	7.83390141	Corps	-90.847465	32.691655	-90 50 50.873999	32 41 29.958000
1	80	7.83390141	Corps	-90.953104	32.574838	-90 57 11.174399	32 34 29.416800
1	80	7.83390141	Corps	-90.712515	32.976211	-90 42 45.053998	32 58 34.359600
1	80	7.83390141	Corps	-90.945450	32.487872	-90 56 43.619999	32 29 16.339200
1	80	7.83390141	Corps	-90.781642	32.793211	-90 46 53.911198	32 47 35.559600

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MSW03411-	403	MSW03411-0403	2	1	0	1	2	1
MSW03411-	404	MSW03411-0404	2	1	0	1	2	1
MSW03411-	405	MSW03411-0405	2	1	0	1	2	1
MSW03411-	406	MSW03411-0406	2	1	0	1	2	1
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1	80	7.83390141	Corps	-91.016152	32.817944	-91 0 58.147199	32 49 4.598400
1	80	7.83390141	Corps	-90.712951	32.901615	-90 42 46.623598	32 54 5.814000
1	80	7.83390141	Corps	-90.794832	32.698306	-90 47 41.395199	32 41 53.901600
1	80	7.83390141	Corps	-90.895181	32.498188	-90 53 42.651599	32 29 53.476800
1	80	7.83390141	Corps	-90.885036	32.747460	-90 53 6.129599	32 44 50.856000
1	80	7.83390141	Corps	-91.035215	33.024774	-91 2 6.774000	33 1 29.186400
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1	80	7.83390141	Corps	-90.788944	32.918743	-90 47 20.198399	32 55 7.474800
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1	80	7.83390141	Corps	-90.787657	32.638516	-90 47 15.565199	32 38 18.657600
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1	80	6.95193329	EPAnot	-90.917894	33.008613	-90 55 4.418399	33 0 31.006800
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1	80	6.95193329	EPAnot	-90.745053	33.214996	-90 44 42.190798	33 12 53.985600
1	80	6.95193329	EPAnot	-90.856491	32.842122	-90 51 23.367599	32 50 31.639200
1	80	6.95193329	EPAnot	-90.731969	32.643673	-90 43 55.088399	32 38 37.222800
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Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	out	out	out	out
EPAnot	2	0	0	out	out	out	out	out
NonWet	0	0	0	out	out	out	out	out
NonWet	0	0	0	out	out	out	out	out
EPAnot	2	0	0	in	in	out	out	out
EPAnot	2	0	0	in	in	out	in	in
EPAnot	2	0	0	in	out	out	out	out
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EPAnot	2	0	0	in	in	out	out	out
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EPAnot	2	0	0	out	out	out	out	out
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NonWet	0	0	0	out	out	out	in	in
EPAnot	2	0	0	in	in	out	in	in
EPAnot	2	0	0	out	out	out	out	out
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NonWet	0	0	0	out	out	out	out	out
EPAnot	0	3	0	in	out	out	in	in
EPAnot	2	0	0	in	out	out	out	out
EPAnot	2	0	0	in	in	out	out	in
EPAnot	2	0	0	in	in	out	in	in
NonWet	0	0	0	out	out	out	out	out
EPAnot	0	3	0	in	in	out	in	in
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EPAnot	2	0	0	out	out	out	out	out
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EPAnot	2	0	0	out	out	out	out	out
NonWet	0	0	0	out	out	out	out	out

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1	80	17.20641343	NonWet	-90.633666	33.023782	-90 38 1.197598	33 1 25.615200
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NonWet	0	0	0	out	out	out	out	out
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NonWet	0	0	0	out	out	out	out	out
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NonWet	0	0	0	out	out	out	out	out
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MSW03411-	1197	MSW03411-1197	3	0	1	2	3	1
MSW03411-	1198	MSW03411-1198	3	0	1	2	3	1
MSW03411-	1199	MSW03411-1199	3	0	1	2	3	1
MSW03411-	1200	MSW03411-1200	3	0	1	2	3	1

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1	80	17.20641343	NonWet	-90.789138	33.032026	-90 47 20.896799	33 1 55.293600
1	80	17.20641343	NonWet	-90.947810	32.834486	-90 56 52.115999	32 50 4.149600
1	80	17.20641343	NonWet	-91.028754	32.846625	-91 1 43.514399	32 50 47.850000
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NonWet	0	0	0	in	in	out	in	in
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Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/10/2021 10:07:56 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: Yazoo Notice of Intent Filed on ESA
Attachments: Yazoo Pumps - Notice of Intent ESA_2-9-21.pdf

Hello Bill,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock

environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

February 8, 2021

John Whitley
Acting Secretary of Army
101 Army Pentagon
Washington, D.C. 20310-0101

Scott de la Vega
Acting Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Vance F. Stewart, III
Acting Assistant Secretary of
the Army (Civil Works)
108 Army Pentagon
Washington, D.C. 20310-0108

Matt Hogan
Acting Director U.S. Fish and Wildlife
Service
1849 C Street, NW
Washington, D.C. 20240

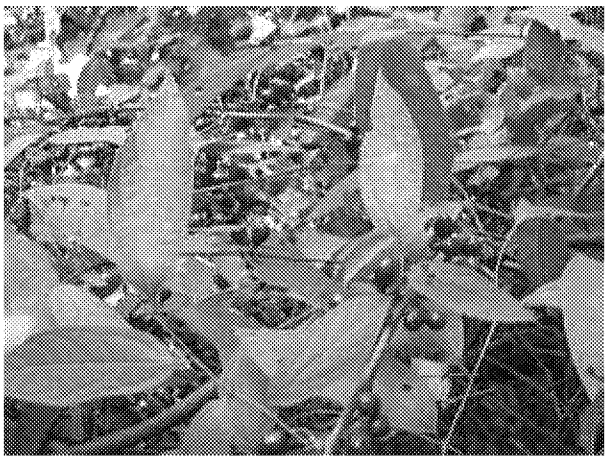
Re: Sixty-day notice of intent to sue to remedy violations of the Endangered Species Act in connection with the Yazoo Backwater Pumps Project

Dear Acting Secretary of the Army John Whitley, Acting Secretary of the Interior Scott de la Vega, Acting Assistant Secretary of the Army (Civil Works) Vance F. Stewart III, and Acting Director of the U.S. Fish and Wildlife Service Matt Hogan:

American Rivers, National Audubon Society, Sierra Club, and Healthy Gulf (collectively the "Conservation Organizations") hereby provide notice, pursuant to section 11(g) of the Endangered Species Act (ESA), 16 U.S.C. § 1540(g)(2)(A)(i), that the United States Army Corps of Engineers (Corps) is in violation of the ESA, 16 U.S.C. §§ 1531 et seq., for failing to formally consult with the U.S. Fish and Wildlife Service (Service) and ensure that the Yazoo Backwater Pumps Project will not jeopardize the federally listed pondberry (*Lindera melissifolia*). Unless the Corps takes immediate action to remedy the significant violations of the ESA detailed below, we will file suit against the Corps and Service to enforce the provisions of section 7 of the ESA, 16 U.S.C. § 1536. We intend to file this action pursuant to section 11(g)(1)(A) of the ESA, 16 U.S.C. § 1540(g)(1)(A), and the Administrative Procedure Act, 5 U.S.C. § 706.

BACKGROUND

The Yazoo Backwater Area sustains a number of federally listed species, including the endangered pondberry. In early spring, this distinctive plant produces small clusters of yellow flowers, which are an important winter food source for pollinators, followed by green fruits that ripen to red by fall. *See* U.S. Fish and Wildlife Service, Pondberry Final Biological Opinion 9 (July 2, 2007) [hereinafter BiOp].



The pondberry is an obligate wetland species, meaning that it occurs almost exclusively in wetlands, and thus is a key indicator of wetland health. *Id.* The Service listed the pondberry as an endangered plant under the ESA in 1986 due to the "tremendous[]" loss of the species caused by "land clearing and drainage activities in recent and historic times."[1] The species is considered extirpated in Alabama, Florida, and Louisiana. BiOp at 13. The remaining, and largest populations, occur in bottomland hardwood forests of the Mississippi alluvial valley. *Id.* The Yazoo Backwater Area contained approximately 13 potential pondberry populations located within 177 pondberry sites in 2005. *Id.* at 32. The following figure depicts a pondberry colony.

[1] Endangered and Threatened Wildlife and Plants; Determination of Endangered Status for *Lindera melissifolia*, 51 Fed. Reg. 27,495, 27,496 (July 31, 1986).

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In 2007, the Corps proposed to construct and operate a 14,000 cubic feet per second (cfs) pumping plant in the Yazoo Backwater Area (known as the Yazoo Pumps Project) to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. The stated objective of the Yazoo Pumps Project was to limit the spatial extent, frequency, and length of time the Yazoo Backwater Area floods.

The Corps acknowledged that the construction and operation of the pumping plant may affect the pondberry, but claimed that there would likely be no adverse effects to the species. BiOp at 2. In support of that contention, the Corps asserted that pondberry sites located above the 2-year floodplain were sustained by local conditions (e.g., precipitation), not overbank flooding, and thus would not be adversely affected by the pumps' impacts on hydrology. *Id.* at 50. The Corps thus refused to initiate formal consultation with the Service to determine whether the pumping plant would jeopardize the species. *Id.* at 4.

The Service rejected the Corps' flawed analysis as "contrary to conclusions based on the available data." *Id.* at 50. As the Service carefully explained, "[s]tatistical relationships demonstrate pondberry is affected by flooding" and that "colony/site growth rates decline as flood frequency decreases." *Id.* The Service thus urged the Corps to initiate formal consultation to comply with the ESA and ensure against jeopardy of the species. *Id.* at 5. The Corps agreed and initiated formal consultation. Through that process, the Service prepared a comprehensive Biological Opinion, which concluded that the pumps project would likely adversely affect the species by altering hydrology, including overbank flooding. *Id.* at 74-92. The Service, however, concluded that the proposed pumps would not appreciably reduce the survival and recovery of the species, and thus reached a no-jeopardy conclusion. *Id.* at 117-18.

In 2008, the Environmental Protection Agency (EPA) exercised its authority under Section 404(c) of the Clean Water Act to veto the Yazoo Pumps Project, including all of the alternatives proposed by the Corps that involved the construction and operation of a 14,000 cfs pumping plant, due to the unacceptable adverse effects on fish and wildlife in the Yazoo Backwater Area. EPA's decision reflects the culmination of decades of review of the project by the EPA, Corps, and Service. The Veto was also a priority of the George W. Bush Administration's EPA and Department of the Interior, which believed there were less environmentally damaging ways to provide flood damage reduction, and urged the Corps to consider those alternative approaches. EPA has issued only 13 vetoes since the Clean Water Act was enacted in 1972, out of approximately 2 million activities approved by the Corps during that timeframe.

Nonetheless, in 2020, the Corps issued a notice of its intent to "complete the Yazoo Area Pump Project feature."[2] To that end, the Corps proposed the construction and operation of the same 14,000 cfs pumping plant at a nearby location with the exact same key features as the vetoed Yazoo Pumps Project (hereinafter the Yazoo Pumps Redo).

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[2] Notice of Intent To Prepare Supplemental Environmental Impact Statement for the Yazoo Area Pump Project, 85 Fed. Reg. 21,218, 21,219 (April 16, 2020).

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The Corps prepared a revised biological assessment for the Yazoo Pumps Redo, which documented "steep declines" in pondberry colonies in the Yazoo Backwater Area. Revised Biological Assessment 67 (Dec. 11, 2021) [hereinafter Revised BA]. Nonetheless, the Corps claimed that the construction and operation of the same 14,000 cfs pumping plant would not likely adversely affect the pondberry because "precipitation inputs" (e.g., rainfall) would sustain wetlands. *Id.* at 70. In support of this contention, the Corps cited a 2019 study by Berkowitz *et al.* titled "Forested wetland hydrology in a large Mississippi River tributary." *Id.*

The Service repeatedly refused to concur with the Corps' "not likely to adversely affect" determination.[3] The Service concluded that: the Corps "inappropriately extrapolated the findings of Berkowitz (2019)" and "disregarded" the Service's prior findings regarding the role of overbank flooding, which constitutes the best available science. Accordingly, the Corps' reliance on the Berkowitz study to disclaim the adverse effects of the pumps was "premature and inappropriate." Service's 2021 Letter at 2; Service's 2020 Letter at A-6. Instead, the Service concluded that the Yazoo Pumps Redo "is likely to adversely affect pondberry" and thus urged the Corps to initiate formal consultation to ensure against jeopardy. Service's 2021 Letter at 2.

Yet, the Corps rejected the Service's expert conclusions, refused to initiate formal consultation, and instead hastily signed the Record of Decision approving the project on January 15, 2021, just days before the end of the Trump Administration.

THE ENDANGERED SPECIES ACT

The ESA is "the most comprehensive legislation for the preservation of endangered species ever enacted by any nation." *Tenn. Valley Auth. v. Hill*, 437 U.S. 153, 180 (1978). Its purpose is to "provide a means whereby the ecosystems upon which endangered and threatened species depend may be conserved [and] to provide a program for the conservation of such endangered species and threatened species . . . ." 16 U.S.C. § 1531(b). The "plain intent of Congress in enacting [the ESA] was to halt and reverse the trend toward species extinction, whatever the cost." *Tenn. Valley Auth.*, 437 U.S. at 184.

Section 7(a)(2) is "the heart of the Endangered Species Act" and requires the Corps to ensure that its actions are "not likely to jeopardize the continued existence of any endangered species or threatened species." 16 U.S.C. § 1536(a)(2); *Nat'l Parks Conservation Ass'n v. Jewell*, 62 F. Supp. 3d 7, 18 (D.D.C. 2014). Section 7(a)(2) of the ESA prohibits federal agencies from undertaking actions that are "likely to jeopardize the continued existence" of any listed species or "result in the destruction or adverse modification of" critical habitat. *Id.* § 1536(a)(2). "Jeopardy" results when it is reasonable to expect, "directly or indirectly," that the action would appreciably reduce "the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of that species." 50 C.F.R. § 402.02.

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[3] *See* Letter from Stephen M. Ricks to Colonel Hilliard (Dec. 8, 2020) (hereinafter "Service's 2020 Letter"); Letter from Stephen M. Ricks to Colonel Hilliard (Jan. 10, 2020) (hereinafter "Service's 2021 Letter").

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To ensure compliance with section 7's substantive mandate, the ESA and its implementing regulations impose specific procedural duties on federal agencies, requiring an "action agency"—in this case, the Corps—to consult with the Service before undertaking any "action" that "may affect" a listed species or its designated critical habitat. 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). The "may affect" threshold for triggering the consultation duty under section 7(a)(2) is low. *See Karuk Tribe of Cal. v. U.S. Forest Serv.*, 681 F.3d 1006, 1027 (9th Cir. 2012) (en banc). "Any possible effect, whether beneficial, benign, adverse, or of an undetermined character, triggers the formal consultation requirement." Interagency Cooperation—Endangered Species Act of 1973, 51 Fed. Reg. 19,926, 19,949-50 (June 3, 1986). The Service and action agency must use the best scientific and commercial data available throughout the consultation process. 16 U.S.C. § 1536(a)(2).

As a first step, the federal action agency prepares a biological assessment ("BA"). 50 C.F.R. §§ 402.02, 402.12. The BA must evaluate the potential "effects of the action" on listed and proposed species and designated and proposed critical habitat within the "action area" and determine whether any such species or habitat are "likely to be adversely affected by the action." *Id.* § 402.12(a), (c). If the action agency determines that a proposed action "may affect" an endangered or threatened species, the agency must engage in formal consultation with the Service. *See* 50 C.F.R. § 402.14 ("Each Federal agency shall review its actions at the earliest possible time to determine whether any action may affect listed species or critical habitat. If such a determination is made, formal consultation is required . . . ."). Formal consultation is only excused where (1) an agency determines, as a result of its biological assessment or as a result of informal consultation with the Service, that the proposed action is not likely to adversely affect any listed species or critical habitat, *and* (2) the regional director of the Service, or authorized representative, provides a written concurrence. *See Nat. Res. Def. Council v. Houston*, 146 F.3d 1118, 1126 (9th Cir. 1998); *Tinoqui–Chalola Council of Kitanemuk & Yowlumne Tejon Indians v. United States Dep't of Energy*, 232 F.3d 1300, 1306 (9th Cir. 2000); *see also* 50 C.F.R. § 402.14(b).

Through the formal consultation process, the Service issues a Biological Opinion assessing whether the proposed action, taken together with its cumulative effects, is "likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat." 50 C.F.R. § 402.14(g)(4). The BiOp's finding must be based on the Service's independent analysis of the "effects of the action"—including the action's "indirect effects" and effects of "interrelated or interdependent" activities—and the "cumulative effects" on listed species or critical habitat. *Id.* §§ 402.02, 402.14(g). As part of this jeopardy analysis, the Service must consider a species' survival *and* recovery. 50 C.F.R. § 402.02; *Nat'l Wildlife Fed'n v. Nat'l Marine Fisheries Serv.*, 524 F.3d 917, 932 (9th Cir. 2008) (noting survival and recovery are "intertwined needs that must both be considered in a jeopardy analysis").

While section 7(a)(2)'s consultation obligations promote agency decision-making that avoids jeopardizing listed species, mere compliance with the obligations does not relieve the Corps of its substantive duties to ensure that a proposed action will not jeopardize listed species or adversely modify critical habitat. *See Res. Ltd., Inc. v. Robertson*, 35 F.3d 1300, 1304 (9th Cir. 1994) (internal quotation marks omitted).

Any ESA violation is subject to judicial review under the ESA's citizen suit provision. 16 U.S.C. § 1540(g)(1)(A).

VIOLATIONS OF THE ESA

A. The Corps Violated the ESA by Refusing to Formally Consult with the Service Regarding the Effects of the Yazoo Pumps Redo.

Construction and operation of a 14,000 cfs pumping plant in the Yazoo Backwater Area—the Yazoo Pumps Redo—may affect the federally listed pondberry, triggering the Corps' obligation to formally consult with the Service to ensure that the proposed project is not likely to jeopardize the species. 50 C.F.R. §§ 402.03, 402.14(a). Instead, the Corps attempted to sidestep this process by hastily approving the Yazoo Pumps Redo. This approach clearly violates the ESA. Given that the Service not only "disagreed with the [Corps'] determination of no adverse effects," but also affirmatively determined that the Yazoo Pumps Redo would likely adversely affect the pondberry, the Corps had "a clear legal obligation" to initiate formal consultation and obtain a biological opinion from the Service determining whether the project would jeopardize the species. *Nat. Res. Def. Council*, 146 F.3d at 1126.

The Corps cannot "meet its independent responsibilities under the ESA" absent formal consultation with the Service regarding the effects of the proposed action. *Id.* As the Ninth Circuit reasoned in *Thomas*, the procedural requirements of the ESA "are designed to ensure compliance with the substantive provisions." 753 F.2d at 764. Accordingly, if a project is allowed to proceed without substantial compliance with those procedural requirements, "there can be no assurance that a violation of the ESA's substantive provisions will not result." *Id.* Courts have thus held that the Corps cannot unilaterally satisfy its obligation to ensure that the project is not likely to jeopardize the pondberry; the Corps can only satisfy this obligation by obtaining concurrence from the Service or a formal biological opinion finding no-jeopardy, neither of which it obtained here. *See Washington Toxics Coal. v. U.S. Dep't of Interior, Fish & Wildlife Serv.*, 457 F. Supp. 2d 1158, 1179 (W.D. Wash. 2006) ("A unilaterally-made [not-likely to adversely affect] determination cannot be converted into a section 7(a)(2) finding of 'not likely to jeopardize' without 'consultation' with the relevant Service.").

The Corps' failure to initiate formal consultation was arbitrary, capricious, and contrary to the ESA for a multitude of additional reasons. As an initial matter, the Corps' purported excuse for foregoing formal consultation is wholly inadequate. Absent the Service's concurrence, the Corps can avoid formal consultation only if it determines that the Yazoo Pumps Redo will have "no effect" on the pondberry. *Nat'l Parks Conservation Ass'n v. Jewell*, 62 F. Supp. 3d 7, 12 (D.D.C. 2014) ("All of this means that an agency avoids the consultation requirement for a proposed discretionary action only if it determines that its action will have 'no effect' on threatened or endangered species or critical habitat."). Here, though, the Corps acknowledged the project may affect the pondberry and the Service concluded that the project would likely adversely affect the pondberry—findings that foreclose the Corps' unilateral attempt to evade formal consultation as made clear by the ESA, regulations, and caselaw.

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Nor can the Corps sidestep the ESA by refusing to request a biological opinion from the Service—the tactic it employed here. Whether or not this was part of "a deliberate (and successful) effort to avoid formal consultation and a possible 'jeopardy' finding," it still violates the ESA as the Corps has failed to ensure that its action is "not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification." *See Pac. Coast Fed'n of Fishermen's Associations v. U.S. Bureau of Reclamation*, 138 F. Supp. 2d 1228, 1246 (N.D. Cal. 2001). As a result, the Corps "clearly violated section 7(a)(2) of the ESA." *Id.*

B. The Corps Failed to Ensure that the Yazoo Pumps Redo Is Not Likely To Jeopardize the Pondberry.

The Corps also violated the ESA by relying on a fundamentally flawed Revised BA that failed to consider the relevant factors and ignored contrary evidence, including the best available science. Due to these errors, the Corps has failed to satisfy its obligation to ensure the Yazoo Pumps Redo is not likely to jeopardize the pondberry. *See* 16 U.S.C. § 1536(a)(2).

The Service determined that the operation of a 14,000 cfs pumping plant will likely adversely affect the pondberry by reducing overbank flooding. Service's 2021 Letter at 2. The Service based this determination on an extensive examination of the record, including the best available science, which demonstrates that "pondberry are affected by overbank flooding, local hydrology, and both factors combined." *Id.*; BiOp at 74-92. The Service also noted the "continued decline of the species in the Delta National Forest," which further exacerbates the adverse effects of the Yazoo Pumps Redo on the species' recovery and survival. Service's 2021 Letter at 2. Given these circumstances, the Service concluded that the project is likely to adversely affect pondberry—a reasoned determination entitled to great weight "given the expertise of the FWS in the area of wildlife conservation and management." *Carlton v. Babbitt*, 900 F. Supp. 526, 530 (D.D.C. 1995). Indeed, courts have consistently recognized that where an action agency—the Corps, in this instance—attempts to proceed in the face of an adverse determination by the Service, the action agency will "almost certainly be found to have acted arbitrarily and capriciously and contrary to law." *Lone Rock Timber Co. v. U.S. Dep't of Interior*, 842 F. Supp. 433, 437 (D. Or. 1994) (citing *TVA*, 437 U.S. at 153).

Despite these clear statements, the Corps disregarded the Service's expert determination and instead claimed the pumping plant is not likely to adversely affect the species. In an attempt to justify this assertion, the Corps generally cited the Berkowitz study for the sweeping proposition that "precipitation inputs sustain most wetlands in the Yazoo Basin, in addition to intermittent local flooding events." Revised BA at 67. The Corps then leaped to the conclusion that few pondberry colonies would be affected by a reduction to overbank flooding due to the Yazoo Pumps Redo, and thus disavowed any adverse effects from the project. *Id.* at 70.

The Service repeatedly rejected this conclusory analysis as not just "premature and inappropriate," but scientifically unsound and contrary to the "best available information."

Service's 2021 Letter at 2; Service's 2020 Letter at A-18.[4] As an initial matter, the Berkowitz study was not based on a randomized, statistically valid sample of wetland locations. As a result, the Corps cannot extrapolate the study to all wetlands in the Yazoo Backwater Area, let alone pondberry colonies. In fact, the Corps admitted that the sampling locations used in the study were "*not* determined randomly or based on a probabilistic distribution approach," Revised BA at 64 (emphasis added), and were selected "*independent* of pondberry locations." Service's 2021 Letter at 1 (emphasis added).

Furthermore, the Berkowitz study improperly conflated the distinct roles of precipitation and overbank flooding in supporting wetland functions. This was a clear oversight, according to the Service, as "duration and inundation patterns (particularly associated with surface waters) differ strongly between wetlands driven by precipitation versus flooding. These differences in hydrology have potentially large impacts on habitat suitability for pondberry." Service's 2021 Letter at 1.[5] Yet, the Corps provides no "method, analysis, or rationale" for extrapolating from the Berkowitz study to pondberry colonies. *Id.* Given these severe shortcomings, the Service concluded that that the Corps had "inappropriately extrapolated the findings of Berkowitz (2019)"—a fundamental error that infected the Corps' determination and rendered its attempt to disclaim the project's adverse affects arbitrary and capricious. *Id.*

Instead of addressing the Service's concerns, the Corps admitted that its sweeping reliance on Berkowitz was largely unfounded and uncertain. It acknowledged that it still "needed" to undertake "more thorough investigations" to assess whether the Berkowitz study "applies to conditions elsewhere in the backwater area." Revised BA at 64. It also acknowledged that it still needed to assess whether it could even "extrapolate" from the Berkowitz study "in a scientifically sound manner." *Id.* These statements demonstrate that the Corps' determination was not based on the best available science, but instead "speculation and surmise" in plain contravention of the ESA. *Conner v. Burford*, 848 F.2d 1441, 1454 (9th Cir. 1988).

Compounding this error, the Corps disregarded the best available science demonstrating that the Yazoo Pumps Redo will likely adversely affect the species by altering overbank flooding, further violating the ESA. *Id.* at 1454 (holding that an agency "cannot ignore available, relevant biological information."). For example, the Service criticized the Corps for blinding itself to the Biological Opinion's extensive analysis of pondberry survey reports, which established a link between overbank flooding and colony health. Service's 2020 Letter at A-12; BiOp at 74-92. As stated by the Service, "[t]hese concerns have not been addressed in the BA

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[4] The Service disputed the Corps' assertion in 2007 that local hydrology (via rainfall) is the most important aspect of hydrologic regimes at pondberry colonies on the Delta National Forest. Service's 2020 Letter at A-6. The Revised BA simply disregarded this extensive analysis. *Id.*

[5] For example, the Berkowitz study asserts that precipitation could sustain wetlands by maintaining water tables within 30 cm of the surface (i.e., belowground). But underground saturation is no substitute for surface inundation, which plays a crucial role in supporting essential wetland functions such as pollutant filtering, export of organic carbon, and providing aquatic habitat.

and that is needed." Service's 2020 Letter at A-12. By failing to consider this available information, the Corps impermissibly "disregarded" the adverse effects of the Yazoo Pumps Redo on the pondberry, thereby overlooking a critical aspect of the problem. *See Greenpeace v. Nat'l Marine Fisheries Serv.*, 80 F. Supp. 2d 1137, 1149 (W.D. Wash. 2000) (finding it unlawful for an agency to entirely ignore relevant factor and fail to analyze and develop projections regarding that factor based on information that was available).

The Corps committed a series of additional errors that underscore the flaws in its Revised BA. The Corps failed to provide an adequate discussion of the environmental baseline, including any "acknowledgment or assessment of potential deleterious impacts caused or exacerbated by previous water and flood control projects in the action area." Service's 2021 Letter at 5. This oversight is particularly problematic given the "steep declines" in pondberry colonies in the Yazoo Backwater Area. Revised BA at 67. Without assessing the impacts of prior flood control projects on the pondberry, and how those projects contributed to these declines, the Corps cannot adequately assess the total impacts of constructing and operating a 14,000 cfs pumping plant. *See Defs. of Wildlife v. Babbitt*, 130 F. Supp. 2d 121, 127-28 (D.D.C. 2001) ("Simply reciting the activities and impacts that constitute the baseline and then separately addressing only the impacts of the particular agency action in isolation is not sufficient.").

The Corps also failed to ensure that the Yazoo Pumps Redo will not "reduce appreciably the likelihood of both the survival and recovery" of the pondberry. 50 C.F.R. § 402.02. As a result, it failed to provide any analysis of whether the species had passed the "tipping point for recovery" given the steep declines in populations, many of which are extant at previously surveyed locations. *Ctr. for Biological Diversity v. Salazar*, 804 F. Supp. 2d 987, 999 (D. Ariz. 2011); *see also Wild Fish Conservancy v. Salazar*, 628 F.3d 513 (9th Cir. 2010). By failing to determine whether the Yazoo Pumps Redo would appreciably reduce survival and recovery of the species, the Corps failed to ensure that its action will not jeopardize the continued existence of the pondberry in violation of the ESA.

C. The Corps Irreversibly and Irretrievably Committed Resources to the Yazoo Pumps Redo in Violation of the ESA.

Section 7(d) of the ESA prohibits a federal agency from making "any irreversible or irretrievable commitment of resources with respect to the agency action which has the effect of foreclosing the formulation or implementation of any reasonable and prudent alternative measures which would not violate subsection (a)(2)." 16 U.S.C. § 1536(d). This prohibition "is in force during the consultation process and continues until the requirements of section 7(a)(2) are satisfied." 50 C.F.R. § 402.09. Section 7(d) is designed to ensure that an agency carefully evaluates a proposed project's impact on listed species before moving ahead with the project. *Sierra Club v. Andrus*, 486 F. Supp. 332, 356 (D.D.C. 1980) ("Congress enacted § 7(d) to prevent Federal agencies from 'steamrolling' activity in order to secure completion of projects regardless of their impact on endangered species.").

Here, the Corps acknowledged that the Yazoo Pumps Redo may affect the pondberry and initiated informal consultation, thereby triggering the section 7(d) prohibition. Accordingly, the Corps agreed not to sign a record of decision "until coordination is complete" with the Service

regarding the pondberry.[6] But instead of following through with this regulatory obligation, the Corps hastily signed the Record of Decision on January 15, 2021, a mere five days after the Service *refused* to concur with the Corps' flawed analysis. By signing the Record of Decision, the Corps approved the construction and operation of the 14,000 cfs pumping plant and foreclosed reasonable and prudent alternatives to that action. This decision constitutes an "irreversible and irretrievable commitment of resources," which the Corps made before completing its section 7(a)(2) consultation duties to ensure that the Project will not jeopardize listed species. *Pac. Rivers Council*, 30 F.3d at 1057; 16 U.S.C. § 1536(a)(2). Therefore, the decision and any activities it authorizes are in direct violation of section 7(d). 16 U.S.C. § 1536(d). Moreover, the decision violates the intent of section 7(d), which is to prevent agencies from "steamrolling" their projects forward to secure completion regardless of impacts to listed species. *N. Slope Borough v. Andrus*, 486 F. Supp. 332, 356 (D.D.C. 1980).

D. The Corps and Service Must Reinitiate Formal Consultation.

Both the Corps and Service have an ongoing obligation to reinitiate consultation if new information reveals effects not previously considered or if the action is modified in a manner that causes unanalyzed effects to a species. 50 C.F.R. § 402.16. Consistent with the plain text of the regulation, the Ninth Circuit has stated that "[t]he duty to reinitiate consultation lies with both the action agency and the consulting agency." *Salmon Spawning & Recovery All. v. Gutierrez*, 545 F.3d 1220, 1229 (9th Cir. 2008).

Here, though, both the Corps and Service abdicated their obligation to reinitiate formal consultation, despite identifying significant new information indicating effects not previously considered in the Biological Opinion. The Corps identified "steep declines" in pondberry colonies in the Yazoo Backwater Area, as well as significant changes in hydrology due to prior flood control projects. Revised BA at 67. Instead of reinitiating formal consultation, however, the Corps tried to short-circuit the process. Though the Service refused to concur, it failed to reinitiate formal consultation and prepare a biological opinion that assesses the total impacts of constructing and operating a 14,000 cfs pumping plant, given the changed circumstances.

Furthermore, the Yazoo Pumps Redo will cause even greater impacts to the aquatic ecosystem than the Yazoo Pumps Project, thereby exacerbating adverse effects to the pondberry in ways not previously considered. Among other things, the Yazoo Pumps Redo will destroy 86 acres of wetlands at the new pump location, which has not been surveyed and may contain pondberry colonies or sites. The Yazoo Pumps Redo also eliminates 8,257 acres of wetland mitigation and 52,900 acres of reforestation, thereby increasing the unacceptable adverse impacts of the project. The agencies' failure to reinitiate formal consultation to analyze these significant new impacts violates section 7(a)(2) of the ESA.

CONCLUSION

If the Corps and Service do not cure the significant ESA violations described above, upon the expiration of 60 days after the date of this Notice, the Conservation Organizations intend to

[6] 2020 Final Supplemental Environmental Impact Statement at 52.

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file suit under the ESA's citizen suit provision, 16 U.S.C. § 1540(g)(1)(A), and the Administrative Procedure Act, 5 U.S.C. § 706. The Conservation Organizations can be reached using the contact information below.

/s/ Stuart C. Gillespie
Stuart C. Gillespie
Jill Heaps
Sharmeen Morrison
Earthjustice
633 17th Street, Suite 1600
Denver, CO 80202
Tel.: (303) 996-9616
sgillespie@earthjustice.org

Counsel for Plaintiffs American Rivers, National Audubon Society, Sierra Club, and Healthy Gulf

cc:

Colonel Robert A. Hillard, District Engineer, U.S. Army Corps of Engineers, Vicksburg District, 4155 Clay Street, Vicksburg, MS 39183-3435

Stephen M. Ricks, Field Supervisor, Mississippi Field Office, U.S. Fish and Wildlife Service, 6578 Dogwood View Parkway, Suite A, Jackson, MS 39213

John Blevins, EPA Office of the Regional Administrator, Atlanta Federal Center, 61 Forsyth Street, SW, Atlanta, GA 30303-3104

ED_006580_00000013-00011

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 12/15/2021 5:46:07 PM
To: Ainslie, William [Ainslie.William@epa.gov]; Hough, Palmer [Hough.Palmer@epa.gov]
Subject: Corps voids Yazoo Pumps approval
Attachments: Feds. Notice of Withdrawal of ROD.pdf

Hello Bill and Hough,

Big Yazoo news today: The Corps has filed a request in federal court to withdraw their Record of Decision on the Pumps.

Please find our joint statement below that links to the Corps' memo. Attached is their court filing.

Kind regards,
Jill

FOR IMMEDIATE RELEASE: December 15, 2021

CONTACTS:
Jill Mastrototaro | Audubon Delta | (504) 481-3659 | jill.mastrototaro@audubon.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org

Science, Law, and Public Voice Prevail in Federal Challenge to Yazoo Pumps

Conservation groups' lawsuit prompts Army Corps' reversal

WASHINGTON, D.C. — Today, the U.S. Army Corps of Engineers (Corps) released a memo withdrawing the agency's January 15, 2021, Record of Decision that green-lighted its proposed 2020 Yazoo Pumps plan, a destructive agricultural drainage project in Mississippi's South Delta. The Corps cited the U.S. Environmental Protection Agency's (EPA) recent restoring of its 2008 Clean Water Act 404(c) veto as a basis for their decision.

Federal lawsuits filed earlier this year by Earthjustice on behalf of American Rivers, National Audubon Society, Sierra Club, and Healthy Gulf, against the Corps, EPA, and U.S. Fish and Wildlife Service, challenged the Trump administration's rushed 2020 attempt to revive the Pumps. The Corps' official withdrawal of their approval was prompted by these legal challenges, which serves as a final step in stopping the Pumps and ensuring some of the nation's richest wetland and water resources are protected once again.

Statement by American Rivers, National Audubon Society, Sierra Club, Healthy Gulf, and Earthjustice:

"The Corps' reversal of the outdated, ineffective Pumps is an unequivocal reminder of the power of science, the law, and the public's voice in holding agencies accountable for their irresponsible actions – namely the Corps' unprecedented effort to illegally sidestep bedrock environmental laws, abdicate agency responsibilities, and ignore key scientific findings about the 2020 Pumps' plan.

The Corps unlawfully refused to consider any other alternatives except the Pumps, yet they themselves acknowledge their plan would leave most local communities vulnerable – Corps data shows only 17% of the backwater would receive

any flood relief from the Pumps.[1] No more time or taxpayer money should be spent on pursuing a boondoggle that would only deliver more environmental injustice to the Mississippi Delta.

This conclusion of the Pumps' saga underscores the real opportunity to deliver meaningful flood relief to vulnerable backwater communities through existing federal programs that are available now to get money on the ground to those who need it the most.

We stand ready to support this new chapter that can benefit people's lives, property, and livelihoods while safeguarding this globally important area for future generations."

[1] Corps' 2020 FSEIS, Appendix C (Tables) at Table 5.3; Corps' 2020 SEIS, Appendix G (Engineering Report) at 135, Table 2-26.

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Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

[1] Corps' 2020 FSEIS, Appendix C (Tables) at Table 5.3; Corps' 2020 SEIS, Appendix G (Engineering Report) at 135, Table 2-26.

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN RIVERS, NATIONAL AUDUBON SOCIETY, SIERRA CLUB, and HEALTHY GULF,

Plaintiffs,

Case No. 1:21-cv-01029

v.

U.S. ARMY CORPS OF ENGINEERS and U.S. FISH and WILDLIFE SERVICE,

Defendants.

NOTICE OF ACTION WITHDRAWING RECORD OF DECISION

Federal Defendants (U.S. Army Corps of Engineers ("Corps") and U.S. Fish and Wildlife Service) hereby provide notice that on December 11, 2021, the Corps signed the attached Memorandum for Record withdrawing the Record of Decision for the Final Supplement No. 2 to the 1982 Yazoo Area Pump Project Final Environmental Impact Statement. *See* Exhibit A, Memorandum dated December 11, 2021, by Maj. Gen. Diana M. Holland, Commanding General, Mississippi Valley Division, United States Army Corps of Engineers.

Dated: December 15, 2021

Respectfully submitted,

TODD KIM
Assistant Attorney General
U.S. Department of Justice
Environment & Natural Resources Division

/s/ Heather E. Gange
HEATHER E. GANGE
D.C. Bar No. 452615
Environmental Defense Section
P.O. Box 7611
Washington, DC 20044
(202) 514-4206

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MARK ARTHUR BROWN
D.C. Bar No. 470050
Wildlife and Marine Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611
(202) 305-0204

SALLY J. SULLIVAN
D.C. Bar No. 1021930
Natural Resources Section
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
(202) 514-9269

Counsel for Federal Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2021, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. The participants in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Heather E. Gange
Heather E. Gange

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/12/2021 7:38:07 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: Yazoo Factsheet
Attachments: Fact Sheet_Immediate Action Required to Stop the Yazoo Pumps_Final_01-21-21.pdf

Hello Bill,

In the hope it can be helpful to you and your colleagues, attached please find a summary outlining the multitude of problems and concerns associated with the Yazoo Pumps.

Please do not hesitate to reach out with questions or for more details.

My best,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Immediate Action is Required to Stop the Yazoo Pumps

The Trump Administration Waived the 2008 Clean Water Act Veto and Approved Construction of the Yazoo Pumps in a Last-Minute Push to Build this Destructive and Dangerous Project

In 2008, the Environmental Protection Agency used its Clean Water Act 404(c) authority to veto the Yazoo Pumps to prevent "unacceptable damage" to "some of the richest wetland and aquatic resources in the nation."[1] This veto has ensured protection of 200,000 acres of hemispherically important wetlands for more than a decade—wetlands that support 450 species of birds, fish and wildlife; are used by 29 million migrating birds each year; and include tens of thousands of acres of federal, state, and privately-owned conservation lands.

But in a reckless about-face, the Trump Administration's EPA revoked this veto in a scant two paragraphs tucked within EPA's November 30, 2020 comments on the Yazoo Pumps' new draft supplemental environmental impact statement (SEIS). This revocation contravenes the veto's extensive factual findings and was issued without the required public notice and comment. The Trump Administration's Corps of Engineers then approved the Yazoo Pumps in a Record of Decision signed on January 15, 2021.

The Biden Administration can quickly restore protections to these hemispherically significant wetlands by taking the following actions, each of which is fully supported by an extensive factual record:

- ✓ **Vacate the Trump Administration's illegal revocation of the Yazoo Pumps veto**
- ✓ **Reconfirm that the Yazoo Pumps veto prohibits the Trump Administration's plan**
- ✓ **Withdraw the Corps' deeply flawed Yazoo Pumps SEIS and Record of Decision**

EPA's unprecedented decision to exempt the Yazoo Pumps from the 2008 veto is insupportable. EPA's exemption contravenes the explicit and extensive findings in its own veto, and was issued without obtaining public input or providing a rational explanation for this unprecedented decision. Instead, EPA waived application of the veto in two paragraphs tucked within EPA's otherwise scathing comments on the Yazoo Pumps draft SEIS. Indeed, EPA made its decision knowing full well that the SEIS relies on the same flawed wetland assessment methodologies decisively rejected by EPA in the veto because they severely underestimate and obscure the pumps' significant, unacceptable impacts. But even the severe underestimate of impacts in the SEIS demonstrates that the veto covers the proposed pumps. The veto explicitly prohibits variations of the Yazoo Pumps that would harm more than 28,400 acres of wetlands; the SEIS acknowledges that a minimum of 38,744 acres of wetlands will be damaged.[2]

The Corps of Engineers' SEIS and Record of Decision are equally insupportable. The Corps has approved construction of the already vetoed Yazoo Pumps despite acknowledging that the pumps are so ineffective they will leave 82% to 89% of flooded lands underwater, and will take weeks to months to drawdown floodwaters on the remaining lands.[3] The Corps' fundamentally flawed SEIS ignores the U.S. Fish and Wildlife Services' strong opposition to the project;[4] EPA's scathing critique and determination that the project is prohibited by the Clean Water Act 404(b)(1) Guidelines;[5] and highly detailed technical comments and overwhelming opposition from the conservation community, scientific community, and the public.[6] The Corps issued the final SEIS just 4 days after the close of the public comment period on the draft, and signed the Record of Decision approving the project on January 15, 2021.

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- **The SEIS Recommends a Project That is Prohibited by the 2008 Veto:** The SEIS recommends construction of the same 14,000 cfs pumping station whose purpose, structure, operation, and impacts fall squarely within the scope of the 2008 veto—which explicitly prohibits plans that would harm more than 28,400 acres of wetlands.[7] The SEIS, which severely underestimates wetland impacts, acknowledges that the pumps will degrade more than 38,744 acres of wetlands.[8]

- **The SEIS Recommends a Project That is Prohibited by the Clean Water Act 404(b)(1) Guidelines:** The Yazoo Pumps are clearly prohibited by the 404(b)(1) Guidelines because they: (1) are not the least environmentally damaging practicable alternative; (2) will clearly cause significant—and conclusively unacceptable, as documented in the EPA veto—degradation of the aquatic ecosystem; (3) rely on a wholly conceptual mitigation proposal that is woefully inadequate and infected by the very same fatal flaws identified by EPA in the veto; (4) will cause or contribute to violations of state water quality standards; and (5) will jeopardize the continued existence of the federally endangered pondberry. EPA's comments on the draft SEIS highlight many of these failings.

- **The SEIS Recommends a Project That Threatens Public Safety:** The vetoed Yazoo Pumps could create significant flood risks for communities in north Vicksburg and the Yazoo Backwater Area—concerns raised repeatedly by the conservation community and EPA. Operation of the Yazoo Pumps would put downstream communities on the receiving end of an additional 9 billion gallons of water a day when the Yazoo River is already at flood stage. Communities in the Yazoo Backwater Area could flood if that massive influx of water overtopped or damaged the Yazoo Backwater Levee, which is at risk of crevassing and is so low that it is not accredited to handle a 100-year flood.[9] Collapse of this levee would flood the very communities the pumps are purported to protect. The SEIS dismisses these concerns out of hand in a brief analysis[10] based on a model that an independent expert found to be so flawed that it "cannot be trusted to get a correct answer" regarding the impact of the Yazoo Pumps on flood levels in the Yazoo River.[11] The SEIS makes no effort to address this expert analysis.

- **The SEIS Does Not Look at Even a Single Alternative to the Vetoed Yazoo Pumps:** The SEIS does not consider even a single alternative to the vetoed Yazoo Pumps, in direct violation of the National Environmental Policy Act, the Clean Water Act, and modern floodplain management techniques. The SEIS makes no mention of repeated requests to consider alternatives, including from EPA and conservation organizations whose scoping and draft SEIS comments proposed a suite of proven, low-cost, natural infrastructure and non-structural measures that would provide effective, sustainable, and environmentally sound relief to communities in the Yazoo Backwater Area.

- **The SEIS Ignores a Wide Array of Devastating Impacts to Hemispherically Significant Wetlands:** The SEIS dramatically understates wetland impacts by looking only at some types of impacts to a small subset of wetlands, and by relying on scientifically unsound methodologies that were decisively rejected by EPA in the 2008 veto. The SEIS arbitrarily and severely restricts its review of wetland impacts to changes in the duration of inundation to the small subset of wetlands located within the 2-year floodplain that receive ≥ 14 consecutive days of flooding. These severe, scientifically unsound restrictions cause the SEIS to significantly understate impacts to wetlands and aquatic habitat, as made clear in the 2008 veto. Even this severe underestimate acknowledges degradation to at least 38,774 acres of wetlands in the 2-year floodplain.

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- **The SEIS Ignores Critical Impacts to the Many Rivers and Streams in the Project Area:** The SEIS does not assess impacts to the project area's many hydrologically-connected streams, even though the Pumps-induced wetland losses will likely reduce flows and increase sedimentation and nutrient pollution in those streams. These wetland losses could also reduce groundwater recharge in the project area, exacerbating low stream flows and the already-significant declines in the Mississippi Alluvial Plain aquifer.

- **The SEIS Ignores Critical Impacts to a Vast Array of Fish and Wildlife:** The SEIS fails to assess critical impacts to a vast array of fish and wildlife, including by failing to fully evaluate the pumps' adverse impacts to internationally significant aquatic resources. For example, the SEIS does not fully evaluate the pumps' adverse impacts to internationally significant aquatic resources evaluate how many acres would no longer flood to a depth of 1 foot for 8 consecutive days with the Pumps in place, even though the SEIS makes clear that all fish spawning habitat would be lost in such areas. The entire analysis of waterfowl impacts is based on a single duck species even though more than 40 percent of the nation's waterfowl migrate through the project area twice each year, including more than 30 species of waterfowl that rely on bottomland hardwood wetlands. The shorebird analysis is limited to a few vague paragraphs even though up to one million shorebirds migrate through the project area twice each year, as highlighted in the 2008 veto. The U.S. Fish and Wildlife Service opposes the SEIS plan, and the Corps has refused to adopt recommendations that could alleviate some of the Services' concerns.[12] The Corps has not completed the required Endangered Species Act consultations, despite committing to do so before signing the Record of Decision.[13]

- **The SEIS Mitigation is Wholly Inadequate and Ignores Longstanding Legal Requirements:** Because the SEIS does not assess the full extent of the pumps' adverse impacts to hemispherically significant aquatic resources and wildlife, it cannot assess the amount of mitigation needed to offset those impacts. The SEIS also repeats the same mitigation errors identified in the 2008 veto by failing to identify specific mitigation sites, provide a detailed mitigation plan, and ensure adequate mitigation even for the severe underestimate of 38,744 acres of wetland impacts. Relying on the same functional assessment rejected in the 2008 veto precisely because it significantly understates lost wetland functions and significantly overstates mitigation outcomes,[14] the SEIS proposes just 2,405 acres of reforestation of yet-to-be-identified frequently flooded lands as in-kind mitigation.[15] This is 8,257 fewer acres of mitigation than proposed by the Corps in 2007; the SEIS also eliminates 52,900 acres of additional restoration that was a much-touted component of the Corps' 2007 proposal.

- **The SEIS Does Not Provide an Estimate of the Project's Costs and Benefits:** The SEIS does not provide any information on the costs or benefits of the Yazoo Pumps, and as a result cannot demonstrate that the project's benefits will exceed the project's costs, as required by law. Construction costs have increased substantially since the last estimate provided by the Corps in 2007, and the SEIS proposes massive new construction at the Deer Creek location that has never been accounted for in a cost estimate; these changes have likely pushed the cost of construction to well over $450 million. The SEIS does make clear that the pumps will provide little if any flood damage reduction benefits, acknowledging that 82% to 89% of the project area will still flood even with the Pumps in place, and the pumps will take weeks to months to drawdown floodwaters on the remaining lands.[16] The SEIS also highlights the extremely limited potential for agricultural benefits, noting that "agricultural crop acres benefited are expected to be 28,700 acres per year over the life of the project."[17] In 2007, the Corps acknowledged that 80% of project benefits would come from agricultural intensification.

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- **The SEIS Has Not Undergone the Mandatory Independent External Peer Review:** The SEIS does not include a report—or account for the findings of—an Independent External Peer Review (IEPR) panel. The SEIS also makes no references to such a review being conducted, even though IEPR improves project planning and is required for this project as a matter of law.[18]

- **The SEIS Does Not Respond to Public Comments:** The SEIS responds to just one set of comments submitted by the public with a scant five paragraphs that dismiss more than 100 pages of detailed technical comments and an expert analysis denouncing the model used by the Corps to assess downstream flood impacts. The SEIS provides no response to any of the other 55,000 comments submitted by citizens, scientists, and public interest groups from Mississippi and across the country, including detailed technical comments submitted by more than 110 scientific professionals, the Society of Wetland Scientists, the Society of Freshwater Science, the North American Lake Management Society, the American Fisheries Society, more than 120 conservation and social justice organizations, and others.[19]

Endnotes

[1] The 2008 Clean Water Act 404(c) Final Determination garnered overwhelming support from the Department of the Interior, more than 120 conservation organizations, 540 independent scientists, the Society of Wetland Scientists, the Association of State Wetland Managers, a former EPA Administrator, four former EPA Assistant Administrators for Water, a former Deputy Assistant Secretary of the Army for Civil Works, and 99.9% of the 48,000 comments submitted on the veto including 90% of comments submitted by Mississippi residents.
[2] SEIS, Appendix F-5 (Wetlands) at 33, 90; Final Determination of the U.S. Environmental Protection Agency's Assistant Administrator for Water Pursuant to Section 404(C) of the Clean Water Act Concerning the Proposed Yazoo Backwater Area Pumps Project, Issaquena County, Mississippi (August 31, 2008).
[3] SEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering) at 135, Table 2-26.
[4] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report).
[5] SEIS, Appendix E (Public Comments) at 34-44.
[6] More than 55,000 citizens, scientists, and public interest organizations from Mississippi and across the country submitted comments opposing the project during the draft SEIS public comment period, including more than 110 science professionals, numerous scientific societies, and more than 120 national, state and local conservation, faith-based, social justice, and recreation organizations.
[7] 2008 Clean Water Act 404(c) Final Determination at iii, 73.
[8] SEIS, Appendix F-5 (Wetlands) at 33.
[9] National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/fema (accessed November 6, 2020). Lack of accreditation means that the Yazoo Backwater Levee cannot protect Yazoo Backwater communities during flood events at or greater than the 1% chance of exceedance (100-year flood event).
[10] SEIS, Appendix G (Engineering) at 144-145, paragraph 177.
[11] SEIS, Appendix E (Public Comment) at 225-273.
[12] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report).
[13] SEIS at 52 ("ESA coordination on the pondberry is ongoing and the Record of Decision would not be signed until coordination is complete.")
[14] SEIS, Appendix F-5 (Wetlands) at 26; 2008 Clean Water Act 404(c) Final Determination at 28 and 47.
[15] The SEIS also proposes out-of-kind mitigation consisting of the installation of groundwater wells far outside of the project area that would result in even more groundwater pumping from the already severely-depleted Mississippi Alluvial Plain aquifer.
[16] SEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering) at 135, Table 2-26.
[17] SEIS, Appendix F-1 (Environmental Justice) at 9.
[18] 33 USC 2343(a) (making independent external peer review mandatory for civil works projects that cost more than $200 million or are controversial).
[19] The SEIS does provide minimal responses to the comments submitted by EPA and the Fish and Wildlife Service.

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Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 7/12/2021 4:17:52 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: RE: Attachments to Conservation Organization comments
Attachments: Conservation Organizations_Yazoo Pumps Scoping Comments(w Resilence Alt)_Final_6-15-20.pdf

Hello Bill,

Good to hear from you and hopefully you've been enjoying some summer travels. All's well here but wondering how it's already mid-July.

Please find attached a copy of the Conservation Orgs scoping comments with Appendix A and Appendices B-I are downloadable here.

Please don't hesitate to reach out if there is anything else I can assist with.

Kind regards,
Jill

From: Ainslie, William <Ainslie.William@epa.gov>
Sent: Monday, July 12, 2021 10:49 AM
To: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: Attachments to Conservation Organization comments

Jill:

Hope this finds you doing well, staying safe, and keeping busy. I was hoping you could help me obtain a complete set of the Attachments the Conservation Organizations included in their scoping comments on the Yazoo Pumps project. Might you have those and be able to provide me with copies?

Thanks,

Bill Ainslie

William Ainslie
Wetlands Regulatory Section
EPA Region IV
61 Forsyth St., NE
Atlanta, GA 30303
(404) 562-9400

"We are drowning in information, while starving for wisdom. The world henceforth will be run by synthesizers, people able to put together the right information at the right time, think critically about it, and make important choices wisely." ***E.O. Wilson (via Rob Brooks)***

American Rivers ◆ Audubon Mississippi ◆ Healthy Gulf
National Audubon Society ◆ Sierra Club ◆ Sierra Club Mississippi

Scoping Comments in Response to
Notice of Intent to Prepare Supplemental Environmental Impact Statement
for the Yazoo Area Pump Project, 85 Fed. Reg. 21218 (April 16, 2020)

June 15, 2020

Delivered by Hand and by Email to the Army Corps of Engineers: YazooBackwater@usace.army.mil
Delivered by Email to the U.S. Environmental Protection Agency and the U.S. Fish and Wildlife Service

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American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi (collectively, the Conservation Organizations) appreciate the opportunity to provide scoping comments in response to the Notice of Intent to Prepare Supplemental Environmental Impact Statement for the Yazoo Area Pump Project, dated April 16, 2020 (85 Fed. Reg. 21218).[1]

The Conservation Organizations call on the U.S. Army Corps of Engineers (Corps) to abandon the Proposed Action, a falsely labeled "new project proposal" to build the Yazoo Pumps. That Proposed Action is prohibited by the 2008 Clean Water Act § 404(c) Final Determination and may not be—and should not be—constructed. The Corps should instead initiate a fundamentally new planning process to examine opportunities for providing meaningful, sustainable, and immediate benefits to the communities in the Yazoo Backwater Area while restoring this ecologically critical region.

General Comments

The Notice of Intent makes clear that the sole purpose of the supplemental environmental impact statement (SEIS) is to attempt to justify construction of the environmentally devastating Yazoo Backwater Pumps project—a project prohibited by the Yazoo Pumps 2008 Clean Water Act § 404(c) Final Determination.[2] The Corps' attempt to build an already-vetoed project is as unprecedented as it is unacceptable. Tragically, this effort also dangles a false promise of hope to the people of the Yazoo Backwater Area by perpetuating a demonstrably untrue narrative that the Yazoo Pumps are designed to, and somehow magically will, protect communities from flooding.

As fully documented in the record that supports the 2008 Clean Water Act Final Determination, the Yazoo Pumps are an agricultural drainage project designed to allow increased agricultural production on marginal lands that have always flooded. More than 80% of the project's benefits come from agricultural intensification that, at most, will benefit a handful of industrial sized farms that already receive massive farm subsidy payments.

The Yazoo Pumps are not designed to protect people, homes, or communities—and they will not do so. Indeed, a recent Corps analysis found that even under the best-case scenario, two-thirds of the Yazoo Backwater Area—347,000 acres during the flood of 2019—would still flood with the Yazoo Pumps in place. The Corps' own new partial assessment of wetland impacts shows that, at the absolute minimum, the Yazoo Pumps will destroy tens of thousands of acres of wetlands that can store billions of gallons of floodwaters. In the process, the Pumps will discharge 6.2 million gallons of water per minute into the Yazoo River during flood events, significantly increasing flood risks for downstream communities.

Wetlands that will be drained and damaged by the Yazoo Pumps are "some of the richest wetland and aquatic resources in the nation," and include "substantial tracts of highly productive bottomland hardwood forests."[3] These ecologically rich wetlands provide vital habitat in the heart of the Mississippi

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[1] Some of the Conservation Organizations will also be submitting companion comments that supplement the information made in this letter and have joined additional, less technical comment letters.
[2] U.S. Environmental Protection Agency, Final Determination of The U.S. Environmental Protection Agency's Assistant Administrator for Water Pursuant to Section 404(C) of the Clean Water Act Concerning the Proposed Yazoo Backwater Area Pumps Project, Issaquena County, Mississippi (August 31, 2008) (referred to hereafter as the "2008 Clean Water Act Final Determination").
[3] 2008 Clean Water Act Final Determination at i to iii.

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River flyway, supporting more than 450 species of birds, fish and wildlife. Many thousands of acres of these wetlands are located in National Forest and National Wildlife Refuge lands, state-owned conservation lands, lands enrolled in federal conservation programs, and lands purchased and restored as mitigation for previously constructed federal water projects—lands that taxpayer dollars have long paid to protect and manage for people and wildlife. The wetlands that will be drained also "protect and improve water quality by removing and retaining pollutants, temporarily store surface water, maintain stream flows, and support aquatic food webs by processing and exporting significant amounts of organic carbon,"[4] among many other benefits.

In 2008, the George W. Bush administration used its Clean Water Act authority to veto the Yazoo Pumps to prevent "unacceptable damage" to many tens of thousands of acres of these hemispherically significant wetlands. The veto was based on the Corps' own determination that the project would drain at least 67,000 acres of wetlands; however, EPA and an independent hydrologic review found that the Pumps would likely damage up to 200,000 acres of ecologically significant wetlands—an area larger than all five boroughs of New York City.

Despite this longstanding veto, and restoration and protection of tens of thousands of additional acres of wetlands in the Yazoo Backwater Area since the veto was issued, the Notice of Intent explicitly rejects evaluation of any alternative other than the Proposed Action—a project that is virtually identical to the project vetoed in 2008 and that clearly falls under the explicit terms of the veto. The 2008 Clean Water Act Final Determination was upheld the U.S. District Court for the Northern District of Mississippi and the U.S. Court of Appeals for the Fifth Circuit.

The Corps' refusal to examine other alternatives violates the National Environmental Policy Act (NEPA), several the Water Resources Development Act provisions, the Clean Water Act, and the Endangered Species Act. NEPA requires a rigorous exploration and objective evaluation of "all reasonable alternatives."[5] Several Water Resources Development Acts require the Corps to consider non-structural alternatives and practicable "natural infrastructure alternatives."[6] The Water Resources Development Act of 2007 also directs that all water resources projects are to reflect national priorities by "protecting and restoring the functions of natural systems."[7] The Clean Water Act 404(b)(1) Guidelines prohibit the Corps from approving a civils works project alternative unless the Corps demonstrates that the alternative is the least environmentally damaging practicable alternative,[8] which can only be done by examining a full range of reasonable alternatives.

The Conservation Organizations urge the Corps to abandon its misguided efforts to build the destructive and dangerous Yazoo Pumps, and instead initiate a fundamentally new planning process to examine opportunities for providing meaningful, sustainable, and immediate flood risk reduction benefits to affected communities in the Yazoo Backwater Area while restoring this ecologically critical region—including the measures outlined in the proposed Resilience Alternative detailed in these scoping comments.

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[4] 2008 Clean Water Act Final Determination at i.
[5] 40 C.F.R. § 1502.14.
[6] 33 U.S.C. 701b-11, 33 USC 2230; 33 USC 2289(a)(2).
[7] 42 USC 1962–3.
[8] 40 CFR 230.10(a). While the Corps does not technically issue itself a Clean Water Act 404 permit, it must satisfy the requirements of the 404(b)(1) Guidelines.

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Detailed Comments

To comply with the National Environmental Policy Act (NEPA), the Clean Water Act, the Endangered Species Act, the National Water Resources Planning Policy, the civil works mitigation requirements, key planning provisions established by a number of Water Resources Development Acts, and the nation's other vital environmental laws, the Conservation Organizations call on the Corps to follow the recommendations set forth in these recommendations when preparing the SEIS.

A. The "Proposed Action" Should Be Abandoned Because it is Prohibited by the 2008 Clean Water Act 404(c) Final Determination and May Not Be Constructed

The Notice of Intent makes clear that the sole purpose of the supplemental environmental impact statement (SEIS) is to attempt to justify construction of the environmentally devastating Yazoo Backwater Pumps project—a project prohibited by the 2008 Clean Water Act Final Determination.

The 2008 Clean Water Act Final Determination was based on an extensive and detailed review and had overwhelming public support.[9] The Final Determination concludes:

> This Final Determination under section 404(c) of the CWA addresses unacceptable adverse effects on fishery areas and wildlife associated with construction and operation of the proposed Yazoo Backwater Area Pumps Project. The section 404(c) regulations define an unacceptable adverse effect as an impact on an aquatic ecosystem that is likely to result in significant degradation of municipal water supplies or significant loss of or damage to fisheries, shellfishing, or wildlife habitat or recreation areas (40 CFR 231.2(e)). Section 231.2(e) of the section 404(c) regulations states that the evaluation of the unacceptability of such impacts should consider relevant portions of the Section 404(b)(1) Guidelines. The relevant portions of the Section 404(b)(1) Guidelines in this case are their prohibition of any discharge that 1) would cause or contribute to significant degradation of the Nation's waters (40 CFR 230.10(c)) and 2) fails to adequately minimize and compensate for wetland and other aquatic resource losses (40 CFR 230.10(d)).
>
> Based upon an independent evaluation by EPA Headquarters of the Recommended Determination and the administrative record submitted by the Regional Administrator and in full consideration of materials submitted by the project sponsor, the Corps and the Assistant Secretary of the Army for Civil Works, I have determined that the aquatic environment, which would be adversely impacted by the proposed project, contains significant fisheries and wildlife resources. According to the Corps, the Yazoo Backwater Area contains between 150,000 to 229,000 acres of wetlands, as well as an extensive network of streams, creeks, and other aquatic resources. Extensive information collected on the Yazoo Backwater Area demonstrates that it includes some of the richest wetland and aquatic resources in the Nation. These include a highly productive floodplain fishery, substantial tracts of highly productive bottomland hardwood

[9] The 2008 Clean Water Act Final Determination garnered overwhelming support, including from: the Department of the Interior; the U.S. Fish and Wildlife Service; more than 120 conservation organizations; 540 independent scientists; the Society of Wetland Scientists; the Association of State Wetland Managers; a former EPA Administrator; four former EPA Assistant Administrators for Water; a former Deputy Assistant Secretary of the Army for Civil Works; and 99.9% of the 48,000 comments submitted during the veto process, including 90% of comments submitted by Mississippi residents.

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forests that once dominated the LMRAV, and important migratory bird foraging grounds. These wetlands provide important habitat for an extensive variety of wetland dependent animal and plant species, including the federally protected Louisiana black bear and pondberry plant. In addition to serving as critical fish and wildlife habitat, project area wetlands also provide a suite of other important ecological functions. These wetlands protect and improve water quality by removing and retaining pollutants, temporarily store surface waters, maintain stream flows, and support aquatic food webs by processing and exporting significant amounts of organic carbon.

The administrative record developed in this case fully supports the conclusion that the construction and operation of the proposed project (i.e., Plan 5 of the FSEIS) and the two alternative proposals offered by the Corps in February 2008 (i.e., Plan 6 and Modified Plan 6), would dramatically alter the timing, and reduce the spatial extent, depth, frequency, and duration of time project area wetlands flood. These large-scale hydrologic alterations would significantly degrade the critical ecological functions provided by at least 28,400 to 67,000 acres of wetlands in the Yazoo Backwater Area, including those functions that support wildlife and fisheries resources. Although not proposed to go forward, FSEIS Plans 3, 4, and 7, would also result in a dramatic alteration of the hydrologic regime in the Yazoo Backwater Area, significantly degrading the critical ecological functions provided by between approximately 28,400 and 118,400 acres of wetlands (see FSEIS Main Report, Table 17, page 1-20). In addition, EPA believes that the Corps has not adequately evaluated the degradation to critical ecological functions that the proposed project would have on 24,000 acres of wetlands outside the FSEIS wetland assessment area. EPA does not believe that impacts of this magnitude are consistent with the CWA. Further, these impacts must be viewed in the context of the significant cumulative losses across the LMRAV, which has already lost over 80 percent of its bottomland forested wetlands, and specifically in the Mississippi Delta where the proposed project would significantly degrade important bottomland forested wetlands.

EPA also finds that the Corps has not demonstrated that potential impacts of the Yazoo Backwater Area Project can be adequately mitigated to reduce the impacts to an acceptable level. Additionally, EPA finds that the environmental benefits suggested by the FSEIS to accrue from the project's nonstructural component have not been substantiated.

EPA also notes that the FWS, in its comments on the Proposed and Recommended Determinations, concurred with EPA Region IV's conclusion that the proposed project would result in extensive and unacceptable adverse effects on wildlife and fisheries. FWS also highlighted its concerns that the proposed project would significantly degrade the wildlife habitat provided by its four National Wildlife Refuges located within the Yazoo Backwater Area – reducing the capability of these refuges to achieve the purpose and intent for which they were congressionally established.

After evaluation of the Recommended Determination and the full administrative record, including public comments and the written documents and information provided by the project sponsor, the Corps and the Assistant Secretary of the Army for Civil Works subsequent to the Recommended Determination, I have determined that the discharge of dredged or fill material in connection with the construction of FSEIS Plans 3 through 7, and Modified Plan 6 would have an unacceptable adverse effect on fishery areas and wildlife. Based on these findings, the Final Determination prohibits, pursuant to section 404(c) of the CWA, the specification of the subject wetlands and other waters of the United States as described in the FSEIS as a disposal site for

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> the discharge of dredged or fill material for the purpose of construction of FSEIS Plans 3 through 7, and Modified Plan 6.
>
> The adverse effects associated with the prohibited projects are the result of a combination of operational factors including the capacity of the pumping station and its associated pump-on elevations. While this Final Determination prohibits the construction of FSEIS Plans 3 through 7, and Modified Plan 6, the data supporting this Final Determination indicates that derivatives of the prohibited projects that involve only small modifications to the operational features or location of these proposals would also likely result in unacceptable adverse effects and would generate a similar level of concern and review by EPA.[10]

According to the Notice of Intent:

> The 2007 FSEIS evaluated a broad array of alternatives, including the No-Action alternative, nonstructural alternatives, structural alternatives, and combinations of structural and nonstructural alternatives. Reformulation will not be included in the Supplemental Environmental Impact Statement. The Supplemental Environmental Impact Statement will focus primarily on updating the 2007 FSEIS where necessary and incorporating the new, previously unavailable, scientific data to analyze the Proposed Action and compare it to the 2007 FSEIS.[11]

Thus, the Notice of Intent plainly states that the SEIS will examine just a single alternative, which is referred to as the "Proposed Action." The Proposed Action consists of the **same** 14,000 cubic foot per second pumping plant, running under the **same** operating plan, pumping water out of the **same** project area, and for the **same** purpose as the 2007 Final SEIS recommended plan—the exact project that was vetoed under Clean Water Act § 404(c) in 2008.[12] The Proposed Action also includes the **same** 55,000-acre voluntary reforestation component that was included in the vetoed plan. The only difference between the Proposed Action and the 2008 vetoed project is that the Proposed Action moves the physical location of the Yazoo Pumps by a few miles to the Deer Creek Site. **In short, the Proposed Action is the same project that was vetoed in 2008 and may not be constructed.**[13] The SEIS should abandon consideration of the Proposed Action and any variation of the Yazoo Pumps.

The Conservation Organizations note that the potential "installation of well fields adjacent to the Mississippi River levee upstream of the backwater area" does not alter the fact that the Proposed Action is the same project that was vetoed in 2008, for at least the following reasons. First, the proposed well fields are fundamentally unrelated to the Yazoo Pumps. Based on the information provided in the Notice of Intent, these relief wells would be located in the far northwestern portion of the Yazoo Backwater Area and would be used to attempt to increase river flows during dry conditions. The Yazoo Pumps will be located on the southeastern edge of the Yazoo Backwater Area and, of course, are

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[10] 2008 Clean Water Act Final Determination at 72-73 (internal footnote omitted).
[11] 85 Fed. Reg. 21218, 21220 (April 16, 2020).
[12] The plan recommended by the 2007 Final EIS is typically referred to as Plan 5, which was explicitly vetoed in the 2008 Clean Water Act Final Determination.
[13] Based on a partial analysis of wetland impacts provided by the Corps in response to a Freedom of Information Act request, it is also clear that the impacts of the Proposed Action will fall within the 28,400 to more than 67,000-acre range of vetoed wetland impacts. This partial Corps wetland analysis is discussed at length in Section D.2 of these comments.

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designed to pump water out of the Yazoo Backwater Area during high water events. Second, the well fields referenced in the Notice of Intent could quickly and easily be constructed as a stand-alone project. There are already many similar types of well fields in the Yazoo Backwater Area (these "relief wells" are typically designed to prevent natural under-seepage from affecting the integrity of a levee). Third, the well fields are being proposed as an "environmental mitigation" measure for the Proposed Action. If the Proposed Action aggravates the already significant low flow conditions in the Yazoo Backwater Area, those impacts must be mitigated as a matter of law and such mitigation would not somehow transform the Proposed Action into a new project. The Conservation Organizations also note that the proposed well fields could themselves create adverse environmental impacts, and may not result in any meaningful augmentation of low flows.

B. The SEIS Must Establish a Proper Project Purpose

It is critical that the SEIS utilize a substantively and legally appropriate project purpose, which determines the universe of alternatives that must be evaluated.[14] It is well-settled that all reasonable alternatives that accomplish the project purpose must be examined in an environmental impact statement (EIS), while alternatives that are not reasonably related to the project purpose do not have to be examined.[15]

An overly narrow project purpose can defeat the fundamental purpose of an EIS by eliminating consideration of highly reasonable, less environmentally damaging alternatives:

> One obvious way for an agency to slip past the strictures of NEPA is to contrive a purpose so slender as to define competing "reasonable alternatives" out of consideration (and even out of existence). . . . If the agency constricts the definition of the project's purpose and thereby excludes what truly are reasonable alternatives, the EIS cannot fulfill its role. Nor can the agency satisfy the Act. 42 U.S.C. § 4332(2)(E).[16]

A court "will reject an 'unreasonably narrow' definition of objectives that compels the selection of a particular alternative."[17] Agencies are also prohibited from so narrowly defining a project purpose that

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[14] Citizens Against Burlington v. Busey, 938 F.2d 190, 195 (D.C. Cir. 1991) (the project purpose and need "delimit[s] the universe of the action's reasonable alternatives.") *See also* Wyoming v. U.S. Dep't of Agric., 661 F.3d 1209, 1244 (10th Cir. 2011) ("how the agency defines the purpose of the proposed action sets the contours for its exploration of available alternatives.").

[15] Methow Valley Citizens Council v. Regional Forester, 833 F.2d 810, 815-16 (9th Cir. 1987).

[16] Simmons v. United States Army Corps of Eng'rs, 120 F.3d 664, 666 (7th Cir. 1997); City of Carmel-by-the-Sea v. United States Dep't of Transp., 123 F.3d 1142, 1155 (9th Cir. 1997) ("an agency cannot define its objectives in unreasonably narrow terms"); Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 195-96 (D.C. Cir. 1991), cert. denied, 502 U.S. 994 (1991) ("an agency may not define the objectives of its action in terms so unreasonably narrow that only one alternative from among the environmentally benign ones in the agency's power would accomplish the goals of the agency's action"); City of New York v. United States Dep't of Transp., 715 F.2d 732, 743 (2d Cir. 1983), cert. denied, 456 U.S. 1005 (1984) ("an agency will not be permitted to narrow the objective of its action artificially and thereby circumvent the requirement that relevant alternatives be considered").

[17] Theodore Roosevelt Conservation Partnership v. Salazar, 661 F.3d 66. 73 (D.C. 2011).

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it "forecloses a reasonable consideration of alternatives"[18] or makes the final EIS "'a foreordained formality.'"[19]

The Notice of Intent clearly establishes an overly narrow project purpose. According to the Notice of Intent, the SEIS: "will analyze a new project proposal to build the pump project (the Proposed Action) in light of the new data" and the "Proposed Action is a new project proposal to complete the Yazoo Area Pump Project feature to alleviate the flood damage in the Yazoo Backwater Area."[20]

This project purpose is overly narrow because it forecloses a reasonable consideration of alternatives that do not focus solely on building the Proposed Action, and makes the final SEIS a foreordained formality.

The SEIS should adopt a fundamentally different project purpose that, as required by law, considers "the views of Congress, expressed, to the extent that an agency can determine them, in the agency's statutory authorization to act, **as well as in other Congressional directives**."[21] Notably, Congress has established a multitude of directives that explicitly require and/or promote: (1) the protection and restoration of the nation's waters and fish and wildlife resources; and (2) the use of natural infrastructure and nonstructural measures as a tool for achieving those goals.[22] For example:

(1) In 2018, Congress required the Corps to "consider the use of both traditional and natural infrastructure alternatives, alone or in conjunction with each other, if those alternatives are practicable" in flood and storm damage risk reduction studies. America's Water Infrastructure Act of 2018 § 1149(c). Natural infrastructure alternatives include, but are by no means limited to, actions to protect and restore floodplain wetlands.

(2) In 2016, Congress directed the Corps to "consider, as appropriate" natural and nature-based measures in flood and storm risk reduction and ecosystem restoration studies. 33 USC 2289a.

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[18] Fuel Safe Washington v. Fed. Energy Regulatory Comm'n, 389 F.3d 1313, 1324 (10th Cir. 2004) (quoting Davis v. Mineta, 302 F.3d 1104, 1119 (10th Cir. 2002); Citizens' Comm. To Save Our Canyons v. U.S. Forest Serv., 297 F.3d 1012, 1030 (10th Cir. 2002); Simmons v. United States Army Corps of Eng'rs, 120 F.3d 664, 666 (7th Cir. 1997); City of New York v. United States Dep't of Transp., 715 F.2d 732, 743 (2d Cir. 1983), cert. denied, 456 U.S. 1005 (1984) ((holding that "an agency may not narrow the objective of its action artificially and thereby circumvent the requirement that relevant alternatives be considered); Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 196 (D.C. Cir. 1991), cert. denied 502 U.S. 994 (1991).

[19] City of Bridgeton v. FAA, 212 F.3d 448, 458 (8th Cir. 2000) (quoting Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 196 (D.C. Cir. 1991), cert. denied 502 U.S. 994 (1991); citing Simmons v. U.S. Army Corps of Eng'rs, 120 F.3d 664, 666 (7th Cir. 1997)).

[20] U.S. Army Corps of Engineers, Notice of Intent to Prepare Supplemental Environmental Impact Statement for the Yazoo Area Pump Project, 85 Fed. Reg. 21218, 21219 (April 16, 2020). By contrast, the 2007 SEIS utilized the following project purpose: "The primary purpose of the authorized Yazoo Backwater Project is to reduce flood damages to the study area." U.S. Army Corps of Engineers, Final Supplement No. 1 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (2007) at SEIS-15, paragraph 40. However, since the 2007 SEIS also determined that more than 80% of the alleged benefits from the Yazoo Pumps would come from increased agricultural production on drained lands, it is clear that the 2007 SEIS recommend an agricultural drainage project.

[21] Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 196 (D.C. Cir. 1991) (emphasis added).

[22] Post-project authorization directives, which include those outlined above, should be incorporated into the project purpose. According to Supplement I, "Project authority is the Flood Control Act of 1928, as amended, including, but not limited to, the Flood Control Acts of 1936, 1938, 1941, 1946, 1950, 1954, 1962, 1965, and 1968 and the Water Resources Development Act of 1986." Supplement I, Project Report at 1.

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(3) In 2007, Congress directed that all water resources projects protect and restore the environment, including by protecting and restoring the functions of natural systems. 42 USC 1962–3.

(4) In 1974, Congress directed the Corps to consider nonstructural alternatives when planning flood damage reduction projects. 33 USC 701b-11. Nonstructural alternatives avoid damage to natural systems, including floodplain wetlands.

(5) In 1973, Congress passed the Endangered Species Act to conserve endangered and threatened species and "the ecosystems upon which endangered species and threatened species depend." The Endangered Species Act also declares a Congressional policy "that Federal agencies shall cooperate with State and local agencies to resolve water resource issues in concert with conservation of endangered species." Endangered Species Act, 16 USC 1531.

(6) In 1972, Congress passed the Clean Water Act "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Clean Water Act § 101, 33 USC § 1251. The Clean Water Act also directed the development of the 404(b)(1) Guidelines which establish clear policies and procedures for protecting wetlands and other special aquatic sites.

(7) In 1970, Congress directed the "Federal Government to use all practicable means" to "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations." National Environmental Policy Act, 42 U.S.C. § 4331(b).

(8) In 1958 Congress directed that "wildlife conservation shall receive equal consideration and be coordinated with other features of water-resource development" and that water resources development is to prevent loss and damage to fish and wildlife and improve the health of fish and wildlife resources. Fish and Wildlife Coordination Act, 16 U.S.C. §§ 661, 662.

(9) The 1941 Congressional authorization for the Yazoo Pumps explicitly designates lands "located below 90 feet, NGVD, in elevation to serve as a sump area for surface water storage"[23] and in 1959, the Corps determined that the authorized level of protection had been met.[24]

To account for these many directives focused on protecting and restoring natural systems, including floodplain wetlands, and to ensure that the alternatives analysis does not inappropriately limit the analysis of alternatives, our organizations urge adoption of the following statement of project purpose:

> The purpose of the proposed action is to reduce and avoid flood damages in the study area while protecting and restoring the ecological health of the study area and its wetlands.

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[23] 2008 Clean Water Act Final Determination at 7-9.

[24] Id. (quoting Vicksburg District Corps, MR&T Comprehensive Review Report, Annex L, Yazoo Backwater Project Mississippi at 20 (November 1959)).

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C. The SEIS Must Rigorously Explore and Objectively Evaluate All Reasonable Alternatives and Select an Alternative that Protects and Restores the Yazoo Backwater Area

The analysis of alternatives is the heart of the environmental review process, and the SEIS must rigorously and objectively evaluate all reasonable alternatives. The Conservation Organizations call on the Corps to rigorously and objectively evaluate the proposed Resilience Alternative discussed below and provided at Attachment A to these comments. The Conservation Organizations incorporate the detailed information provided in this Attachment A as thought as though fully set forth herein.

1. The SEIS Must Rigorously and Objectively Evaluate All Reasonable Alternatives

The SEIS must "[r]igorously explore and objectively evaluate all reasonable alternatives."[25] This fundamental NEPA mandate clearly applies to supplemental environmental impact statements,[26] which means that "the existence of reasonable but unexamined alternatives" will render the SEIS "inadequate."[27] An SEIS that examines just one alternative—as the Notice of Intent explicitly states will be done in this SEIS—would unquestionably violate NEPA.[28]

The Water Resources Development Acts require the Corps to consider non-structural alternatives and practicable "natural infrastructure alternatives."[29] The Water Resources Development Act of 2007 directs that all water resources projects are to reflect national priorities by "protecting and restoring the functions of natural systems."[30]

The Clean Water Act 404(b)(1) Guidelines prohibit the Corps from proceeding with a civil works project unless the Corps demonstrates that the project is the least environmentally damaging practicable alternative,[31] which can only be done by examining a full range of reasonable alternatives. "An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes."[32]

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[25] 40 C.F.R. § 1502.14.

[26] Holy Cross Neighborhood Ass'n v. U.S. Army Corps of Engineers, No. CIV.A. 03-370, 2011 WL 4015694, at *7 (E.D. La. Sept. 9, 2011) (holding that Army Corps violated NEPA by failing to "re-evaluate" alternatives in a SEIS in light of significant new information); Natural Res. Def. Council v. U.S. Forest Serv., 421 F.3d 797, 813–14 (9th Cir.2005) (holding that "where changed circumstances affect the factors relevant to the development and evaluation of alternatives," an agency's SEIS "must account for such change in the alternatives it considers.") (citation omitted); *Sierra Forest Legacy v. Ray*, 577 F.3d 1015, 1021-22 (9th Cir. 2009) (holding that additional alternatives analysis was required in an SEIS due to "altered ... modeling techniques" and "substantively new objectives" since preparation of the original EIS); 40 CFR §1502.9 (c) (applying same standards to preparing an EIS and an SEIS). *See* High Country Conservation Advocates v. United States Forest Serv., 951 F.3d 1217, 1227 (10th Cir. 2020) (holding that agency arbitrarily eliminated an alternative from detailed study in a SEIS).

[27] Ctr. for Biological Diversity v. United States Dep't of the Interior, 623 F.3d 633, 642 (9th Cir. 2010); Westlands Water Dist. v. U.S. Dep't of Interior, 376 F.3d 853, 868 (9th Cir. 2004); Morongo Band of Mission Indians v. Fed. Aviation Admin., 161 F.3d 569, 575 (9th Cir. 1998); Oregon Natural Desert Ass'n v. Bureau of Land Management, 531 F.3d 1114, 1121 (9th Cir. 2008).

[28] 85 Fed. Reg. 21218, 21220 (April 16, 2020).

[29] 33 U.S.C. 701b-11, 33 USC 2230; 33 USC 2289(a)(2).

[30] 42 USC 1962–3.

[31] 40 CFR 230.10(a). While the Corps does not technically issue itself a Clean Water Act 404 permit, it must satisfy the requirements of the 404(b)(1) Guidelines.

[32] 40 C.F.R. § 230.10(a).

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The Council on Environmental Quality has made clear that "[r]easonable alternatives include those that are practical or feasible from a technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant."[33] Critically, the SEIS must also include "reasonable alternatives not within the jurisdiction of the lead agency."[34] Congress has long recognized the importance of the Corps carefully assessing wetland restoration, nonstructural measures and reasonable alternatives that are not within the agency's jurisdiction when evaluating alternatives. For example, the Conference Report for the Water Resources Development Act of 1996 states:

> The conferees have included several provisions in section 202 which modify the flood control program of the Corps of Engineers, reflecting an evolution in national flood control policy. The conferees have deleted the provision in the House bill to allow additional review of the proposal without prejudice to its substance. The conferees expect the Corps to continue to consider nonstructural alternatives as required by existing law, and encourage the Corps to improve its efforts at considering nonstructural alternatives in its project study and formulation. Such consideration should include watershed management, wetlands restoration, elevation, and relocation. The Corps is also encouraged to explore alternatives which may be implemented by others, beyond the authority of the Corps. Examples of such alternatives include changes in zoning or development patterns by local officials. Because the Corps has no authority to implement such recommendations, such options are generally not explored or displayed in Corps study documents. However, such alternatives could, in some cases, result in a more effective flood protection program at reduced cost to both Federal and non-Federal interests.
>
> Such alternatives are consistent with current approaches to flood control and recent congressional actions related to reducing Federal expenditures for flooding. For example, Congress enacted the Hazard Mitigation and Flood Damage Reduction Act of 1993, in direct response to the disastrous flooding in the Midwest in 1993. This law allows for increased use of relocation in response to flooding. It would be prudent for the Corps to also increase its review of nonstructural alternatives prior to flooding.[35]

In developing and selecting alternatives, the SEIS must also comply with the full suite of federal laws and policies designed to protect the environment. These include, the Endangered Species Act, the Clean Water Act, the Fish and Wildlife Coordination Act, the Migratory Bird Treaty Act, and the mitigation requirements applicable to Corps civil works projects that were established by § 2036(a) of the Water Resources Development Act of 2007. These mitigation requirements must be satisfied, among other times, whenever the Corps will be recommending a project alternative in an EIS.[36] The alternative ultimately recommend by the SEIS must also obtain a Clean Water Act water quality certification from the State of Mississippi.

In short, the SEIS must evaluate a full range of reasonable alternatives—including nonstructural, natural, and nature-based solutions—that would protect and restore the natural functions of the rivers, streams, and wetlands in the Yazoo Backwater Area. The SEIS must ultimately select an alternative that achieves these objectives while causing the least possible amount of harm to the environment.

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[33] Forty Most asked Questions Concerning CEQ's NEPA Regulations, 46 Fed. Reg. 18,026 (March 23, 1981).
[34] 40 CFR §1502.14(c).
[35] H.R. Rep. No. 104-843, at 146 (1996) (Water Resources Development Act of 1996 Conference Report) (discussing the same section that waived the non-federal cost share for the Yazoo Pumps if they are located at Steele Bayou).
[36] 33 U.S.C. § 2283(d).

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It is clear from the Notice of Intent, however, that the SEIS will not comply with these critical requirements. Instead, the SEIS will look at just one alternative—an alternative that will cause such significant and unacceptable harm that it was vetoed under the Clean Water Act in 2008.

According to the Notice of Intent:

> The 2007 FSEIS evaluated a broad array of alternatives, including the No-Action alternative, nonstructural alternatives, structural alternatives, and combinations of structural and nonstructural alternatives. Reformulation will not be included in the Supplemental Environmental Impact Statement. The Supplemental Environmental Impact Statement will focus primarily on updating the 2007 FSEIS where necessary and incorporating the new, previously unavailable, scientific data to analyze the Proposed Action and compare it to the 2007 FSEIS.[37]

If the SEIS in fact follows the highly restricted approach announced in the Notice of Intent, it will be in direct violation of NEPA, the Clean Water Act, and many other bedrock environmental laws.

2. The Recommended Resilience Alternative Will Quickly Provide Sustainable Benefits to the Yazoo Backwater Area While Restoring the Environment

The Conservation Organizations call on the Corps to fully examine the Resilience Alternative included in Attachment A to these comments, along with other natural, nature-based, and non-structural alternatives. The Resilience Alternative will avoid flood risks and reduce flood damages to impacted communities while protecting and restoring—instead of harming—this ecologically rich area. The Resilience Alternative unquestionably complies with the Clean Water Act 404(b)(1) Guidelines, the Endangered Species Act, and all other applicable environmental laws.

The Resilience Alternative utilizes sustainable solutions that are being employed by communities across the country to reduce flood risks, including purchasing wetland reserve and floodplain easements, voluntary buyouts and relocations, and flood-proofing infrastructure (including elevating homes, buildings and roads). These solutions can be carried out under existing federal programs that are currently funded and available for use in the Yazoo Backwater Area, including: U.S. Department of Agriculture easement programs; Federal Emergency Management Agency pre-disaster mitigation programs (which are being consolidated under the new Building Resilient Infrastructure and Communities "BRIC" program); and Federal Emergency Management Agency post-disaster recovery programs.[38]

In evaluating the Resilience Alternative and developing and evaluating other reasonable alternatives, the SEIS must ensure: (i) a full understanding of the conditions on-the-ground, including the strong interest in enrolling lands in conservation easements, established conservation priorities, and the significant farm subsidy payments that already flow to farms in the Yazoo Backwater Area; (ii) a full and accurate

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[37] 85 Fed. Reg. 21218, 21220 (April 16, 2020).

[38] Post-disaster recovery funds and programs are available for at least one year after a Presidential Emergency Declaration, and eligibility can be extended for an additional 180 days. These funds and programs may currently be available to the Yazoo Backwater Area pursuant to Federal Disaster Declaration 4429, which was most recently amended on September 20, 2019 (available at https://www.fema.gov/disaster/4429/notices).

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assessment of environmental impacts (including the long-term impacts of climate change) and of economic costs and benefits; and (iii) full compliance with Federal environmental laws and planning requirements, all as highlighted throughout these comments.

The following factors provide clear and compelling evidence of the appropriateness of selecting, and the practicability of, the Resilience Alternative. These factors must be fully evaluated in the SEIS:

(1) There has been—and continues to be—a strong interest in enrolling lands in the Wetland Reserve Easement program in the Yazoo Backwater Area, as demonstrated by NRCS data (*see* Figure 1, below).

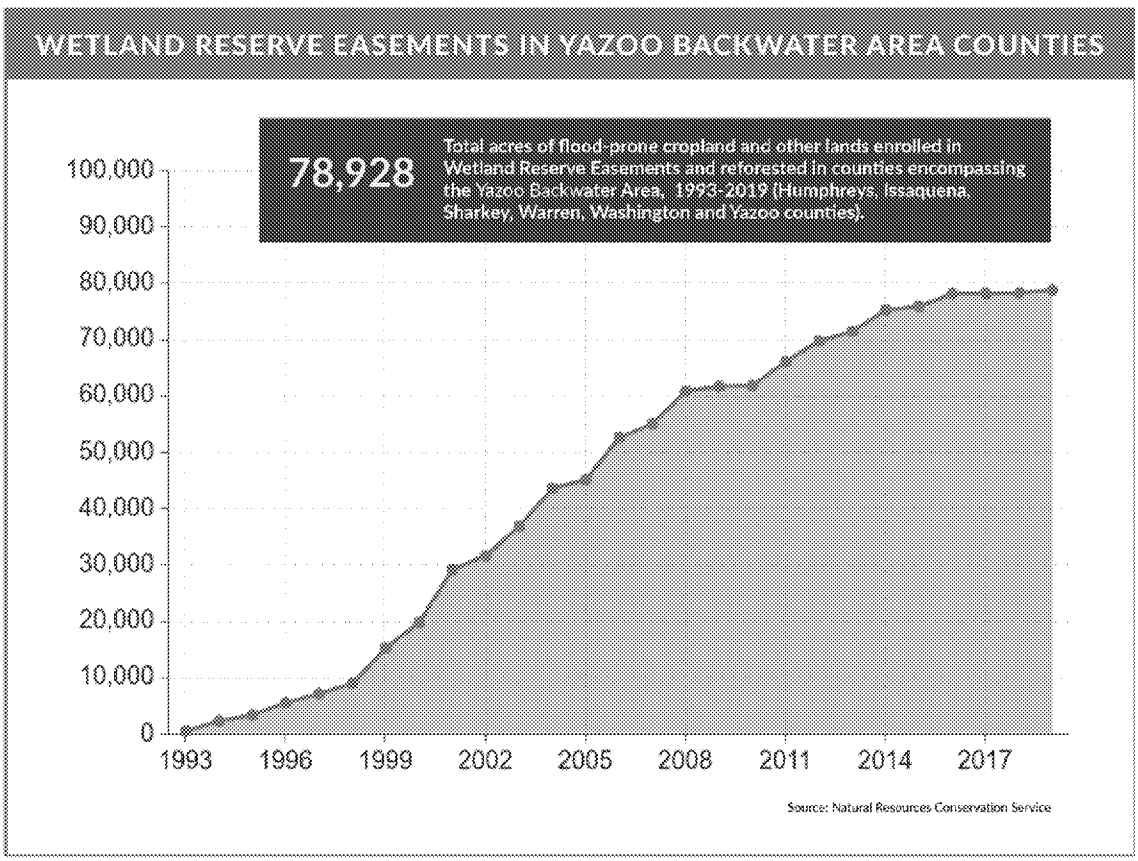

Figure 1, Wetland Reserve Easements in Yazoo Backwater Counties, 1993-2019 (Source: NRCS)

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The high demand for the Wetland Reserve Easement program can be seen throughout the Lower Mississippi Valley states, as demonstrated by NRCS data (*see* Figure 2, below). More than 1,000 separate Wetland Reserve Easement applications were pending in Arkansas, Louisiana, Kentucky, Mississippi, Missouri and Tennessee in FY2019. But just 98 were funded that year, enrolling 18,534 acres at a cost of $71 million. This represents just 10% of lands that owners currently want to enroll and restore in the Lower Mississippi Valley states. Unfunded applications roll over from year to year, and efforts are underway to encourage Congress to increase funding to address the backlog in this program.

Wetland Reserve Easements in the Lower Mississippi Valley States Pending Applications and Funded Easements for FY 2019						
State	Applications	Value	Acres	Easements Funded	Value	Acres Enrolled
Arkansas	116	$91,548,905	28,639	20	$12,244,691	4,339
Kentucky	19	$22,691,157	4,388	13	$7,700,000	1,354
Louisiana	339	$194,540,500	62,333	31	$16,911,697	5,028
Mississippi	309	$175,134,388	60,172	18	$16,631,186	3,801
Missouri	182	$69,963,059	15,085	9	$12,833,949	2,364
Tennessee	47	$17,338,134	5,521	7	$5,174,571	1,648
Total	**1,012**	**$571,216,143**	**176,138**	**98**	**$71,496,094**	**18,534**

Figure 2, WRE Easement Requests Lower Mississippi Valley States (Source: NRCS)

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(2) There is substantial interest in—and a significant need for—restoring forested and other wetlands in the project area, as evidenced by the 2020 Lower Mississippi Valley Joint Venture Conservation Priorities in the Yazoo Backwater Area (see Figure 3, below).[39] In the Fish and Wildlife Coordination Act Report prepared for the 2007 SEIS, the U.S. Fish and Wildlife Service stated that the Yazoo Backwater Area is the area with the "greatest potential" for meeting breeding bird habitat restoration and protection needs within the Mississippi Alluvial Valley.[40]

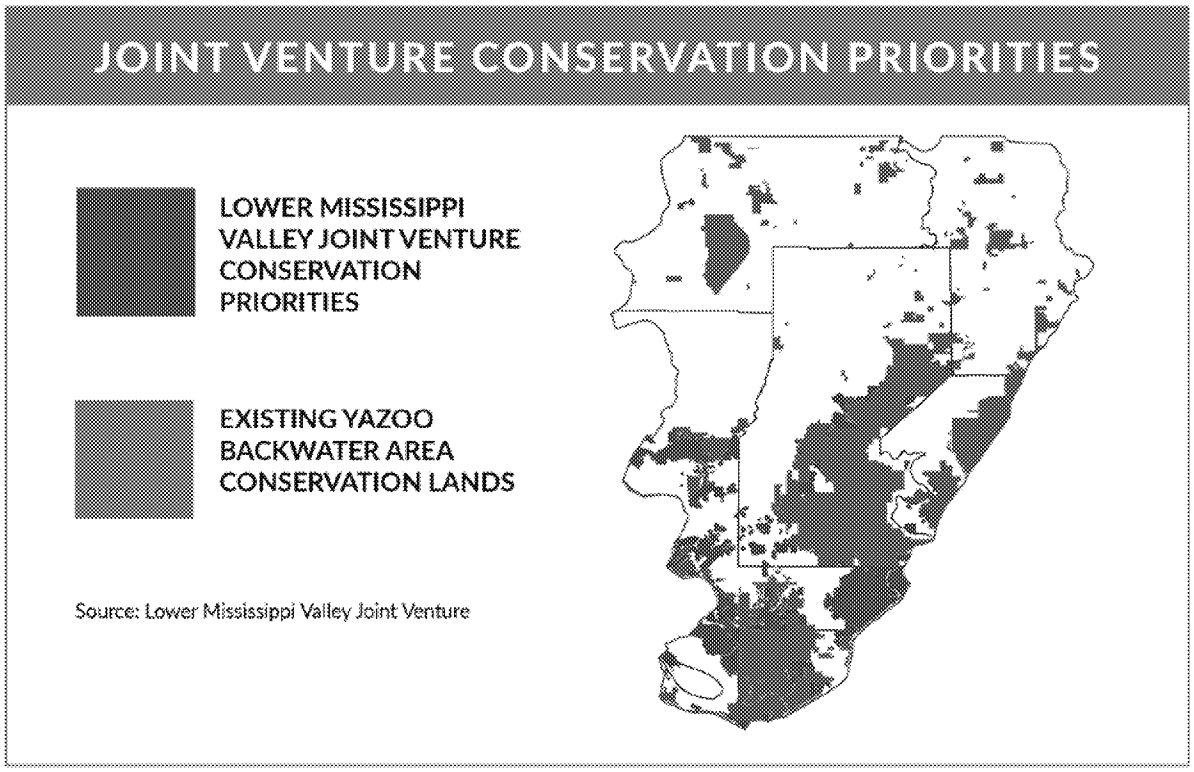

Figure 3, Lower Mississippi Valley Joint Venture 2020 Yazoo Backwater Area Conservation Priorities

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[39] Elliott, A.B.; Mini, A.E.; McKnight, S.K.; Twedt, D.J. Conservation–Protection of Forests for Wildlife in the Mississippi Alluvial Valley. *Forests* 2020, *11*, 75 (available at https://www.mdpi.com/1999-4907/11/1/75). A copy of this study is provided at Attachment E to these comments. The GIS data associated with this study can be accessed at https://www.sciencebase.gov/catalog/item/5dd30670e4b069579762839c.

[40] U.S. Fish and Wildlife Service, Fish and Wildlife Coordination Act Report (October 23, 2006), 2007 Final SEIS, Appendix 3 at 7.

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(3) Reforestation of the wettest lands in the Yazoo Backwater Area is a conservation priority, and there are no limitations (*i.e.*, there are no county caps) on enrolling these lands in the Wetland Reserve Easement Program. Most of the 250,000 acres of conservation lands in the Yazoo Backwater Area have been established on the wettest soils. These wet soils, commonly known as 4W+ lands, are classified by USDA as "severely limited" for farming and are exempt from county caps on Wetland Reserve Easements. There are at least 46,000 acres of 4W+ lands in the Yazoo Backwater Area that are not in conservation, many of which are adjacent to existing conservation lands (*see* Figure 4, below). Reforestation of remaining unprotected 4W+ lands is a conservation priority. Investments to increase Wetland Reserve Easement Program enrollments would greatly improve the financial security of farmers who plant crops on marginal lands.

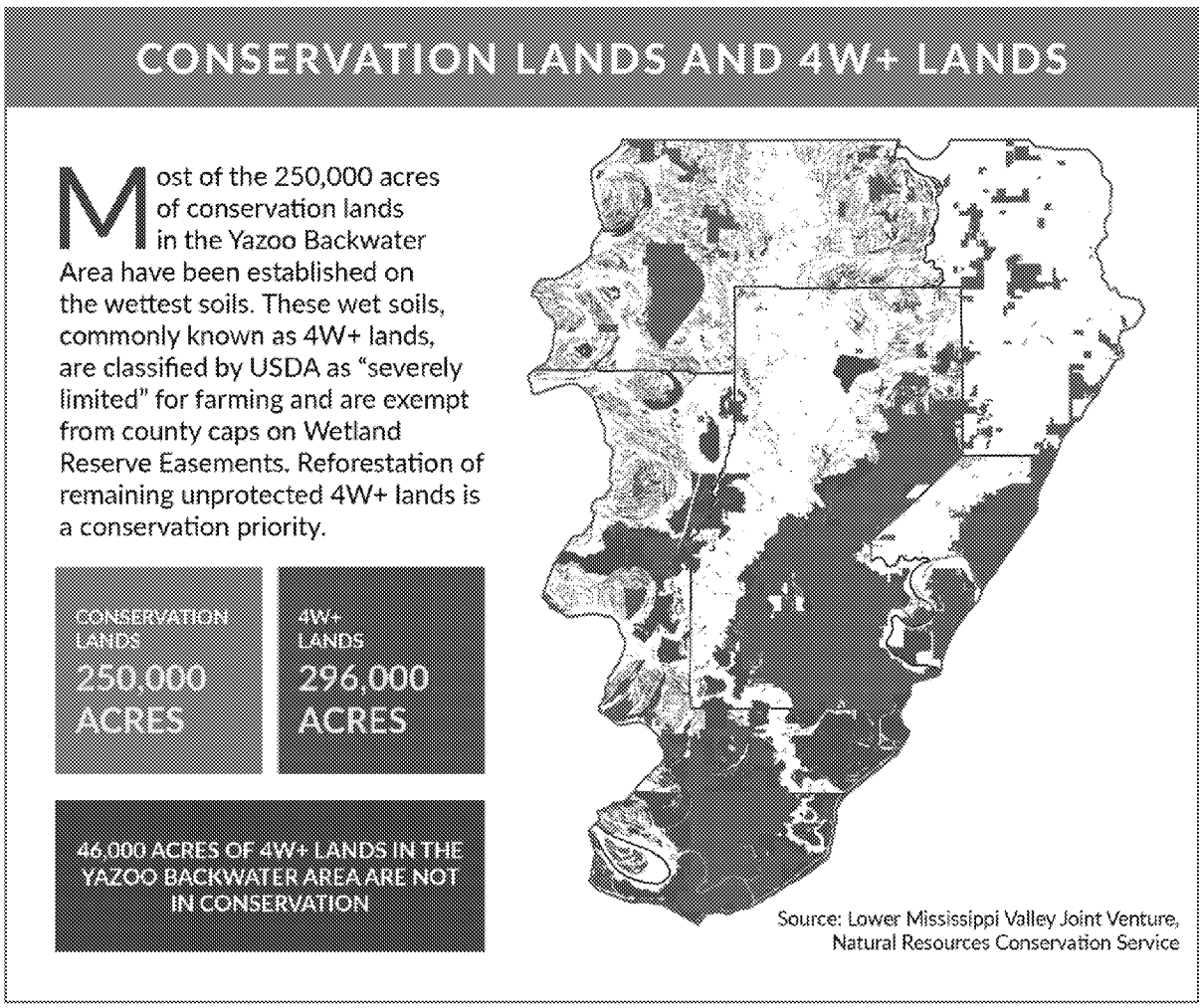

Figure 4, Conservation Lands and 4W+ Lands in the Yazoo Backwater Area

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(4) Operation of the Yazoo Pumps would unquestionably damage both existing conservation lands, and lands that are a priority for future conservation efforts, including:

- The Yazoo National Wildlife Refuge Complex, which includes Panther Swamp National Wildlife Refuge, Yazoo National Wildlife Refuge, Holt Collier National Wildlife Refuge, and Theodore Roosevelt National Wildlife Refuge;
- Delta National Forest, which is the only bottomland hardwood forest in the National Forest System;
- Twin Oaks Mitigation Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Mahannah Wildlife Management Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Lake George Wildlife Management Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Phil Bryant Wildlife Management Area; and
- The extensive acreage enrolled in the Wetland Reserve Easement and Conservation Reserve Programs.

Had the Yazoo Pumps been operating in 2019, vast acres of wetlands would have been drained—between 60,000 and 70,000 acres—even as 65% of flooded lands would have remained underwater (including 110,000 acres of cropland). The largest single tract of land that would have been drained is the 8,000-acre Lake George Wildlife Management Area, a Corps mitigation site for previously constructed water resources projects. *See* Figure 5, below.

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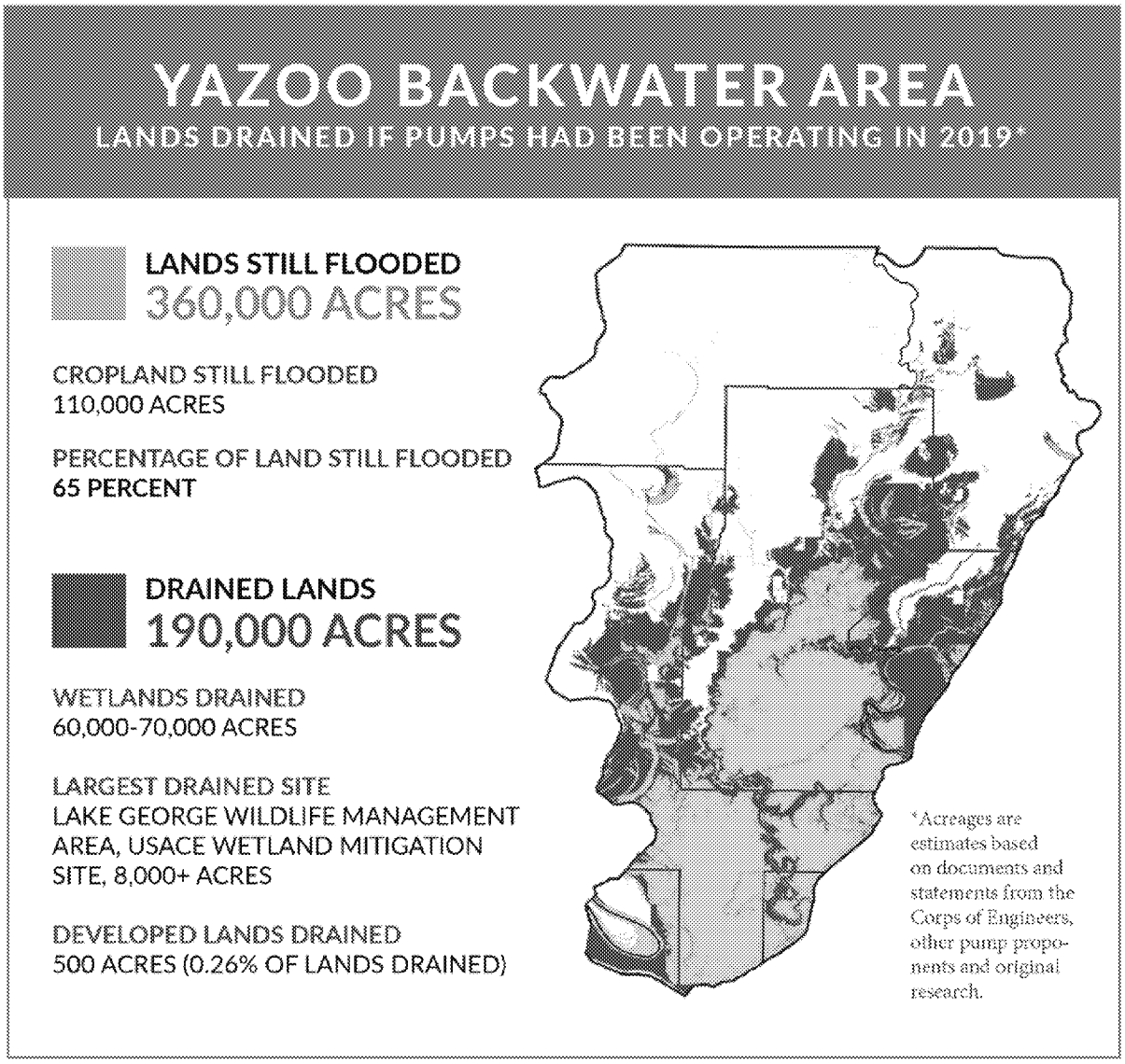

Figure 5, Yazoo Backwater Area, Lands Drained if Yazoo Pumps had been operating in 2019

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(5) Many farms in the Yazoo Backwater Area already receive substantial farm subsidy payments, calling into question the so-called "need" for having taxpayers spend what will likely be more than $440 million to further subsidize agricultural production in this region. The 2007 SEIS concluded that more than 80% of project benefits would come from agricultural intensification.

According to USDA data compiled through the Environmental Working Group Farm Subsidy Database, farms in the 16 zip codes that fall within the Yazoo Backwater Area received the following subsidies between 1995 and 2019 (*see* Figures 6 and 7, below):

- Recipients received a total of **$1.05 billion** in farm subsidy payments;
- The top 5 recipients received a total of **$20.5 million**, **$17.4 million**, **$15.5 million**, **$14.2 million**, and **$10.7 million**, respectively;
- The top 5 recipients in each zip code received a total of **$430.7 million—an average of $215,000 for each of 80 recipients every year for 25 years**;
- 272 recipients received **more than $1 million each—an average of $40,000 a year for each recipient every year for 25 years**.

While the purchase of conservation easements provides important financial assistance to farmers, it does so without facilitating agricultural intensification and restores ecological services that provide important ecological services to the entire region, and beyond. The purchase of conservation easements also creates important cost avoidance benefits (see Section F.5, below).

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YAZOO BACKWATER AREA FARM SUBSIDIES*

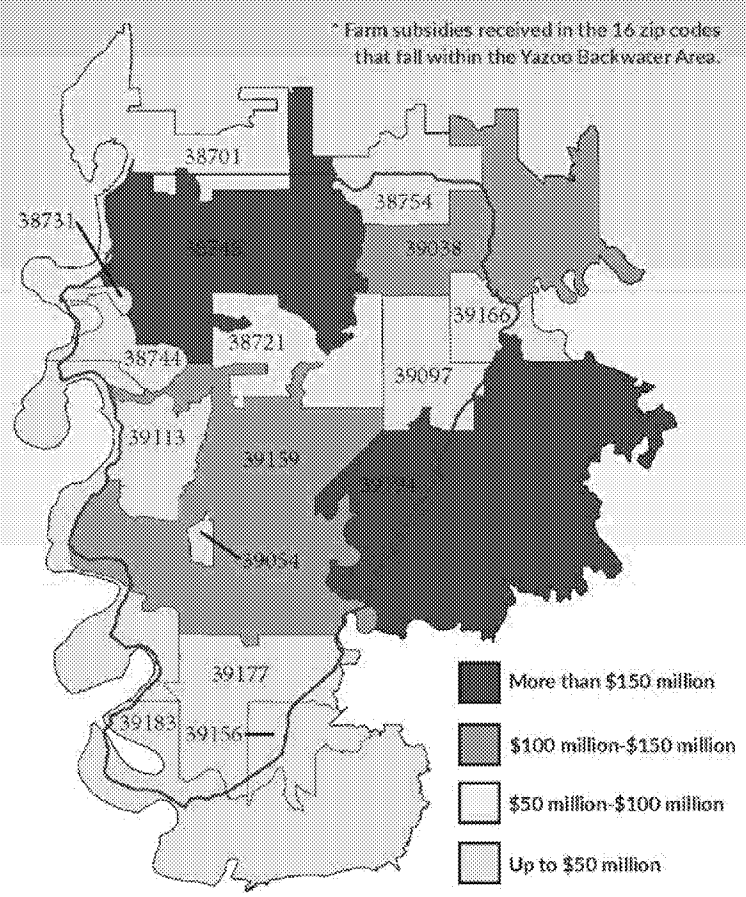
TOTAL SUBSIDIES*

$1.05 BILLION

Subsidy payments include all taxpayer-funded farm subsidies received from 1995 to 2019. Subsidies were compiled for the 16 zip codes that fall within the Yazoo Backwater Area from the Environmental Working Group Farm Subsidy Database, which compiles USDA data. Some of the zip codes extend beyond the boundary of the backwater area (outlined in blue).

ZIP CODE	SUBSIDIES
39194	$206,461,849
38748	$195,420,691
39159	$148,391,998
39038	$112,189,087
38721	$77,456,356
38701	$67,762,848
39097	$49,603,235
38744	$44,373,852
38754	$26,945,846
39054	$25,504,986
39183	$25,462,913
38731	$19,659,275
39177	$18,153,356
39166	$15,032,921
39156	$12,270,589
39113	$8,484,164
TOTAL	$1,053,173,966

* Farm subsidies received in the 16 zip codes that fall within the Yazoo Backwater Area.



Subsidies received include commodity payments, crop insurance, disaster payments and conservation payments. From 1995 to 2019, Mississippi farmers received a total of $10.1 billion in farm subsidy payments, of which 90% were crop-related.

Nearly 60% of Mississippi farmers do not receive farm subsidies in any given year.

Figure 6, Yazoo Backwater Area Farm Subsidies 1995 to 2019

Farm Subsidy Payments Per Recipient in Yazoo Backwater Area Zip Codes, 1995-2019
Compiled from the Environmental Working Group Farm Subsidy Database

ZIP CODE	TOTAL SUBSIDIES	TOTAL RECIPIENTS	TOP FIVE RECIPIENTS	TOP RECIPIENT	FARMS RECEIVING MORE THAN $1 MILLION
38701	$67,762,848	576	$22,712,766	$7,194,098.06	19
38721	$77,456,356	247	$30,888,620	$9,036,034.68	21
38731	$19,659,275	43	$18,497,489	$6,232,323.25	6
38744	$44,373,852	151	$24,600,514	$8,041,347.43	14
38748	$195,420,691	494	$67,719,354	$20,474,822.20	41
38754	$26,945,846	182	$11,122,965	$3,068,592.91	9
39038	$112,189,087	561	$31,289,857	$10,709,713.62	32
39054	$25,504,986	87	$29,316,093	$8,428,658.15	5
39097	$49,603,235	144	$36,435,442	$15,490,694.85	10
39113	$8,484,164	68	$6,427,399	$3,947,952.38	2
39156	$12,270,589	84	$8,620,492	$3,442,211.37	2
39159	$148,391,998	474	$48,992,874	$14,235,037.72	38
39166	$15,032,921	74	$11,394,043	$8,095,796.40	2
39177	$18,153,356	54	$13,713,357	$6,600,398.14	5
39183	$25,462,913	301	$14,012,933	$4,019,405.06	8
39194	$206,461,849	1125	$54,923,294	$17,362,445.53	58
TOTALS	$1,053,173,966	4,665	$430,667,491	$146,379,532	272

Figure 7, Farm Subsidy Payments Per Recipient in Yazoo Backwater Area Zip Codes 1995-2019

As the Corps is aware, an extensive and independent economic review determined that the Yazoo Pumps would do nothing more than "**help landowners grow crops on land that is farmed only to earn farm subsidy payments,**" based on the economic data used by the Corps in the 2007 SEIS.[41] That review also determined that the Yazoo Pumps could not be economically justified even at what was then a $207 million projected construction cost.[42]

Even if increased production resulting from the Yazoo Pumps did increase profits for some large landowners in the project area, such increased production is unlikely to help other American farmers. Increased production causes overall prices to drop. For example, according

[41] Leonard Shabman & Laura Zepp Review Comments on "Yazoo Backwater Reformulation" dated September 24, 2000 (emphasis in original); see also Leonard Shabman & Laura Zepp, An Approach for Evaluating Nonstructural Actions with Application to the Yazoo River (Mississippi) Backwater Area (February 7, 2000) (prepared in cooperation with the U.S. Environmental Protection Agency, Region 4). Both of these documents were submitted with the Environmental Protection Agency Comments on the 2007 Draft SEIS.
[42] Id.

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to a May 2020 article in Barron's, USDA has determined that corn and soybean prices are likely to fall this year due to excess production:

> Facing a supply glut, the US Department of Agriculture projects the average farm price for corn will to drop to its lowest level in 14 years in the 2020-2021 growing season. Soybean prices also are expected to fall."[43]

(6) Even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data.[44] In addition, Conservation Organizations understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event.

Moreover, a scientific study conducted in the Yazoo River basin strongly suggests that the Yazoo Pumps would harm—not help—agricultural production in the Yazoo Backwater Area.[45] This study is discussed at length in Section F.3 of these comments.

(7) Since completion of the Yazoo Backwater Levee in 1978, flooding in the Yazoo Backwater Area has primarily been restricted to lower elevations (*see* Figure 8, below). Even as unprecedented flooding inundated communities along the Mississippi, Missouri, and Arkansas Rivers, in 2019, flooding in the Yazoo Backwater Area was predominately restricted to the 20-year floodplain, and just touched the 25-year floodplain elevation at its peak.[46] Between 1978 and 2018, water levels in the Yazoo Backwater Area **never** reached the 20-year floodplain and exceeded the 10-year floodplain just 2 times.[47] As a result, flood damage reduction solutions should focus on avoiding flood damages to homes and critical infrastructure located in these lower elevations.

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[43] Chris Stein, AFP News, *'It's Kind Of Glum': US Farmers Worry As Crop Prices Dip,* Barron's, May 24, 2020 *(available at* https://www.barrons.com/news/it-s-kind-of-glum-us-farmers-worry-as-crop-prices-dip-01590370505).

[44] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.

[45] Jackson, D. C. and Q. Ye. 2000. Riverine fish stock and regional agronomic responses to hydrologic and climatic regimes in the upper Yazoo River basin. Pages 242-257 *in* I. G. Cowx, Editor. Management and Ecology of River Fisheries. Fishing News Books. Blackwell Science. London. This study was submitted into the record for the veto process on May 5, 2008.

[46] Flood levels rose above the 25 year floodplain for just 8 days, reaching to just 0.23 inches above the 25 year floodplain elevation before receding. This year's flooding was the largest in the YBWA since completion of the Yazoo Backwater Levee in 1978. Between 1978 and 2018, water levels in the YBWA never reached the 20 year floodplain, and those levels exceeded the 10 year floodplain elevation just 2 times. By comparison, flooding in the YBWA reached 101.48 feet in 1973, which is well above the 100 year floodplain elevation. U.S. Army Corps of Engineers Rivergages Website (http://rivergages.mvr.usace.army.mil) (a compilation of this data is available from the National Wildlife Federation upon request).

[47] Floodplain elevation level source: USACE, Final EIS Yazoo Backwater Pumping Plant, Main Report at 90 (lower ponding area without project in place) Final Supplement No. 1 to the 1982 Yazoo Area Pump Project Final Environmental Impact Statement (2007), Main Report at 90, Table 13 (lower ponding area elevation base conditions); Steele Bayou Landside gage elevation source: USACE, RiverGages.com, http://rivergages.mvr.usace.army.mil.

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Yazoo Backwater Area Flood Elevations
Period of Record 1978 to 2019—Steele Bayou Landside Gage

Number of Years water reached and slightly exceeded the 25-year floodplain:	1
Number of Years water reached above 10-year and below 20-year floodplain:	2
Number of Years water reached above 5-year and below 10-year floodplain:	5
Number of Years water reached above 3-year and below 5-year floodplain:	2
Number of Years water reached above 2-year and below 3-year floodplain:	5
Number of Years water reached above 1-year and below 2-year floodplain:	17
Number of Years water did not reach the 1-year floodplain:	11

Year	Peak Elevation	Floodplain	Flood Rank
2019	98.23 May 23, 2019	0.23 inches above 25 year	1
2018	95.33	below 10 year	7
2017	88.46	below 2 year	24
2016	91.98	below 3 year	13
2015	95.39	below 10 year	6
2014	95.59	below 10 year	4
2013	90.94	below 2 year	15
2012	85.37	below 1 year	32
2011	89.96	below 2 year	20
2010	95.5	below 10 year	5
2009	93.74	below 5 year	8
2008	92.18	below 3 year	11
2007	85.4	below 1 year	31
2006	80.1	below 1 year	39
2005	90	below 2 year	19-tied
2004	84.7	below 1 year	35
2003	88.4	below 2 year	25
2002	90	below 2 year	19-tied
2001	88.7	below 2 year	23
2000	77.4	below 1 year	40
1999	90.3	below 2 year	17
1998	88.3	below 2 year	26
1997	93.3	below 5 year	9
1996	88.1	below 2 year	27
1995	87.9	below 2 year	28
1994	90.9	below 2 year	16
1993	91.5	below 3 year	14
1992	82.3	below 1 year	36
1991	92.5	below 3 year	10
1990	89.6	below 2 year	22

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Year	Peak Elevation	Floodplain	Flood Rank
1989	89.7	below 2 year	21
1988	85.3	below 1 year	33
1987	84.9	below 1 year	34
1986	82.1	below 1 year	37
1985	87.1	below 2 year	29
1984	92	below 3 year	12
1983	95.8	below 10 year	3
1982	90.2	below 2 year	18
1981	80.4	below 1 year	38
1980	90	below 2 year	19-tied
1979	96.5	below 20 year	2
1978	85.7	below 1 year	30

Figure 8, Yazoo Backwater Area Flood Elevation Levels 1978 to 2019, Steele Bayou Landside Gage (Source: USACE Data)

The Corps is currently engaged in multiple planning efforts focused on improving management of the Mississippi River to reduce or better manage flood levels in the Mississippi River.[48] If the measures developed through these studies are implemented, they would further reduce flood risks to the Yazoo Backwater Area by reducing the amount of time that the gates at the Steele Bayou Flood Control Structure would need to be closed. These planning efforts should be accelerated.

(8) The proposed Yazoo Pumps plan and its 87-foot activation level (as indicated in the Notice of Intent) vastly exceeds the scope of the project's Congressional authorization. As extensively documented in the 2008 Clean Water Act Final Determination, the authorization for the Yazoo Pumps designates lands "located below 90 feet, NGVD, in elevation to serve as a sump area for surface water storage."[49] In 1959, the Corps determined that the authorized level of protection had been met:

> Since the original authorization for Yazoo Backwater Protection, important hydraulic changes have taken place due to improvement of channel efficiency in the Mississippi River and to reservoirs and channel improvement in the Yazoo Basin headwater area. These have resulted in less frequent flooding, and shorter duration of flooding, which makes it feasible to develop a simplification of the authorized plan by eliminating pumping at a large saving in project cost. . . . It is apparent that a protection plan for the Yazoo Backwater Area involving levees and floodgates only, which was not feasible under earlier conditions, is now feasible, and will provide a

[48] While the Corps is of course aware of its ongoing planning processes, to our understanding they include an assessment of alternative management regimes for the Old River Control Structure, evaluating needs related to the Mississippi Rivers & Tributaries Project mainline levee system; and examining Mississippi River sediment diversions and other projects to restore Louisiana's coastal wetlands.

[49] 2008 Clean Water Act Final Determination at 7-9.

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high degree of protection for the foreseeable future without the necessity of pumping.[50]

(9) Even during the unprecedented 2019 flood, structural damages within the Yazoo Backwater counties were highly concentrated with **76% of all structural damage** and **85% of all structural monetary damages** occurring in Warren County, which includes the Eagle Lake community and extensive areas located outside of the boundaries of the Yazoo Backwater Area (*see* Figure 9, below). In 2019, relatively few structures were affected by flooding in Issaquena and Sharkey counties, the two counties located entirely within the Yazoo Backwater Area, according to Mississippi Emergency Management data. Within Issaquena and Sharkey counties a total of 53 homes and 19 mobile homes were affected. Of those, 27 homes had only minor or very minor damage. Data for other counties include large areas that would not be affected by the Pumps.

As discussed in Section F.4 of these comments, multiple factors contributed to the 2019 flooding at Eagle Lake, making it likely that the Eagle Lake community would have suffered flood damages even if the Yazoo Pumps had been operating in 2019. The targeted solutions proposed in the Resilience Alternative would provide reliable solutions to reduce flood damages for the Eagle Lake community.

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[50] Id. (quoting Vicksburg District Corps, MR&T Comprehensive Review Report, Annex L, Yazoo Backwater Project Mississippi at 20 (November 1959)).

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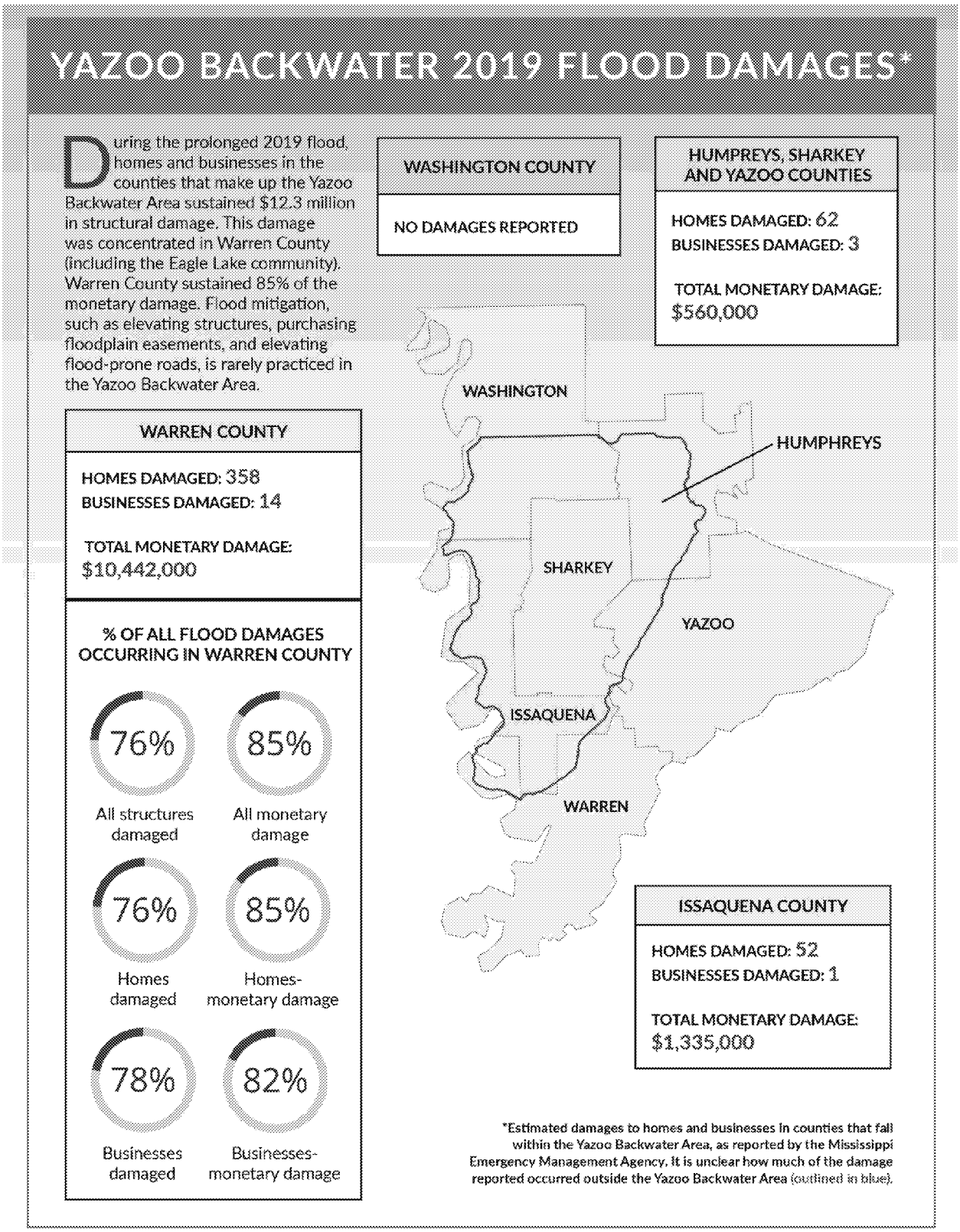

Figure 9, Yazoo Backwater Area 2019 Flood Damages Reported by Mississippi Emergency Management Agency

(10) Ample evidence demonstrates that natural infrastructure (natural and nature-based solutions) and non-structural solutions can provide highly effective, and cost-effective flood damage reduction and flood avoidance benefits for communities. Indeed, the Reinsurance Association of America has concluded that: "One cannot overstate the value of preserving our natural systems for the protection of people and property from catastrophic events."[51]

The value of wetlands for reducing flood risks has long been recognized by the Corps. For example, in a 1972 study evaluating options to reduce flooding along Charles River in Massachusetts, the Corps concluded:

> Nature has already provided the least-cost solution to future flooding in the form of extensive [riverine] wetlands which moderate extreme highs and lows in streamflow. Rather than attempt to improve on this natural protection mechanism, it is both prudent and economical to leave the hydrologic regime established over millennia undisturbed.[52]

A single acre of wetland can store 1.5 million gallons of floodwaters.[53] Just a 1 percent loss of a watershed's wetlands can increase total flood volume by almost seven percent.[54] Wetlands prevented $625 million in flood damages in the 12 coastal states affected by Hurricane Sandy, and reduced damages by 20 to 30 percent in the four states with the greatest wetland coverage.[55] Coastal wetlands reduced storm surge in some New Orleans neighborhoods by two to three feet during Hurricane Katrina, and levees with wetland buffers had a much greater chance of surviving Katrina's fury than levees without wetland buffers.[56]

A 2018 study shows that in the Gulf Coast regions of Texas, Louisiana, Mississippi, and Florida, nature-based solutions to reduce coastal flood risks are significantly more cost effective than structural solutions. A 2018 study shows that in this region, **the average benefit-cost ratio for nature-based solutions is 3.5 compared to 0.26 for levees/dikes**. Restoring wetlands could prevent $18.2 billion of losses while costing just $2 billion to carry out.[57]

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[51] Restore America's Estuaries, *Jobs & Dollars BIG RETURNS from coastal habitat restoration* (September 14, 2011) (http://www.estuaries.org/images/81103-RAE_17_FINAL_web.pdf).

[52] American Rivers, Unnatural Disasters, Natural Solutions: Lessons From The Flooding Of New Orleans (2006) (quoting USACE, from Massachusetts Department of Fish and Game, *Functions of Riparian Areas for Flood Control*, http://www.mass.gov/dfwele/river/pdf/riparian_factsheet_1.pdf.)

[53] Environmental Protection Agency, "Wetlands: Protecting Life and Property from Flooding." EPA 843-F-06-001. (2006) (factsheet).

[54] Demissie, M. and Abdul Khan. 1993. "Influence of Wetlands on Streamflow in Illinois." Illinois State Water Survey, Contract Report 561, Champaign, IL, Table 7, pp. 44-45.

[55] Narayan, S., Beck, M.B., Wilson, P., et al., The Value of Coastal Wetlands for Flood Damage Reduction in the Northeastern USA. Scientific Reports 7, Article number 9463 (2017), doi:10.1038/s41598-017-09269-z (available at https://www.nature.com/articles/s41598-017-09269-z).

[56] Bob Marshall, Studies abound on why the levees failed. But researchers point out that some levees held fast because wetlands worked as buffers during Katrina's storm surge, New Orleans Times-Picayune (March 23, 2006).

[57] Borja G. Reguero et al., "Comparing the Cost Effectiveness of Nature-Based and Coastal Adaptation: A Case Study from the Gulf Coast of the United States," PLoS ONE 13, no. 4 (April 11, 2018),

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Communities across the country are successfully using natural infrastructure and non-structural approaches to reduce flood risks. For example:

- In California, the Napa Valley Flood Control Project is using a community-developed "living river" plan to reduce flood damages along the flood-prone Napa River. This plan replaces the Corps' originally-proposed floodwalls and levees with terraced marshes, wider wetland barriers, and restored riparian zones. The Project will restore more than 650 acres of high-value tidal wetlands of the San Francisco Bay Estuary while protecting 2,700 homes, 350 businesses, and over 50 public properties from 100-year flood levels, saving $26 million annually in flood damage costs.[58] Though only partially complete, the project was credited for lowering flood levels by about 2 to 3 feet during the 2006 New Year's Day flood.

- In Florida, the Corps is using wetland restoration in the Upper St. John's River floodplain to provide important flood damage reduction benefits. The backbone of this project is restoration of 200,000 acres of floodplain which will hold more than 500,000 acre-feet of water—enough to cover 86 square miles with 10 feet of water—and will accommodate surface water runoff from a more than 2,000 square mile area. The Corps predicts that this $200 million project will reduce flood damages by $215 million during a 100-year flood event, and provide average annual benefits of $14 million. This project was authorized by Congress in 1986 to reduce flood damages along the river.[59]

- In Illinois, a 2014 study conducted for the Chicago Wilderness Green Infrastructure Vision, found that natural systems are the least costly and most efficient way to control flooding. Wetlands in the seven-county Chicago metropolitan area provide an average $22,000 of benefits per acre each year in water flow regulation. This study also found that watersheds with 30 percent wetland or lake areas saw flood peaks that were 60 to 80 percent lower than watersheds without such coverage, and that preventing building in floodplain areas could save an average of $900 per acre per year in flood damages.[60]

- In Iowa, the purchase of 12,000 acres in easements along the 45-mile Iowa River corridor saved local communities an estimated $7.6 million in flood damages as of 2009. The easement purchase effort began after the historic 1993 floods when river communities in east-central Iowa recognized the need for a more effective approach to reducing flood damages.

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https://doi.org/10.1371/journal.pone.0192132 (also finding that restoring oyster reefs could prevent $9.7 billion in losses at a cost of $1.3 billion; restoring barrier islands could prevent $5.9 billion in losses at a cost of $1.2 billion).

[58] Napa County California website at https://www.countyofnapa.org/1096/Creating-Flood-Protection.

[59] American Rivers, Unnatural Disasters, Natural Solutions: Lessons From The Flooding Of New Orleans (2006) (Upper St. Johns River case study).

[60] Will Allen, Ted Weber, and Jazmin Varela, *Green Infrastructure Vision: Version 2.3: Ecosystem Service Valuation.* (The Conservation Fund: 2014), 13-15, https://datahub.cmap.illinois.gov/dataset/c303fd2e-beaf-4a75-a9ec-b27c6da49b69/resource/028c9b69-bb19-425e-bb92-3d33656bea4c/download/tcfcmapgiv23ecosystemservicesfinalreport201412v2.pdf.

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- In Massachusetts, a 1972 Corps study showed that upstream wetlands were playing a critical role in reducing flooding in the middle and upper reaches of the Charles River by storing millions of gallons of water and preventing $17 million each year in flood damages. This led the Corps to preserve 8,000 floodplain acres to ensure future flood storage, at a cost of just one-tenth of the structural project it had previously planned to build. This approach was sanctioned by Congress in 1974 when it authorized the Charles River Natural Valley Storage Area. These floodplain wetlands are credited with reducing major floods, including in 1979, 1982, and 2006. The Corps estimates that this project has prevented $11.9 million in flood damages while providing recreational benefits valued at between $3.2 and $4.6 million.[61]

- In New York, restoration of wetlands and lands adjacent to 19 stream corridors in Staten Island "successfully removed the scourge of regular flooding from southeastern Staten Island, while saving the City $300 million in costs of constructing storm water sewers."[62] Some 400 acres of freshwater wetland and riparian stream habitat has been restored along 11 miles of stream corridors that collectively drain about one third of Staten Island's land area. A 2018 study commissioned by the City of New York found that using "hybrid infrastructure" that combines nature, nature-based, and gray infrastructure together could save Howard Beach, Queens $225 million in damages in a 100-year storm while also generating important ecosystem services.[63]

- In Oregon, the Portland Bureau of Environmental Services restored 63 acres of wetland and floodplain habitat, restored 15 miles of Johnson Creek, and move structures out of high-risk areas to reduce flood damages in the Johnson Creek neighborhood. In January 2012, when heavy rainfall caused Johnson Creek to rise two feet above its historic flood stage, the restored site held the floodwaters, keeping nearby homes dry and local businesses open. An ecosystem services valuation of the restored area found that the project would provide $30 million in benefits (in 2004 dollars) over 100 years through avoided property and utility damages, avoided traffic delays, improved water and air quality, increased recreational opportunities, and healthy fish and wildlife habitat.[64]

- In Texas, restoration of a 178-acre urban wetland—formerly an abandoned golf course—acted as a sponge to store 100 million gallons of water during Hurricane Harvey, protecting 150 homes in Houston's Clear Lake community from serious flooding. This project will store up to a half billion gallons of water and protect 3,000 homes when completed in 2021.[65]

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[61] American Rivers, Unnatural Disasters, Natural Solutions: Lessons From The Flooding Of New Orleans (2006) (Charles River Valley Natural Storage Area case study); and https://www.arcgis.com/apps/MapJournal/index.html?appid=0bf97d033a8642b18c2e8075d4b5ecfe.
[62] Cooper Union, Institute for Sustainable Design, *The Staten Island Bluebelt: A Study In Sustainable Water Management* (http://cooper.edu/isd/news/waterwatch/statenisland). These effort was started in 1990.
[63] The Nature Conservancy, *Urban Coastal Resilience: Valuing Nature's Role*. (2015), https://www.nature.org/content/dam/tnc/nature/en/documents/urban-coastal-resilience.pdf.
[64] "Johnson Creek Restoration, Portland, Oregon," Naturally Resilient Communities, accessed November 12, 2019, http://nrcsolutions.org/johnson-creek-restoration-portland-oregon/.
[65] Exploration Green, 2018, https://www.explorationgreen.org/.

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- In Vermont, a vast network of floodplains and wetlands, including those protected by 23 conservation easements protecting 2,148 acres of wetland along Otter Creek, saved Middlebury $1.8 million in flood damages during Tropical Storm Irene, and between $126,000 and $450,000 during each of 10 other flood events. Just 30 miles upstream, in an area without such floodplain and wetland protections, Tropical Storm Irene caused extensive flooding to the city of Rutland.

D. The SEIS Must Fully Analyze Direct, Indirect, and Cumulative Impacts

The SEIS must examine, among other things, the direct, indirect, and cumulative environmental impacts of alternatives, the conservation potential of those alternatives, and the means to mitigate adverse environmental impacts that cannot be avoided.[66] These assessments are essential for: understanding the impacts of the various alternatives; determining whether less environmentally damaging alternatives are available; making a reasoned choice among alternatives; identifying the least environmentally damaging alternative, as required by the Clean Water Act; ensuring compliance with the Endangered Species Act; and identifying alternatives that would protect and restore the functions of the Yazoo Backwater Area, as required by the National Water Resources Planning Policy.[67]

Direct impacts are caused by the action and occur at the same time and place as the action. Indirect impacts are also caused by the action, but are later in time or farther removed from the location of the action.[68] Cumulative impacts are:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.[69]

The cumulative impacts analysis ensures that the agency will not "treat the identified environmental concern in a vacuum."[70] The cumulative impacts analysis must examine the cumulative effects of federal, state, and private projects and actions.[71] The cumulative impacts analysis must also evaluate the cumulative impacts of climate change.[72]

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[66] 40 C.F.R. § 1502.16.
[67] 42 USC 1962–3(a).
[68] 40 C.F.R. § 1508.8.
[69] 40 C.F.R. § 1508.7.
[70] Grand Canyon Trust v. FAA, 290 F.3d 339, 346 (D.C. Cir. 2002).
[71] The requirement to assess non-Federal actions is not "impossible to implement, unreasonable or oppressive: one does not need control over private land to be able to assess the impact that activities on private land may have" on the project area. Resources Ltd., Inc. v. Robertson, 35 F.3d 1300, 1306 (9th Cir. 1993).
[72] *See* Center for Biological Diversity v. Nat'l Hwy Traffic Safety Administration, 538 F.3d 1172, 1217 (9th Cir. 2008) (holding that analyzing the impacts of climate change is "precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct" and that NEPA requires analysis of the cumulative impact of greenhouse gas emissions when deciding not to set certain CAFE standards); Center for Biological Diversity v. Kempthorne, 588 F.3d 701, 711 (9th Cir. 2009) (NEPA analysis properly included analysis of the effects of climate change on polar bears, including "increased use of coastal environments, increased bear/human encounters, changes in polar bear body condition, decline in cub survival, and increased potential for stress and mortality, and energetic needs in hunting for seals, as well as traveling and swimming to denning sites and feeding areas.").

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Importantly, as the Council on Environmental Quality has made clear, in situations like those in the Yazoo Backwater Area where the environment has already been greatly modified by human activities, it is **not** sufficient to compare the impacts of the proposed alternative against the current conditions. Instead, the baseline must include a clear description of how the health of the resource has changed over time to determine whether additional stresses will push it over the edge.[73]

The SEIS must provide "quantified or detailed information" on the impacts, including the cumulative impacts, so that the courts and the public can be assured that the Corps has taken the mandated hard look at the environmental consequences of the project.[74] **If information that is essential for making a reasoned choice among alternatives is not available, the Corps must obtain that information unless the costs of doing so would be "exorbitant."[75]**

To properly analyze impacts from the Yazoo Pumps, it is also essential that the SEIS provide a detailed operating plan for the Yazoo Pumps, and examine the full suite of impacts in light of that operating plan and reasonably foreseeable deviations from that plan because the Corps retains the ability to modify operating plans. The SEIS must also fully analyze and account for all impacts related to building the Pumps and supporting infrastructure at the Deer Creek location. *See* Section D.5, below.

1. Impacts to Wetlands

As the 2008 Clean Water Act Final Determination makes clear, the "construction and operation of the proposed Pumps would dramatically alter the timing, and reduce the spatial extent, depth, frequency, and duration of time that wetlands within the project area are inundated."[76] The ecological implications of these changes are enormous, because hydrology is "the single most important determinant of the establishment and maintenance of specific types of wetlands and wetland processes."[77]

Among many other things:

> Hydrology affects species composition and richness, primary productivity, organic accumulation, and nutrient cycling in wetlands. . . . Water depth, flow patterns, and duration and frequency of flooding, which are the result of all the hydrologic inputs and outputs, influence the biochemistry of the soils and are major factors in the ultimate selection of the biota of wetlands. . . . the hydrology of a wetland directly modifies and changes its physiochemical environment (chemical and physical properties), particularly oxygen availability and related chemistry, such as nutrient availability, pH, and toxicity (e.g., the production of hydrogen sulfide). Hydrology also transports sediments, nutrients, and even toxic materials into wetlands, thereby further influencing the physiochemical environment. . . . Hydrology also causes water outflows from

[73] Council on Environmental Quality, Considering Cumulative Effects Under the National Environmental Policy Act at 41 (January 1997).
[74] Neighbors of Cuddy Mountain v. U. S. Forest Service, 137 F.3d 1372, 1379 (9th Cir. 1998); Natural Resources Defense Council v. Callaway, 524 F.2d 79, 87 (2d Cir. 1975).
[75] 40 C.F.R. § 1502.22 (emphasis added).
[76] 2008 Final Determination at i.
[77] William J. Mitsch and James G. Gosselink, *Wetlands* (5th ed.) (2015) at 112 (emphasis in original).

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wetlands that often remove biotic and abiotic material, such as dissolved organic carbon, excessive salinity, toxins, and excess sediments and detritus."[78]

Critically, even small alterations in wetland hydrology can produce significant, ecosystem-wide changes, as the seminal textbook on wetlands makes clear:

> **When hydrologic conditions in wetlands change even slightly, the biota may respond with massive changes in species composition and richness and in ecosystem productivity.**[79]

Wetlands maintained by overbank flooding are particularly productive: "Pulse-fed wetlands are often the most productive wetlands and are the most favorable for exporting materials, energy, and biota to adjacent ecosystems."[80] The many significant ecological values of riverine wetlands are discussed at length in the 2008 Clean Water Act Final Determination (including the Technical Appendices) and in the comments on the 2007 SEIS submitted by the U.S. Department of the Interior, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, independent scientists, conservation community, and the public. These comments should be fully considered by the Corps in preparing this SEIS and should be included in the administrative record for this SEIS.

The Corps recognizes that pulse-fed riverine wetlands provide at least three critical functions that are not provided by non-riverine wetlands (detaining floodwater, exporting organic carbon, and removing elements and compounds).[81] Riverine wetlands provide essential habitat for many species of fish and wildlife, including critical spawning habitat.[82] Typically, at least 7 consecutive days of overbank flooding are required to trigger spawning.

The Corps' 2013 Guidebook on the Hydrogeomorphic Approach (HGM) to Assessing Functions of Forested Wetlands in the Mississippi Alluvial Valley (which includes the Mississippi Yazoo Backwater Area) states that the 5-year floodplain is the cut-off between riverine and other types of wetlands: "a wetland must be in the 5-year floodplain of a stream system to be included within the Riverine Class. This return interval is regarded as sufficient to support major functions that involve periodic connection to stream systems."[83]

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[78] Id. at 111-112.
[79] Id. at 112 (emphasis added).
[80] Id. at 119.
[81] USACE Engineer Research and Development Center, A Regional Guidebook for Applying the Hydrogeomorphic Approach to Assessing Functions of Forested Wetlands in the Mississippi Alluvial Valley, ERDC/EL TR-13-14 (July 2013) at 27. This HGM Guidebook assigns 6 functions to pulse-fed wetlands with a return interval of 5 years or less (detain floodwater, export organic carbon, detain precipitation, cycle nutrients, maintain plant communities, and provide fish and wildlife habitat), but assigns just 4 functions to non-riverine wetlands (detain precipitation, cycle nutrients, maintain plant communities, and provide fish and wildlife habitat). The Corps' 2002 HGM Guidebook, developed for the Yazoo Pumps project, assigns a third function that is only supplied by pulse-fed riverine wetlands (remove elements and compounds). USACE Engineer Research and Development Center, *A Regional Guidebook for Applying the Hydrogeomorphic Approach to Assessing Wetland Functions of Selected Regional Wetland Subclasses, Yazoo Basin, Lower Mississippi River Alluvial Valley*, ERDC/EL TR-02-4 (April 2002).
[82] See, e.g. 2008 Clean Water Act Final Determination, Technical Appendices.
[83] USACE Engineer Research and Development Center, A Regional Guidebook for Applying the Hydrogeomorphic Approach to Assessing Functions of Forested Wetlands in the Mississippi Alluvial Valley, ERDC/EL TR-13-14 (July 2013) at 27.

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Despite the importance of wetlands in the 5-year floodplain and of wetlands that receive less than 14 consecutive days of flooding (often referred to as "short-hydroperiod wetlands"), the 2007 FSEIS arbitrarily and inappropriately excluded consideration of these types of wetlands.[84] The 2007 FSEIS acknowledges that it did **not** evaluate impacts to short-hydroperiod wetlands, and did **not** evaluate impacts to wetlands sustained by sources other than backwater flooding.[85]

As a result of these arbitrary limits, the 2007 FSEIS completely excluded consideration of impacts to at least 24,000 acres of wetlands in the 2-year floodplain and to all wetlands located outside the 2-year floodplain, as recognized in the 2008 Clean Water Act Final Determination:[86]

> EPA's concerns regarding this proposed project are amplified because we believe the spatial extent of wetlands potentially impacted by the proposed project is much greater than that estimated in the FSEIS. As discussed in Appendix 5, EPA's Environmental Monitoring and Assessment Program (EMAP) analysis identified approximately 52,000 acres of wetlands which are located on the 2-year floodplain but outside of the wetland assessment area established in the FSEIS (Figure 5). EPA believes that as much as 24,000 acres of these 52,000 acres of wetlands are connected to backwater flooding and will be adversely impacted by the project to an even greater degree than the wetlands considered in the FSEIS. However, the FSEIS did not evaluate impacts to these wetlands.[87]

The 2007 FSEIS also acknowledged that calculating **if** it had calculated impacts based on the "upper 90 percent confidence" range, it would have concluded that operation of the Yazoo Pumps would affect **95,200 acres of wetlands**, with 44,600 acres of wetlands becoming non-jurisdictional and an additional 50,600 acres of wetlands suffering changes in the duration of inundation.[88] The 2007 FSEIS did not explain why it did not rely on this confidence range.

The gross underestimate of wetland impacts in the 2007 FSEIS was also documented in a January 2008 independent hydrology analysis prepared by Nutter & Associates, which concluded that **the Corps' 2007 SEIS failed to account for at least 37,000 additional acres of wetlands that would be completely drained by the Yazoo Pumps, and failed to account for the harm to a substantial number of additional wetland acres due to changes to the duration and extent of inundation of those wetlands.**[89]

Given the significant ecological value of the Yazoo Backwater Area wetlands—and the importance of adverse wetland impacts to fish and wildlife, water quality, flood damage reduction, and project costs

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[84] The many additional failings in the 2007 FSEIS are documented in the May 5, 2008 comments of American Rivers, Delta Land Trust, Earthjustice, Environment America, Environmental Defense Fund, Gulf Restoration Network, National Audubon Society, National Wildlife Federation, Sierra Club, and the Surfrider Foundation—Central Gulf Coast Chapter on the Proposed Determination to prohibit the use of disposal sites for dredged or fill material in connection with the construction of the Yazoo Backwater Area Project. These comments are provided at Attachment F to these comments. Many other commenters also highlighted the major problems with the 2007 FSEIS, making it fundamentally inappropriate for the Corps to tier this SEIS to the 2007 FSEIS.

[85] 2007 FSEIS Main Report at 141.

[86] 2008 Clean Water Act Final Determination at iii, 3, 45.

[87] 2008 Clean Water Act Final Determination at 45-47.

[88] 2007 FSEIS Main Report at 142.

[89] Nutter & Associates, Inc., Technical Memorandum No. 07-059.01, Review of the USACE Yazoo River Backwater Area Reformulation Report, Prepared for National Wildlife Federation American Rivers, January 22, 2008. A copy of this report is provided at Attachment G to these comments.

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and benefits, among many other things—it is essential that the new SEIS properly account for the full suite of wetland impacts.

However, based on the Corps' draft Wetlands Analysis for the new SEIS (which was provided in response to a Freedom of Information Act request), the Corps is not carrying out the analyses required to properly account for the full suite of wetland impacts. Among many other failings, the draft Wetlands Analysis is only examining impacts to wetlands that receive ≥ 14 consecutive days of flooding—ignoring many other impacts to wetlands that among other things, will result in substantial harm to fish and wildlife. A copy of the draft Wetlands Analysis is provided at Attachment B to these comments.

The SEIS must provide at least the following information to ensure that the SEIS accurately addresses the geographic extent of wetland impacts in the project area:

(1) The SEIS must provide the areal extent (number of acres) of wetlands in the 5-year floodplain without the project, and the areal extent of wetlands that will be in the 5-year floodplain with the project—*i.e.*, a full assessment of wetland acres that will no longer be in the 5-year floodplain with the project. It is also important that the Corps provide the GIS shapefile polygons for the 5-year floodplain with and without the project on the Yazoo Backwater Pumps website "**as quickly as practicable**" after they are generated, as required by law, so that the public can have prompt access to this critical planning data.[90]

There is no scientific basis or rational justification for failing to evaluate impacts to wetlands located above the 2-year floodplain or to short-hydroperiod wetlands as the Corps had done in the draft Wetland Analysis and as the Corps did in 2007. To the contrary, the fundamental underpinnings of the science of wetland functions and values, ecological processes, ecosystem services, and fish and wildlife habitat requirements, make clear that impacts to these types of wetlands must in fact be assessed.

(2) The SEIS must provide the areal extent (number of acres) of wetlands in the 2-year floodplain without the project, and the areal extent of wetlands that will be in the 2-year floodplain with the project—*i.e.*, a full assessment of wetland acres that will no longer be in the 2-year floodplain with the project. It is also important that the Corps provide the GIS shapefile polygons for the 2-year floodplain with and without the project on the Yazoo Backwater Pumps website "as quickly as practicable" after they are generated, as required by law, so that the public can have prompt access to this critical planning data.[91]

(3) The SEIS must provide the areal extent (number of acres) of wetlands that receive equal to or greater than 14 consecutive days of flooding without the project, and the areal extent of wetlands that receive equal to or greater than 14 consecutive days of flooding

[90] 33 U.S.C. § 2342 (emphasis added) (the "Secretary shall make publicly available, including on the Internet, all data in the custody of the Corps of Engineers on . . . the planning, design, construction, operation, and maintenance of water resources development projects . . . as quickly as practicable after the data is generated by the Corps of Engineers.")
[91] Id.

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with the project—*i.e.*, a full assessment of the wetland acres that will no longer receive equal to or greater than 14 consecutive days of flooding with the project. It is also important that the Corps provide the GIS shapefile polygons for these areas with and without the project on the Yazoo Backwater Pumps website "as quickly as practicable" after they are generated, as required by law, so that the public can have prompt access to this critical planning data.[92]

(4) The SEIS must provide the areal extent (number of acres) of wetlands that receive equal to or greater than 7 consecutive days of flooding without the project, and the areal extent of wetlands that receive equal to or greater than 7 consecutive days of flooding with the project—*i.e.*, a full assessment of the wetland acres that will no longer receive equal to or greater than 7 consecutive days of flooding with the project. It is also important that the Corps provide the GIS shapefile polygons for these areas with and without the project on the Yazoo Backwater Pumps website "as quickly as practicable" after they are generated, as required by law, so that the public can have prompt access to this critical planning data.[93] As noted above, there is no scientific basis or rational justification for failing to evaluate impacts to short-hydroperiod wetlands or to wetlands located above the 2-year floodplain as the Corps did in 2007 and as the Corps continues to do in the draft Wetlands Analysis.

(5) The SEIS must provide detailed information on the changes that would result from construction and operation of the Yazoo Pumps to: the areal extent of inundation, depth of inundation, and duration of inundation of all wetlands that currently receive equal to or greater than 14 consecutive days of flooding.

(6) The SEIS must provide detailed information on the changes that would result from construction and operation of the Yazoo Pumps to: the areal extent of inundation, depth of inundation, and duration of inundation of all wetlands that currently receive equal to or greater than 7 consecutive days of flooding.

(7) The SEIS must provide detailed information on the direct and indirect impacts to wetlands, streams, and groundwater that will occur as a result of siting and operating the Pumps at the Deer Creek site. Among many other things, this must include an analysis of wetland impacts that would result from operating the Pumps when the Steele Bayou gates are open—which could occur since the structural limitations on operating that Pumps when the gates are open (*i.e.*, with the gates open, the flow of water through the Pumps would overwhelm the pump mechanism) may no longer apply at the Deer Creek location. *See* Section D.5 of these comments for additional information needs related to relocating the Yazoo Pumps to the Deer Creek site.

(8) The SEIS must provide the underlying data and assumptions relied on by the Corps to establish: (i) floodplain elevations without the project; (ii) floodplain elevations with the project; and (iii) stage frequency curves with and without the project. This information is fundamental to assessing impacts and project costs and benefits, and should be fully available for public review and comment. It is also important that the Corps provide this

[92] Id.
[93] Id.

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information on the Yazoo Backwater Pumps website "as quickly as practicable" after it is generated, as required by law, so that the public can have prompt access to this critical planning data.[94]

(9) The SEIS must provide detailed information on all conservation and easement lands in the project area, and the wetlands on those lands that will be affected by the Yazoo Pumps, including:

- All federally-owned conservation lands (*e.g.*, National Wildlife Refuge lands, National Forest lands);
- All state-owned conservation lands (*e.g.*, State Wildlife Management Areas and other state-owned lands);
- All lands enrolled in the U.S Department of Agriculture Wetland Reserve Easement Program, Floodplain Easement Program, or Conservation Reserve Program;
- All lands owned or managed by the Corps for mitigation or for other purposes, and all lands subject to Corps flood or flowage easements. The Conservation Organizations understand that the Corps owns permanent flood easements on at least 19,463 acres of land in the Yazoo Backwater Area and has purchased many thousands of acres of mitigation lands in the Yazoo Backwater Area for other water resources projects; and
- All privately owned conservation lands.

No agricultural or other flood damage reduction benefits may be calculated for conservation and easement lands in the Yazoo Backwater Area. Instead, the value of the ecosystem services lost due to adverse project impacts on these lands must be quantified and accounted for as a project cost in the benefit-cost assessment. It is critical that the SEIS fully inform the public and decision-makers about the adverse impacts that the Yazoo Pumps would cause to the wetlands, streams, and other natural systems on lands and conservation easements that have been purchased, or are being managed, for conservation purposes using federal and state taxpayer dollars. See Section C.2 and Figures 3 and 4, above.

(10) The SEIS must provide detailed information on all lands that fall under the following land use categories in the project area, and the adverse impacts to wetlands located on those lands as a result of the Yazoo Pumps, including: crop land, forest land, fallow land, and lands with soils identified as 4W+ soils under the USDA Land Classification system. Information on these land use categories is readily available from the U.S. Department of Agriculture (USDA) CropScape database[95] and other USDA sources. This information is essential for ensuring a meaningful evaluation of impacts, an effective evaluation of all reasonable alternatives as required by law, and proper evaluation of project costs and benefits.

The USDA Land Capability Classification system rates soils based on their degree of limitations for farming. Lands rated as Classes 4W to 8W, which are commonly referred

[94] Id.
[95] USDA CropScape database (https://nassgeodata.gmu.edu/CropScape/).

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to as 4W+ soils, are the wettest soils and have "severe limitations" on farming, according to the USDA. In general, 4W+ lands are saturated or inundated from 50 to 100 percent of growing seasons. These lands were exempted from county caps on Wetland Reserve Easements by the 2014 Farm Bill, and reforestation of these lands is a conservation priority.

The USDA Land Capability Classification system provides the following definitions applicable to 4W+ soils:

- "Class 4 soils have very severe limitations that restrict the choice of plants or require very careful management, or both."[96]
- "Class 5 soils have little or no hazard of erosion but have other limitations, impractical to remove, that limit their use mainly to pasture, range, forestland, or wildlife food and cover."[97]
- "Class 6 soils have severe limitations that make them generally unsuited to cultivation and that limit their use mainly to pasture, range, forestland, or wildlife food and cover."[98]
- "Class 7 soils have very severe limitations that make them unsuited to cultivation and that restrict their use mainly to grazing, forestland, or wildlife."[99]
- "Class 8 soils and miscellaneous areas have limitations that preclude their use for commercial plant production and limit their use to recreation, wildlife, or water supply or for esthetic purposes."[100]
- "Subclass w is made up of soils for which excess water is the dominant hazard or limitation affecting their use. Poor soil drainage, wetness, a high water table, and overflow are the factors that affect soils in this subclass."[101]

USDA data shows 296,126 acres of 4W+ soils in the Yazoo Backwater Area. Most of the remaining unprotected 4W+ soils are adjacent to existing conservation lands, making them particularly important conservation priorities. See Section C.2 and Figure 4, above.

(11) The SEIS must provide a detailed explanation of the models, underlying assumptions, and data inputs used to develop the new baseline wetland calculations in the draft Wetlands Analysis—this information is only vaguely touched upon in the draft Wetlands Analysis. The SEIS must also provide a detailed explanation regarding how the new baseline wetland calculations can be reconciled with: (i) the significantly larger area of 2-year floodplain baseline wetlands identified through the statistically valid field sample carried out in 2003 (the 2003 EMAP analysis); and (ii) the significant increases in

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[96] USDA, Land Classification System (http://www.ncrcd.org/files/4414/0968/3285/NRCS_Land_Capability_Classes.pdf and https://www.ars.usda.gov/ARSUserFiles/np215/Food%20security%20talk%20inputs%20Lunch%203-15-11.pdf; https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/technical/nra/?cid=nrcs143_014040).
[97] Id.
[98] Id.
[99] Id.
[100] Id.
[101] Id.

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conservation land acreage in the Yazoo Backwater Area since the 2007 SEIS, including tens of thousands of acres of additional lands enrolled in the Wetland Reserve Easement program, which includes restoration of wetland characteristics on enrolled lands.

- The 2007 SEIS concluded that there were 189,000 acres of wetlands in the ≥ 14 day duration flood zone (the 2-year floodplain; the 2007 SEIS did not evaluate impacts above the 2-year floodplain and did not evaluate all wetland impacts in the 2-year floodplain, as discussed above).

- The 2003 EMAP analysis found 179,120 acres of baseline wetlands in the 2-year floodplain.[102] The 2003 EMAP analysis is a statistically valid field sampling survey that used EPA's Environmental Monitoring and Assessment Program (EMAP) to ground-truth the baseline wetland acreage. The 2003 EMAP survey was conducted by the U.S. Environmental Protection Agency, the Corps, the U.S. Fish and Wildlife Service, and the Natural Resource Conservation Service.[103]

- The draft Wetlands Analysis, on the other hand, concludes that only 69,465 acres of baseline wetlands exist in the 2-year floodplain (which it describes as the area within the ≥ 14 day duration flood zone "potentially sustained by flood inputs").[104]

The dramatic difference between the 2003 EMAP statistically valid field sampling survey and the new wetland baseline strongly suggest that the new wetland baseline acreage numbers are incorrect. The new wetland baseline also appears to be incompatible with the increase in Wetland Reserve Easements and other conservation lands in the Yazoo Backwater Area.

(12) If the wetland baseline numbers in the draft Wetland Analysis are accurate, it means that between 109,655 and 120,015 acres of wetlands were lost in just the 2-year floodplain in the Yazoo Backwater Area since approximately 1978 (when the Yazoo Backwater Levee was completed), despite *increased* conservation of wetland acres over this same timeframe. According to the Corps' 2007 documentation (based on the FEAT analysis) and the 2003 EMAP ground-truthing analysis, these wetlands existed in the 2003-2007 timeframe. If these wetlands have in fact been lost, the SEIS must fully account for these highly significant losses, including in the cumulative impacts and alternatives analyses.

(13) A detailed explanation of the models, underlying assumptions, data inputs, and rationales employed to impose the following limitations and reach the following conclusions in the draft Wetlands Analysis—this information is only vaguely touched upon in the draft Wetlands Analysis:

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[102] 2008 Clean Water Act Final Determination, Appendix 5 at Table 2.
[103] Id. at Appendix 5.
[104] Draft Wetland Analysis at 109.

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a. *"Potential wetland impacts consider hydrologic alternations to areas exhibiting flooding for ≥ 14 days."*[105] As discussed above, there is no scientific justification for limiting consideration of wetland impacts to these areas. The SEIS should provide a detailed, quantified, and comprehensive explanation for imposing this highly significant limitation on the wetland impacts analysis.

b. *"All HGM calculations utilized the mid-point of each flood duration range."*[106] It is unclear why this mid-point was utilized. Since the length and level of inundation has significant implications for ecological services and outcomes, utilizing this midpoint could mask critical adverse impacts. *See also*, the points raised below regarding the many problems with the Corps' HGM analysis.

c. *"The analysis of direct impacts was not altered from the [2007 SEIS] due to the expectation that the physical footprint and associated impacts to wetlands remain consistent with previous estimates."*[107] The calculation of functional values for the direct wetland impacts was also based on the 2007 SEIS project location.[108] These assessments of direct wetland impacts cannot be correct since the location of the Pumps has been changed. The SEIS must assess the direct impacts associated with the Deer Creek Site.

   Critically, the many flaws in the 2007 HGM analysis should preclude its use, or any type of reliance on that analysis. The 2008 Clean Water Act Final Determination rejects the 2007 HGM analysis as fundamentally flawed:

   EPA believes that certain modeling assumptions and factors used by the Corps in the application of these assessment tools lead to a significant underestimation of the proposed pumping station's adverse impacts on the aquatic ecosystem, as well as a significant overestimation of the project's environmental benefits. These concerns are summarized in Appendix 6.[109]

   The SEIS should correct the many failings that make the 2007 SEIS HGM analysis unreliable—including those identified in the 2008 Clean Water Act Final Determination, and use the improved HGM process to conduct a fundamentally new HGM analysis for the SEIS.

d. *"This HGM analysis considers potential impacts to wetlands that experience ≥ 14 days of flood inundation. Recent onsite hydrologic monitoring results demonstrate that wetlands hydrology in the study area is predominantly driven by precipitation, with surface water flood inundation providing supplemental water sources in some*

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[105] Draft Wetlands Analysis at 100.
[106] Id. at 100.
[107] Id. at 101
[108] Id. at 120.
[109] 2008 Clean Water Act Final Determination at 47. A full analysis of the problems with the Corps' 2007 HGM analysis are provided in Appendix 6 of the 2008 Clean Water Act Final Determination. This Appendix, along with the entire 2008 Clean Water Act Final Determination, of course must be fully considered in the SEIS and included in the administrative record for the SEIS.

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areas during some years (Berkowitz et al. 2019, see Section 4.8 of this report). As a result, the current analysis focuses on wetlands with the potential to be impacted from operation of the pumps (i.e., those supported by flooding). However, available data demonstrates that the wetlands within the project will continue to exhibit wetland hydrology based upon seasonal high water tables derived from precipitation inputs. Thus, conversion of wetlands to non-wetland habitats (i.e., uplands) is not anticipated outside of direct impacts related to the physical project footprint (38 acres)."[110] The Berkowitz study does not support these conclusions, as discussed in detail below; and the many other problems identified in this section strongly suggest that these conclusions are fundamentally incorrect.

e. *"Notably, the three tiers of wetlands identified during the EMAP study do not reflect the wetlands within the study area subject to potential impacts from operation of the pumps. This is due to the fact that most wetlands within the region are sustained by local patterns of precipitation, with flooding providing supplemental sources of wetland hydrology in some areas (Figure 4.5.1-1). A recent publication (Berkowitz et al. 2019) identifies dominant sources of wetland hydrology in the region, reporting that >75% of wetland saturation events were induced by precipitation and that 87% of study wetlands would persist in the absence of flood water inputs (Figure 4.5.1-2)."*[111] The Berkowitz study does not support these conclusions, as discussed in detail below; and the many other problems identified in this section strongly suggest that these conclusions are fundamentally incorrect.

f. *"The Holly Bluff Cut-off was completed in 1958, and the Backwater levee was completed in 1978. These flood control features reduced stages in the study area. The median ≥ 14 day flood duration elevation threshold was lowered approximately one to three feet as a result of implementing the flood control features, translating to a large aerial decrease in potential wetland areas when superimposed on the project landscape."*[112] If this is accurate, the SEIS must explain why the authorized level of flood protection (as set forth in the 1941 project authorization) has not already been achieved. The SEIS must also ensure that the new stage elevations are used consistently for all analyses in the SEIS, including for determining project benefits.

g. *"[A] total of 69,465 acres occurring below the ≥ 14 day flood duration elevation. This represents the potential wetland area that may be supported by flood inundation, and is the extent utilized throughout the subsequent analysis. These 69,465 acres occurs across several flood duration intervals ranging from 14 to > 35 days (Table 4.5.1-2)."*[113] *See* the discussion of baseline wetland impacts, above. The many other problems identified in this section also strongly suggest that these conclusions are fundamentally incorrect.

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[110] Id. at 101.
[111] Id. at 102
[112] Id. at 109.
[113] Id. at 109.

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h. *"The flood duration modeling data reports changes in the hydroperiod of potential wetland areas being examined. The majority (75 percent; 51,964 acres) of wetlands are not expected to change flood duration as a result of project implementation (Table 4.5.3-1). A subset of wetlands (24 percent; 16,841 acres) are estimated to display a decrease in flood duration, and a small number of (<0.1 percent; 661 acres) may experience an increase in flood duration."*[114] *See* the discussion of baseline wetland impacts, above. The many other problems identified in this section also strongly suggest that these conclusions are fundamentally incorrect.

i. *"The majority (9,167 acres) of wetlands expected to display a decrease in flood duration will continue to experience ≥ 14 days of inundation from floodwaters, although the wetland functional capacity of those wetlands may be decreased. A portion of the wetlands (7,674 acres) estimated to experience a decrease in flood duration will no longer be subject to ≥ 14 days of flood inundation. However, available data suggests that this will not result in the conversion of wetlands to non-wetlands (i.e., loss of wetlands; except for the 38 acre physical project footprint) as precipitation-induced wetland hydrology has been shown to significantly exceed the period of flood inundation within the study area across all flood duration intervals (Berkowitz et al. 2019). The changes in flood duration will decrease wetland functional capacities, and those decreases are present for in the wetland functional assessment portion of this report (see below)."*[115] The Berkowitz study does not support these conclusions, as discussed in detail below; and the many other problems identified in this section strongly suggest that these conclusions are fundamentally incorrect.

j. The draft Wetlands Analysis states that the total acres of agricultural (crop) lands in the updated ≥ 14 day flood inundation zone totals 5,206 acres.[116] The draft Wetland Analysis further concludes that only 997 acres of agricultural lands in that zone would be affected by the Yazoo Pumps.[117] If the SEIS relies on these impact numbers, it must limit any assessment of agricultural benefits in this flood inundation zone to 997 acres, and explain how the Corps could carry out the promised reforestation component and required mitigation.

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[114] Id. at 110.
[115] Id. at 111.
[116] Id at 109.
[117] Id. at 121.

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k. *"The HGM assessment of wetland functions applied the same principles, equations, and parameter values utilized in the 2007 report, while updating the extent and distribution of wetlands based upon the best available data."*[118] It is inappropriate to rely on the 2007 HGM analysis. As the Environmental Protection Agency stated in the 2008 Clean Water Act Final Determination:

> EPA believes that certain modeling assumptions and factors used by the Corps in the application of these assessment tools lead to a significant underestimation of the proposed pumping station's adverse impacts on the aquatic ecosystem, as well as a significant overestimation of the project's environmental benefits. These concerns are summarized in Appendix 6.[119]

(14) The SEIS must provide a detailed assessment of: (i) the uncertainties associated with the model, data, and underlying assumptions used to develop its Wetland Analysis; and (ii) the implications of relying on a model that does not (or may not) accurately account for baseline wetlands or impacts to those wetlands.

(15) The SEIS must provide documentation of the certification for models relied upon in the SEIS, including: (i) "the updated Digital Elevation Model (DEM) which uses a 10-meter resolution"[120]; (ii) the "Flood Event Simulation Model (FESM)" which was used to model baseline conditions[121]; and (iii) any other models used in the SEIS. Corps guidance requires the use of certified models for project planning; a model this is not certified and that has not gone through peer review may not be used for the SEIS.

The Corps' internal guidance clearly requires certification of the new model before it can be used for planning activities. The purpose of model certification is to ensure, among other things, that models used by the Corps are technically and theoretically sound, computationally accurate, transparent, and in compliance with Corps policy:

> **Use of certified or approved models for all planning activities is mandatory**. This policy is applicable to all planning models currently in use, models under development and new models. District commanders are responsible for delivering high quality, objective, defensible, and consistent planning products. Development of these products requires the appropriate use of tested and defensible models. National certification and approval of planning models results in significant efficiencies in the conduct of planning studies and enhances the capability to produce high quality products. The appropriate PCX will be responsible for implementing the model certification/approval process. The goal of certification/approval is to ensure that Corps planning products are theoretically sound, compliant with Corps policy, computationally accurate, based on reasonable assumptions regarding the availability of data, transparent, and described to address any limitations of the model or its use. The use of a

[118] Id. at 121.
[119] 2008 Clean Water Act Final Determination at 47. For a full analysis of the problems with the Corps' 2007 HGM analysis see Appendix 6 of the 2008 Clean Water Act Final Determination.
[120] USACE Draft Wetland Analysis at 99, provided at Appendix B to these comments.
[121] Id. at 100.

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> certified/approved model does not constitute technical review of the planning product. The selection and application of the model and the input data is still the responsibility of the users and is subject to Agency Technical Review and Independent External Peer Review (where applicable). Once a model is certified/approved, the PCXs will be responsible for assuring that model documentation and training on the use of the model are available (either from the PCX or the model developers), and for coordinating with model developers to assure the model reflects current procedures and policies. All certification/approval decisions will be in effect for a period specified by the Model Certification HQ Panel, not to exceed seven years.[122]

Similarly, the use and application of the new model for individual projects is subject to the requirements of the Corps' peer review process.[123]

(16) The SEIS must ensure appropriate use of the Berkowitz study cited in the Notice of Intent and attached to and relied upon extensively in the draft Wetlands Analysis. The draft Wetlands Analysis draws improper conclusions from the Berkowitz study that taint the entire draft Wetlands Analysis. The Berkowitz study provides little, if any, information that is relevant or useful to the SEIS. It is critical that the SEIS not misuse or overstate the implications of the Berkowitz study.

The Berkowitz study looked at "56 forested wetland study sites throughout the Yazoo Basin" that were chosen "based upon access to public lands, mapped flood frequency and duration (where available), and site condition to include analyses of mature second growth forest and reforested farmed wetlands."[124] Of these sites, **44 were monitored for less than one year**, "from November 2010 until October 2011." Only 12 sites were monitored for more than that extremely limited amount of time: "12 wetland monitoring locations were maintained for three to eight years during the 2011–2018 period" in order "to evaluate trends across multiple years." Based on the extremely limited monitoring at the equally limited and non-representative sample locations, the study provides an even more limited conclusion: "Data suggest that most wetlands examined (87%) would persist in the absence of flooding, and that duration and inundation patterns differed with dominant water source."[125]

These findings do not support, and may not be used to support, any conclusions related to wetland impacts from the Proposed Action for at least the following critical reasons:

a. As clearly documented in the Berkowitz study, the study is not based on a randomized, statistically valid sample of wetland locations in the project area.

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[122] EC 1105-2-412, Assuring Quality of Planning Models at paragraph 6 (emphasis added).
[123] *See, e.g.*, EC 1105-2-408 and EC-1105-2-410.
[124] Berkowitz, J.F., D.R. Johnson, and J.J. Price, "Forested Wetland Hydrology in a Large Mississippi River Tributary System", Wetlands Journal (December 2019))(available at *https://link.springer.com/article/10.1007/s13157-019-01249-5)*. While the April 16, 2020 Notice of Intent states that this study is also available on the Yazoo Pumps Backwater Pumps project website, it was not posted to that site as of June 7, 2020.
[125] Id. (emphasis added).

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As a result, any findings from the Berkowitz study may not be applied—because they in fact do not apply—to the entire project area. Any attempt to extrapolate the Berkowitz findings to the project area must be rejected.

b. The Berkowitz study is based on an extremely limited monitoring record that by definition, cannot and does not provide the information needed to draw conclusions regarding the long-term and cumulative implications of the loss of overbank flooding that would occur with the Pumps in place.

c. The Berkowitz study draws just one extremely limited conclusion that has no meaning in the context of the required NEPA or Clean Water Act reviews, and no meaning in the context of the ecological harm (including loss of ecological services) that would result from construction and operation of the Yazoo Pumps. The Berkowitz study simply concludes that "most wetlands" examined by the study would "persist" in the absence of flooding. Even if this conclusion was correct—which, given the severe limitations of the study, it almost certainly is not—it fails to provide any type of meaningful information.

Saying that a wetland would "persist" means nothing more than that it would continue to exist in some form (presumably, but not necessarily as a jurisdictional wetland). Under that definition, a wetland that pre-Yazoo Pumps would experience inundation of more than a foot for more than 14 consecutive days during key spawning seasons could be deemed to "persist" post-Yazoo Pumps if it lacked any flood-induced inundation but still retained wetland soil characteristics. But under this scenario, the wetland would cease to provide any habitat for fish spawning or any nutrient cycling because wetlands cannot cycle nutrients if the water is not transported off the floodplain, among many other changes. Similarly, if the Yazoo Pumps prevented 20,000 acres of riverine wetlands from receiving at least 7 consecutive days of overbank flooding that would occur without the Pumps, spawning habitat would be completely lost on all of those 20,000 acres even though the wetlands could still persist.

In short, relying on a conclusion that some wetlands would "persist" as providing a rationale for constructing the Yazoo Pumps would constitute a willful refusal to account for the vitally important functions provided by riverine wetlands. Indeed, this is one of the key problems identified in the 2008 Clean Water Act Final Determination that warranted the 2008 veto. The Environmental Protection Agency highlighted the fact that the Yazoo Pumps would cause thousands of acres to "shift from the riverine backwater wetland subclass to the flats wetland subclass (see Table 2)."[126] These changes constituted significant degradation in violation of the Clean Water, notwithstanding the fact that a subclass of wetlands still "persisted."

(17) The SEIS must ensure that the same criteria used to assess the geographic extent of wetland impacts (i.e., the new period of record and other data referred to in the Notice of Intent) is also used to assess the geographic extent of flood damage

[126] 2008 Clean Water Act Final Determination at 50.

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reduction benefits. If, as claimed in the draft Wetlands Analysis, the 2007 period of record overestimated wetland impacts, the 2007 period of record would also have overestimated flood damage reduction benefits.

(18) The SEIS must ensure a comprehensive examination of cumulative wetland losses, including by quantifying and fully accounting for: (i) the historic losses of bottomland hardwood wetlands and other wetlands in the project area and beyond; (ii) the impacts of the project area's massive agricultural withdrawals on the project area wetlands; (iii) the impacts of the severe depletion of groundwater levels in and near the project area on the area's wetlands; and (iv) the impacts of climate change on the project area wetlands. The cumulative impacts of the geographical extent of wetland losses also, of course, must be assessed in connection with the loss of and changes in wetland functions and the ecological impacts of those losses on fish and wildlife including migratory species, amphibians, and reptiles.

Once the SEIS properly assesses the extent of wetland impacts through the analyses discussed above, it must then assess the ecological implications—and significance of those implications—in light of a full understanding of the values provided by the Yazoo Backwater Area wetlands, the implications of the loss of ecological services provided by those wetlands, the full life-cycle needs of the many species that rely on these vital wetlands, and the critical importance of short hydroperiod wetlands for fish and wildlife, among other things.

Many of these factors are discussed in detail in the 2008 Clean Water Act Final Determination and the comments of the U.S. Department of the Interior, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, independent scientists, and conservation organizations on the 2008 Clean Water Act Final Determination and the 2007 SEIS. These materials should be carefully reviewed and fully accounted for in the SEIS, and should be included in the administrative record for the SEIS.

As confirmed in the 2008 Clean Water Act Final Determination, the Corps' 2007 HGM analysis process (which, as discussed above, the Corps continues to rely on) is fundamentally flawed and will not properly account for the ecological implications of the Yazoo Pumps-induced wetland losses:

> EPA believes that certain modeling assumptions and factors used by the Corps in the application of these assessment tools lead to a significant underestimation of the proposed pumping station's adverse impacts on the aquatic ecosystem, as well as a significant overestimation of the project's environmental benefits. These concerns are summarized in Appendix 6.[127]

As has been repeatedly highlighted by the Federal resource agencies, the area that would be drained by the Yazoo Pumps:

> contains some of the richest natural resources in the nation including a highly productive floodplain fishery, one of only a few remaining examples of the bottomland hardwood forest

[127] 2008 Clean Water Act Final Determination at 47. A full analysis of the problems with the Corps' 2007 HGM analysis are provided in Appendix 6 of the 2008 Clean Water Act Final Determination. This Appendix, along with the entire 2008 Clean Water Act Final Determination, of course must be fully considered in the SEIS and included in the administrative record for the SEIS.

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ecosystem which once dominated the Lower Mississippi Alluvial Valley, and is one of only four remaining backwater ecosystems with a hydrological connection with the Mississippi River."[128]

The Yazoo Pumps would cut off the hydrological cycle of backwater flooding that "is critically important to maintenance of project-area wetland and aquatic habitat values, including fisheries production" and that provides the biochemical link to the rest of the lower Mississippi Alluvial Valley ecosystem.[129]

Forested wetlands have long been recognized as vitally important and as being "among the Nation's most important wetlands."[130] The bottomland hardwood wetlands of the Lower Mississippi River Valley:

> "are prime overwintering grounds for many North American waterfowl, including 2.5 million of the 3 million mallards of the Mississippi Flyway, nearly all of the 4 million wood ducks and many other migratory birds. Numerous finfishes depend on the flooded hardwoods for spawning and nursery grounds. These wetlands support many other species of wildlife, including deer, squirrel, raccoon, mink, beaver, fox and rabbit. They also play a vital role in reducing flooding problems by temporarily storing large quantities of water and by slowing the velocity of flood waters. In the process, these wetlands remove chemicals such as fertilizers and pesticides from the water, trap soil eroding from nearby farmlands, and recharge ground water supplies."[131]

Notably, it its comments on the 2007 FSEIS, the Department of the Interior concluded that the Yazoo Pumps "will have unacceptable adverse effects on fishery areas, including spawning and breeding areas" and "unacceptable adverse effects on wildlife, specifically to the area's breeding and migratory birds, including landbirds, shorebirds, wading birds, and waterfowl."[132] As noted above, many fish species require at least 7 consecutive days of overbank flooding to trigger spawning so that spawning habitat will be completely lost on those wetlands that no longer flood in this manner as a result of the Pumps.

The assessment of the ecological implications of the adverse impacts to wetlands must also account for the full suite of impacts to wetland plants, including the region's vitally important bottomland hardwood wetland species. As noted above, even small changes in wetland hydrology can cause "massive changes in species composition and richness and in ecosystem productivity."[133]

The assessment of the ecological implications of the adverse impacts to wetlands must also account for the full suite of ecological services provided by the area's wetlands. For example, losses to forested and other wetlands resulting from the Yazoo Pumps could, among many other adverse impacts:

- Significantly undermine flood storage, leading to more flooding in the Yazoo Backwater Area since "[w]ooded wetlands in particular increase flood storage, reduced flood peaks and increase peak travel time."[134]

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[128] U.S. Fish and Wildlife Service, Fish and Wildlife Coordination Act Report (October 23, 2006), 2007 Final SEIS, Appendix 3 at 1.
[129] Id. at 11.
[130] Report to Congress, Secretary of the Interior, Impact of Federal Programs on Wetlands, 1988, Volume I at 39.
[131] Id.
[132] U.S. Department of the Interior Comments on the 2007 FSEIS at 7, 9.
[133] William J. Mitsch and James G. Gosselink, *Wetlands* (5th ed.) (2015) at 112.
[134] Acreman, M.; Holden, J. 2013. How wetlands affect floods. Wetlands, 33 (5). 773-786. 10.1007/s13157-013-0473-2.

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- Significantly undermine nutrient and sediment removal capabilities since "reconnection of bottomland hardwood wetlands to their surrounding watershed through the restoration of surface hydrology is necessary to restore wetland functions important to nutrient and sediment removal."[135]

- Further deplete the already significantly depleted groundwater in the Yazoo Backwater Area and the entire Mississippi Delta and further exacerbate the already significant low stream flows in the Yazoo Backwater Area by eliminating large swaths of wetlands that contribute to groundwater recharge and the protection and restoration of stream flow.

Many of these impacts and implications are discussed in more detail below and throughout these comments.

2. Impacts to Streams

The SEIS must evaluate the impacts of constructing and operating the Yazoo Pumps on the rivers, streams, and bayous within the Yazoo Backwater Area. As discussed in Section D.5 of these comments, the SEIS also must evaluate the impacts of the Yazoo Pumps on the Yazoo River. The 2007 SEIS did not analyze any of these impacts.

It is beyond question that draining vast areas of wetlands will adversely affect the streams in the Yazoo Backwater Area. Intensifying agricultural production in the Yazoo Backwater Area, which is the fundamental purpose of the Yazoo Pumps use (and accounts for more than 80% of project benefits) will result in increased cultivation, additional fertilizer and pesticide use, and potential land clearing that will all have an adverse effect on the area's streams.

Stream impacts that must be evaluated include:

(1) Changes to water temperature;

(2) Changes to flow, including changes that result from eliminating floodplain wetlands and further reductions in groundwater;

(3) Change to water quality, including increased sedimentation, nutrient pollution, and toxic contamination; and lower levels of dissolved oxygen (*see* Section D.6 of these comments for more information on required assessments of water quality impacts);

(4) Changes to the form and function of stream and river channels, which are typically driven by changes in flow patterns, reductions in flow, reduction or loss of natural flood-pulse, and loss of overbank flooding;

(5) Changes to the floodplain, including particularly to floodplain wetlands; and

(6) Changes to in-stream and floodplain habitats.

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[135] Hunter, R.G., Faulkner, S.P. & Gibson, K.A. The importance of hydrology in restoration of bottomland hardwood wetland functions. Wetlands 28, 605–615 (2008). https://doi.org/10.1672/07-139.1.

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Impacts to stream resources must be separately evaluated and mitigated, as a matter of law. The SEIS cannot simply ignore the impacts to the project area's vast array of streams.

3. Impacts to Conservation Lands

The SEIS must fully evaluate the impacts of the project on conservation lands in the Yazoo Backwater Area and on the wetlands and streams located on those lands. The ecological implications of these impacts—and significance of those implications—must be assessed in light of the significant contribution of these conservation lands to the fish, wildlife, and plant resources in the Yazoo Backwater Area, and throughout the Mississippi River Alluvial Valley.

As noted above, conservation lands in the Yazoo Backwater Area include:

- The Yazoo National Wildlife Refuge Complex, which includes Panther Swamp National Wildlife Refuge, Yazoo National Wildlife Refuge, Holt Collier National Wildlife Refuge, and Theodore Roosevelt National Wildlife Refuge;
- Delta National Forest, which is the only bottomland hardwood forest in the National Forest System;
- Twin Oaks Mitigation Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Mahannah Wildlife Management Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Lake George Wildlife Management Area, which provides mitigation for wetland losses caused by previously constructed federal flood control projects;
- Phil Bryant Wildlife Management Area; and
- The extensive acreage enrolled in the Wetland Reserve Easement and Conservation Reserve Programs.

For example, had the Yazoo Pumps been operating in 2019, vast acres of wetlands would have been drained—between 60,000 and 70,000 acres—even as 65% of flooded lands would have remained underwater (including 110,000 acres of cropland). The largest single tract of land that would have been drained is the 8,000-acre Lake George Wildlife Management Area, which as noted above is a Corps mitigation site for previously constructed water resources projects. *See* Figure 5, above.

Collectively, these conservation lands cover 250,000 acres in the Yazoo Backwater Area. *See* Figures 3 and 4, above. The following are the estimated acres in each category of conservation lands in the Yazoo Backwater Area:

Conservation Lands in the Yazoo Backwater Area	
Category	**Acres**
National Fish and Wildlife Refuges	25,000
National Forest	20,000
State Wildlife Management Areas	118,000
NRCS Easements	50,000
NGO Easements	7,000
Conservation Reserve Program	30,000
Total	**250,000**

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In addition to fully assessing adverse impacts to these conservation lands, it is critical that no agricultural or other flood damage reduction benefits be calculated for conservation and easement lands in the Yazoo Backwater Area. Instead, the value of the ecosystem services lost due to adverse project impacts on these lands must be quantified and accounted for as a project cost in the benefit-cost assessment. It is critical that the SEIS fully inform the public and decision-makers about the adverse impacts that the Yazoo Pumps would cause to the wetlands, streams, and other natural systems on lands and conservation easements that have been purchased, or are being managed, for conservation purposes using federal and state taxpayer dollars.

4. Impacts on Downstream Flooding

The SEIS must carefully assess the impacts of operating the Yazoo Pumps on: increasing flood heights in the Yazoo River; increasing flood risks to homes, businesses, and communities located along or near the Yazoo River; increasing the risk of overtopping or otherwise undermining the integrity of the Yazoo Backwater Levee; and increasing flood heights in the Mississippi River.

A document entitled *Impacts of Yazoo Backwater Pump to Downstream Stages, 22 November 2019,*[136] which was prepared by the Corps, concludes that operating the Pumps in 2019 would have increased flood levels in the Yazoo River (on the riverside of the Steele Bayou Gates) by 0.3 feet. However, because the study has a margin of error of 0.5 feet, the **Corps' study actually shows that flood levels in the Yazoo River could have increased by 0.3 feet to 0.8 feet in 2019 had the Yazoo Pumps been in operation.**[137] This Corps study also concludes that operating the Pumps in 2019 would have increased flood levels at the mouth of the Yazoo River by 0.2 feet. However, **because of the study's margin of error, the increase in flood levels at the mouth of the Yazoo River could be as high as 0.7 feet.**

Based on this Corps analysis, had the Yazoo Pumps been operating in 2019, they would have overtopped the Yazoo Backwater Levee, which according to the Corps had just 0.3 feet of remaining freeboard during the 2019 flood, as demonstrated in this slide from a Mississippi Valley Division presentation on the 2019 Mississippi River flood. *See* Figure 10, below.

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[136] This document is posted on the Delta Council website at https://www.deltacouncil.org/corpsimpactstudy.html (last visited June 8, 2020).

[137] USACE, *Impacts of Yazoo Backwater Pump to Downstream Stages, 22 November* 2019 at 1 (Model tolerance for the MR&T flowline assessment HEC-RAS model is approximately plus or minus 0.5 ft."

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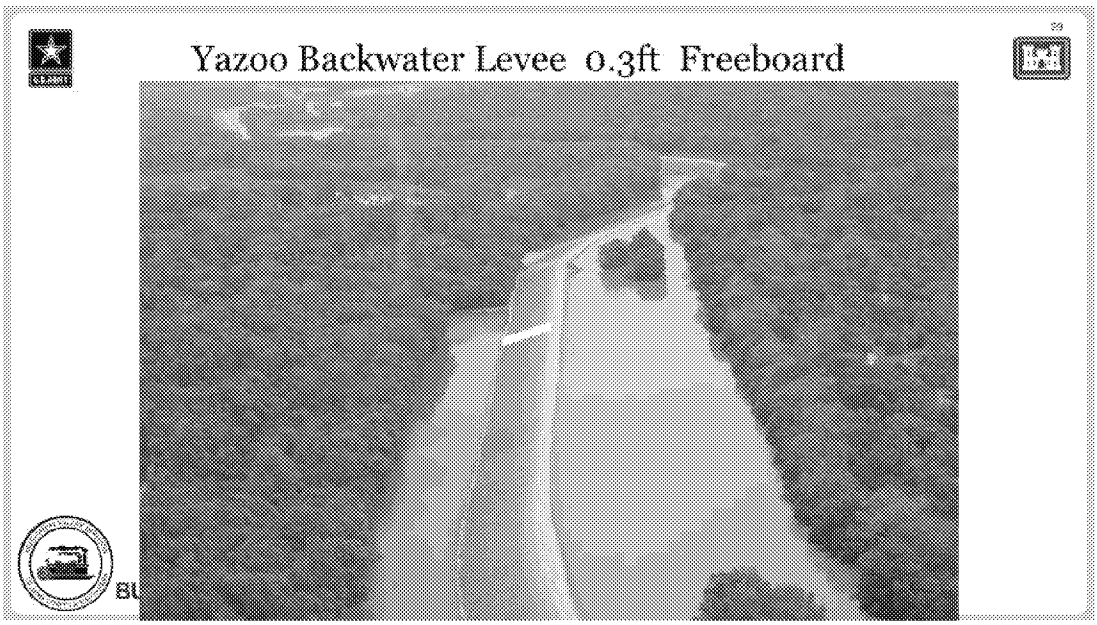

Figure 10, Yazoo Backwater Levee Remaining Freeboard 2019 Flood (0.3ft) (Source: USACE Mississippi Valley Division Presentation on 2019 Mississippi River Flood, Joey Windham, Chief Watershed Division)

The portion of the Yazoo Backwater Levee that could be directly impacted by the Yazoo Pumps (that portion located south of Belzoni, MS) consists of "approximately 28 miles of earthen embankment." This portion of the Yazoo Backwater Levee (which is not accredited by the Federal Emergency Management Agency) has a moderate risk with **overtopping with breach the primary risk driver,** according to the National Levee Database.[138] Moderate risk is defined as follows: "Likelihood of inundation due to breach and/or system component malfunction in combination with loss of life, economic, or environmental consequences results in moderate risk."[139]

As reported by the Mississippi Business Journal in 2012, this section of the Yazoo Backwater Levee must be "raised slightly more than 1.5 feet, according to Ken Parrish, Army Corps of Engineers' senior project manager for the mainline Mississippi River levee."[140] The article also states that "Federal officials say the recent flooding showed the 27-mile long flood protection berm must be raised more than a foot-and-a-half to provide its intended protection. The levee must have three to five feet of "free board," according to the U.S. Army Corps of Engineers. This is the water-free mark from the highest level of a 100-year-flood to the top of the levee. The spring flood led to a recalculation of the 100-year flood mark and the beginning of the de-certification fears."[141]

The Corps recommends supporting "**risk reduction actions as a priority**" for levees at moderate risk:

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[138] National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/summary (visited June 8, 2020) (emphasis added).
[139] USACE, EC 1165-2-218, APPENDIX D Levee Safety Action Classification (LSAC) Table, https://www.mvn.usace.army.mil/Portals/56/docs/PAO/LSACs/LSAC%20Table.pdf (visited June 8, 2020).
[140] Ted Carter, Army Corps of Engineers: Backwater levees must be raised or face de-certification, Mississippi Business Journal, May 17, 2012 (available at https://msbusiness.com/2012/05/army-corps-of-engineers-backwater-levees-must-be-raised-or-face-de-certification/).
[141] Id.

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> Based on risk drivers, implement interim risk reduction measures as appropriate. Verify risk information is current and implement routine monitoring program; assure O&M is up to date; communicate risk characteristics to the community in a timely manner; verify emergency plans and flood inundation maps are current; ensure community is aware of flood warning and evacuation procedures; and, recommend purchase of flood insurance. **Support risk reduction actions as a priority**.[142]

Operation of the Yazoo Pumps would increase—not reduce—risks to the integrity of the Yazoo Backwater Levee by increasing flood heights in the Yazoo River and by pumping water into the Yazoo River at high velocity. Increased flood heights in the Yazoo River would also affect Vicksburg communities and business located along the Yazoo River. Because of the new Deer Creek location, increased flood heights in the Yazoo River caused by the Yazoo Pumps would also create a significant risk of inundating the International Paper wastewater treatment ponds and releasing significant amounts of toxic wastewater into the Yazoo River. *See* Section D.5 and Figure 11, below.

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[142] USACE, EC 1165-2-218, APPENDIX D Levee Safety Action Classification (LSAC) Table, https://www.mvn.usace.army.mil/Portals/56/docs/PAO/LSACs/LSAC%20Table.pdf (visited June 8, 2020).Id.

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5. Impacts of Siting the Yazoo Pumps at the Deer Creek Location

The SEIS must fully evaluate the impacts associated with moving the location of the Pumps to the Deer Creek Location (see Figure 11, below).

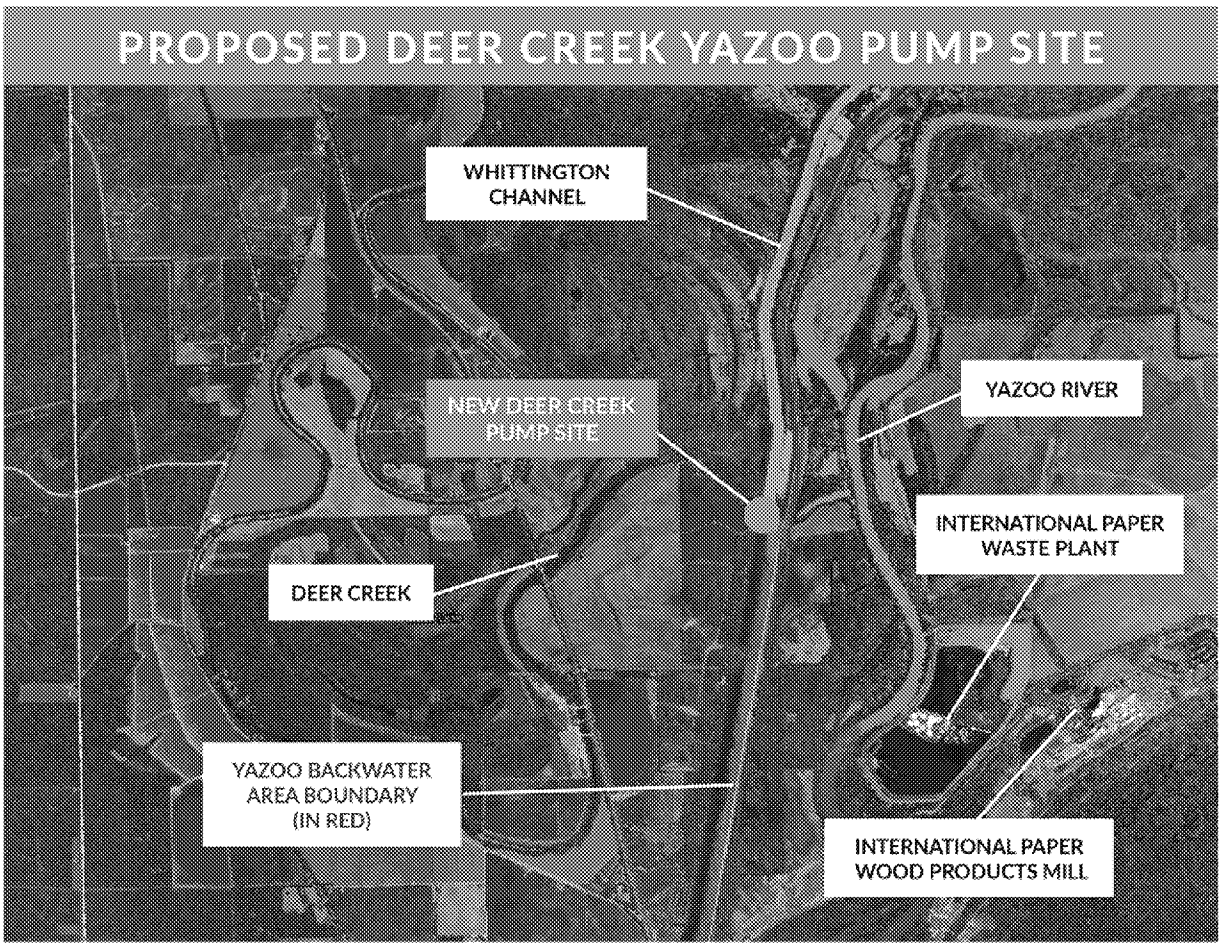

Figure 11, Proposed Deer Creek Yazoo Pumps Site Location (Source: Google Maps)

The new location raises the specter of numerous additional significant impacts that were never considered in the 2007 SEIS. To ensure a proper evaluation of these impacts, the SEIS must assess and quantify at least the following:

(1) The SEIS must examine the impacts associated with channel clearing, channel enlargement, channel stabilization, and any other actions needed to ensure that Deer Creek will be able to support the pressure and flow associated with operating the Yazoo Pumps.

(2) The SEIS must examine the impacts resulting from constructing the inlet and outlet channels and other required infrastructure at the Deer Creek location.

(3) The SEIS must examine the impacts of constructing and operating the Yazoo Pumps at the Deer Creek location on the stability and integrity of the Yazoo Backwater Levee.

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(4) The SEIS must provide a detailed operating plan for the Yazoo Pumps at the Deer Creek location, and examine the impacts of the project in light of the inherent flexibility of Corps operating plans. For example, the operating plan presented in the 2007 SEIS states that the Pumps can be turned on whenever water levels are "predicted" to reach 87 feet, which could allow initiation of pumping wen water levels are already extremely low. Notably, the public has no way of tracking the exact time or elevations when pumping is initiated.

Moreover, any pumping regime adopted by the Corps can, and certainly will, change. The Corps has the authority to make changes to the operating regime, and the pressure to do so will be significant. The Corps has a long history of changing operations in a way that harms the environment and public safety. For example, over time, the Corps has changed the operating plan for the New Madrid Floodway (which provides a natural area for the Mississippi River to spread out onto its historic floodplain) by raising the activation level from 58 feet to 60 feet and finally to 61.72 feet in 2011 (*see* Figure 12, below).

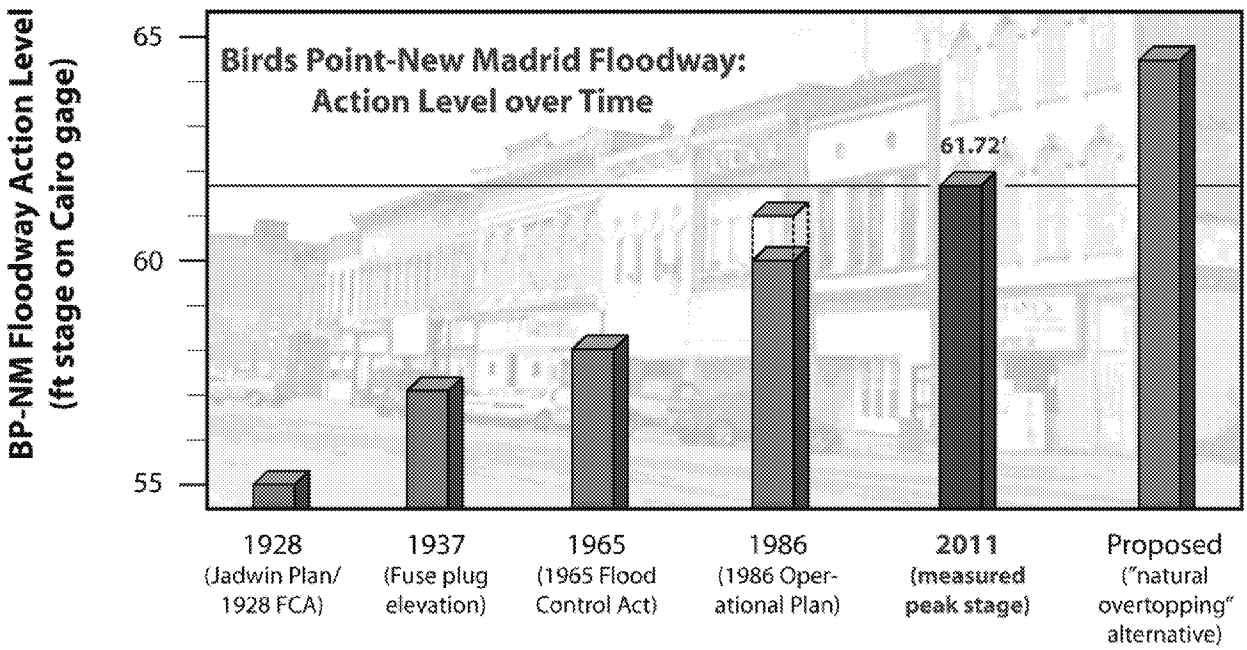

Figure 12, Example of Fundamental Operating Plan Changes—New Madrid Floodway (Courtesy of Nicholas Pinter, Ph.D., Southern Illinois University)

The New Madrid Floodway operational changes have happened "officially" and unofficially. A 1986 Operating Plan "officially" changed the activation level to trigger use of the floodway when water levels were predicted to reach 61 feet.[143] However, during the flood of 2011, the Corps did not follow that operating plan, but instead waited to activate the floodway until the river reached 61.72 feet at Cairo, far above either the authorized activation level or the 1986 activation level. The delay in activating the floodway resulted in extensive

[143] Camillo, Charles A., "Divine Providence: The 2011 Flood in the Mississippi River and Tributaries Project" (2012). *US Army Corps of Engineers, Omaha District.* Paper 142 at 57, available at http://digitalcommons.unl.edu/usarmyceomaha/142) (visited on December 18, 2016).

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flooding. More than 200 structures flooded in Olive Branch, Illinois. Almost 240 homes were flooded in the City of Metropolis Illinois and dozens of businesses were either closed or greatly affected by high water. Lost revenue, flood fighting and clean-up costs from the 2011 flood cost Metropolis almost $1.4 million.[144] The entire city of Cairo Illinois was put under a mandatory evacuation order. Residents were forced to leave their homes and find alternative places to stay, often at significant personal expense. Cairo could have been completely destroyed by any further delay. Once the floodway was used, water levels at Cairo dropped 1 foot in just 6 hours, and 2.7 feet in just 48 hours.

(5) The SEIS must examine whether locating the Yazoo Pumps at the Deer Creek location will allow (and thus, likely lead to) operating the Yazoo Pumps when the Steele Bayou gates are open. If this is the case, the adverse impacts to wetland from the Yazoo Pumps could be significantly greater since pumping could happen much more frequently. Locating the Yazoo Pumps at Steele Bayou creates a fundamental structural limitation on pumping operations. According to the 2007 SEIS, if the Pumps are located at Steele Bayou they cannot be operated when the Steele Bayou gates are open because the large flow of water would through the open gates would overwhelm the pump mechanism.

(6) The SEIS must examine whether operating the Yazoo Pumps at the Deer Creek location will cause additional or more intense harm to the Deer Creek watershed due to the much smaller drainage area of that watershed. According to Corps documents, Deer Creek drains just 200 square miles. By contrast, Steele Bayou drains 752 square miles, the Big Sunflower River drains 2,832 square miles, and the Little Sunflower drains 309 square miles.

(7) The SEIS must examine whether operating the Yazoo Pumps at the Deer Creek location will cause additional or more intense harm to Delta National Forest (which is managed as a bottomland hardwood wetland ecosystem) and other nearby conservation lands. Moving the Pumps to the Deer Creek location places the Pumps much closer to Delta National Forest and other conservation lands than the Steele Bayou location.

(8) The SEIS must examine whether discharging the Yazoo Pumps into the Yazoo River at the Deer Creek location will cause additional, more intense, or different harm to the Yazoo River and its floodplain. Of particular note, the Deer Creek location is just upstream of an International Paper Plant and the plant's industrial wastewater treatment facility and ponds which are directly adjacent to the Yazoo River (*see* Section D.5 and Figure 11, above). Discharging water into the Yazoo River at this location creates a significant risk of inundating the wastewater treatment ponds and releasing significant amounts of toxic wastewater into the Yazoo River.

(9) The SEIS must examine the impacts of construction and operation of any power generation facilities at the site, and the impacts to air quality from operations, including any increase in compounds that will contribute to climate change.

(10) As discussed in detail in Section F.2 of these comments, the SEIS must examine whether locating the Yazoo Pumps at the Deer Creek location results in the loss of the non-federal cost share waiver implemented in 1997.

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[144] July 26, 2016 Letter to President Obama from Billy McDaniel, Mayor of the City of Metropolis Illinois.

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6. Impacts to Water Quality

The SEIS must demonstrate that the Yazoo Pumps will not cause or contribute to violations of state water quality standards, as required by the Clean Water Act.

The Corps may not permit the discharge of dredge and fill material for a project if it causes or contributes to violations of any applicable State water quality standard.[145] This prohibition is especially relevant as the Yazoo Backwater Area already suffers from degraded water quality due to pollutants such as sediment, pesticides, and excessive nutrients. As a result, the area includes an extensive list of section 303(d) impaired waters, some of which are subject to strict Total Maximum Daily Loads (TMDL). A list of these TMDLs are provided at Attachment C to these comments. Furthermore, Mississippi's anti-degradation standards protects all of the natural streams and wetlands in the area.[146]

The Yazoo Pumps would, however, exacerbate pollution levels in this area, leading to exceedances of state water quality standards. Among other impacts, the proposed project would (1) increase sediment and pesticide levels in Deer Creek, (2) degrade or destroy thousands of acres of wetlands that play a crucial role in protecting water quality, and (3) increase agricultural production and the use of fertilizers and pesticides. The net result could trigger exceedances of state water quality standards, precluding the Corps' ability to comply with Clean Water Act section 404, unless the Corps proves there is "sufficient information" to conclude otherwise.[147] The Corps must therefore prepare an SEIS that comprehensively analyze the impacts of the project on water quality, including the significant new information regarding water quality in the area.[148]

(1) Water Quality Standards in the Yazoo Backwater Area

The Yazoo Backwater Area contains a network of streams and channels that ultimately connect through the Yazoo River to the Mississippi River near Vicksburg. Most stream flow in the Yazoo River originates in the uplands along the eastern flank of the basin and is carried to the Yazoo River via the Coldwater, Yokona, Tallahatchie, and Yalobusha Rivers, and several smaller streams. Interior drainage is provided by numerous small streams that discharge to Deer Creek, the Big Sunflower River, or Bogue Phalia, all of which flow to the lower Yazoo River.

The Yazoo Backwater Area is an incredibly productive fishery, as highlighted by the U.S. Fish and Wildlife Service:

> The Yazoo system is an incredibly productive fishery for catfishes (flathead, blue and channel cats) and catostomids (primarily buffalofishes – a principal group exploited by subsistence and artisanal fishers). Blue sucker stocks are also fairly strong and dynamic (this is a fish that is not

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[145] *See* 40 C.F.R. § 230.10(b); *see also id.* § 131.21(d) (stating that state water quality standards must be used in "evaluating proposed discharges of dredged or fill material under section 404").
[146] 11 Code Miss. R. Pt. 6, R. 2.1.
[147] *See* 40 C.F.R. § 230.12(a)(3)(iv).
[148] *See* 40 C.F.R. § 1502.9(c)(1) (requiring agencies to evaluate and disclose environmental consequences of "new circumstances or information" that are significant and which have not been previously the subject of an original EIS).

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doing well in other parts of its range, but holding its own in the Yazoo system).[149]

The Service documented dozens of additional backwater fish that depend upon the Yazoo Backwater Area's river floodplains and ecosystems.[150]

As such, Mississippi classifies all of the natural streams and waters in the Yazoo Backwater Area as "Fish and Wildlife" waters, ensuring their protection under the state's anti-degradation policy.[151] Fish and Wildlife waters "are intended for fishing and for propagation of fish, aquatic life, and wildlife. Waters that meet the Fish and Wildlife Criteria shall also be suitable for secondary contact recreation. Secondary contact recreation is defined as incidental contact with the water during activities such as wading, fishing, and boating, that are not likely to result in full body immersion."[152] Mississippi's anti-degradation policy states that "[i]n no event . . . may degradation of water quality interfere with or become injurious to existing instream water uses."[153]

The Yazoo Backwater Area, however, suffers from degraded water quality due to the impacts of agricultural past practices prevalent in the Mississippi Delta. In 2005, the state reported that overall water quality was lower in this area than anywhere else in the state, as evidenced by a region-wide advisory regarding fish consumption, and numerous consumption bans in some area waters because of high pesticide levels. EPA also documented the extensive list of 303(d)-impaired water bodies in the Area in 2007 due to pollutants such as sediment, pesticides, and excessive nutrients.[154] As a result, numerous waterbodies are subject to TMDLs with little or no margin for additional pollution. See Attachment C.

The Corps acknowledged in the 2007 SEIS its obligation to analyze the TMDL and Section 303(d) list waters "because Mississippi's most recent edition of its water quality criteria states that these waters shall not be further impaired for any designated use."[155] Since then, the Mississippi Department of Environmental Quality (MDEQ) has completed numerous additional TMDLs for streams and rivers in the Yazoo Backwater Area, including the following TMDLs:

- Organic Enrichment / Low Dissolved Oxygen (DO) for Swiftwater Bayou Watershed (February 2014)
- Total Nitrogen and Total Phosphorus For Silver Creek (June 2008)
- Total Nitrogen and Total Phosphorus For Jaynes Bayou (June 2008)
- Total Nitrogen and Total Phosphorus For Lake Jackson (June 2008)
- Total Nitrogen and Total Phosphorus For Cypress Lake (June 2008)
- Total Nitrogen and Total Phosphorus For Selected Large Rivers in the Delta (June 2008)
- Yazoo River Basin Designated Oxbow Lakes for Sediment (April 2008)

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[149] U.S. Fish and Wildlife Service, Fish and Wildlife Resources Associated with the Yazoo Backwater Area Certain Life History Aspects, Ecological Relationships, and Effects Anticipated as a Result of Reduced Flooding (June 11, 2018), at 15.
[150] Id. at 18, Table 2.
[151] *See* https://www.mdeq.ms.gov/wp-content/uploads/2007/10/yzmap&tablewqsadptaug07.pdf (Map depicting Yazoo River Basin Water Quality Standards)
[152] 11 Code Miss. R. Pt. 6, R. 2.3.
[153] 11 Code Miss. R. Pt. 6, R. 2.1.
[154] *See* 2008 Clean Water Act Final Determination, Appendix 7.
[155] 2007 EIS, Appx. 16 ¶235.

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- Total Nitrogen, Total Phosphorus, and Organic Enrichment / Low Dissolved Oxygen For the False River (April 2008)
- Yazoo River Basin Delta Region for Impairment Due to Sediment (April 2008)
- Total Nitrogen, Total Phosphorus, and Organic Enrichment / Low Dissolved Oxygen For Deer Creek (June 2008)
- Total Nitrogen, Total Phosphorus, and Organic Enrichment / Low Dissolved Oxygen For Snake Creek (June 2008)
- Total Nitrogen, Total Phosphorus, and Organic Enrichment / Low Dissolved Oxygen For Collins Creek (June 2008)

These TMDLs contain significant new information regarding environmental conditions and water quality requirements in the Yazoo Backwater Area, triggering the Corps' obligation to prepare an SEIS and evaluates whether the proposed project complies with state water quality standards, including these newly issued TMDLs.[156]

(2) The Proposed Project Will Increase Sediment and Pesticide Levels in Deer Creek

The Yazoo Backwater Area suffers from elevated levels of legacy pesticides, including DDT and Toxaphene. As documented by MDEQ, these contaminants have year-round impacts on aquatic species and public health, requiring closure of fishing in the Yazoo backwater Area, including the Yazoo National Wildlife Refuge.[157] MDEQ has also issued fish consumption advisories due to the elevated concentrations of these pesticides in fish tissue.[158] To prevent any further impairment of the watershed or existing uses, MDEQ imposed a TMDL for these pesticides in 2005, which contains no margin for safety due to the severity of these pollutants.[159]

The proposed construction of the Yazoo Pumps in Deer Creek would mobilize legacy pesticides in the soil, potentially violating the TMDL and causing impermissible degradation of waterbodies. As shown by the Corps' soil samples, Deer Creek contains DDT, DDD, DDE, and Dieldrin at levels that exceed the threshold effect and probable effect levels imposed by EPA to protect public health.[160] Deer Creek also contains levels of arsenic, copper, lead, mercury, nickel and zinc that exceed EPA's threshold effect levels.[161] The proposed project would periodically remove sediment in Deer Creek, releasing these pollutants, violating the TMDL (which contains no allowance for increased levels in pollutants), and impairing the ability of the creek to support "Fish and Wildlife" uses.

Yet, the Corps has never analyzed the impacts of these construction activities on state water quality standards, despite the obligation to do so under NEPA and the 404(b)(1) Guidelines.[162] In the 2007 SEIS, the Corps focused solely on construction activities at the Steele Bayou gates, claiming there were no contaminated soils in the area.[163] That assertion does not apply to the newly proposed location at Deer Creek, as demonstrated by the Corps' own soil data. The Corps must therefore prepare an SEIS to

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[156] *See* 40 C.F.R. § 1502.9(c)(1).
[157] *See* MDEQ, Yazoo River Basin Legacy Pesticide TMDL (Nov. 2005), at 14.
[158] Id.
[159] *Id.* at 17.
[160] 2007 EIS Appx. 16 at Table 16-5a.
[161] *Id.* at Table 16-6.
[162] *See* 40 C.F.R. § 230.10(b).
[163] *See* 2007 EIS Appx. 16 ¶230.

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evaluate these water quality impacts and demonstrate that the proposed project will not cause or contribute exceedances of state water quality standards.

(3) The Proposed Project Will Destroy Wetlands, Impairing Water Quality Throughout the Yazoo Backwater Area

Wetlands perform a series of critical functions that reduce the excessive levels of pollutants in the Yazoo Backwater Area. As documented by EPA,

> wetlands permanently remove or temporarily immobilize elements and compounds that are imported to the wetland from various sources, but primarily via the flood cycle. Elements include macronutrients essential to plant growth (e.g., nitrogen, phosphorus, and potassium) as well as heavy metals (zinc, chromium, etc.) that can be toxic at high concentrations. Compounds include pesticides and other imported materials. The primary benefit of this function is that the removal and sequestration of elements and compounds by wetlands reduces the load of nutrients, heavy metals, pesticides, and other pollutants in rivers and streams.[164]

Despite this critical pollutant-filtering role, the 2007 FSEIS arbitrarily and inappropriately excluded consideration of wetlands in the 5-year floodplain and of wetlands that receive less than 14 consecutive days of flooding (often referred to as "short-hydroperiod wetlands").[165] As a result of these arbitrary limits, the 2007 FSEIS completely excluded consideration of impacts to at least 24,000 acres of wetlands in the 2-year floodplain and to all wetlands located outside the 2-year floodplain, as recognized in the 2008 Clean Water Act Final Determination:

> EPA's concerns regarding this proposed project are amplified because we believe the spatial extent of wetlands potentially impacted by the proposed project is much greater than that estimated in the FSEIS. As discussed in Appendix 5, EPA's Environmental Monitoring and Assessment Program (EMAP) analysis identified approximately 52,000 acres of wetlands which are located on the 2-year floodplain but outside of the wetland assessment area established in the FSEIS (Figure 5). EPA believes that as much as 24,000 acres of these 52,000 acres of wetlands are connected to backwater flooding and will be adversely impacted by the project to an even greater degree than the wetlands considered in the FSEIS. However, the FSEIS did not evaluate impacts to these wetlands.[166]

The 2007 FSEIS also acknowledged that if it had calculated impacts based on the "upper 90 percent confidence" range, it would have concluded that operation of the Yazoo Pumps would affect 95,200 acres of wetlands, with 44,600 acres of wetlands becoming non-jurisdictional and an additional 50,600 acres of wetlands suffering changes in the duration of inundation.[167]

Due to this gross underestimate of wetlands impacts, the Corps failed to recognize that the destruction and degradation of these wetlands would contribute to violations of state water quality standards, as documented by EPA. The 2008 Clean Water Act Final Determination states:

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[164] EPA Veto at 30.
[165] FSEIS Main Report at 141.
[166] EPA Veto at 45.
[167] FSEIS Main Report at 142.

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> In the 24,000 acres of wetlands occurring in the 2-year floodplain that were not evaluated in the FSEIS, the pollutant removal functions would be lost completely since flooding would be reduced to a point (i.e., 10 year return) where floodwaters no longer access the wetlands on a regular basis. Without regular input of the elements and compounds by floods, these normally riverine wetlands would convert to flat wetlands and would no longer perform this particular function. Given that the Yazoo Backwater Area already contains CWA section 303(d)-listed impaired waterbodies (see Appendix 7), the extensive loss of pollutant filtering and removal functions by wetlands impacted by the proposed project could exacerbate the elevated concentrations of the pollutants of concern, potentially causing or contributing to violations of applicable state water quality standards (40 CFR 230.10(b)).[168]

The Corps has an obligation to prepare an SEIS to evaluate these significant impacts, which it entirely overlooked in 2007, and ensure the project does not violate state water quality standards, as predicted by EPA.

(4) The Proposed Project Will Increase Agricultural Production and Associated Pollution

By draining the Yazoo backwater Area, the Yazoo Pumps would convert normally riverine wetlands into flat wetlands free from periodic flooding. This conversion would eliminate the pollutant filtering capacity of these lands, all while encouraging agricultural production and the associated use of pesticides. The net result would be unavoidable degradation of water quality, as made clear by Dr. R. Eugene Turner, one of the nation's preeminent wetland scientists. In his comments on EPA's veto, he clearly explained the consequences for water quality:

> When drained there will be substantial changes to the soils which will encourage agricultural development and this development will use fertilizers. The fertilizers will leak from the system sooner or later. Water quality compromises are, therefore, unavoidable. Several studies, for example, have demonstrated a positive linear relationships between soil P and P in runoff (Sharpley 1995; Pote et al. 1996; Davis et al. 2005).
>
> The net result is a loss in nutrient uptake/transformation, and an increase in the nutrient loading from agricultural uses of fertilizer and the 'mining' of nutrients stored in vegetation and soils (Turner and Rabalais 2003).[169]

The Corps must analyze whether the "net result" of the Pumps—the loss of wetland capacity coupled with increased agricultural production—would impermissibly degrade waterways in the backwater area or exceeded TMDLs. For example, in 2006, MDEQ listed numerous rivers in the Yazoo backwater Area as impaired for nutrients (total phosphorous and nitrogen), including Steele Bayou and the Yazoo River.[170] Though the TMDL only set limits for point-sources, it acknowledged the need to assess whether these

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[168] EPA Veto at 52.

[169] Comments of Dr. R. Eugene Turner submitted to the EPA docket on the Yazoo Pumps veto on April 23, 2008. Full citations to the studies referred to in this quotation are included in Dr. Turner's comments.

[170] *See* TMDL Total Nitrogen and Total Phosphorus For Selected Large Rivers in the Delta (June 2008), at 4 (available at https://www.mdeq.ms.gov/wp-content/uploads/TMDLs/Yazoo/Delta_Large_Rivers_FINAL_Nutrients_TMDL_35411.pdf).

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standards were sufficient, given nutrient loadings from the non-point sources, including agricultural cropland.[171] Given the impairment of waterways due to nutrients, the Corps must demonstrate the proposed project will not cause exceedances of existing TMDLs or otherwise degrade water quality and impair existing uses.

The Corps also has an obligation to analyze impacts of increased nutrient loadings on downstream waters, including the Gulf of Mexico.[172] Each summer, an extensive area of hypoxia forms in the Gulf of Mexico as a result of high nutrients in the Mississippi and Atchafalaya Rivers. The Yazoo River basin is a significant cause of the problem due to its proximity to the Gulf and intensive agricultural operations.[173] The proposed project would exacerbate this problem, requiring a thorough SEIS to ensure that the Yazoo backwater Area pollution problems are not causing water quality violations downstream.

7. Impacts to Groundwater

The SEIS must fully evaluate the impacts of the project on groundwater, and the cascading impact to the Yazoo Backwater Area's rich natural resources. Irrigation in the Mississippi Delta, including the Yazoo Backwater Area, has caused some of the most severe groundwater declines in the United States and highly damaging low-flow conditions in many Delta streams.

Farms in the Mississippi Delta withdraw an estimated 9 billion gallons of groundwater per day for irrigation from the upper-most aquifer underlying the Mississippi Alluvial Plain. This aquifer is the third largest provider of groundwater in the United States, according to the U.S. Geological Survey. USGS studies show that groundwater levels in parts of the region have dropped more than 100 feet since 1870. This is among the most significant declines of groundwater levels of any region in the United States. Computer models suggest that these significant declines will expand in the coming decades. Groundwater declines and resulting low-flow conditions in many Delta streams are contemporaneous with increases in irrigation, according to the USGS. Low flows in streams threaten fish, mussels and other aquatic life. Low flows also impair water quality and threaten the ability of streams to assimilate wastewater discharges. Government agencies are investing millions of dollars to characterize groundwater declines in the region and implement conservation measures.[174]

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[171] *Id.* at 22.

[172] *See Riverside Irrigation District v. Andrews*, 758 F.2d 508, 511–12 (10th Cir. 1985) (requiring Corps to analyze the secondary effects of a proposed project on downstream waters).

[173] In 1996, the Yazoo River Basin alone contributed at least 5.7% of phosphorous loads, 2.7% of nitrogen loads, and 1% of the nitrogen load in the Gulf. *See* Coupe, R.H., Concentrations and Loads of Nitrogen and Phosphorous in the Yazoo River, Northwestern Mississippi, 1996-97 (available at); *see also* F. Douglas Shields Jr., et al., Nitrogen and Phosphorous Levels in the Yazoo River Basin, Mississippi, Ecohydrology (2009) (available at https://naldc.nal.usda.gov/download/44722/PDF).

[174] Killian, C.D., Asquith, W.H., Barlow, J.R.B. *et al.* Characterizing groundwater and surface-water interaction using hydrograph-separation techniques and groundwater-level data throughout the Mississippi Delta, USA. *Hydrogeol J* 27, 2167–2179 (2019) (available at https://doi.org/10.1007/s10040-019-01981-6); 2019 Mississippi Water Resources Conference Proceedings (available at https://www.wrri.msstate.edu/pdf/2019_wrri_proceedings.pdf); M.L. Reba, J.H. Massey, M.A. Adviento-Borbe, D. Leslie, M.A. Yaeger, M. Anders, and J. Farris, *Aquifer Depletion in the Lower Mississippi River Basin: Challenges and Solutions*, Universities Council on Water Resources Journal of Contemporary Water Research & Education Issue 162, Pages 128-139, December 2017 (available at https://onlinelibrary.wiley.com/doi/pdfdirect/10.1111/j.1936-704X.2017.03264.x?download=true); 2014. Mississippi Executive Order 1341 (establishment of the Governor's Delta Sustainable Water Resources Task Force, signed by Gov. Phil Bryant, April 26, 2014) (https://www.mdeq.ms.gov/wp-content/uploads/2018/11/View-

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Recent studies demonstrate the significant value of wetlands to groundwater recharge in the Yazoo Backwater Area,[175] strongly suggesting that wetland losses caused by the Yazoo Pumps will exacerbate the area's already significant groundwater declines. The likelihood of increased irrigation to facilitate the Yazoo Pumps-induced agricultural intensification, will cause additional groundwater declines in the Yazoo Backwater Area. These declines in turn, will harm the area's remaining wetlands and exacerbate the area's already significant low flow problems (since groundwater provides some base flow in the Yazoo Backwater Area rivers, streams, and bayous).

The implications of Yazoo Pumps-induced groundwater declines will not stop at the borders of the Yazoo Backwater Area. To the contrary, such declines will affect all areas that rely on the upper-most aquifer underlying the Mississippi Alluvial Plain.

8. Impacts to Fish and Wildlife, Including Listed Species

The SEIS must examine the direct, indirect, and cumulative impacts of the Yazoo Pumps and alternatives on the full array of species that rely on the Yazoo Backwater Area, including fish, waterfowl, birds, mammals, reptiles, amphibians, and mussels. Close attention must be paid to at-risk species, including species listed under the Endangered Species Act, and the SEIS must comply with the consultation and other requirements of the Endangered Species Act.

The ecologically rich wetlands in the Yazoo Backwater Area provide vital habitat to an astounding array of more than 450 species of birds, fish and wildlife. Located in the heart of the Mississippi River flyway, the Yazoo Backwater Area is vitally important to migratory species. Sixty percent of all North American birds and 40% of North America's waterfowl migrate through the Mississippi River flyway.

The Yazoo Backwater Area is also home to a number of at-risk species and species of special concern, including species designed as threatened or endangered under the Federal Endangered Species Act after the 2007 SEIS was completed. The impacts to all at-risk and species of concern must be fully evaluated in the SEIS. As noted above, the SEIS also must comply with the consultation and other requirements of the Endangered Species Act.

It is beyond dispute that a loss of wetlands and natural flood pulses in the Yazoo Backwater Area will cause adverse impacts to wildlife. For example:

Executive-Order-1341.pdf); Mississippi Water Resources Research Institute, Mississippi State University (available at https://www.wrri.msstate.edu/); 38th Annual Mississippi Water Resources Research Conference, Session A panel discussion proceedings (available at https://www.wrri.msstate.edu/pdf/sessionA.pdf); 2018 annual report. Mississippi Water Resources Research Institute, Mississippi State University (available at https://www.wrri.msstate.edu/pdf/2018annual.pdf); Proceedings of the 37th annual Mississippi Water Resources Conference. Agricultural Water Use in the Mississippi Delta, Shane Powers, Yazoo Mississippi Delta Joint Water Management District (available at https://www.wrri.msstate.edu/pdf/powers07.pdf).

[175] Ying Ouyanga, et al., *Estimating impact of forest land on groundwater recharge in a humid subtropical watershed of the Lower Mississippi River Alluvial Valley*, Journal of Hydrology: Regional Studies 26 (2019) 100631 (wetlands in the lower Yazoo River Basin provide the highest rates of groundwater recharge while agricultural lands provide the lowest rates). Michael Gratzer, et al., *Quantifying Recharge to the Mississippi River, Valley Alluvial Aquifer from Oxbow Lake-Wetland Systems*, (2017) (oxbow lake wetlands near Belzoni, MS produce "significant vertical recharge" into the Mississippi River Valley Alluvial Aquifer). A copy of Journal of Hydrology study is provided at Attachment D to these comments.

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> "Disruption of lateral connectivity and the flood pulse can affect both aquatic and non-aquatic organisms, as well as nutrient processing, and other floodplain functions (Cobb et al. 1993, Lytle and Poff 2006 and references therein). For example, productivity of songbirds and waterfowl can be affected because of the influence of the flood pulse on predators and food availability (Heitmeyer 2006, Hoover 2006, Cooper et al. 2009, Hoover 2009). Furthermore, channelization and dams can alter the timing, depth, duration, and frequency of floods and disrupt synchronized linkages between the flood pulse and life history processes of organisms (Richter et al. 1997, Bunn and Arthington 2002, Heitmeyer 2006, Hupp et al. 2009).
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> * * *
>
> Floodplain forests historically provided a variety of habitats for breeding amphibians, secretive marsh birds, and wintering and breeding waterfowl. Furthermore, the diversity of hydroperiods resulted in abundant aquatic invertebrate populations and high seed production by moist-soil plants. These food and structural resources are critical for fulfilling wintering, breeding, and migrating waterfowl and shorebird needs; however, they have been lost over broad expanses of the landscape as a result of widespread drainage. Such resources are not restored through simple planting of trees."[176]

Thus, to properly assess impacts to fish and wildlife, the SEIS must first properly assess the direct, indirect, and cumulative impacts of the Yazoo Pumps and alternatives to the wetlands, streams, conservation lands, overbank flooding, and water quality and quantity in the Yazoo Backwater Area, as discussed throughout these comments. Once baseline habitat losses and their ecological implications are determined, the implications of those changes must be assessed for the wildlife species that rely on the affected habitats.

The 2008 Clean Water Act Final Determination (including its Technical Appendices) provide detailed information on the many species that rely on the Yazoo Backwater Area, discuss vital habitat needs for those species, and highlight the harm that the Yazoo Pumps would cause to those species. These documents should form the foundation of the SEIS assessment of fish and wildlife impacts.

The impacts to fish and wildlife must assessed in light of an understanding of current population levels, existing stressors, and full life cycle needs of the species that utilize the project area. Lifecycle needs include such things as: fish spawning (including the timing, amount, and depth of overbank flooding needed to trigger spawning), fish rearing, fish refugia; breeding, rearing, resting, and feeding for all species; and for migratory species the availability of food and stopover habitat throughout their migratory cycles. The SEIS must also account for any harm that might be caused by species being drawn into the Pump mechanism. Critically, the SEIS also must assess the cumulative impacts of climate change on fish and wildlife, as discussed below.

As discussed in Section D.1 of these comments, the Corps' HGM process is fundamentally flawed and will not provide a valid assessment of fish and wildlife impacts. The Corps' typical reliance on such things as annual, seasonal, and daily averages to account for impacts is also flawed, and cannot provide the information needed to conduct a valid assessment of impacts. For example, an assessment of the

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[176] Sammy L. King, et, al, The Ecology, Restoration, And Management Of Southeastern Floodplain Ecosystems: A Synthesis, Wetlands, Vol. 29, No. 2, June 2009, pp. 624–634.

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"average annual days" of flooding or "average annual duck use days" cannot provide the information needed to determine whether access to wetlands or food supplies will be available at the right time of year and for the right amount of time to support the lifecycle needs of fish and wildlife.

The vast majority of wildlife species in the South Delta are well-adapted to living and thriving in floodplain environments, and rely on wetlands sustained by flooding for critical phases of their life cycles (including ducks, migratory songbirds, wading birds, raptors, snakes, frogs, salamanders, alligators to name a few). The tens of thousands of acres of damage to these vital wetlands caused by the Yazoo Pumps—and the elimination of spawning habitat caused by loss or reduction of overbank flooding—will not be offset by limited reductions in flood elevations during rare large-scale flood events.[177]

9. Cumulative Impacts

The cumulative impacts analysis is a critical component of NEPA review. It ensures that the reviewing agency will not "treat the identified environmental concern in a vacuum."[178] Cumulative impacts are defined as:

> "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."[179]

In evaluating cumulative impacts:

> "The analyst's primary goal is to determine the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative effects of other past, present, and future actions. Much of the environment has been greatly modified by human activities, and most resources, ecosystems, and human communities are in the process of change as a result of cumulative effects. **The analyst must determine the realistic potential for the resource to sustain itself in the future and whether the proposed action will affect this potential; therefore, the baseline condition of the resource of concern should include a description of how conditions have changed over time and how they are likely to change in the future without the proposed action.** The potential for a resource, ecosystem, and human community to sustain its structure and function depends on its resistance to stress and its ability

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[177] Moreover, even during the prolonged 2019 floods, many factors unrelated to flooding played a role in wildlife impacts. For example, while significant numbers of White-tailed deer perished in 2019, a large number of those deer were deliberately culled—645 deer were killed in the Yazoo Backwater Area counties during the 2019 flood under depredation permits issued by the Mississippi Department of Wildlife, Fisheries, and Parks. Many deer in the Yazoo Backwater Area also had the ability to flee to higher ground but did not, according to William McKinley, Mississippi's deer program coordinator. Many factors likely aggravated the impacts of the 2019 flood on the White-tailed deer in the Yazoo Backwater Area, including the extensive flood-control works and widespread conversion of habitat to agriculture that eliminated vital habitat, reduced the resiliency of the deer population, and created artificial barriers to wildlife movement. The Resilience Alternative proposed in these comments would protect and restore contiguous habitat corridors that could be used by deer to migrate out of the area during large-scale floods.

[178] *Grand Canyon Trust v. FAA*, 290 F.3d 339, 346 (D.C. Cir. 2002).

[179] 40 C.F.R. § 1508.7.

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> to recover (i.e., its resilience). Determining whether the condition of the resource is within the range of natural variability or is vulnerable to rapid degradation is frequently problematic. Ideally, the analyst can identify a threshold beyond which change in the resource condition is detrimental. More often, the analyst must review the history of that resource and evaluate whether past degradation may place it near such a threshold. For example, the loss of 50% of historical wetlands within a watershed may indicate that further losses would significantly affect the capacity of the watershed to withstand floods. **It is often the case that when a large proportion of a resource is lost, the system nears collapse as the surviving portion is pressed into service to perform more functions.**"[180]

A meaningful assessment of cumulative impacts must identify:

> "(1) the area in which effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions – past, present, and proposed, and reasonably foreseeable – that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate."[181]

In conducting the cumulative impacts assessment, it is not enough to simply catalog past, present, and reasonably foreseeable future actions. An EIS instead must determine the specific impacts on the system of those actions and determine whether those impacts combined with the proposed action would significantly affect the ecological health and functioning of the area impacted by the project.

As recognized by the 2008 Clean Water Act Final Determination, the adverse impacts of the Yazoo Pumps must be considered:

> in the context of the significant cumulative losses across the Lower Mississippi River Alluvial Valley (LMRAV), which has already lost over 80 percent of its bottomland forested wetlands, and specifically in the Mississippi Delta where the proposed project would significantly degrade important bottomland forested wetlands.[182]

The significant loss of vital bottomland forested and other wetlands throughout the Mississippi Delta and the Mississippi River Alluvial Valley must be fully evaluated in the cumulative impact analysis, along with the significant losses of wildlife throughout these regions, among other things. A recent article in Science Magazine reported on the staggering loss of **three billion** north American birds since 1970:

> North America's birds are disappearing from the skies at a rate that's shocking even to ornithologists. Since the 1970s, the continent has lost 3 billion birds, nearly 30% of the total, and even common birds such as sparrows and blackbirds are in decline, U.S. and Canadian researchers report this week online in *Science*. "It's staggering," says first author Ken Rosenberg, a conservation scientist at the Cornell University Laboratory of Ornithology. The

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[180] Council on Environmental Quality, *Considering Cumulative Effects Under the National Environmental Policy Act* (January 1997) at 41 (emphasis added).
[181] TOMAC, Taxpayers of Michigan Against Casinos v. Norton, 435 F.3d 852 (D.C. Cir. 2006) (quoting Grand Canyon Trust, 290 F.3d at 345); Fritiofson v. Alexander, 772 F.2d 1225, 1245 (5th Cir. 1985) (holding this level of detail necessary even at the less detailed review stage of an Environmental Assessment).
[182] 2008 Clean Water Act Final Determination at iii.

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> findings raise fears that some familiar species could go the way of the passenger pigeon, a species once so abundant that its extinction in the early 1900s seemed unthinkable.
>
> The results, from the most comprehensive inventory ever done of North American birds, point to ecosystems in disarray because of habitat loss and other factors that have yet to be pinned down, researchers say.[183]

The SEIS also must analyze the impacts of climate change in the cumulative impacts analysis. Indeed, analyzing the impacts of climate change is "precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct."[184]

Climate change is already causing significant impacts in the Mississippi River Valley and these impacts will likely grow, as recognized by the recently released Fourth National Climate Assessment.[185] The impacts of climate change are particularly significant for migratory species. As recognized by the United Nations Environment Program and the Convention on the Conservation of Migratory Species of Wild Animals, migratory wildlife is particularly vulnerable to the impacts of climate change:

> "As a group, migratory wildlife appears to be particularly vulnerable to the impacts of Climate Change because it uses multiple habitats and sites and use a wide range of resources at different points of their migratory cycle. They are also subject to a wide range of physical conditions and often rely on predictable weather patterns, such as winds and ocean currents, which might change under the influence of Climate Change. Finally, they face a wide range of biological influences, such as predators, competitors and diseases that could be affected by Climate Change. While some of this is also true for more sedentary species, migrants have the potential to be affected by Climate Change not only on their breeding and non-breeding grounds but also while on migration."
>
> "Apart from such direct impacts, factors that affect the migratory journey itself may affect other parts of a species' life cycle. Changes in the timing of migration may affect breeding or hibernation, for example if a species has to take longer than normal on migration, due to changes in conditions *en route*, then it may arrive late, obtain poorer quality breeding resources (such as territory) and be less productive as a result. If migration consumes more resources than normal, then individuals may have fewer resources to put into breeding . . . ."

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[183] Elizabeth Pennisi, Three billion North American birds have vanished since 1970, surveys show, Science, September 19, 2019 (available at https://www.sciencemag.org/news/2019/09/three-billion-north-american-birds-have-vanished-1970-surveys-show).

[184] Center for Biological Diversity v. Nat'l Hwy Traffic Safety Administration, 538 F.3d 1172, 1217 (9th Cir. 2008); Center for Biological Diversity v. Kempthorne, 588 F.3d 701, 711 (9th Cir. 2009) (NEPA analysis properly included analysis of the effects of climate change on polar bears, including "increased use of coastal environments, increased bear/human encounters, changes in polar bear body condition, decline in cub survival, and increased potential for stress and mortality, and energetic needs in hunting for seals, as well as traveling and swimming to denning sites and feeding areas.")

[185] The SEIS should fully consider and carefully evaluate the information contained in the Fourth National Climate Assessment, which can be accessed at https://nca2018.globalchange.gov/.

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> "Key factors that are likely to affect all species, regardless of migratory tendency, are changes in prey distributions and changes or loss of habitat. Changes in prey may occur in terms of their distributions or in timing. The latter may occur though differential changes in developmental rates and can lead to a mismatch in timing between predators and prey ("phenological disjunction"). Changes in habitat quality (leading ultimately to habitat loss) may be important for migratory species that need a coherent network of sites to facilitate their migratory journeys. Habitat quality is especially important on staging or stop-over sites, as individuals need to consume large amounts of resource rapidly to continue their onward journey. Such high quality sites may [be] crucial to allow migrants to cross large ecological barriers, such as oceans or deserts."[186]

Migratory birds are at particular risk from climate change. Migratory birds are affected by changes in water regime, mismatches with food supply, sea level rise, and habitat shifts, changes in prey range, and increased storm frequency.[187]

The SEIS should also carefully assess the cumulative impact on the loss of Yazoo Backwater Area wetlands to the dire conditions currently facing amphibian populations worldwide. Amphibians thrive in cool wetland environments and small, isolated wetlands play especially important roles in amphibian productivity.[188] Amphibian populations thrive when there are a variety of small ecosystems within a regional landscape in which a "dynamic equilibrium" of different populations becomes established.[189] Habitat fragmentation can disturb this dynamic equilibrium by disruption patterns of amphibian emigration and immigration.

Amphibians in general are at critical risk worldwide. In the United States, the IUCN Red List of Threatened Species lists 56 amphibian species and 37 reptile species as known to be critically endangered, endangered, or vulnerable.[190] Worldwide, at least 1,950 species of amphibians are threatened with extinction of which 520 species are critically endangered, 783 are endangered, and 647 species are vulnerable. This represents 30 percent of all known amphibian species.[191] In 2004, scientists estimated that most of 1,300 other amphibian species are also threatened though sufficient data are currently lacking to be able to accurately assess the status of those species.[192]

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[186] UNEP/CMS Secretariat, Bonn, Germany, *Migratory Species and Climate Change: Impacts of a Changing Environment on Wild Animals* (2006) at 40-41 (available at http://www.cms.int/publications/pdf/CMS_ClimateChange.pdf).
[187] *Id.* at 42-43.
[188] Gibbons, J. Whitfield, Christopher Winne, et. al. 2006. Remarkable Amphibian Biomass and Abundance in an Isolated Wetland: Implications for Wetland Conservation. Conservation Biology Volume 20, No. 5, 1457–1465.
[189] Mann, W., P. Dorn, and R. Brandl. 1991. Local distribution of amphibians: The importance of habitat fragmentation. Global Ecology and Biogeography Letters 1:36-41.
[190] IUCN Red List version 2013:2, Table 5: Threatened species in each country (totals by taxonomic group), available at http://cmsdocs.s3.amazonaws.com/summarystats/2013_2_RL_Stats_Table5.pdf (visited on November 24, 2013.)
[191] IUCN Red List version 2013:2, Table 3a: Status category summary by major taxonomic group (animals), available at http://cmsdocs.s3.amazonaws.com/summarystats/2013_2_RL_Stats_Table3a.pdf (visited on November 24, 2013).
[192] Science Daily, Amphibians In Dramatic Decline; Study Finds Nearly One-Third Of Species Threatened With Extinction (October 15, 2004), available at http://www.sciencedaily.com/releases/2004/10/041015103700.htm (visited on November 24, 2013).

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A recent study demonstrates the increasingly dire conditions of amphibians worldwide:

> "Current extinction rates are most likely 136–2707 times greater than the background amphibian extinction rate. These are staggering rates of extinction that are difficult to explain via natural processes. No previous extinction event approaches the rate since 1980 (Benton and King, 1989).
>
> Despite the catastrophic rates at which amphibians are currently going extinct, these are dwarfed by expectations for the next 50 yr (Fig. 1). If the figure provided by Stuart et al. (2004) is true (but see Pimenta et al., 2005; Stuart et al., 2005), one-third of the extant amphibians are in danger of extinction. This portends an extinction rate of 25,000–45,000 times the expected background rate. Episodes of this stature are unprecedented. Four previous mass extinctions could be tied to catastrophic events such as super volcanoes and extraterrestrial impacts that occur every 10 million to 100 million years (Wilson, 1992). The other mass extinction seems to be tied to continental drift of Pangea into polar regions leading to mass glaciation, reduced sea levels, and lower global temperatures (Wilson, 1992). The current event far exceeds these earlier extinction rates suggesting a global stressor(s), with possible human ties."[193]

Recent studies also point to the role of global climate change in promoting potentially catastrophic impacts to amphibian populations. For example:

- Global climate change will result in changes to weather and rainfall patterns that can have significant adverse effects on amphibians. Drought can lead to localized extirpation. Cold can induce winterkill in torpid amphibians. It is possible that the additional stress of climate change, on top of the stresses already created by severe loss of habitat and habitat fragmentation may jeopardize many amphibian species.[194]

- Recent studies suggest that climate change may be causing global mass extinctions of amphibian populations. Particularly alarming is the fact that many of these disappearances are occurring in relatively pristine area such as wilderness areas and national parks.[195] One recent study suggests that climate change has allowed the spread of a disease known as chytridiomycosis which has led to extinctions and declines in amphibians. Climate change has allowed this disease to spread by tempering the climate extremes that previously kept the disease in check.[196] About two-thirds of the 110 known harlequin frog species are believed to have

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[193] McCallum, M. L. (2007). "Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. *Journal of Herpetology* 41 (3): 483–491. doi:10.1670/0022-1511(2007)41[483:ADOECD]2.0.CO;2.

[194] Sjogren, P. 1993a. Metapopulation dynamics and extinction in pristine habitats: A demographic explanation. Abstracts, Second World Congress of Herpetology, Adelaide, Australia, p. 244; Sjogren, P. 1993b. Applying metapopulation theory to amphibian conservation. Abstracts, Second World Congress of Herpetology, Adelaide, Australia, p. 244-245.

[195] Pounds, J. A., and M. L. Crump. 1994. Amphibian declines and climate disturbance: The case of the golden toad and the harlequin frog. Conservation Biology 8:72-85; Lips, K. R. 1998. Decline of a Tropical Montane Amphibian Fauna. Conservation Biology 12:106-117; Lips, K., F.Brem, R. Brenes, J.D. Reeve, R.A. Alford, J. Voyles, C. Carey, L. Livo, A. P. Pessier, and J.P. Collins 2006. Emerging infectious disease and the loss of biodiversity. Proceedings of the National Academy of Sciences 103:3165-3170.

[196] Pounds, J.A., M.P.L. Fogden, J.H. Campbell. 2006. Biological response to climate change on a tropical mountain. Nature 398, 611-615.

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vanished during the 1980s and 1990s because of the chytrid fungus *Batrachochytrium dendrobatidis*. Other studies indicate that amphibians may be particularly sensitive to changes in temperature, humidity, and air and water quality because they have permeable skins, biphasic life cycles, and unshelled eggs.[197]

- Climate change may also affect amphibian breeding patterns.[198] Amphibians spend a significant part of the year protecting themselves from cold or shielding themselves from heat. They receive cues to emerge from their shelters and to migrate to ponds or streams to breed from subtle increases in temperature or moisture. As the earth warms, one potential effect on amphibians is a trend towards early breeding, which makes them more vulnerable to snowmelt-induced floods and freezes common in early springs. Some studies already indicate a trend towards earlier breeding in certain amphibian species.[199]

- Increases in UV-B radiation in the northern hemisphere due to ozone depletion is also having an adverse impact on amphibians.[200] One study suggests that ultraviolet-B (UV-B) radiation adversely affects the hatching success of amphibian larvae.[201] High levels of UV-B also induced higher rates of developmental abnormalities and increased mortality in certain species (*Rana clamitans* and *R. sylvatica*) than others that were shielded from UV-B.[202] UV-B also can have detrimental effects on embryo growth.

The cumulative impacts of climate change must be fully addressed and accounted for in the SEIS.

10. Environmental Justice

The SEIS must assess whether the Yazoo Pumps would cause disproportionate impacts to low income communities and communities of color. Executive Order 12898 requires that each Federal agency achieve environmental justice by identifying and addressing disproportionately high adverse human health or environmental effects of federal activities on minority and low-income populations.

Particular concerns that should be addressed in this assessment include:

- Exposing such communities to increased flood risks, including by discharging the Yazoo

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[197] Carey, C., and M. A. Alexander. 2003. Climate change and amphibian declines: is there a link? Diversity and Distributions 9:111-121.
[198] Carey, C., and M. A. Alexander. 2003. Climate change and amphibian declines: is there a link? Diversity and Distributions 9:111-121.
[199] Beebee, T. J. C. 1995. Amphibian Breeding and Climate. Nature 374:219-220; Blaustein, A. R., L. K. Belden, D. H. Olson, D. M. Green, T. L. Root, and J. M. Kiesecker. 2001. Amphibian breeding and climate change. Conservation Biology 15:1804-1809; Gibbs, J. P., and A. R. Breisch. 2001. Climate warming and calling phenology of frogs near Ithaca, New York, 1900-1999. Conservation Biology 15:1175-1178.
[200] Blither, M., and W. Ambach. 1990. Indication of increasing solar ultraviolet-B radiation flux in alpine regions. Science 248:206-208; Kerr, J. B., and C. T. McElroy. 1993. Evidence for large upward trends of ultraviolet-B radiation linked to ozone depletion. Science 262:1032-1034.
[201] Blaustein, A. R., P. D. Hoffman, D. G. Hokit, J. M. Kiesecker, S. C. Walls, and J. B. Hays. 1994a. UV repair and resistance to solar UV-B in amphibian eggs: A link to population declines? *Proceedings of the National Academy of Science* 91:1791-1795.
[202] Grant, K. P., and L. E. Licht. 1993. Effects of ultraviolet radiation on life history parameters of frogs from Ontario, Canada. Abstracts, Second World Congress of Herpetology, Adelaide, Australia, p. 101.

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Pumps into what will be an already flooded Yazoo River, and eliminating tens of thousands of acres of wetlands that provide natural flood protection;

- Adversely affecting subsidence hunting and fishing, including through extensive loss of vital waterfowl and fisheries habitat (including fisheries spawning and rearing habitat);

- Increased exposure to pesticides, fertilizers, and other agricultural chemicals due to project-induced agricultural intensification, including through increased contamination in area streams;

- The potential for exposure to toxic materials, including through the release or re-suspension of contaminated sediments during construction and operation activities, and the potential for releasing significant amounts of toxic wastewater into the Yazoo River through inundating industrial-sized wastewater treatment ponds during operation of the Pumps;

- Significant noise and air pollution from construction and operation activities; and

- The cumulative impacts of any such activities.

E. The SEIS Must Demonstrate Compliance with the 404(b)(1) Guidelines

The Clean Water Act 404(b)(1) Guidelines prohibit a "discharge into the aquatic ecosystem **unless it can be demonstrated** that such a discharge will not have an unacceptable adverse impact either individually or in combination with known and/ or probable impacts of other activities affecting the ecosystem of concern."[203] The "degradation or destruction of special aquatic sites, such as filling operations in wetlands, is considered to be among the most severe environmental impacts covered by the[] Guidelines."[204]

Under the 404(b)(1) Guidelines, the proposed Yazoo Pumps project is prohibited if the proposed discharge (and operation of the Yazoo Pumps) meet any of the following criteria:

(1) The proposed discharge "will cause or contribute to significant degradation of the waters of the United States." 40 C.F.R. § 230.10(c).

(2) The proposed discharge will violate applicable toxic effluent standards or prohibition under Clean Water Act § 307 and cause or contribute to violations of state water quality standards. 40 C.F.R. § 230.10(b).

(3) The proposed discharge will result in a likelihood of the destruction or adverse modification of formally designated critical habitat. 40 C.F.R. § 230.10(b).

(4) The Corps has not clearly demonstrated that there is no "practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem." 40 C.F.R. § 230.10(a).

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[203] 40 C.F.R. § 230.1(c) (emphasis added).
[204] 40 C.F.R. § 230.10(d).

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(5) The Corps has not taken "appropriate and practicable" steps to minimize potential adverse impacts on the aquatic ecosystem. 40 C.F.R. § 230.10(d).

The SEIS must carry out the analyses highlighted throughout these comments to determine whether the recommended alternative can proceed under the 404(b)(1) Guidelines. As noted above, the SEIS cannot demonstrate compliance if it looks at only one alternative. The Corps also may not rely on the 2007 SEIS to argue that the Yazoo Pumps are the least environmentally damaging alternative, including for the obvious reason that the Pumps are the same project recommended in the 2007 SEIS—a project determined to be so damaging that it was vetoed under Clean Water Act § 404(c).

F. The SEIS Must Fundamentally Reexamine the Project's Economic Costs and Benefits

The SEIS must fundamentally reexamine the project's economic costs and benefits. This reexamination is essential in light of the new data, changed conditions, cost increases, new project components, and new project location, among other things. This update is also critical given the many deficiencies in the 2007 SEIS economic assessment.

The SEIS must also ensure that the same criteria used to assess the geographic extent of wetland impacts (i.e., the new period of record and other data referred to in the Notice of Intent) is also used to assess the geographic extent of flood damage reduction benefits. If, as claimed in the draft Wetlands Analysis, the 2007 period of record overestimated wetland impacts, the 2007 period of record would also have overestimated flood damage reduction benefits.

1. Costs of Construction, Mitigation, and Operations and Maintenance

The SEIS should develop a completely new estimate of project costs, including mitigation costs. A simple update based on the Corps' Construction Cost Index is insufficient to meaningfully account for the increases in project costs given the passage of 15 years (the 2007 estimate was based on 2005 price levels), the many changes in the project area, the increased costs associated with restoring wetlands on frequently flooded agricultural lands, the proposed Deer Creek site location—which will requires significant additional construction than would be required at Steele Bayou, and the costs of the newly proposed well fields, among many other things.[205]

Project costs should also include the quantified value of the ecosystem services that will be lost to the Yazoo Pumps, as required by the March 2013 Principles and Requirements for Federal Investments in Water Resources and the December 2014 Interagency Guidelines that implement those Principles and Requirements (collectively, the PR&G). The PR&G apply to Corps projects, and the Corps has been directed to develop agency specific guidelines to ensure full implementation.

The March 2013 Principles and Requirements state that evaluation methods "should apply an ecosystem services approach in order to appropriately capture all effects (economic, environmental and social) associated with a potential Federal water resources investment." The December 2014 Interagency

[205] The Corps' 2007 SEIS estimated construction costs at more than $220 million based on 2005 price levels. Updating those costs using the Corps' Civil Works Construction Cost Index and current mitigation costs puts the cost of construction including required compensatory mitigation at well over $300.6 million based on 2018 price levels. The additional promised reforestation brings the total project construction costs to $438.5 million. The 2007 SEIS estimated operations and maintenance costs at $2.1 million each year.

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Guidelines state that "Federal investment impacts on the environment or ecosystem may be understood in terms of changes in service flows. The process of identifying, evaluating, and comparing these changes provides a useful organizing framework to produce a complete accounting. **Reduced service flows over time amount to costs, and increased services flows over time amount to benefits.**" The Guidelines also state: "Agencies must provide an explicit list of the services that flow from the existing study area ecosystems and infrastructure (including operational plans) with identification of those services that are likely to meaningfully change within the larger context of the watershed because of the Federal investment."

2. Non-Federal Cost Share

As noted in Section D.5 of these comments, the SEIS must carefully assess whether locating the Yazoo Pumps at the Deer Creek location results in the loss of the non-federal cost share waiver enacted in 1997. The non-federal cost share waiver applies "to any project" or "separable element thereof" on which physical construction is initiated after April 30, 1986. 33 USC 2213(e). For purposes of this provision, "physical construction shall be considered to be initiated on the date of the award of a construction contract." 33 USC 2213(e).

The Water Resources Development Act of 1986 imposed a 25% non-federal cost share for all flood control projects on which physical construction was initiated after April 30, 1986 (33 U.S.C. § 2213). This provision established a non-federal cost share for the Yazoo Pumps. A construction contract had been awarded for inlet and outlet channel and cofferdam at the Steele Bayou location of the Yazoo Pumps on March 25, 1986, but construction did not begin until May 5, 1986.

The Water Resources Development Act of 1996 exempted the Yazoo Pumps from the non-federal cost share that had been implemented in 1986, while raising the non-federal cost share for all other flood control projects to 35%. That exemption was created by the addition of the following language to the cost share provision: "For the purpose of the preceding sentence, physical construction shall be considered to be initiated on the date of the award of a construction contract." 33 USC 2213 (e)(1). Notably, the Yazoo Pumps project was not mentioned by name in the provision that enacted the exemption.

The contract award that triggered the Yazoo Pumps cost-share waiver was the contract to construct the entrance and exit channel and cofferdam for the pump station at the Steele Bayou location. This work was completed in 1987 at a cost of approximately $2,500,000. However, this construction is only a component of the Yazoo Pumps project **if** the Pumps are located at Steele Bayou. The already-constructed entrance and exit channel and cofferdam could serve no purpose whatsoever for the Yazoo Pumps—and will not be a component of the Yazoo Pumps project—if the Pumps are moved to the Deer Creek location. *See* Figure 13, below.[206] As a result, the date of the award of the contract for these components would no longer act to waive the non-federal cost share requirement.

[206] This slide was obtained through a Freedom of Information Act request.

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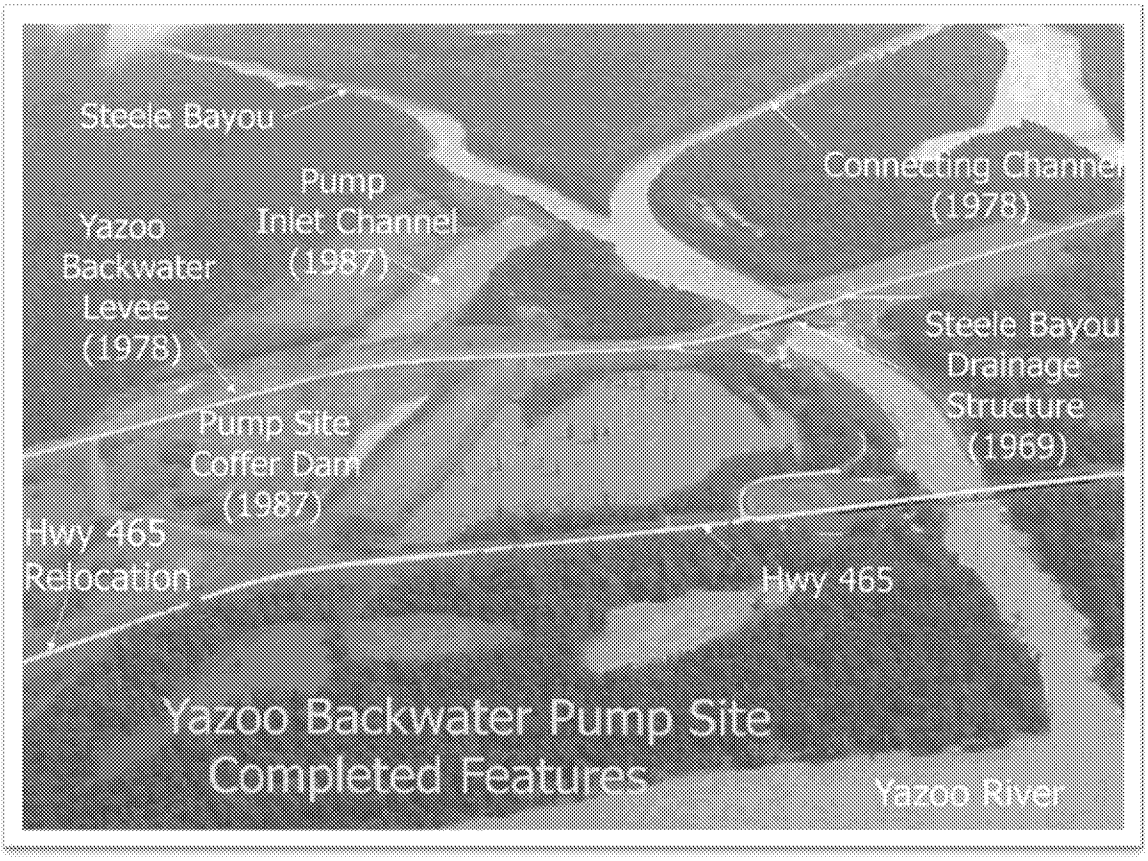

Figure 13, Completed Construction at Steele Bayou Location from USACE Presentation to EPA, Yazoo Backwater Project Brief Region IV 15 May 2019

In short, if the Yazoo Pumps are moved to the Deer Creek location, the project could not proceed unless a non-federal sponsor could provide the non-federal cost share of 35% of total project costs (including mitigation). So, for example, if it costs $440 million to build the Yazoo Pumps at the Deer Creek location, the non-federal sponsor would be required to contribute $154 million of those costs, plus all necessary lands, easements, and rights of way. If construction costs increase, the costs to the non-federal sponsor would also increase since the non-federal cost share is based on a percentage of total project costs (including mitigation).

3. Flood Damage Reduction Benefits—Agriculture

The 2007 SEIS determined that more than 80% of the alleged benefits from the Yazoo Pumps will come from increased agricultural production—which makes it clear that agricultural drainage is the project's true primary purpose. As the Corps is well aware, draining wetlands to promote increased agricultural production is an archaic concept from another era, and is in direct conflict with current federal law and policy.

The 2007 analysis of agricultural benefits also contained many extensive flaws, as documented by an independent economic review prepared in cooperation with the Environmental Protection Agency.[207]

[207] Leonard Shabman & Laura Zepp Review Comments on "Yazoo Backwater Reformulation" dated September 24, 2000; *see also* Leonard Shabman & Laura Zepp, An Approach for Evaluating Nonstructural Actions with Application

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The SEIS must make sure that these flaws are not repeated in the new economic analysis. To this end, it is essential that the current SEIS start over from scratch and conduct a fundamentally new and comprehensive assessment of agricultural benefits that carefully assesses and accounts for at least the following:

(1) A full and accurate accounting of land use in the Yazoo Backwater Area. Agricultural benefits must be carefully assessed only on agricultural lands that would see reduced levels of inundation during the growing season sufficient to justify more intensive agricultural practices. No agricultural or other flood damage reduction benefits should be calculated for conservation and easement lands in the Yazoo Backwater Area. Instead, the value of the ecosystem services lost due to adverse project impacts on these lands must be quantified and accounted for as a project cost in the benefit-cost assessment. *See* Sections C.2 and D.3., above. In addition, no agricultural or other flood damage reduction benefits should be calculated for lands used for mitigation for the Yazoo Pumps or other projects, or on lands that will engage in voluntary reforestation pursuant to the Proposed Action.

(2) A comprehensive assessment of whether the Yazoo Pumps would in fact provide any statistically significant benefit to agricultural production, or would instead harm agricultural production in the Yazoo Backwater Area. A scientific study conducted in the Yazoo River basin strongly suggests that the Yazoo Pumps would harm—not help—agricultural production in the Yazoo Backwater Area.[208]

This study looked at the riverine hydrological and regional climatic regime relationships to agriculture (cotton, soybeans) and the principal riverine fish stocks in the upper Yazoo River basin. The study looked at 31 years of data (from 1964 to 1994) to compare flooding in the study area with soybean and cotton production. It found that "**no factor associated with flood events adversely influence production of cotton and soybeans**. However, with regard to soybeans, the amount of area flooded two years prior to a crop was positively related to soybean yield. **From a long-term perspective therefore, the data suggest that flooding may benefit agricultural enterprises associated with soybean production.**"[209] The study also found that **cotton yield was positively correlated with maximum area flooded during the same year**, noting that this was likely due to increased soil moisture which benefits cotton production. This was true even though floods resulted in fewer acres of cotton being planted during flood years.[210]

The study did note, however, that a different pattern appeared to emerge over shorter time periods "which may explain the public perception that flooding adversely impacts agriculture in the area. During the 5 year period from 1990-1994, high precipitation was

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to the Yazoo River (Mississippi) Backwater Area (February 7, 2000) (prepared in cooperation with the U.S. Environmental Protection Agency, Region 4). Both of these documents were submitted with the Environmental Protection Agency Comments on the 2007 Draft SEIS.

[208] Jackson, D. C. and Q. Ye. 2000. Riverine fish stock and regional agronomic responses to hydrologic and climatic regimes in the upper Yazoo River basin. Pages 242-257 *in* I. G. Cowx, Editor. Management and Ecology of River Fisheries. Fishing News Books. Blackwell Science. London. This study was submitted into the record for the veto process on May 5, 2008.

[209] Id.(emphasis added).

[210] Id.

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negatively related to area planted in cotton and the percent of the area planted in soybeans that was actually harvested. However, flooding during this period did not significantly affect overall yield of cotton and soybeans."[211] And again, there was a positive correlation between cotton yields and the maximum area flooded during the same year.

That same study also shows that flooding benefits fisheries in the area, finding a positive relationship between flooding and positive fish stock characteristics, which the study defines as more and bigger fish. The study also noted that much of the productive potential for fisheries in floodplain river ecosystems is determined by the dynamics of overbank flooding and riparian vegetation.[212]

(3) The ability to plant crops even during years with large flood events. Even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data.[213] In addition, the Conservation Organizations understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event. *See* Section C.2, above.

In 2008, then Mississippi Governor Haley Barbour stated on Mississippi Public Radio that even during the 100-year flood of 1973, farmers had good soybean crops. Indeed, we understand that many farmers prefer to plant after floods because it is cheaper to do so. Post-flood planting reduces the amount of chemicals that must be applied to the land to clear the fields, and reduces the amount of fertilizer needed due to the nutrients provided by the flooding.

(4) A full assessment of documentation demonstrating the amount of uninsured and/or unsubsidized crop losses per year for each farm in the Yazoo Backwater Area, and the elevation of lands on which the lost crops were planted. Only uninsured losses that could be reduced by operation of the Yazoo Pumps should be accounted for in the benefits assessment.

(5) A full assessment of farm subsidy payments in the Yazoo Backwater Area to assess whether additional subsidies to intensify agricultural production are in fact necessary or an appropriate investment of federal taxpayer dollars. *See* Section C.2. and Figures 6 and 7, above. As the Corps is aware, an extensive and independent economic review determined that the Yazoo Pumps would do nothing more than "**help landowners grow crops on land that is farmed only to earn farm subsidy payments,**" based on the economic data used by the Corps in the 2007 SEIS.[214] That review also determined that

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[211] Id.
[212] Id.
[213] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.
[214] Leonard Shabman & Laura Zepp Review Comments on "Yazoo Backwater Reformulation" dated September 24, 2000 (emphasis in original); see also Leonard Shabman & Laura Zepp, An Approach for Evaluating Nonstructural Actions with Application to the Yazoo River (Mississippi) Backwater Area (February 7, 2000) (prepared in

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the Yazoo Pumps could not be economically justified even at what was then a $207 million projected construction cost.[215]

(6) A full assessment of farm ownership in the areas of the Yazoo Backwater Area that would be able to intensify agricultural production due to operation of the Yazoo Pumps, to ensure that the concentration of benefits warrants the large investment of federal taxpayer dollars that would be required to construct and operate the Pumps. The 2007 SEIS noted that there were only 192 farms in the project area with an average size of 2,913 acres.[216] The 2007 SEIS did not provide any information on the elevation of those farms, so it was not possible to assess what percentage of the total farms in the project area might allegedly benefit from the Yazoo Pumps. The FSEIS also did not provide farm ownership information, so it is was possible to discern whether some landowners or corporations own multiple farms in the project area.

(7) A full assessment of farm elevations in the Yazoo Backwater Area, to ensure that only those farms in areas that could see reduced flood inundation are accounted for in the benefits analysis, and to ensure that no benefits are counted for farms lying being the 90-foot elevation since the Yazoo Pumps authorization does not authorize pumping below the 90-foot elevation.

4. Flood Damage Reduction Benefits—Homes, Businesses, Structures

In assessing flood damage reduction benefits to homes, businesses, and other structures, the SEIS should utilize an up-to-date inventory of all structures and roads in the Yazoo Backwater Area that provides precise elevation data. The SEIS should also ground-truth its quantification of flood damage reduction benefits, including by comparing the predicted benefits with the limited, and highly concentrated, structural damage incurred during the 2019 flood. *See* Section C.2. and Figures 5, 8, and 9, above.

Before assessing potential flood damage reduction benefits for the Eagle Lake Community, the Corps should conduct a detailed after-action assessment of the cause of the 2019 Eagle Lake area flooding. Factors that likely influenced the 2019 flooding of homes near Eagle Lake include the Lake's water control management regime and actions associated with maintaining the stability of the portion of the Mississippi River mainline levee that abuts Eagle Lake. If these factors played a role in the flooding surrounding Eagle Lake, it is likely that the area would have flooded in 2019 even if the Yazoo Pumps were in operation. The multiple risk factors facing Eagle Lake must be accounted for when calculating any flood damage reduction benefits for the Yazoo Pumps.

The SEIS should also ensure that it does not overstate potential benefits as it clearly did in the 2007 SEIS. Some of the most egregious examples of these overstatements include:

- Flood damage reduction benefits – automobiles. The 2007 SEIS claims that the average household in the project area has two automobiles valued at $15,000 per car. The Corps

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cooperation with the U.S. Environmental Protection Agency, Region 4). Both of these documents were submitted with the Environmental Protection Agency Comments on the 2007 Draft SEIS.

[215] Id.

[216] 2017 FSEIS Main Report at 24.

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says that despite the low velocity flooding typical in the study area that about 1/3 of these cars will get flood damages estimated at $298,000 per year. These estimates make no sense given the economics in the project area. At the time these values were assessed, the average per capita income in Sharkey and Issaquena counties was $11,187, and one third of the population lived below the poverty level. Median household income was approximately $20,000 to $22,000 depending on the county. Based on these economic realities, it is highly unlikely that each home would have two cars valued at $15,000 sitting in the driveway, or that if this were the case, it is even more unlikely that the owners would not simply drive their cars to higher ground during the typical slow-moving flood event.

- Flood damage reduction benefits – home values. The Corps bases its flood damage reduction benefits on inflated home values in the region, which in turn inflates flood damage reduction benefits for contents of homes (see below). The 2007 SEIS asserts that the average residential home in the project area is valued at $44,000 based on data collected by a local contractor from 2000-2005. FSEIS, Appendix 7 at 77. This contrasts considerably with data that the Corps supplied to Dr. Shabman and Laura Zepp in 2000. In 2000, the Corps identified residential one-story building average values at $22,405. Accuracy in the valuation of homes is particularly important in calculating flood damages in this case because the estimate of contents damage is directly correlated to property value.

- Flood damage reduction benefits – home contents. For one- and two-story homes in the project area, the Corps assumed that contents are equal to 100 percent of the home value, and for mobile homes the Corps assumes that contents are equal to 50 percent of the structure's value. Given the lower average income levels that exist in the project area counties, these assumptions would appear to have overstated potential damages, and failed to correlate with the experience of the National Flood Insurance Program.

5. **Benefits of Nonstructural, Natural, and Nature-Based Measures**

The many flood damage reduction benefits (and the cost-effectiveness) of nonstructural, natural, and nature-based measures are highlighted in Section C.2., above. These benefits must be fully accounted for to ensure proper assessment of these approaches.

There are extensive, and well-established tools for the assessing ecosystem services provided by healthy natural systems, and these should be used by the Corps in developing the SEIS. A Duke University, Nicholas Institute report *Valuing Ecosystem Services from Wetland Restoration in the Mississippi Alluvial Valley* is provided at Attachment H to the Comments. An Earth Economics report *The Value of Restoring the Mississippi River Delta* is provided at Attachment I to these Comments. The Conservation Organizations will supply additional ecosystem services valuation studies upon request. In addition to fully accounting for the ecosystem service values, the SEIS should also account for benefits associated with avoiding flood-fighting costs, the additional cost avoidance benefits discussed below, and National Flood Insurance Rate reduction benefits when assessing the benefits of these measures.

- Cost Avoidance Benefits: Enrolling cropped wetlands in WRE reduces the costs of commodity, federal crop insurance, and noninsured crop disaster assistance programs. A recent study documents these avoidance benefits (present value of avoided costs less the Wetlands Reserve easement and restoration costs) in Mississippi at $870 per acre. *Wetland Reserve Easement Program Economic Assessment: Estimated Commodity Program and Crop*

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Insurance Premium Subsidy Cost Avoidance Benefits, prepared for the Nature Conservancy (June 2, 2018) (authored by retired U.S. Department of Agriculture economist Dr. Doug Lawrence).

- National Flood Insurance Program Rate Reductions: Protecting floodplains has the largest impact on lowering National Flood Insurance Program (NFIP) rates for communities participating in the voluntary Community Rating System Program (CRS). Participation in the CRS can reduce NFIP rates from 15% to 45%. The CRS credits over 90 elements of comprehensive floodplain and watershed management, including providing significant credits for protecting the natural functions of riverine floodplains by preserving natural floodplain open space, acquiring flood-prone land and returning it to its natural state, and protecting and restoring natural floodplain functions and habitat.[217]

G. The SEIS Must Fully Analyze Mitigation and Include a Detailed Mitigation Plan

As documented in the 2008 Clean Water Act Final Determination, the mitigation plan established by the 2007 SEIS was woefully inadequate and could not compensate for the significant adverse impacts of the Yazoo Pumps.

The SEIS must develop a fundamentally new mitigation plan that complies with the requirements highlighted below. Critically, the first step in developing that plan is to accurately assess the full scope of adverse impacts to wetlands, streams, fish and wildlife, and other critical resources. The SEIS must also address how the promised mitigation can be achieved on lands that will be drained by the Yazoo Pumps. There is ample evidence that the Yazoo Pumps would, at a minimum, significantly undermine the effectiveness of mitigation measures by draining the very lands targeted for mitigation.[218]

To comply with NEPA, the SEIS must analyze mitigation measures with "sufficient detail to ensure that environmental consequences have been fairly evaluated."[219] To comply with the Water Resources Development Acts, the SEIS must meet the mitigation requirements established by 33 U.S.C. § 2283(d), including the requirement to develop a detailed mitigation plan.

NEPA requires that the SEIS discuss mitigation measures "in sufficient detail to ensure that environmental consequences have been fairly evaluated."[220] A "perfunctory description" of the mitigating measures is not sufficient.[221] As the Supreme Court has noted, this is because:

> omission of a reasonably complete discussion of possible mitigation measures would undermine the 'action-forcing' function of NEPA. Without such a discussion, neither the agency nor other interested groups and individuals can properly evaluate the severity of

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[217] Federal Emergency Management Agency Fact Sheet, The Community Rating System works to Protect Natural Floodplains (2015) (available at https://www.fema.gov/media-library-data/1459276443255-663d02584edc3ac6cda2f4a7f337100b/Natural-Functions-and-CRS.pdf).
[218] *See* Envtl. Def. v. U.S. Army Corps of Eng'rs, 515 F. Supp. 2d 69, 81 (D.D.C. 2007) ("The agency cannot reliably conclude that the selected project has minimized adverse impacts on aquatic ecosystems to the extent practicable when its habitat mitigation calculations are infected with an underestimate of the floodplain habitat impacted.").
[219] Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 352 (1989).
[220] Id.
[221] Neighbors of Cuddy Mountain v. U.S. Forest Service, 137 F.3d 1372, 1380 (9th Cir.1998).

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> the adverse effects. An adverse effect than can be fully remedied by, for example, an inconsequential public expenditure is certainly not as serious as a similar effect that can only be modestly ameliorated through the commitment of vast public and private resources.[222]

The SEIS also must discuss the effectiveness of the proposed mitigation:

> "An essential component of a reasonably complete mitigation discussion is an assessment of whether the proposed mitigation measures can be effective. The Supreme Court has required a mitigation discussion precisely for the purpose of evaluating whether anticipated environmental impacts can be avoided. A mitigation discussion without at least *some* evaluation of effectiveness is useless in making that determination."[223]

This should include a discussion of how the mitigation will effectively address temporal losses (i.e., it takes many years to restore a fully functioning, mature wetland and many decades to restore a fully functioning mature bottomland hardwood wetland forest), and how mitigation for wetland losses can be effectively carried out in areas drained by the Yazoo Pumps. A bald assertion that mitigation will be successful is not sufficient. The effectiveness must instead be supported by "substantial evidence in the record."[224]

A discussion of the effectiveness is particularly critical because, despite progress in this area, wetland and stream mitigation often fails or does not fully replace lost ecological values. For example, the National Research Council has concluded:

> "Attempts to restore forested wetlands of the Southeast (e.g., bottomland hardwoods and cypress swamps) have encountered difficulties related to the time required to replace mature trees, the lack of material to transplant, the lack of knowledge of how and when to carry out seeding or transplantation, (Clewell and Lea, 1989) and altered hydrology (drainage for conversion to agriculture) of the wetland area. Natural forested wetlands may support hundreds of plant species, many of which thrive in the understory (91 percent of 409 species in one riverine forest were understory species). Old-growth forests are dominated by trees that gradually achieve a dominant role in the canopy and that are self-sustaining through their ability to reproduce in their own shade. It is not clear that such climax species can be successfully established in open sites, or whether their introduction must await development of seral (intermediate successional stage) plant communities. Clewell and Lea (1989) noted the need for intensive site preparation to reduce competition between weeds and transplanted tree seedlings. Their review was the first to mention insect herbivory and fire as potential problems. In many cases, restoration of suitable hydrologic conditions will be necessary. The short time period within which forest restoration attempts have been monitored precludes an evaluation of their functional equivalency with natural reference systems."[225]

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[222] Id.
[223] South Fork Band Council v. Dept. of Interior, 588 F.3d 718, 727 (9th Cir. 2009) (internal citations omitted).
[224] Wyoming Outdoor Council v. U.S. Army Corps of Eng'rs, 351 F. Supp. 2d 1232, 1252 (D. Wyo. 2005).
[225] National Research Council, Restoration of Aquatic Ecosystems: Science, Technology, and Public Policy (1992) at 311-12.

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Absent a meaningful discussion of the effectiveness of the proposed mitigation, the SEIS will not have taken the mandated "hard look" at the environmental impacts of the proposed action and alternatives to the action, and will fail to provide "a clear basis for choice among options by the decisionmaker."[226]

Provisions established through a number of Water Resources Development Acts require the Corps to mitigate the adverse impacts of the project.[227] The Corps is required to mitigate all losses to fish and wildlife created by a project unless the Secretary determines that the adverse impacts to fish and wildlife would be "negligible." 33 U.S.C. § 2283(d)(1). To ensure that this happens, the Corps is prohibited from selecting a "project alternative in any report" unless that report includes a "specific plan to mitigate fish and wildlife losses." *Id.* Accordingly, the draft SEIS must include a specific mitigation plan.

Corps mitigation plans must ensure that "impacts to bottomland hardwood forests are mitigated in-kind and harm to other habitat types are mitigated to not less than in-kind conditions, to the extent possible." 33 U.S.C. § 2283(d)(1). Mitigation plans "shall include, at a minimum:"

(1) The type, amount, and characteristics of the habitat being restored, a description of the physical actions to be taken to carry out the restoration, and the functions and values that will be achieved;
(2) The ecological success criteria, based on replacement of lost functions and values, that will be evaluated and used to determine mitigation success;
(3) A description of the lands and interest in lands to be acquired for mitigation, and the basis for determining that those lands will be available;
(4) A mitigation monitoring plan that includes the cost and duration of monitoring, and identifies the entities responsible for monitoring if it is practicable to do so (if the responsible entity is not identified in the monitoring plan it must be identified in the project partnership agreement that is required for all Corps projects). Corps mitigation must be monitored until the monitoring demonstrates that the ecological success criteria established in the mitigation plan have been met; and
(5) A contingency plan for taking corrective action in cases where monitoring shows that mitigation is not achieving ecological success as defined in the plan. 33 U.S.C. § 2283(d).

Corps mitigation plans must also comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps. 33 U.S.C. § 2283(d).

Corps mitigation must be monitored until the monitoring demonstrates that the ecological success criteria established in the mitigation plan have been met. The Corps is also required to consult yearly on each project with the appropriate Federal agencies and the states on the status of the mitigation efforts. The consultation must address the status of ecological success on the date of the consultation, the

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[226] 40 C.F.R. § 1502.14.

[227] The Water Resources Development Act of 2007 requires the Corps to implement mitigation, and comply with mitigation planning requirements, for any project for which the Corps "select[s] a project alternative in any report." 33 U.S.C. § 2283(d). Thus, mitigation will be required for the Project as a matter of law upon issuance of the final SEIS, and mitigation is required as a matter of law for components of the Regulating Works Project that are proceeding under environmental assessments.

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likelihood that the ecological success criteria will be met, the projected timeline for achieving that success, and any recommendations for improving the likelihood of success. 33 U.S.C. § 2283(d).

In addition, mitigation lands for Corps civil works projects must be purchased before any construction begins. 33 U.S.C. § 2283(a). Any physical construction required for purposes of mitigation should also be undertaken prior to project construction but must, at the latest, be undertaken "concurrently with the physical construction of such project." *Id.*

H. The SEIS Must Undergo Independent External Peer Review

The SEIS must be reviewed under the Independent External Peer Review (IEPR) process established by the Water Resources Development Act of 2007. 33 USC 2343. We strongly urge the Corps to immediately initiate the IEPR process and contract with the National Academies to carry out the IEPR for the SEIS.

The SEIS clearly triggers mandatory IEPR under this provision as it evaluates a civil works project that will cost well over $200 million and that is unquestionably highly controversial. 33 USC 2343(a). The project clearly satisfies both of the IEPR controversy triggers as: "there is a significant public dispute as to the size, nature, or effects of the project" and "there is a significant public dispute as to the economic or environmental costs or benefits of the project." 33 USC 2343 (a)(4).

As the Corps is well aware, "in all cases" the IEPR review must be carried out concurrently with the project study and must be completed "not more than 60 days after the last day of the public comment period for the draft project study," unless the Chief of Engineers determines that more time is necessary. 33 USC 2343(b) and 2343(d). The Corps provides IEPR plans online, and is required by law to provide the public with information on the timing of the IEPR, the entity that has the contract for the IEPR review, and the names and qualifications of the IEPR panel members. 33 USC 2343(c).

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Conclusion

That Yazoo Pumps are prohibited by the 2008 Clean Water Act Final Determination and may not be—and should not be—constructed. The Conservation Organizations urge the Corps to abandon its misguided efforts to build the destructive and dangerous Yazoo Pumps, and instead initiate a fundamentally new planning process to examine opportunities for providing meaningful, sustainable, and immediate flood risk reduction benefits to impacted communities in the Yazoo Backwater Area while restoring this ecologically critical region—including the measures outlined in the proposed Resilience Alternative detailed in these scoping comments.

Please contact Jill Mastrototaro with Audubon Mississippi (Jill.Mastrototaro@audubon.org, 504-481-3659) or Olivia Dorothy with American Rivers (odorothy@americanrivers.org, 217-390-3658) if you have any questions or would like additional information.

Respectfully submitted,

Olivia Dorothy
Director, Upper Mississippi River Basin
American Rivers

Louie Miller
State Director
Mississippi Chapter of the Sierra Club

Jill Mastrototaro
Policy Director
Audubon Mississippi

Julie Hill-Gabriel
Vice President, Water Conservation
National Audubon Society

Matt Rota
Senior Policy Director
Healthy Gulf

Dalal Aboulhosn
Deputy Legislative Director
Sierra Club

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Attachment A

Conservation Organizations Scoping Comments in Response to
Notice of Intent to Prepare Supplemental Environmental Impact Statement
for the Yazoo Area Pump Project, 85 Fed. Reg. 21218 (April 16, 2020)

A Resilience Alternative for the Yazoo Backwater Area

This document provides information on natural infrastructure and non-structural measures to reduce flood risks and increase community resilience in the Yazoo Backwater Area (YBWA) of Mississippi. Large-scale implementation of these measures can be achieved through the strategic use of federal programs that are currently funded, accepting proposals, and available to assist communities in the YBWA.

Flooding in the YBWA is primarily restricted to the lowest lying areas. From 1978 to 2018, water levels in the YBWA reached the 10-year floodplain elevation just 2 times, and never reached the 20-year floodplain elevation.[1] During the unprecedented flooding in 2019, water levels in the YBWA were primarily restricted to the 20-year floodplain, rising less than a quarter of an inch into the 25-year floodplain for 8 days before receding.

Wetlands in the YBWA play an essential role in minimizing flood damages, providing vital habitat to hundreds of species of fish and wildlife, and supporting wildlife-related recreation. Recognizing these many benefits, the George W. Bush Administration acted to protect 67,000 acres of the YBWA's ecologically significant natural wetland infrastructure by issuing a Clean Water Act 404(c) Final Determination for the Yazoo Backwater Pumping Plant.[2] This 2008 action paved the way for the long-term protection of an additional 53,300 acres of YBWA wetlands through conservation easements and other voluntary mechanisms. These protected wetlands safeguard YBWA communities by storing tens of billions of gallons of floodwaters.

The following sections recommends areas where investment in natural infrastructure and non-structural measures would provide important flood risk reduction benefits and and increase resilience in the YBWA. It also provides information on federal programs that implement those measures.

Federal Programs Available to Reduce Flood Risks and Increase Resilience in the Yazoo Backwater Area

Numerous federal programs are currently funded, accepting proposals, and available to advance the large-scale use of natural infrastructure and non-structural measures to reduce flood risks and increase resilience in the YBWA. These programs, and targets for their use, are outlined below. Successful deployment of these programs will require robust engagement with YBWA communities and collection of the data and information outlined in Section II.

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[1] This period of record follows completion of the Yazoo Backwater Area Levee in 1978. By comparison, flooding in the YBWA reached 101.48 feet in 1973, which is well above the 100 year floodplain elevation. U.S. Army Corps of Engineers Rivergages Website.

[2] While the 2019 flooding has prompted a renewed push for the Yazoo Pumps, preliminary Corps of Engineers' data shows that at least 68% of lands flooded in 2019 would have remained flooded if the Yazoo Pumps had been built and able to operate.

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Reducing Flood Risks and Improving Resilience in the Yazoo Backwater Area Federal Programs Currently Funded and Accepting Proposals				
Federal Program	Structures	Agricultural Lands	Community Facilities	Roads, Bridges Utility Systems
Wetland Reserve Easements (WRE) **USDA**		✓		
Floodplain Easement Program **USDA**	✓	✓		
Hazard Mitigation Grant Program (HMGP) **FEMA – Post-Disaster Recovery**	✓		✓	✓
Community Facilities Grant Program **USDA – Post-Disaster Recovery**	✓		✓	
Pre-Disaster Mitigation Program (PDM) **FEMA – Pre-Disaster Mitigation**	✓		✓*	✓
Flood Mitigation Assistance (FMA) **FEMA – Pre-Disaster Mitigation**	✓		✓*	✓

*With some limitations. Additional programs, including the FEMA Community Development Block Grants-Disaster Recovery Program, could become available through supplemental appropriations.

Effective implementation of these programs would add to the region's rich natural resource base and create more resilient communities. These benefits could be amplified by an innovative marketing campaign to drive wildlife and cultural heritage-associated tourism to the YBWA developed in collaboration with the Mississippi Delta National Heritage Area, the Delta Blues Trail, the Delta National Forest, and the Theodore Roosevelt National Wildlife Refuge Complex. The Delta Interpretive Center, which will be housed in the newly constructed Theodore Roosevelt Wildlife Refuge Visitor Center, could be a centerpiece of this effort.[3] Funding for such a campaign could be sought through the Mississippi Delta National Heritage Area Grant Program.[4]

Diversifying the economy of the YBWA in this manner would assist in arresting and reversing the region's economic decline. In 2011, state residents and nonresidents spent $2.63 billion on wildlife recreation in Mississippi. Of that total, $650 million was spent on trip-related expenditures, $1.7 billion

[3] The Theodore Roosevelt Wildlife Refuge Visitor Center is "one of the most significant investments in tourism infrastructure" in the Delta.

[4] The Mississippi Delta National Heritage Area, which includes all the YBWA counties, was established by Section 8008 of the Omnibus Federal Land Management Act of 2009, Pub. L. 111–11 (16 USC 461 note) to preserve and promote the landscape, culture and history of the Mississippi Delta. Section 8008 authorizes appropriations of up to one million dollars a year through 2024, and establishes a management authority and a local coordinating entity to assist local governments, regional planning organizations, and nonprofit organizations in developing recreational and educational opportunities in the Heritage Area and increasing public awareness of, and appreciation for, natural, historic, scenic, and cultural resources of the Heritage Area.

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was spent on equipment, and $268 million was spent on licenses, leases, and other items. U.S. Fish and Wildlife Service, 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, Table 47. The demand for wildlife-related recreation is increasing nationwide, and directing more of this demand to the YBWA could produce significant economic benefits.

1. Wetland Reserve and Floodplain Easement Programs (USDA)

Target: Enroll at least **70,000 acres** of Yazoo Backwater Area lands in the Wetland Reserve Easement and Floodplain Easement Programs managed by the U.S. Department of Agriculture. Wetland reserve easements should target marginal croplands (those with 4W+ soils) adjacent to existing conservation lands, and marginal croplands inundated during the 2019 floods. Floodplain easements should target those same lands and/or frequently flooded residential properties, particularly "severe repetitive loss" and "repetitive loss" properties as defined by the Federal Emergency Management Agency.

Responsible Federal Agency and Partners: U.S. Department of Agriculture (Natural Resources Conservation Service) working with local landowners, homeowners, and non-governmental organizations.

Funding: Both programs are currently funded and accepting proposals for enrollment.

Benefits: Natural infrastructure is highly effective at reducing flood and storm risks for communities. Extensive public benefits include significantly reducing flood risks and emergency response costs, creating safer and healthier communities, and restoring vital floodplain habitat. A single acre of wetland can store 1.5 million gallons of floodwater. Wetlands purify water supplies, reduce nutrient loading into streams and rivers, and recharge groundwater supplies. Wetlands provide vital wildlife habitat, and restoring bottomland hardwood wetlands in the YBWA is a priority for achieving the forest bird population goals for the Lower Mississippi Valley Joint Venture. Protecting and restoring floodplain wetlands can significantly lower federal flood insurance rates for communities participating in the National Flood Insurance Program Community Rating System. Restoring enrolled lands creates jobs and economic outputs. Enrolling cropped wetlands in WRE reduces the costs of commodity, federal crop insurance, and noninsured crop disaster assistance programs. Landowners receive direct payments for enrolling their lands.

Wetland Reserve Easement Program (WRE):

- Cropped and forested lands can be enrolled in WRE. Enrolled lands are taken out of agricultural production and restored to wetlands.
- Enrollment provides direct payments to landowners, currently up to $3,100 per acre. USDA also pays to restore the enrolled lands. Landowners can make additional profits by selling or leasing the land for hunting, fishing, or other uses compatible with maintaining the restoration. Landowners may also be eligible for a tax deduction.
- 4W+ lands are classified by USDA as "severely limited" for agriculture because they are saturated at least 50% or more of the growing season. Because of these limitations, the 2014 Farm Bill exempted 4W+ lands from WRE enrollment caps. 4W+ lands also do not count towards county-wide WRE caps.
- **More than 296,000 acres** in the YBWA are classified by USDA as 4W+ lands, and as a result could be enrolled in WRE. In 2019, **62,042 acres** of 4W+ lands were inundated in Issaquena, Sharkey, and Warren counties. Most 4W+ lands in the YBWA **adjoin existing conservation lands**.

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- Detailed GIS-based information on 4W+ soils and conservation lands in the YBWA is provided in the Conservation Organization Scoping Comments.
- The WRE program is extremely popular in Mississippi. At least 186,000 acres have been enrolled in the WRE program in Mississippi (in both the Wetlands Reserve Program and WRE programs which are now combined), and there is strong interest in enrolling more acres into the program.

Floodplain Easements:

- Both cropland and residential properties may be enrolled in the USDA Floodplain Easement program. Cropped lands are taken out of agricultural production and restored. Structures located within the area of a floodplain easement are demolished and removed, or relocated outside of the affected floodplain, and the lands are then restored.
- Enrollment provides direct payments to landowners, currently up to $3,100 per acre. USDA pays to restore the enrolled lands. USDA also pays the costs of demolishing and removing, or relocating structures out of the affected floodplain. Landowners can make additional profits by selling or leasing the land for hunting, fishing, or other uses compatible with maintaining the restoration. Landowners may also be eligible for a tax deduction.
- A significant amount of funding is currently available for the purchase of floodplain easements in Mississippi (and numerous other states).

Additional Information:

- **Easement Payment Schedule**: In Mississippi, payments for enrolling lands in the WRE and Floodplain Easement Programs are the same. Easement purchase prices on forested land are slightly less than on cropland. The payment schedule is established by USDA on a yearly basis and may fluctuate slightly from year to year.

- **Agency Capacity**: Enrolling 70,000 acres of easements would be facilitated by adding staff capacity within the USDA Natural Resources Conservation Service to assess and process easement proposals.

- **Jobs and Economic Activity:** Restoration work associated with easement enrollment would create jobs. In Mississippi, the Fish and Wildlife Service Partners for Wildlife Program created 29.7 jobs for each million dollars spent on restoration, and $1.63 of economic activity for each dollar spent on restoration in FY2011. U.S. Fish and Wildlife Service, *The Contribution of Partners for Fish and Wildlife Program and Coastal Program Restoration Projects to Local U.S. Economies* (September 2013) at 18.

- **Groundwater Recharge**: Restoring enrolled lands would provide critically important groundwater recharge benefits to the YBWA. Irrigation in the Mississippi Delta, including the YBWA, has caused some of the most severe groundwater declines in the United States and highly damaging low-flow conditions in many Delta streams. Recent studies demonstrate the significant value of wetlands to groundwater recharge in the YBWA. Ying Ouyanga, et al., *Estimating impact of forest land on groundwater recharge in a humid subtropical watershed of the Lower Mississippi River Alluvial Valley*, Journal of Hydrology: Regional Studies 26 (2019) 100631 (wetlands in the lower Yazoo River Basin provide the highest rates of groundwater recharge while agricultural lands provide the lowest rates); Michael Gratzer, et al., *Quantifying Recharge to the Mississippi River, Valley Alluvial Aquifer from Oxbow Lake-Wetland Systems,*

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(2017) (oxbow lake wetlands near Belzoni, MS produce "significant vertical recharge" into the Mississippi River Valley Alluvial Aquifer).

- **National Flood Insurance Program Rate Reductions:** Protecting floodplains has the largest impact on lowering National Flood Insurance Program (NFIP) rates for communities participating in the voluntary Community Rating System Program (CRS). Participation in the CRS can reduce NFIP rates from 15% to 45%. The CRS credits over 90 elements of comprehensive floodplain and watershed management, including providing significant credits for protecting the natural functions of riverine floodplains by preserving natural floodplain open space, acquiring flood-prone land and returning it to its natural state, and protecting and restoring natural floodplain functions and habitat.

- **Cost Avoidance Benefits:** Enrolling cropped wetlands in WRE reduces the costs of commodity, federal crop insurance, and noninsured crop disaster assistance programs. A recent study documents these avoidance benefits (present value of avoided costs less the Wetlands Reserve easement and restoration costs) in Mississippi at $870 per acre. *Wetland Reserve Easement Program Economic Assessment: Estimated Commodity Program and Crop Insurance Premium Subsidy Cost Avoidance Benefits,* Prepared for the Nature Conservancy (June 2, 2018) (authored by retired U.S. Department of Agriculture economist Dr. Doug Lawrence).

- **Ad Valorem Tax Offsets:** To offset potential losses of ad valorem taxes that could result from placing YBWA county cropland under easements, landowners (or through enactment of legislation, USDA) could make a one-time payment to the county as easements are enrolled equal to a very small percentage of the cost of the easement. The county could then place the funds in trust and draw upon the interest of the trust to offset losses in ad valorem taxes.

2. Pre-Disaster Mitigation Programs (FEMA)

Target: Significantly expand pre-disaster mitigation planning and protection in the YBWA to reduce the risk of damage from future high water events and increase community resilience, and provide free Flood Risk Management Workshops in the YBWA for interested parties.

Responsible Federal Agency and Partners: Federal Emergency Management Agency working with the State of Mississippi, local governments, and non-governmental organizations.

Funding: FEMA's Pre-Disaster Mitigation Grant Program and Flood Mitigation Assistance Programs are currently funded and accepting proposals. FEMA will provide free Certified Floodplain Management training upon request.

Benefits: Significant public benefits through creation of safer communities by improving resiliency, eliminating impacts of future flood events, and providing long-term solutions to flooding problems. Effective pre-disaster mitigation reduces loss of life and property damage from future floods, minimizes flood disaster disruptions, and allows more rapid recovery when flooding does occur. On average, $1 spent on hazard mitigation through a federally funded mitigation grant saves $6 in future disaster costs. Federal grants provide $7 in benefits for each $1 invested in riverine flood mitigation.

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FEMA Pre-Disaster Mitigation Grant Program:

- The Pre-Disaster Mitigation (PDM) program provides funding to states, tribes, and local governments to reduce overall risk to the population and structures from future hazard events while also reducing reliance on federal funding to recover from future disasters. The PDM program typically covers up to 75% of eligible activity costs, but small and impoverished communities may be eligible for coverage of up to 90% of eligible costs.
- Following this current funding cycle, the PDM program will transition into the Building Resilient Infrastructure and Communities (BRIC) program established by the Disaster Recovery Reform Act of 2018. The BRIC program will be funded through a 6% equivalency set-aside of all disaster expenditures from the Disaster Relief Fund. This should significantly increase the amount of funding available for pre-disaster mitigation efforts.
- FEMA has $250 million available for distribution under the PDM program for FY19. The deadline for submitting requests under this cycle is January 31, 2020.

FEMA Flood Mitigation Assistance Program:

- The Flood Mitigation Assistance (FMA) Program provides funding to states, tribes, and local governments to reduce or eliminate the risk of repetitive flood damage to buildings and structures insured under the National Flood Insurance Program. FMA funding may cover up to 100% of costs to address severe repetitive loss properties and up to 90% of costs to address repetitive loss properties. Other activities will be funded up to 75%.
- FEMA has $70 million available for distribution under the FMA program for FY19. The deadline for submitting applications under the current cycle is January 31, 2020.

Free Certified Floodplain Management Training:

- FEMA can provide free Flood Risk Management Workshops and Certified Floodplain Manager (CFM) Exams to equip participants with important information on reducing flood risks and career skills. The CFM program seeks to reduce flood risk for people and encourage flood resilient development through multi-benefit floodplain management. The CFM program seeks to reduce flood risk for people and encourage flood resilient development through multi-benefit floodplain management. Trainings include information on the National Flood Insurance Program, including its history, standards, regulations and administration; floodplain mapping; flood hazard mitigation; and floodplain management for environmental benefits. FEMA could also provide additional relevant trainings in the YBWA through its Integrated Emergency Management Course.
- The NGO community could work with foundations and others to obtain scholarship funding to defray out-of-pocket costs for attendees, including travel expenses, lost wages, and daycare.
- The state, local governments, or others could request that FEMA provide free Flood Risk Management Workshops at locations in the YBWA.

3. Post-Disaster Recovery Programs (FEMA, USDA, HUD)

Target: Prioritize disaster recovery funds to voluntary buy-outs and elevations of "severe repetitive loss" and "repetitive loss" properties in the YBWA, and improve essential community infrastructure. Key targets include the **198** severe repetitive loss properties in Issaquena and Sharkey counties (150 in Issaquena, 48 in Sharkey), and any of the **1,191** severe repetitive loss properties located in the YBWA

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portions of Warren, Washington, and Humphreys counties (total severe repetitive loss properties are 833 in Warren, 314 in Washington, 44 in Humphreys).

Responsible Federal Agencies and Partners: Federal Emergency Management Agency, U.S. Department of Agriculture, U.S. Department of Housing and Urban Development (depending on program used), working with the State of Mississippi, local governments, property owners, and residents.

Funding: The FEMA Hazard Mitigation Grant Program is currently funded and may be accepting applications for the YBWA. The USDA Community Facilities Grant Program is currently funded and accepting applications. Supplemental appropriations targeted to the YBWA would be required to take advantage of the HUD Community Development Block Grants – Disaster Recovery program.

Benefits: Significant public benefits, including reducing flood risks and emergency response costs, creating safer and healthier communities, and restoring vital floodplain habitat. Increasing the resilience of roads and other community infrastructure improves community well-being and supports economic development. Homeowners are compensated for moving out of harm's way or elevating homes and other structures to avoid future flood damages.

FEMA Hazard Mitigation Grant Program (HMGP):

- The HMGP provides grants to state and local governments in areas covered by a Presidential disaster declaration. These grants can be used to purchase flood-damaged properties from willing sellers at pre-flood values and preserve the land as open space, or to elevate structures.
- The YBWA is eligible for HMGP grants through the April 23, 2019 Federal Disaster Declaration 4429, which made FEMA's HMGP available to the entire state of Mississippi. This Disaster Declaration was most recently amended on September 20, 2019. FEMA accepts HMGP applications for **one year** after a federal disaster declaration with the possibility of up to a 180-day extension at the state's request.
- Any structure in the 100-year floodplain (*i.e.*, a Special Flood Hazard Area) valued at up to $276,000 automatically qualifies for a FEMA-funded buy-out, and any structure in a Special Hazard Area valued at up to $175,000 automatically qualifies for a FEMA-funded elevation. Other structures may also qualify if a benefit-cost analysis shows that a buy-out or elevation would be cost-effective.
- FEMA has funded **638 buy-outs in Mississippi, including 105 in Warren County**, since the 1980s.

USDA Community Facilities Grant Program:

- The USDA Community Facilities Grant Program provides grants to rural communities with up to 20,000 residents in areas covered by a Presidential disaster declaration. Funding under this grant program can be used to advance more than 100 types of projects, including the purchase, construction, or improvement of essential community facilities. Essential community facilities include such things as health care facilities, town halls, courthouses, community centers, fairgrounds, police and fire departments, libraries, museums, and food banks.
- USDA recently announced the availability of $150 million to fund grants under this program.

HUD Community Development Block Grants – Disaster Recovery (CDBG-DR):

- CDBG-DR grants supplement FEMA disaster recovery funds to help cities, counties, and states recover from Presidentially-declared disasters, especially in low-income communities. Activities funded through these flexible grants must meet one of three national objectives: benefit low-

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and-moderate-income persons; aid in the prevention or elimination of slums or blight; or meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.

- Mississippi is currently finishing up two CDBG-DR grants for Hurricane Katrina recovery ($5.06 billion and $423 million) and a third CDBG-DR grant for recovery from the storms of 2008 ($11.7 million), and appears to have some unspent monies remaining.
- The Bipartisan Budget Act of 2018 approved $12 billion in funding for a new Community Development Block Grant disaster fund focused on helping CDBG-DR grant recipients "carry out strategic and high-impact activities to mitigate disaster risks and reduce future losses" including among many other things, supporting data-informed investments in high-impact mitigation projects, building state and local government capacity for comprehensively analyzing disaster risks, and supporting the adoption of policies that minimize future disaster costs. While Mississippi has not received an allocation under this fund to date, a second round of allocations will be taking place and future appropriations are likely.
- CDBG-DR grants require supplemental appropriations to HUD. Advocating for CDBG-DR funding for the YBWA could result in a significant source of additional funding to assist in recovery.

Additional Information:

- **Disaster Declaration:** The April 23, 2019 Federal Disaster Declaration 4429 made FEMA's HMGP applicable to the entire state of Mississippi. Multiple amendments were made to that declaration, with the last amendment issued on September 20, 2019. The Mississippi Emergency Management Agency has clarified that the declaration covers the 2019 YBWA flood.

- **Severe Repetitive Flood Loss Properties:** "Severe repetitive loss properties" are properties covered by the National Flood Insurance Program that have flooded repeatedly and are priorities for elevation or removal. These structures, which are mostly homes, have been the subject of four or more damage claims of more than $5,000 each, or two or more claims in which the insured structure sustained cumulative damage exceeding its fair market value. FEMA can provide the precise number of severe repetitive loss properties within the YBWA.

- **Repetitive Flood Loss Properties:** "Repetitive loss properties" are properties covered by the National Flood Insurance Program that have flood-related damage on two occasions where the cost of the repair equaled or exceeded 25% of the market value of the structure at the time of each such flood event; and the second incidence of flood-related damage increased the cost of flood-insurance compliance coverage. FEMA can provide the precise number of repetitive loss properties within the YBWA.

- **Typical Timeline for FEMA Buy-Outs:** Approximately 70% of FEMA buy-out projects are approved within two years of the associated disaster. More than half of all buyout projects have taken more than 5 years to closeout. NRDC, *Going Under: Long Wait Times for Post-Flood Buyouts Leave Homeowners Underwater* (September 2019).

- **History of FEMA Buy-Outs:** Since the 1980s, FEMA has funded 638 buy-outs in Mississippi, including 105 in Warren County. In all, FEMA has funded the buy-out of more than 43,360 properties through 3,839 "projects" in 49 states. Of these properties, 96% suffered from river flooding or intense rains, while 4% suffered from coastal flooding. The HMGP has funded 96%

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of all FEMA buy-outs. Buy-outs disproportionately occur in white communities rather than communities of color, according to a 2019 NPR investigation. For example, after the 2008 floods in Iowa, "households in high social vulnerability areas were less likely to obtain full financial compensation" from federally funded buyout programs and waited longer to receive acquisition funds. NRDC, *Going Under: Long Wait Times for Post-Flood Buyouts Leave Homeowners Underwater* (September 2019) at 10, 8, 6.

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Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/26/2021 9:28:04 PM
To: Ainslie, William [Ainslie.William@epa.gov]
Subject: Yazoo Resilience Alternative
Attachments: Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf

Good Afternoon, Bill,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information.

Kind regards,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Yazoo Backwater Area
A Resilience Alternative

Strategic use of voluntary wetland reserve easements, restoration, and non-structural measures can reduce flood risks for vulnerable communities in the Yazoo Backwater Area (YBWA) of Mississippi, make those communities and the nation's wildlife more resilient to climate change, and advance the vitally important 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands. These commonsense measures could be implemented through existing federal programs under the direction of an interagency task force convened by the Council on Environmental Quality and led by the U.S. Fish and Wildlife Service, U.S. Department of Agriculture, and Federal Emergency Management Agency.

The hemispherically significant wetlands in the YBWA are "some of the richest wetland and aquatic resources in the nation."[1] They support 450 species of birds, fish and wildlife; are used by 29 million migrating birds each year; and include tens of thousands of acres of federal, state, and privately-owned conservation lands. Critically, these wetlands help protect YBWA communities by storing hundreds of billions of gallons of floodwaters, improving water quality, and sequestering carbon. To prevent unacceptable damage to more than 67,000 acres of these vital wetlands, the Environmental Protection Agency used its Clean Water Act 404(c) authority in 2008 to veto the Yazoo Pumps. This veto paved the way for the subsequent protection of an additional 53,300 acres of YBWA wetlands through conservation easements and other voluntary mechanisms.

But in a reckless about-face and in direct violation of the law, the Trump Administration hastily revoked the 2008 veto and then approved the Yazoo Pumps just days before President Biden was sworn in to office. The Corps refused to consider this Resilience Alternative—or any other alternative to the destructive and ineffective Yazoo Pumps—despite repeated requests to do so. The Corps' decision was opposed by the U.S. Fish and Wildlife Service, 110 scientific professionals, four scientific associations, 120 conservation and social justice organizations, and more than 55,000 members of the public.

The $450 million Yazoo Pumps will drain tens of thousands of acres of wetlands to subsidize large-scale agribusiness operations that have already received $1.05 billion in farm subsidies.[2] The Yazoo Pumps are <u>not</u> designed to protect communities and will <u>not</u> prevent flooding.[3] The Pumps will leave 82% to 89% of flooded lands underwater, take weeks to months to drawdown floodwaters on the remaining lands, and increase flood risks for downstream frontline communities.[4]

The Biden Administration can deliver immediate, sustainable flood relief to underserved communities in the YBWA while protecting nationally significant wildlife resources by reconfirming EPA's 2008 veto of the Yazoo Pumps, withdrawing the fatally flawed Record of Decision approving the project, and appointing an interagency task force to implement the Resilience Alternative outlined below.

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Targeted Use of Existing Federal Programs in the Yazoo Backwater Area

Flooding in the YBWA is primarily restricted to conservation lands managed as wetland systems, low-lying marginal agricultural lands targeted for restoration by the Lower Mississippi Valley Joint Venture, and other low-lying, sparsely populated areas.[5] Strategic implementation of existing federal programs can protect communities in the YBWA, while also achieving the area's critical restoration goals.

The programs outlined below authorize and fund the voluntary wetland reserve easements, restoration, and non-structural measures that are part of this Resilience Alternative. Strategic use of these measures can be achieved through an interagency task force led by the U.S. Fish and Wildlife Service, U.S. Department of Agriculture, and Federal Emergency Management Agency.

Federal Program	Structures	Agricultural Lands	Community Facilities	Roads, Bridges, Utility Systems
Wetland Reserve Easements (WRE) USDA		✓		
Floodplain Easement Program USDA	✓	✓		
Building Resilient Infrastructure and Communities (BRIC) FEMA – Pre-Disaster Mitigation	✓		✓*	✓
Flood Mitigation Assistance (FMA) FEMA – Pre-Disaster Mitigation	✓		✓*	✓
Hazard Mitigation Grant Program (HMGP) FEMA – Post-Disaster Recovery	✓		✓	✓
Community Facilities Grant Program USDA – Post-Disaster Recovery	✓		✓	

*With some limitations. Other federal programs, including the HUD Community Development Block Grants-Disaster Recovery Program, are also available to assist with post-disaster recovery subject to targeted appropriations.

The benefits of these measures could be amplified by an innovative marketing campaign to stimulate wildlife and cultural heritage-associated tourism in the YBWA developed in collaboration with the Mississippi Delta National Heritage Area, the Delta Blues Trail, the Delta National Forest, and the Theodore Roosevelt National Wildlife Refuge Complex. The Delta Interpretive Center, which will be housed in the newly constructed Theodore Roosevelt Wildlife Refuge Visitor Center, could be a centerpiece of this effort.[6] Funding for such a campaign could be sought through the Mississippi Delta National Heritage Area Grant Program.[7]

Diversifying the economy of the YBWA in this manner would provide a substantial lifeline to the region's struggling economy. Outdoor recreation in Mississippi generates $8 billion in consumer spending, $620 million in state and local tax revenue, and 79,000 jobs.[8] In 2011, state residents and nonresidents spent $2.63 billion on wildlife recreation in Mississippi.[9] The demand for wildlife-related recreation is increasing nationwide and directing more of this demand to the YBWA could produce significant economic benefits for the region's rural, low income communities.

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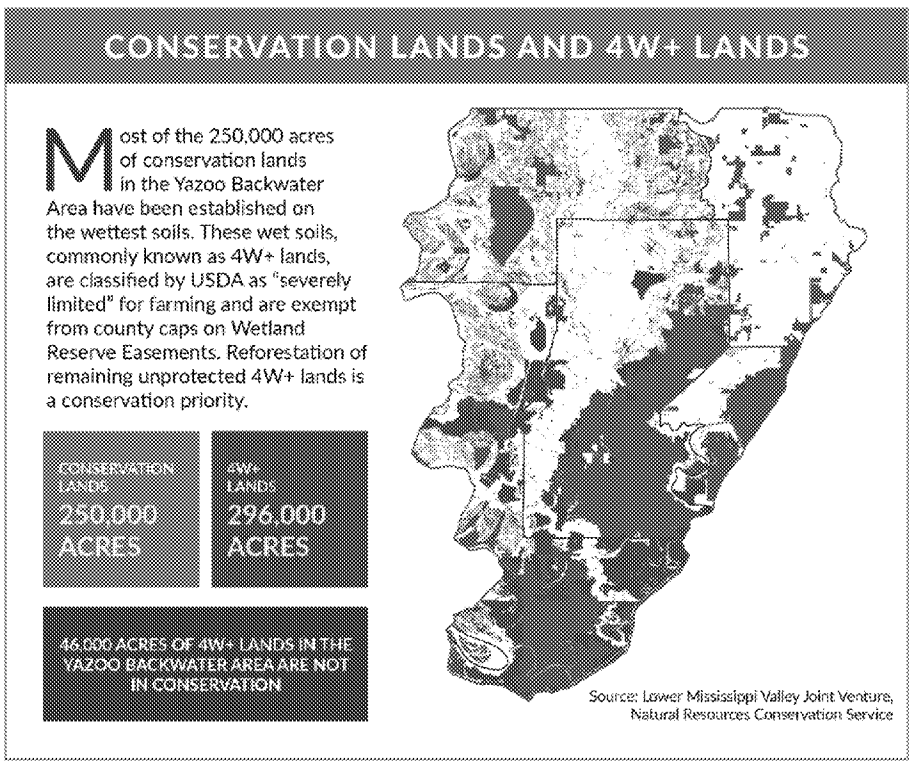
1. Wetland Reserve and Floodplain Easement Programs (USDA)

Goal: Enroll at least **80,000 acres** of YBWA lands in the Wetland Reserve Easement (WRE) and Floodplain Easement Programs managed by the U.S. Department of Agriculture. These easements should be targeted towards marginal croplands (those with 4W+ soils) adjacent to existing conservation lands, croplands inundated during the 2019 floods, croplands within the acquisition boundaries established for the National Wildlife Refuges in the YBWA, and croplands targeted for restoration by the Lower Mississippi Valley Joint Venture. Floodplain easements should also target frequently flooded residential properties.

This goal is supported by extensive planning assessments, GIS analyses, and the best available conservation science which have been used to identify 80,000 acres of conservation and reforestation priorities for the YBWA. The USDA has classified 46,000 acres of unprotected lands in the YBWA as 4W+ lands, which means they are "severely limited" for agriculture because they are saturated at least 50% or more of the growing season. These 4W+ lands, most of which are adjacent to existing conservation lands, are a priority for WRE enrollment and are exempt from WRE enrollment and county wide caps.



The Lower Mississippi Alluvial Valley Joint Venture has identified 60,000 acres (which includes 20,000 acres of the unprotected 4W+ lands described above) as priorities for restoration and protection to benefit wetland forest breeding birds (e.g. Prothonotary Warbler, Wood Thrush, Wood Duck, Wild Turkey, Swallow-tailed Kite). Restoring and protecting bottomland hardwood forests also benefits other forest-dependent wildlife, including Louisiana Black Bear, at-risk bat species, and the swamp rabbit.

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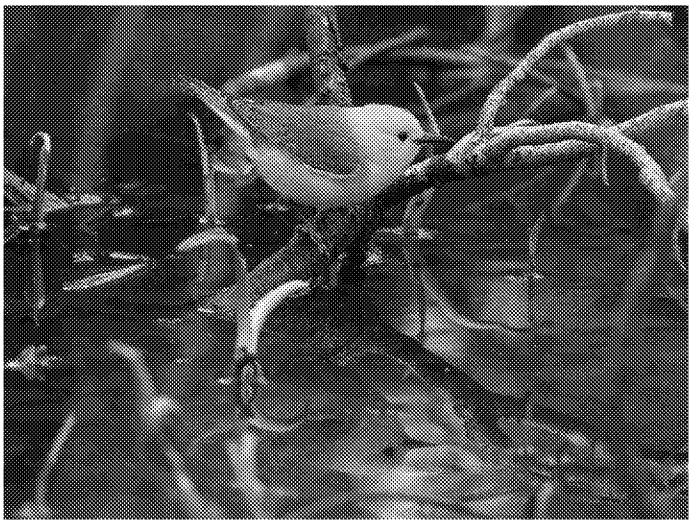

Prothonotary Warblers rely heavily on the Yazoo Backwater Area during spring migration.
Photo: Gary Robinette/Audubon Photography Awards

Responsible Federal Agency and Partners: U.S. Department of Agriculture (Natural Resources Conservation Service) working with landowners, homeowners, communities, and non-governmental organizations.

Funding: Both programs are funded and regularly accept proposals for enrollment.

Multiple Benefits: Restoring enrolled lands to healthy wetlands would provide multiple benefits.

- **Reducing Flood Risks:** Restoring enrolled lands would provide significant flood damage reduction benefits, reduce emergency response costs, and help create safer and healthier communities. A single acre of wetland can store 1.5 million gallons of floodwater,[10] preventing flood damages. For example, wetlands prevented $625 million in flood damages in the 12 coastal states affected by Hurricane Sandy, and reduced damages by 20% to 30% in the four states with the greatest wetland coverage.[11] In its flood damage reduction recommendation for the Charles River in Massachusetts, the Corps of Engineers concluded that: "Nature has already provided the least-cost solution to future flooding in the form of extensive [riverine] wetlands which moderate extreme highs and lows in streamflow. Rather than attempt to improve on this natural protection mechanism, it is both prudent and economical to leave the hydrologic regime established over millennia undisturbed."[12]

- **Improving Water Quality and Groundwater Recharge:** Restoring enrolled lands will help purify water supplies, reduce nutrient loading into streams and rivers, and recharge groundwater in the YBWA. Irrigation in the Mississippi Delta, including the YBWA, has caused some of the most severe groundwater declines in the United States and highly damaging low-flow conditions in many Delta streams. Recent studies demonstrate the significant value of wetlands to groundwater recharge in the YBWA.[13]

- **Providing Vital Wildlife Habitat:** Restoring enrolled lands will provide essential benefits to fish and wildlife in the YBWA and beyond. Wetlands are some of the most biologically productive natural ecosystems in the world, and support an incredibly diverse and extensive array of fish

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and wildlife. The wetlands in the YBWA support 450 species of birds, fish and wildlife and are used by 29 million migrating birds each year. The YBWA contains one of the last existing and most substantial tracts of highly productive bottomland hardwood forests in the Lower Mississippi River Alluvial Valley, and the U.S. Fish and Wildlife Service has determined that the YBWA is the area with the "greatest potential" for meeting breeding bird habitat restoration and protection needs within the Mississippi Alluvial Valley.[14] Restoring wetlands in the YBWA is a conservation priority for the Lower Mississippi Valley Joint Venture. An additional 1.73 million acres of sustainable forest habitat are needed in the Mississippi Alluvial Valley to attain population goals for most forest-dependent bird species in the region.[15]

- **Sequestering Carbon:** The Mississippi Alluvial Valley was an early proving ground for carbon sequestration through forest restoration and protection. In the 1990's public utilities provided millions of dollars to voluntarily offset their carbon emissions by expanding carbon sequestration on private lands and federal wildlife refuges. There is now renewed interest in facilitating, funding and expanding carbon sequestration incentives on private land in the region.

- **Creating Jobs and Economic Activity:** Restoration work associated with easement enrollment would create jobs. In Mississippi, the Fish and Wildlife Service Partners for Wildlife Program created 29.7 jobs for each million dollars spent on restoration, and $1.63 of economic activity for each dollar spent on restoration in FY2011.[16]

- **Reducing National Flood Insurance Program Rates:** Protecting floodplains has the largest impact on lowering National Flood Insurance Program (NFIP) rates for communities participating in the voluntary Community Rating System Program (CRS). Participation in the CRS can reduce NFIP rates from 15% to 45%. The CRS credits over 90 elements of comprehensive floodplain and watershed management, including significant credits for preserving natural floodplain open space, acquiring flood-prone land and returning it to its natural state, and protecting and restoring natural floodplain functions and habitat.

- **Avoiding Farm Subsidy Costs:** Enrolling cropped wetlands in Wetland Reserve Easements reduces the costs of commodity, federal crop insurance, and noninsured crop disaster assistance programs. A recent study documents these avoidance benefits (present value of avoided costs less the Wetlands Reserve easement and restoration costs) in Mississippi at $870 per acre.[17]

Program Details—Wetland Reserve Easements:

- Cropped and forested lands can be enrolled in the Wetland Reserve Easement Program (WRE) . Enrolled lands are taken out of agricultural production and restored to wetlands.
- Enrollment provides direct payments to landowners, currently up to $3,100 per acre.[18] USDA also pays to restore the enrolled lands. Landowners can make additional profits by selling or leasing the land for hunting, fishing, or other uses compatible with maintaining the restoration. Landowners may also be eligible for a tax deduction.
- Lands classified by USDA as 4W+ are "severely limited" for agriculture because they are saturated at least 50% or more of the growing season. The 2014 Farm Bill exempted 4W+ lands from WRE enrollment and county-wide caps. At least 46,000 acres of 4W+ lands in the YBWA are not in conservation, with many of these acres adjacent to existing conservation lands.
- The WRE program is extremely popular in Mississippi. At least 186,000 acres—including almost 80,000 acres in the YBWA counties—have already been enrolled in the WRE program in

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Mississippi (in both the Wetlands Reserve Program and WRE programs which are now combined), according to the NRCS.

Program Details—Floodplain Easements:

- Both cropland and residential properties may be enrolled in the USDA Floodplain Easement program. Cropped lands are taken out of agricultural production and restored. Structures located within the area of a floodplain easement are demolished and removed, or relocated outside of the affected floodplain, and the lands are then restored.
- Enrollment provides direct payments to landowners, currently up to $3,100 per acre.[19] USDA pays to restore the enrolled lands. USDA also pays the costs of demolishing and removing, or relocating structures out of the affected floodplain. Landowners can make additional profits by selling or leasing the land for hunting, fishing, or other uses compatible with maintaining the restoration. Landowners may also be eligible for a tax deduction.

2. Pre-Disaster Mitigation Programs (FEMA)

Goal: Significantly expand pre-disaster mitigation planning and protection in the YBWA to reduce the risk of damage from future high water events and increase community resilience.

Responsible Federal Agency and Partners: Federal Emergency Management Agency working with the State of Mississippi and local governments.

Funding: FEMA's Building Resilient Infrastructure and Communities (BRIC) Grant Program and Flood Mitigation Assistance Program are well funded and accept proposals yearly. FEMA can provide free Flood Risk Management Workshops for elected officials and community administrators to assist communities in reducing flood risks and increasing resilience.

Benefits: Significant public benefits through creation of safer communities by improving resilience, eliminating impacts of future flood events, and providing long-term solutions to flooding problems. Effective pre-disaster mitigation reduces loss of life and property damage from future floods, minimizes flood disaster disruptions, and allows more rapid recovery when flooding does occur. On average, $1 spent on hazard mitigation through a federally funded mitigation grant saves $6 in future disaster costs. Federal grants provide $7 in benefits for each $1 invested in riverine flood mitigation.

Program Details—FEMA BRIC Program:

- The BRIC Program provides funding to states, tribes, and local communities to reduce overall risk to the population and structures from future hazard events and increase community resilience through funding hazard mitigation projects and activities.
- The BRIC priorities are to incentivize: public infrastructure projects; projects that mitigate risk to one or more lifelines; projects that incorporate nature-based solutions; and adoption and enforcement of modern building codes.
- The BRIC program typically covers up to 75% of eligible activity costs, but "small impoverished communities" are eligible for coverage of up to 90% of eligible costs. A small impoverished community is an economically disadvantaged community with 3,000 or fewer individuals having an average per capita annual income not exceeding 80% of the national per capita income.
- The BRIC program is funded through a 6% equivalency set-aside of all disaster expenditures from the Disaster Relief Fund. The BRIC program was funded at $500 million in FY20.

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Program Details—FEMA Flood Mitigation Assistance Program:

- The Flood Mitigation Assistance (FMA) Program provides funding to states, tribes, and local governments to reduce or eliminate the risk of repetitive flood damage to buildings and structures insured under the National Flood Insurance Program. FMA funding may cover up to 100% of costs to address severe repetitive loss properties and up to 90% of costs to address repetitive loss properties. Other activities will be funded up to 75%.
- The FMA program was funded at $200 million in FY20.

Program Details—Floodplain Management Training:

- FEMA can provide free Flood Risk Management Workshops for elected officials and community administrators to assist communities in reducing flood risks and increasing resilience. Trainings include information on the National Flood Insurance Program, including its history, standards, regulations and administration; floodplain mapping; flood hazard mitigation; and floodplain management for environmental benefits. FEMA can also provide additional relevant trainings in the YBWA through its Integrated Emergency Management Course.

- The Association of State Floodplain Managers (ASFPM) offers a Certified Floodplain Management program for public and private sector professionals that compliments the FEMA floodplain management trainings. Anyone can join ASFPM and take the CFM exam for a nominal fee. ASFPM members and Certified Floodplain Managers© have access to unique resources that can help their communities more effectively administer FEMA programs, reduce flood insurance rates, and minimize flood damages.

3. Post-Disaster Recovery Programs (FEMA, USDA, HUD)

Goal: Prioritize disaster recovery funds to voluntary buy-outs and elevations of "severe repetitive loss" and "repetitive loss" properties in the YBWA, and improve essential community infrastructure.[20] FEMA has identified 198 severe repetitive loss properties in Issaquena and Sharkey counties (which are located entirely within the YBWA).[21]

Responsible Federal Agencies and Partners: Federal Emergency Management Agency, U.S. Department of Agriculture, U.S. Department of Housing and Urban Development (depending on program used), working with the State of Mississippi, local governments, property owners, and residents.

Funding: The FEMA Hazard Mitigation Grant Program is funded and accepts applications from state and local governments in areas covered by a Presidential disaster declaration. The USDA Community Facilities Grant Program is funded and accepts applications from rural communities with up to 20,000 residents in areas covered by a Presidential disaster declaration. Supplemental appropriations targeted to the YBWA would be required to take advantage of the HUD Community Development Block Grants – Disaster Recovery program and the HUD Community Development Block Grants – Mitigation program.

Benefits: Significant public benefits, including reducing flood risks and emergency response costs, creating safer and healthier communities, and restoring vital floodplain habitat. Increasing the resilience of roads and other community infrastructure improves community well-being and supports economic development. Homeowners are compensated for moving out of harm's way or elevating homes and other structures to avoid future flood damages. Targeting buy-outs to the YBWA would help

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refocus the HMGP program, which historically has disproportionately funded buy-outs in white communities rather than communities of color.

Program Details—FEMA Hazard Mitigation Grant Program:

- The FEMA Hazard Mitigation Grant Program (HMGP) provides grants to state and local governments in areas covered by a Presidential disaster declaration. FEMA accepts HMGP applications for **one year** after a federal disaster declaration with the possibility of up to a 180-day extension at the state's request. Approximately 70% of FEMA buy-out projects are approved within two years of the associated disaster.
- HMGP grants can be used to purchase flood-damaged properties from willing sellers at pre-flood values and preserve the land as open space, or to elevate structures.
- Any structure in the 100-year floodplain (*i.e.*, a Special Flood Hazard Area) valued at up to $276,000 automatically qualifies for a FEMA-funded buy-out, and any structure in a Special Hazard Area valued at up to $175,000 automatically qualifies for a FEMA-funded elevation. Other structures may also qualify if the buy-out or elevation would be cost-effective.
- The YBWA was eligible for HMGP grants through the April 23, 2019 Federal Disaster Declaration 4429 (as amended), which made FEMA's HMGP available to the entire state of Mississippi. Extending this Disaster Declaration would ensure that funding is available for the HMGP program in the YBWA, and any future applicable disaster declaration would re-trigger the availability of post-disaster recovery funds and programs to the YBWA.
- FEMA has funded **638 buy-outs in Mississippi, including 105 in Warren County**, since the 1980s. In all, FEMA has funded the buy-out of more than 43,360 properties through 3,839 "projects" in 49 states. Of these properties, 96% suffered from river flooding or intense rains, while 4% suffered from coastal flooding. The HMGP has funded 96% of all FEMA buy-outs.
- Targeting buy-outs to the YBWA would help refocus the HMGP program, which historically has disproportionately funded buy-outs in white communities rather than communities of color, according to a 2019 NPR investigation. For example, after the 2008 floods in Iowa, "households in high social vulnerability areas were less likely to obtain full financial compensation" from federally funded buyout programs and waited longer to receive acquisition funds.

Program Details—USDA Community Facilities Grant Program:

- The USDA Community Facilities Grant Program provides grants to rural communities with up to 20,000 residents in areas covered by a Presidential disaster declaration. Funding under this grant program can be used to advance more than 100 types of projects, including the purchase, construction, or improvement of essential community facilities. Essential community facilities include such things as health care facilities, town halls, courthouses, community centers, fairgrounds, police and fire departments, libraries, museums, and food banks.
- The 2019 Additional Supplemental Appropriations for Disaster Relief Act appropriated $150 million for grants under this program in areas where FEMA provided a notice declaring a Major Disaster Declaration, which includes the YBWA.

Program Details—HUD Community Development Block Grants – Disaster Recovery:

- The HUD Community Development Block Grants-Disaster Recovery Program (CDBG-DR) supplements FEMA disaster recovery funds to help cities, counties, and states recover from Presidentially-declared disasters, especially in low-income communities. Activities funded through these flexible grants must meet one of three national objectives: benefit low-and-moderate-income persons; aid in the prevention or elimination of slums or blight; or meet other

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community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.

- Significant funding can be obtained through the CDBG-DR grant process. For example, Mississippi is currently finishing up two CDBG-DR grants for Hurricane Katrina recovery ($5.06 billion and $423 million) and a third CDBG-DR grant for the 2008 storms ($11.7 million).

Program Details—HUD Community Development Block Grants – Mitigation:

- HUD Community Development Block Grants—Mitigation (CDBG-MIT) may be provided to CDBG-DR grant recipients to "carry out strategic and high-impact activities to mitigate disaster risks and reduce future losses" including by supporting data-informed investments in high-impact mitigation projects; building state and local government capacity for comprehensively analyzing disaster risks; supporting adoption of policies that minimize future disaster costs; and maximizing the impact of funds by leveraging other funding sources.
- Congress appropriated $12 billion in CDBG funds in February 2018 for mitigation activities related to qualifying disasters in 2015-2017, and HUD has allocated an additional $3.9 billion, bringing the amount available for mitigation to nearly $16 billion.

Targeting these available and funded programs to the YBWA would provide immediate, cost-effective, and sustainable flood relief to underserved communities in the YBWA while protecting nationally significant wildlife resources.

Endnotes

[1] U.S. Environmental Protection Agency, Final Determination of The U.S. Environmental Protection Agency's Assistant Administrator for Water Pursuant to Section 404(C) of the Clean Water Act Concerning the Proposed Yazoo Backwater Area Pumps Project, Issaquena County, Mississippi (August 31, 2008).

[2] USDA data compiled through the Environmental Working Group Farm Subsidy Database, shows that farms in the 16 zip codes that fall within the YBWA received a total of $1.05 billion in farm subsidy payments between 1995 and 2019, with the top 5 recipients receiving a total of $20.5 million, $17.4 million, $15.5 million, $14.2 million, and $10.7 million, respectively. The top 5 recipients in each zip code received a total of $430.7 million—an average of $215,000 for each of 80 recipients every year for 25 years—while 272 recipients received more than $1 million each for an average of $40,000 a year for each recipient every year for 25 years.

[3] Operation of the Yazoo Pumps would put downstream frontline communities on the receiving end of an additional 9 billion gallons of water a day when the Yazoo River is already at flood stage. Communities in the Yazoo Backwater Area could flood if that massive influx of water overtopped or damaged the Yazoo Backwater Levee, which is at risk of crevassing and is so low that it is not accredited to handle a 100-year flood. Collapse of this levee would flood the very communities the pumps are purported to protect.

[4] 2020 Final Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS), Appendix C (Tables), Table 5.3 (the "sloped pool" model is the most accurate).

[5] Since completion of the Yazoo Backwater Levee in 1978, there has been a significant decline in the elevation of backwater floods, with water levels in the YBWA reaching the 20-year floodplain elevation just one time—during the unprecedented flood of 2019. From 1978 to 2018, water levels in the YBWA reached the 10-year floodplain just 2 times. By comparison, in 1973 flooding in the YBWA reached 101.48 feet, which is well above the 100 year floodplain elevation. U.S. Army Corps of Engineers Rivergages Website.

[6] The Theodore Roosevelt Wildlife Refuge Visitor Center is "one of the most significant investments in tourism infrastructure" in the Delta.

[7] The Mississippi Delta National Heritage Area, which includes all the YBWA counties, was established by Section 8008 of the Omnibus Federal Land Management Act of 2009, Pub. L. 111–11 (16 USC 461 note) to preserve and

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promote the landscape, culture and history of the Mississippi Delta. Section 8008 authorizes appropriations of up to $1 million a year through 2024, and establishes a management authority and a local coordinating entity to assist in developing recreational and educational opportunities in the Heritage Area and increasing public awareness of, and appreciation for, natural, historic, scenic, and cultural resources of the Heritage Area.

[8] Outdoor Industry Association, Economic Value of Recreation in Mississippi 2017 (https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_MS.pdf).

[9] U.S. Fish and Wildlife Service, 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, State Overview, Table 3.

[10] Environmental Protection Agency, "Wetlands: Protecting Life and Property from Flooding." EPA 843-F-06-001. (2006) (factsheet).

[11] Narayan, S., Beck, M.B., Wilson, P., et al., The Value of Coastal Wetlands for Flood Damage Reduction in the Northeastern USA. Scientific Reports 7, Article number 9463 (2017), doi:10.1038/s41598-017-09269-z (available at https://www.nature.com/articles/s41598-017-09269-z).

[12] American Rivers, Unnatural Disasters, Natural Solutions: Lessons From The Flooding Of New Orleans (2006) (quoting USACE, from Massachusetts Department of Fish and Game, *Functions of Riparian Areas for Flood Control*, http://www.mass.gov/dfwele/river/pdf/riparian_factsheet_1.pdf.)

[13] Ying Ouyanga, et al., Estimating impact of forest land on groundwater recharge in a humid subtropical watershed of the Lower Mississippi River Alluvial Valley, Journal of Hydrology: Regional Studies 26 (2019) 100631 (wetlands in the lower Yazoo River Basin provide the highest rates of groundwater recharge while agricultural lands provide the lowest rates); Michael Gratzer, et al., Quantifying Recharge to the Mississippi River, Valley Alluvial Aquifer from Oxbow Lake-Wetland Systems, (2017) (oxbow lake wetlands near Belzoni, MS produce "significant vertical recharge" into the Mississippi River Valley Alluvial Aquifer).

[14] U.S. Fish and Wildlife Service, Fish and Wildlife Coordination Act Report (October 23, 2006), 2007 Final SEIS, Appendix 3 at 7.

[15] Elliott, A.B.; Mini, A.E.; McKnight, S.K.; Twedt, D.J. Conservation–Protection of Forests for Wildlife in the Mississippi Alluvial Valley. *Forests* 2020, *11*, 75 (available at https://www.mdpi.com/1999-4907/11/1/75).

[16] U.S. Fish and Wildlife Service, The Contribution of Partners for Fish and Wildlife Program and Coastal Program Restoration Projects to Local U.S. Economies (September 2013) at 18.

[17] Wetland Reserve Easement Program Economic Assessment: Estimated Commodity Program and Crop Insurance Premium Subsidy Cost Avoidance Benefits, Prepared for the Nature Conservancy (June 2, 2018) (authored by retired U.S. Department of Agriculture economist Dr. Doug Lawrence).

[18] In Mississippi, payments for enrolling lands in the WRE and Floodplain Easement Programs are the same. Easement purchase prices on forested land are slightly less than on cropland. The payment schedule is established by USDA on a yearly basis and may fluctuate slightly from year to year.

[19] Id.

[20] "Severe repetitive loss properties" are properties covered by the National Flood Insurance Program (NFIP) that have been the subject of four or more damage claims of more than $5,000 each, or two or more claims in which the insured structure sustained cumulative damage exceeding its fair market value. These structures, which are mostly homes, are priorities for elevation or removal. "Repetitive loss properties" are properties covered by the NFIP that have flood-related damage on two occasions where the cost of the repair equaled or exceeded 25% of the market value of the structure at the time of each such flood event; and the second incidence of flood-related damage increased the cost of flood-insurance compliance coverage.

[21] Of these severe repetitive loss properties, 150 are in Issaquena county and 48 are in Sharkey county. An additional 1,191 severe repetitive loss properties are located in Warren, Washington, and Humphreys counties, but large portions of these counties (and thus, many of these properties) are located outside the YBWA.

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Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 3:54:46 PM
To: Blevins, John [Blevins.John@epa.gov]
Subject: .Introduction and Yazoo Pumps Update

Flag: Follow up

Good Morning, Acting Regional Administrator Blevins,

By way of introduction, I am Audubon's Mississippi Policy Director and lead our national work on the proposed Yazoo Backwater Pumps in Mississippi's South Delta.

I wanted to let you know that yesterday Audubon and partners filed a lawsuit against the Corps and FWS challenging the Yazoo Pumps. Our press release follows and our complaint can be downloaded here.

Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Please do not hesitate to reach out with questions or for more details.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

Lawsuit challenges Army Corps' unlawful approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

The Yazoo Pumps project would involve construction of a 14,000 cubic-feet-per-second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, the Corps admitted in 2007 that 80 percent of the project's benefits would be for agriculture.

"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally endangered species, such as the pondberry. Also, the Yazoo Pumps would increase flood risk for downstream communities while failing to provide the promised level of relief to communities in the Yazoo Backwater Area.

Instead of the ineffective, antiquated pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. See: Alternative Flood Relief Solutions to the Yazoo Pumps .

The conservation groups' legal complaint can be downloaded here.

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CONTACTS:
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

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Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Gray, Elizabeth [elizabeth.gray@audubon.org]
Sent: 11/22/2021 6:58:44 PM
To: Regan, Michael [Regan.Michael@epa.gov]
CC: McCabe, Janet [McCabe.Janet@epa.gov]; Fox, Radhika [Fox.Radhika@epa.gov]; Goodin, John [Goodin.John@epa.gov]; Gray, Elizabeth [elizabeth.gray@audubon.org]
Subject: Audubon Letter on EPA Restoring Yazoo Pumps CWA 404(c) Veto
Attachments: Yazoo Pumps Audubon Thank You Letter 11.22.2021.pdf

Flag: Follow up

Dear Administrator Regan,

Please find attached a letter from the National Audubon Society thanking the Environmental Protection Agency for restoring the Clean Water Act 404(c) veto for the Yazoo Backwater Pumping Plant project.

Audubon is deeply grateful to the EPA for reinstating these vital protections and commend the agency for reaffirming its commitment to ensure local communities get the effective, sustainable flood relief they have long deserved.

We believe a federal interagency task force is essential to guide this important work to benefit birds and people of the Mississippi Delta, and we stand ready to help the EPA make this a reality.

Again, thank you for your leadership and for the careful attention you and your staff have given to this significant matter.

Sincerely,

Elizabeth Gray

Elizabeth Gray, Ph.D.
Chief Executive Officer
Pronouns: she, her, hers

National Audubon Society
1200 18th St. NW, Suite 500
Washington, D.C. 20036
www.audubon.org

Audubon

November 22, 2021

Via Electronic Mail: Regan.Michael@epa.gov

The Honorable Michael Regan
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Mail Code 1101A

Re: EPA Decision to Restore Critical Protections to Hemispherically Significant Wetlands

Dear Administrator Regan:

On behalf of the National Audubon Society and our nearly 2 million members, thank you for reinstating the 2008 Clean Water Act 404(c) veto of the Yazoo Backwater Pumping Plant ("Yazoo Pumps") that was revoked at the end of the previous administration. Audubon is deeply grateful for the Environmental Protection Agency's commitment to uphold science and the law by restoring vital protections to these hemispherically significant wetlands and reconfirming its support to deliver effective flood relief for vulnerable local communities.

Audubon has long celebrated the EPA's 2008 veto that stopped the destructive, ineffective Yazoo Pumps. It protected tens of thousands of acres of wetlands that support over 450 species of birds, fish, and wildlife, and are used by more than 28 million migrating birds each year.[1]

The EPA's 2008 determination was based on an extensive record that remains as valid today as it was when it was first issued. Audubon unequivocally supports the EPA's decisive decision to withdraw its November 2020 letter and reassert that the veto protections apply to the Corps' 2020 project. Moreover, we commend the EPA for going one-step further by adding substantive clarity to the 2008 Final Determination that will help ensure the agency's rigorous scientific and legal analyses remain durable into the future and beyond political interference. Audubon is especially grateful for all the comprehensive work and rigorous attention provided by EPA staff over the Pumps' long history.

Reinstatement of these federal safeguards has restored protections for some of the nation's richest wetlands and waters, including some of the last existing and most substantial tracts of highly-productive bottomland hardwood forests in the Lower Mississippi River Alluvial Valley. These forests provide vital foraging, nesting, breeding, and migration habitat to annually support millions of birds and waterfowl. Relatedly,

[1] The findings were based on 2020 analyses by the National Audubon Society, using data from eBird Status & Trends from the Cornell Lab of Ornithology and Partners in Flight Population Estimates Database from Bird Conservancy of the Rockies. The findings were made possible thanks to data contributed by community science participants in eBird and the USGS Breeding Bird Survey.

hundreds of thousands of acres of public and private conservation lands, many of which are recognized as Important Bird Areas, are no longer in peril of being drained.[2]

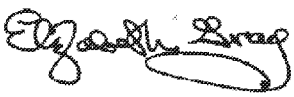
The EPA's decision reflects the views of more than 230 conservation groups, social justice organizations, and scientific professionals along with over 93,000 members of the public and Audubon. This overwhelming response demonstrates the broad, sustained public support that endures for safeguarding this ecologically important area twelve years after the 404(c) veto decision.

Furthermore, we acknowledge that EPA's actions have provided a transformational moment to ensure local communities receive the effective, sustainable flood relief they have long deserved, and we commend the agency for reaffirming its commitment to this path.

As Audubon and our conservation partners have outlined in the Resilience Alternative we developed and shared with EPA, effective, sustainable non-structural and nature-based flood solutions are available now to provide relief to vulnerable backwater communities, meaningfully redress systemic environmental injustices, protect the region's globally-significant wetlands, and strengthen the nation's resilience to climate change. We believe a federal interagency task force is essential to guide this important work, and we stand ready to help the EPA make this a reality.

In closing, Audubon sincerely appreciates the EPA upholding its critical veto decision and its commitment to advance effective, enduring flood relief that delivers lasting benefits to birds and people. We look forward to being a resource to assist the EPA in this and other endeavors. Please do not hesitate to let us know how we can be helpful.

Sincerely,



Elizabeth Gray, Ph.D.
CEO
National Audubon Society

Cc:
Janet McCabe, Deputy Administrator, EPA
Radhika Fox, Assistant Administrator, Office of Water, EPA
John Goodin, Director, Office of Wetlands, Oceans, and Watersheds, EPA

[2] An Important Bird Area (IBA) is an area that has been identified using an internationally agreed to set of criteria as being globally important for the conservation of bird populations. Audubon administers this program in the U.S. Source: https://www.audubon.org/important-bird-areas/state/mississippi (last visited 11/16/20).

Message

From: Jenny Hoffner [JHoffner@americanrivers.org]
Sent: 12/6/2021 11:31:43 PM
To: Fox, Radhika [Fox.Radhika@epa.gov]
Subject: Yazoo Thank you
Attachments: ATT00001.txt

Greetings Radhika –

I hope you and the family are well given all the transitions and strange covid-times.

I wanted to take the opportunity to personally reach out and thank you for EPA's decision to halt the Yazoo Pumps Project north of Vicksburg, Mississippi.

As you know it was a project vetoed by the G.W. Bush Administration in 2008, under the EPA's Clean Water Act Section 404(c) veto authority and in the waning of the Trump administration, there was a rushed and unfounded attempt to approve the project without consideration of applicable and required environmental laws.

We appreciate EPA heeding the science and determining that the Corps' newly proposed Yazoo Pumps Project is still subject to the 2008 Clean Water Act veto decision. We look forward to you and the Biden Administration working with local leaders and residents to build towards solutions that will better protect people without harming the area's vitally important wetlands. We are looking forward to working with CEQ, EPA, Corps of Engineers, Emergency Management Agency, Fish and Wildlife Service, and Department of Agriculture on these just climate adaptation projects.

I do hope our paths will cross again soon!

Stay well -

Jenny

Jenny Hoffner
Vice President for Conservation Strategies
Pronouns: she|her|hers
404-784-5771
AmericanRivers.org
Instagram I Facebook I Twitter

Environmental injustice threatens America's Most Endangered Rivers® of 2021.
Learn more and take action: AmericanRivers.org/EndangeredRivers

Message

From: Gettle, Jeaneanne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D8E72AA7E1894FAEA44006FD9F22B637-GETTLE, JEANEANNE]
Sent: 2/10/2021 10:28:12 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Notice of Intent Filed on ESA

Thank you Ms. Mastrototaro.

Jeaneanne

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Wednesday, February 10, 2021 5:12 PM
To: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Subject: Yazoo Notice of Intent Filed on ESA

Hello Ms. Gettle,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Gettle, Jeaneanne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D8E72AA7E1894FAEA44006FD9F22B637-GETTLE, JEANEANNE]
Sent: 1/11/2021 10:25:25 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Conservation Orgs Letter on Yazoo Pumps Final SEIS

Ms. Mastrototaro,

This confirms my receipt of letters you forwarded on behalf of the American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi relative to the Final Draft Supplement No. 2 to the 1982 Yazoo Pump Final Environmental Impact Statement.

Have a good afternoon.

Jeaneanne M. Gettle, Director
Water Division

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Monday, January 11, 2021 4:56 PM
To: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS

Good Afternoon, Ms. Gettle,

On behalf of American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi, please find attached our comments with two supporting documents on the Final Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Please confirm receipt of this email.

Thank you,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 3:57:02 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]
Subject: Yazoo Pumps Update

Hello Ms. Gettle,

I wanted to let you know that yesterday Audubon and partners filed a lawsuit against the Corps and FWS challenging the Yazoo Pumps. Our press release follows and our complaint can be downloaded here.

Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Please do not hesitate to reach out with questions or for more details.

Kind regards,
Jill

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

Lawsuit challenges Army Corps' unlawful approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

The Yazoo Pumps project would involve construction of a 14,000 cubic-feet-per-second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, the Corps admitted in 2007 that 80 percent of the project's benefits would be for agriculture.

"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally endangered species, such as the pondberry. Also, the Yazoo Pumps would increase flood risk for downstream communities while failing to provide the promised level of relief to communities in the Yazoo Backwater Area.

Instead of the ineffective, antiquated pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. See: Alternative Flood Relief Solutions to the Yazoo Pumps .

The conservation groups' legal complaint can be downloaded here.

####

CONTACTS:
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/10/2021 10:11:57 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]
Subject: Yazoo Notice of Intent Filed on ESA
Attachments: Yazoo Pumps - Notice of Intent ESA_2-9-21.pdf

Hello Ms. Gettle,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
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Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock

environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

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"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/26/2021 9:24:57 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]
Subject: Yazoo Resilience Alternative
Attachments: Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf

Good Afternoon, Ms. Gettle,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information.

Kind regards,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/12/2021 7:44:26 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]
Subject: Yazoo Fact Sheet
Attachments: Fact Sheet_Immediate Action Required to Stop the Yazoo Pumps_Final_01-21-21.pdf

Hello Ms. Gettle,

In the hope it can be helpful to you and your colleagues, attached please find a summary outlining the multitude of problems and concerns associated with the Yazoo Pumps.

Please do not hesitate to reach out with questions or for more details.

My best,
Jill Mastrototaro

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 1/11/2021 9:56:19 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS
Attachments: Conservation Organization Comments on Final SEIS_Yazoo Pumps_Final with attachments_01-11-21.pdf; EPA_FOIA_FinalEMAPSubmittal.xlsx; EPA_FOIA_pt5out.xlsx

Good Afternoon, Ms. Gettle,

On behalf of American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi, please find attached our comments with two supporting documents on the Final Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Please confirm receipt of this email.

Thank you,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

American Rivers ◆ Audubon Mississippi ◆ Healthy Gulf
National Audubon Society ◆ Sierra Club ◆ Sierra Club Mississippi

January 11, 2021

Via email: YazooBackwater@usace.army.mil

Colonel Robert A. Hillard
District Engineer
U.S. Army Corps of Engineers
Vicksburg District
4155 Clay Street
Vicksburg, MS 39183-3435

Re: Comments on the Final Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement

American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi (collectively, the Conservation Organizations) submit these comments on the Final Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Comments

The Conservation Organizations call on the Corps to abandon the Proposed Plan—which is prohibited by the 2008 Clean Water Act § 404(c) Final Determination and the Clean Water Act 404(b)(1) Guidelines. The Corps should also withdraw the deeply flawed FSEIS, which like the Draft SEIS, does not comply with the important, longstanding requirements of the National Environmental Policy Act (NEPA). The Corps should permanently abandon all efforts to build the environmentally devastating, extremely costly, highly controversial, and long-vetoed Yazoo Pumps project and instead focus on opportunities for providing more effective, meaningful, sustainable, and immediate benefits to the communities in the Yazoo Backwater Area while restoring this ecologically critical region.

The Conservation Organizations remind the Corps of the commitment provided in both the FSEIS and the Draft SEIS that the Corps will not sign the Record of Decision for the already-vetoed Yazoo Pumps until Endangered Species Act (ESA) coordination on the pondberry has been completed:

> ESA coordination on the pondberry is ongoing and the Record of Decision would not be signed until coordination is complete (see Threatened and Endangered Species Appendix for additional information on Pondberry assessment).[1]

On November 5, 2020, the U.S. Fish and Wildlife Service (the Service) advised the Corps that "sufficient data is not available at this time to make an 'effects' determination" for the federally endangered

[1] FSEIS at 52; Draft SEIS at 51.

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pondberry.[2] As a result, the Conservation Organizations believe that the Service will not concur with the Corps' Biological Assessment for the pondberry. This will mandate formal consultation and development of a full Biological Opinion. As a result, the Corps almost certainly will not be able to sign a Record of Decision for the Proposed Plan in the near future without violating its explicit commitment in the FSEIS.

A. The FSEIS Does Not Correct the Many Failings that Led the Environmental Protection Agency and the U.S. Fish and Wildlife Service to Conclude that the Project Should Not Move Forward

Both the U.S. Environmental Protection Agency (EPA) and the U.S. Fish and Wildlife Service submitted scathing comments on the Draft SEIS—comments that make clear that the project may not move forward. While the Corps provided nominal responses to these comments, the FSEIS does not address even one of the many critical problems identified by those agencies.

EPA's comments on the Draft SEIS make clear that the Proposed Plan is prohibited by the Clean Water Act 404(b)(1) Guidelines.[3] EPA's comments also determine that the proposed mitigation plan violates the Clean Water Act § 404 mitigation regulations. As a result, the Proposed Plan also violates 33 USC § 2283(d), which requires that civil works projects comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps. As EPA's comments highlight:

- The analysis of wetland impacts is fatally flawed. Among other problems, the analysis cannot be reconciled with the findings of the interagency field-based Environmental Monitoring and Assessment Program (EMAP) which "determined that there are approximately 216,000 acres of wetlands" in the Yazoo Backwater Area, an estimate that "has not changed in the 2020 DSEIS." The Corps has not completed the required jurisdictional determination required by current regulations. The wetlands impact analysis should—but does not—evaluate the full suite of wetland impacts, including because the FSEIS: (1) does <u>not</u> evaluate the "potential effects on wetlands based on expected changes in flood duration and frequency;" (2) does <u>not</u> evaluate "how the pumps project would impact wetlands that currently experience ≥ 7 days of flood inundation;" (3) does <u>not</u> evaluate "all flooded wetlands that are in the 5-year floodplain;" and (4) does <u>not</u> evaluate "how many wetlands would no longer be within the 2-year and 5-year floodplains with the pumps project implemented."

- The analysis of impacts to fish and other aquatic species is fatally flawed. Notably, EPA concludes that it "is unclear whether the pumps project's potential impacts to fish and other aquatics have been fully assessed" which is particularly important because "prior data also indicate that between 2007 and 2020 there has been a 30% decrease in the size of the spawning

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[2] FSEIS, Appendix H (Threatened and Endangered Species) at 97. The Service also raised significant concerns about the impacts of the same plan on the federally endangered pondberry in 2007, when the Service determined that take would occur. 2007 FSEIS, Main Report at 33-34.

[3] FSEIS, Appendix E (Public Comments) at 34-44. The Conservation Organizations strongly disagree with the statement contained in the EPA cover letter transmitting these comments that the Proposed Plan is not subject to the 2008 Clean Water Act Veto of the Yazoo Pumps. As discussed in these comments and in our comments on the Draft SEIS, the Proposed Plan is unquestionably prohibited by the 2008 Veto. EPAs scathing comments on the Draft SEIS also document the fact that the Corps has relied on the same flawed wetland assessment methodologies decisively rejected by EPA in the 2008 veto because those methodologies severely underestimate and obscure the pumps' significant, unacceptable impacts.

ED_006580_00000037-00002

habitat impact assessment area and a 133% decrease in the size of the rearing habitat impact assessment area."

- The analysis of water quality impacts is fatally flawed. EPA concludes that the "statements regarding water quality benefits from the operation of the pumps, are not supported by data to quantify beneficial or adverse effects."

- The analysis of secondary and cumulative impacts is fatally flawed. EPA recommends a fundamentally new analysis of these impacts. EPA notes that the new analysis should include an evaluation of the "effects of discharging water from the YBA into the Yazoo River on homes, communities, and/or infrastructure along the Yazoo River, particularly in areas downstream of the Deer Creek site's pump discharge point (e.g., Vicksburg)."

- The compensatory mitigation plan is fatally flawed. EPA has determined that the "compensatory mitigation plan described in the 2020 DSEIS includes a number of deficiencies that would preclude a private party from receiving a Section 404 permit" including, but not limited to failing to identify specific mitigation sites. As a result, the Proposed Plan also violates 33 USC § 2283(d), which requires that civil works projects comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps.

- The proposed adaptive management plan is fatally flawed. Among other problems this plan does not require collection of scientific data on key resources, "including aquatic biology, water quality, and wetlands" and does not require "use of that information to inform ongoing management of the project." The plan also does not evaluate the "effects and management of the pumps" or the proposed groundwater wells. The plan also fails to identify the steps that will be followed if mitigation is not offsetting the actual impacts of the Yazoo Pumps.

- The Environmental Justice analysis is fatally flawed. EPA has determined that this important analysis fails on many levels. As the starting point to correct these failings, "EPA recommends the EJ analysis clarify information regarding the scope of the study area, project benefits, and impacts in the FSEIS."

The comments from the U.S. Fish and Wildlife Service (the Service) are equally scathing. The Service highlights its significant concerns with the Proposed Plan and identifies 20 substantial recommendations that would need to be followed to address the Service's concerns, including such major actions as: (1) restoring the one-year floodplain; (2) reforesting the 2-year floodplain; and (3) fully compensating for all wetland impacts "including impacts to shorter hydroperiod wetlands and wetlands outside the two-year floodplain"—impacts that the Corps has not even evaluated, let alone proposed to mitigate.[4]

The Service concludes that the Proposed Plan should not move forward:

> In conclusion, the Service does not believe the currently formulated plan represents a balanced approach to addressing the flood damage reduction and environmental opportunities in the

[4] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 8-16.

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Yazoo Study Area. The fish and wildlife resource planning goals must be addressed to at least a satisfactory level."[5]

The Service also advised the Corps that the "abbreviated timeframe" imposed by the Corps precluded "the Service and the Corps from undertaking necessary coordination during the planning process to ensure adequate time for Service review of Corps-relied upon models and assumptions, as well as compliance with the [Fish and Wildlife Coordination Act]. The abbreviated timeframe has restricted the Service's ability to undertake a more thorough analysis and fully develop recommendations to reduce damages to fish and wildlife resources."[6]

B. The FSEIS Does Not Address the Detailed Technical Comments Submitted by the Public In Opposition to the Proposed Plan

The FSEIS fails to substantively address the many detailed technical comments submitted by the public on the Draft SEIS. Instead, the Corps opted to finalize the FSEIS just 4 days after the public comment period closed on the Draft SEIS, precluding the Corps from providing any degree of meaningful review to those technical comments.[7] The Corps' failure to respond to significant comments violates NEPA and the Administrative Procedure Act.[8]

As the Corps is aware, the Conservation Organizations submitted 113 pages of detailed technical comments on the Draft SEIS along with a detailed expert analysis denouncing the model used by the Corps to assess downstream flood impacts, a detailed proposal for a Resilience Alternative, and 13 additional attachments consisting of hundreds of pages of information.[9] The Corps' response to these highly detailed, technical comments consists of a scant five general paragraphs, each of which provides a blanket rejection of concerns raised in our comments. The Corps did not make any changes to the Draft SEIS in response to these comments. Each issue highlighted in our comments on the Draft SEIS remains valid and applicable to the FSEIS and should be considered a part of our comments on the FSEIS. Accordingly, the Conservation Organizations incorporate our comments on the Draft SEIS into these comments on the FSEIS, as though fully set forth herein.

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[5] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 16.

[6] SEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report) at 1.

7 While the FSEIS was noticed in the December 11, 2020 Federal Register (85 Fed. Reg. 80093), the FSEIS electronic files, including all appendices, are dated (04Dec20) in the official EPA Environmental Impact Statement (EIS) Database. See https://cdxnodengn.epa.gov/cdx-enepa-II/public/action/eis/details?eisId=316671 (last visited January 8, 2021). The public comment period on the Draft SEIS closed on November 30, 2020. 85 Fed. Reg. 65800 (October 16, 2020).

[8] *See, e.g., Ala. Power Co. v. Costle*, 636 F.2d 323 (D.C. Cir. 1979)(finding that the "duty to respond to significant comments finds a statutory basis in required notice and comment procedures for the opportunity to comment for the opportunity to comment is meaningless unless the agency responds to significant points raised by the public."); *FBME Bank Ltd. v. Lew*, 2016 WL 5108018, *1, *23 (D.D.C. 2016) (finding that the agency's failure to respond to significant comments that would have required a change in the proposed rule was arbitrary and capricious); *Lilliputian Systems Inc. v. Pipeline and Hazardous Materials Safety Admin.*, 741 F.3d 1309, 1313 (D.C. Cir. 2004) ("An agency's failure to respond to relevant and significant public comments generally demonstrates that the agency's decision was not based on a consideration of the relevant factors." (internal quotations and citations omitted)).

[9] Comments of American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi on the October 2020 Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement, dated November 30, 2020.

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As the Corps is also aware, the Conservation Organizations submitted 80 pages of detailed technical comments during the scoping period for the FSEIS.[10] The Conservation Organizations also submitted a detailed proposal for a Resilience Alternative with those scoping comments, along with 8 additional attachments consisting of many hundreds of pages of information. Neither the FSEIS nor the Draft SEIS addressed any of the concerns or proposals made in these scoping comments. Each issue highlighted in these scoping comments remains valid and applicable to the FSEIS and should be considered a part of our comments on the FSEIS. Accordingly, the Conservation Organizations incorporate our scoping comments into these comments on the FSEIS, as though fully set forth herein.

The Corps provides no response at all to any of the other more than 50,500 comment letters submitted by citizens, scientists, and public interest groups from Mississippi and across the country. For example, the Corps refused to provide any response to any of the following detailed technical comments:

- Detailed comments submitted by more than 110 scientific professionals;
- Detailed comments submitted by the Society of Wetland Scientists;
- Detailed comments submitted by the Society of Freshwater Science;
- Detailed comments submitted by the North American Lake Management Society;
- Detailed comments submitted by the American Fisheries Society;
- Detailed comments submitted by a number of biologists who specialize in turtles;
- Detailed comments submitted by a former Environmental Protection Agency attorney; and
- Detailed comments submitted by more than 120 national, state and local conservation, faith-based, social justice, and recreation organizations.

C. The FSEIS Recommends the Exact Same Unacceptable Project and Relies on the Exact Same Flawed Analyses Utilized in the Draft SEIS

The FSEIS recommends the exact same project as the Draft SEIS, and relies on the exact same flawed analysis utilized in the Draft SEIS. These flaws, which are extensively detailed in the Conservation Organizations' Comments on the Draft SEIS and in the Conservation Organizations' Scoping Comments, are briefly summarized below.

1. The FSEIS Recommends a Project That is Prohibited by the 2008 Clean Water Act Veto. The FSEIS recommends construction of the same 14,000 cubic-feet-per-second (cfs) pumping plant whose purpose, structure, operation, and impacts fall squarely within the scope of the 2008 veto—which explicitly prohibits plans that would harm more than 28,400 acres of wetlands.[11]

[10] Comments of American Rivers, Audubon Mississippi, Healthy Gulf, National Audubon Society, Sierra Club, and Sierra Club Mississippi in response to the April 16, 2020 Notice of Intent to Prepare Supplemental Environmental Impact Statement for the Yazoo Area Pump Project (85 Fed. Reg. 21218), dated June 15, 2020.
[11] 2008 Clean Water Act 404(c) Final Determination at iii, 73.

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The FSEIS, which severely underestimates wetland impacts, acknowledges that the pumps will degrade more than 38,744 acres of wetlands.[12]

The FSEIS acknowledges that the recommended plan is the same project vetoed by EPA in 2008. For example, the FSEIS states:

- "Because the Proposed Plan is an updated and reevaluation of the 2007 recommended plan there was no reformulation of the array of alternatives examined in the 2007 Main Report. The original formulation of plans has been reviewed and accepted as remaining valid. Because the project is authorized, and a recommended plan for the remaining features has been vetted and reviewed, this FSEIS No. 2 serves the specific purpose of updating and completing the NEPA requirement for disclosure of impacts, and to support finalizing a ROD."[13]

- "The goal of this study is to update and reevaluate the recommended plan from the 2007 Main Report based on new environmental and hydraulic data. No new study goals or objectives have been added."[14]

- **"Why is the Corps proposing the same pumping project that was vetoed by the EPA?** The Corps received funding to update the recommended plan from the 2007 Main Report based on updated environmental and hydrologic data. A number of changes have been made to the proposed project."[15]

- **"You said that you reviewed non-structural alternatives in the 2007 report, but you did not review all the non-structural alternatives, as pointed out in the 2008 veto. Why didn't you consider these new alternatives in the DSEIS?** Congress directed funding only to update the recommended plan from the 2007 Main Report based on updated environmental and hydrologic data."[16]

- FSEIS Table 2-28 refers to the Proposed Plan as "Plan 5" which was the plan recommended in the 2007 FSEIS.[17]

2. The FSEIS Recommends a Project That is Prohibited by the Clean Water Act 404(b)(1) Guidelines. The Yazoo Pumps are clearly prohibited by the 404(b)(1) Guidelines because they: (1) are not the least environmentally damaging practicable alternative; (2) will clearly cause significant—and conclusively unacceptable, as documented in the EPA veto—degradation of the aquatic ecosystem; (3) rely on a wholly conceptual mitigation proposal that is woefully inadequate and infected by the very same fatal flaws identified by EPA in the veto; (4) will cause or contribute to violations of state water quality standards; and (5) will jeopardize the continued existence of the

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[12] FSEIS, Appendix F-5 (Wetlands) at 33.
[13] FSEIS at 86.
[14] FSEIS at 17.
[15] FSEIS, Appendix E (Public Comments) at 9 (bolded language in original).
[16] FSEIS, Appendix E (Public Comments) at 24 (bolded language in original).
[17] FSEIS, Appendix G (Engineering Report) at 144 ("Table 2-28. Base condition cumulative land-use by frequency and Plan 5 Pump Frequency land-use."); *see also* Draft SEIS, Appendix G (Engineering) at 123 ("The proposed plan is Plan 5 from the 2007 FEIS.").

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federally endangered pondberry. EPA's comments on the Draft SEIS highlight many of these failings and make it clear that the Yazoo Pumps are prohibited by the 404(b)(1) Guidelines.

3. The FSEIS Recommends a Project That Will Not Provide the Promised Flood Relief. The vetoed Yazoo Pumps will not provide the promised flood relief for the Yazoo Backwater Area. In fact, the pumps are so ineffective that they will leave 82% to 89% of flooded lands underwater, and will take weeks to months to drawdown floodwaters on the remaining lands, as acknowledged in the FSEIS.[18]

4. The FSEIS Recommends a Project That Threatens Public Safety. The vetoed Yazoo Pumps could create significant flood risks for communities in north Vicksburg and the Yazoo Backwater Area—concerns raised repeatedly by the conservation community and EPA. Operation of the Yazoo Pumps would put downstream communities on the receiving end of an additional 9 billion gallons of water a day when the Yazoo River is already at flood stage. Communities in the Yazoo Backwater Area could flood if that massive influx of water overtopped or damaged the Yazoo Backwater Levee, which is at risk of crevassing and is so low that it is not accredited to handle a 100-year flood.[19] Collapse of this levee would flood the very communities the pumps are purported to protect. The FSEIS dismisses these concerns out of hand in a brief analysis[20] based on a model that an independent expert found to be so flawed that it "cannot be trusted to get a correct answer" regarding the impact of the Yazoo Pumps on flood levels in the Yazoo River.[21] The FSEIS makes no effort to address this expert analysis.

5. The FSEIS Does Not Look at Even a Single Alternative to the Vetoed Yazoo Pumps. The FSEIS does not consider even a single alternative to the vetoed Yazoo Pumps, in direct violation of the National Environmental Policy Act, the Clean Water Act, and modern floodplain management techniques. The FSEIS makes no mention of repeated requests to consider alternatives, including from EPA, and the Conservation Organizations whose scoping and Draft SEIS comments proposed a suite of proven, low-cost, natural infrastructure and non-structural measures (referred to as the Resilience Alternative) that would provide effective, sustainable, and environmentally sound relief to communities in the Yazoo Backwater Area.

6. The FSEIS Ignores a Wide Array of Devastating Impacts to Hemispherically Significant Wetlands. The FSEIS dramatically understates wetland impacts by looking only at some types of impacts to a small subset of wetlands, and by relying on scientifically unsound methodologies that were decisively rejected by EPA in the 2008 veto. The FSEIS arbitrarily and severely restricts its review of wetland impacts to changes in the duration of inundation to the small subset of wetlands located within the 2-year floodplain that receive ≥ 14 consecutive days of flooding. These severe, scientifically unsound restrictions cause the FSEIS to significantly understate impacts to wetlands and aquatic habitat, as made clear in the 2008 veto. Even this severe underestimate acknowledges degradation to at least 38,774 acres of wetlands in the 2-year floodplain; a level of impacts prohibited by the 2008 veto.

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[18] FSEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering Report) at 135, Table 2-26.
[19] National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/fema (accessed November 6, 2020). Lack of accreditation means that the Yazoo Backwater Levee cannot protect Yazoo Backwater communities during flood events at or greater than the 1% chance of exceedance (100-year flood event).
[20] FSEIS, Appendix G (Engineering Report) at 165, paragraph 205.
[21] FSEIS, Appendix E (Public Comment) at 225-273.

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7. The FSEIS Ignores Critical Impacts to the Many Rivers and Streams in the Project Area. The FSEIS does not assess impacts to the project area's many hydrologically-connected streams, even though the pumps-induced wetland losses will likely reduce flows and increase sedimentation and nutrient pollution in those streams. These wetland losses also could reduce groundwater recharge in the project area, exacerbating low stream flows and the already-significant declines in the Mississippi Alluvial Plain aquifer.

8. The FSEIS Ignores Critical Impacts to a Vast Array of Fish and Wildlife. The FSEIS fails to assess critical impacts to a vast array of fish and wildlife, including by failing to fully evaluate the pumps' adverse impacts to internationally significant aquatic resources. For example, the FSEIS does not evaluate how many acres would no longer flood to a depth of 1 foot for 8 consecutive days with the pumps in place, even though the FSEIS makes clear that all fish spawning habitat would be lost in such areas. The entire analysis of waterfowl impacts is based on a single duck species even though more than 40 percent of the nation's waterfowl migrate through the project area twice each year, including more than 30 species of waterfowl that rely on bottomland hardwood wetlands. The shorebird analysis is limited to a few vague paragraphs even though up to one million shorebirds migrate through the project area twice each year, as highlighted in the 2008 veto. The U.S. Fish and Wildlife Service opposes the FSEIS plan, and the Corps has refused to adopt recommendations that could alleviate some of the Services' concerns.[22] The FSEIS also does not include a completed Endangered Species Act consultation on the federally endangered Pondberry.

9. The FSEIS Mitigation Is Wholly Inadequate and Ignores Longstanding Legal Requirements. Because the FSEIS does not assess the full extent of the pumps' adverse impacts to hemispherically significant aquatic resources and wildlife, it cannot assess the amount of mitigation needed to offset those impacts. The FSEIS also repeats the same mitigation errors identified in the 2008 veto by failing to identify specific mitigation sites, provide a detailed mitigation plan, and ensure adequate mitigation even for the severe underestimate of 38,744 acres of wetland impacts. Relying on the same functional assessment rejected in the 2008 veto precisely because it significantly understates lost wetland functions and significantly overstates mitigation outcomes,[23] the FSEIS proposes just 2,405 acres of reforestation of yet-to-be-identified frequently flooded lands as in-kind mitigation.[24] This is 8,257 fewer acres of mitigation than proposed by the Corps in 2007; the FSEIS also eliminates 52,900 acres of additional restoration that was a much-touted component of the Corps' 2007 proposal. As discussed above, EPA has advised the Corps that the mitigation plan violates the Clean Water Act § 404 mitigation regulation. As result, the Proposed Plan also violates 33 USC § 2283(d), which requires civil works projects to comply with "the mitigation standards and policies established pursuant to the regulatory programs" administered by the Corps.

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[22] FSEIS, Appendix M-2 (U.S. Fish and Wildlife Coordination Act Report).

[23] FSEIS, Appendix F-5 (Wetlands) at 26; 2008 Clean Water Act 404(c) Final Determination at 28 and 47.

[24] The FSEIS also proposes out-of-kind mitigation consisting of the installation of groundwater wells far outside of the project area that would result in even more groundwater pumping from the already severely-depleted Mississippi Alluvial Plain aquifer.

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10. The FSEIS Does Not Provide an Estimate of the Project's Costs and Benefits. The FSEIS does not provide any information on the costs or benefits of the Yazoo Pumps, and as a result cannot demonstrate that the project's benefits will exceed the project's costs, as required by law. Construction costs have increased substantially since the last estimate provided by the Corps in 2007, and the FSEIS proposes massive new construction at the Deer Creek location that has never been accounted for in a cost estimate; these changes have likely pushed the cost of construction to well over $450 million. The FSEIS does make clear that the pumps will provide little if any flood damage reduction benefits, acknowledging that 82% to 89% of the project area will still flood even with the pumps in place, and the pumps will take weeks to months to drawdown floodwaters on the remaining lands.[25] The FSEIS also highlights the extremely limited potential for agricultural benefits, noting that "agricultural crop acres benefited are expected to be 28,700 acres per year over the life of the project."[26] In 2007, the Corps acknowledged that 80% of project benefits would come from agricultural intensification, which further reinforces that the pumps are not designed to provide flood relief for homes and other structures.

11. The FSEIS Has Not Undergone the Mandatory Independent External Peer Review. The FSEIS does not include a report—or account for the findings of—an Independent External Peer Review (IEPR) panel. The FSEIS also makes no references to such a review being conducted, even though IEPR improves project planning and is required for this project as a matter of law.[27]

12. The FSEIS Does Not Respond to Public Comments. As detailed above, the FSEIS responds to just one set of comments submitted by the public. In a scant five paragraphs that response dismisses more than 100 pages of detailed technical comments and an expert analysis denouncing the model used by the Corps to assess downstream flood impacts. The FSEIS provides no response to any of the other 50,500 comment submitted by citizens, scientists, and public interest groups from Mississippi and across the country, including detailed technical comments submitted by more than 110 scientific professionals, the Society of Wetland Scientists, the Society of Freshwater Science, the North American Lake Management Society, the American Fisheries Society, more than 120 conservation and social justice organizations, and others.[28]

D. Additional Problems with the FSEIS

In addition to the extensive problems detailed in the comments submitted by EPA, the Service, and the public, the FSEIS suffers from at least the following additional flaws.

1. 2019 Flood After Action Report

Because the Corps reinitiated its study of the vetoed Yazoo Pumps project in response to the 2019 flood event, it is particularly critical for the Corps and the public to fully understand how that event played out in the Yazoo Backwater Area, and how any actions undertaken by the Corps and others may have exacerbated or otherwise influenced the level and extent of flooding in the Yazoo Backwater Area.

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[25] FSEIS, Appendix C (Tables) at Table 5.3; SEIS, Appendix G (Engineering) at 135, Table 2-26.
[26] FSEIS, Appendix F-1 (Environmental Justice) at 9.
[27] 33 USC 2343(a) (making independent external peer review mandatory for civil works projects that cost more than $200 million or are controversial).
[28] The FSEIS does provide minimal responses to the comments submitted by EPA and the U.S. Fish and Wildlife Service.

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The Conservation Organizations urged the Corps to develop an After Action Report for the 2019 flood in their scoping comments, but no such report was referenced in the Draft SEIS. The Corps was also asked whether it had prepared an After Action Report for the 2019 flood during the virtual public hearing. The Corps responded in the FSEIS that an after action report had been prepared, and that a copy of the report was available upon request from the Vicksburg District:

> **Did the Corps prepare an after action flood report for the 2019 flood to help inform the development of solutions? If not, why not? Where is that available?**
>
> An AAR was completed for the 2019 flood and is available upon request from the Vicksburg District. The Vicksburg District utilized flood data from the 2019 flood in the updated period of record for the Proposed Plan.[29]

However, the Corps still has not provided a copy of this report to the Conservation Organizations even though we requested a copy on December 11, 2020.[30] Because the Corps has failed to supply this critical After Action Report, the public has no way of knowing whether or not the Corps properly accounted for the 2019 flood in the FSEIS. The 2019 Flood After Action Report, and any supporting materials and documentation, should be immediately provided to the Conservation Organizations, and must be made a part of the record for the FSEIS.

The FSEIS also acknowledges that it "does not discuss the exact number of homes and farmland acres impacted from the 2019 flood."[31] In the absence of this information—including the precise elevations of the structures and farmland acres impacted—it is not possible for the Corps or the public to determine whether, or by how much, operation of the Yazoo Pumps would have reduced flood damages during the 2019 flood.

As highlighted at page 19 of the Conservation Organization Comments on the Draft SEIS, documentation provided by the Corps in response to a Freedom of Information Act request demonstrates that had the Yazoo Pumps been in operation during the 2019 flood, 442,195 acres—**83% of the lands that flooded in 2019**—would still have been underwater, based on data provided by the Corps.[32] Just 17% of the acreage that flooded in 2019 would have been drained by the Yazoo Pumps.

Moreover, even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data,[33] as highlighted at page 89 of the Conservation Organization Comments on the Draft SEIS. The Conservation Organizations also understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event.

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[29] FSEIS, Appendix E (Public Comments) at 13.

[30] Email from Olivia Dorothy, American Rivers, to Kent Parrish, U.S. Army Corps of Engineers Vicksburg District, dated December 11, 2020 (making the following request: "The FSEIS documents indicate that the 2019 Flood After Action Review is available upon request. I am requesting those documents, please send me the full report and any appendices or other supporting documentation.")

[31] FSEIS, Appendix E (Public Comments) at 29.

[32] This data was provided to the Conservation Organizations in response to a November 2, 2020 Freedom of Information Act request submitted by Earthjustice.

[33] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.

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This information should have been considered by the Corps in the FSEIS, but was not.

2. Yazoo Backwater Levee Accreditation

The FSEIS incorrectly states that the Yazoo Backwater Levee is accredited.[34] This levee is in fact not accredited as confirmed by the Corps' National Levee Database, Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps, and the Mississippi Department of Environmental Quality (MDEQ).[35]

A provisional accreditation issued by FEMA in 2010 expired in 2012 because the Corps did not certify that the levee could withstand a 100-year flood event. MDEQ, which manages the levee accreditations in Mississippi, has advised the Conservation Organizations that the Corps also has not recommended the Yazoo Backwater Levee for accreditation since Provisionally Accredited Levee (PAL) Agreements expired in 2014. The Conservation Organizations provided this information and supporting documentation to the Corps on December 11, 2020.[36] According to the National Levee Database the minimum design standard for the Yazoo Backwater Levee is 107-feet NAVD. To be certified to provide protection for a 100-year event the levee requires a minimum design standard of 108-feet NAVD because the base flood elevation of the Yazoo River is 105-feet NAVD.

By incorrectly asserting that the Yazoo Backwater Levee is accredited, the Corps is misrepresenting the level of protection provided by the Yazoo Backwater Levee to the public. The lack of accreditation also means that it would be irresponsible for the Corps to operate the Yazoo Pumps during a 100-year flood event when the additional water being pumped into the Yazoo River (up to 9 billion gallons of water a day) would likely overtop the Yazoo Backwater Levee, potentially threatening the levee's integrity and the safety of the 40,000 people who live and work in the Yazoo Backwater Area—the very people that the pumps purport to protect. As a result, the Corps' inclusion of modeling results showing reductions in stage, volume and area of inundation from the Yazoo Pumps during the 100-year flood event is unrealistic, inappropriate, and highly misleading, as highlighted in the Conservation Organization comments on the Draft SEIS. The FSEIS should not claim benefits for reducing the impacts of a 100-year flood—including the unsupported claim that 615 structures would be protected during a 100-year flood with the pumps in place[37]—because the Corps could not operate the Yazoo Pumps during such an event.

3. Missing EMAP Data

As documented in the 2008 Veto, in EPA's comments on the Draft SEIS, and in the Conservation Organizations' comments on the Draft SEIS (at pages 35-37), the analysis in the FSEIS cannot be reconciled with the baseline wetland acreage identified through the statistically valid, field sample of wetlands carried out under EPA's Environmental Monitoring and Assessment Program (EMAP). This flaw taints the entire FSEIS.

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[34] FSEIS, Appendix E (Public Comments) at 19.
[35] E.g., National Levee Database at https://levees.sec.usace.army.mil/#/levees/system/5905000041/fema (accessed November 6, 2020). Lack of accreditation means that the Yazoo Backwater Levee cannot protect Yazoo Backwater communities during flood events at or greater than the 1% chance of exceedance (100-year flood event).
[36] Email from Olivia Dorothy, American Rivers, to Kent Parrish, U.S. Army Corps of Engineers Vicksburg District, dated December 11, 2020.
[37] *See* FSEIS at 21.

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In response to a November 2, 2020 Freedom of Information Act (FOIA) request submitted to the Corps by the Conservation Organizations, the Corps indicated that they no longer have the data identifying the locations of the EMAP sample sites. By definition, this means that the Corps could not have considered this important information during its preparation of the Draft SEIS or FSEIS. The Conservation Organizations obtained this data through a FOIA submitted to EPA, and provide it to the Corps in pdf form as Attachment A to these comments and in excel form via the email transmitting these comments.

4. Unacceptable Impacts of the Proposed Groundwater Wells

In the Conservation Organizations' comments on the Draft SEIS, the Conservation Organizations demonstrated that the Corps' proposal to drill supplemental groundwater wells up to five miles away from the Mississippi River levee is an unacceptable option that would not provide the purported benefits claimed by the Corps. In fact, the Mississippi Delta Comprehensive Multipurpose Water Resource Plan (the Comprehensive Plan) explicitly rejected such a proposal as an "unacceptable option" because groundwater studies show that the Mississippi River "does not directly influence wells at distances greater than about 1 mile from the levee."[38] Accordingly, by locating wells beyond that one-mile limit, the Corps' proposal would further deplete the aquifer, undercutting if not negating the purported mitigation.

The Conservation Organizations also provided monitoring data corroborating this point[39] and showing that the proposed groundwater wells, such as at Straight Bayou and Brown Bayou, would be located in areas where groundwater levels have dropped significantly over time due to excessive pumping and insufficient recharge.[40] Drilling additional wells in these areas would worsen the overdraft problem and further deplete surface flows—an unacceptable impact, as made clear by the Comprehensive Plan.

Yet, the Corps responded to neither the Comprehensive Plan nor the monitoring data provided by the Conservation Organizations. Instead, the FSEIS relies on a 2001 USGS study for the proposition that "ground water recharge occurs within five miles of the Mississippi River."[41] But that study is of no assistance because the Corps proposes to locate wells more than five miles away from the Mississippi River Channel, as depicted below.

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[38] USDA, Natural Resource Conservation Service, Mississippi Delta Comprehensive Multipurpose Water Resource Plan provided as Attachment K to the Conservation Organizations'' Nov. 30, 2020 Comments on the Draft SEIS.
[39] USGS Groundwater Watch, Field Groundwater Level Measurements for Site Numbers 334957090564301 - 011F0020 BOLIVAR & 334106090590902 - 011N0002 BOLIVAR, provided as Attachment M to the Conservation Organizations'' Nov. 30, 2020 Comment Letter.
[40] The Conservation Organizations have provided a map showing the location of the USGS monitoring well, as well as the proposed wells at Straight Bayou and Brown Bayou, all of which are more than one mile away from the levee. See Attachment B to these comments.
[41] FSEIS Appendix E (Public Comments) at 27.

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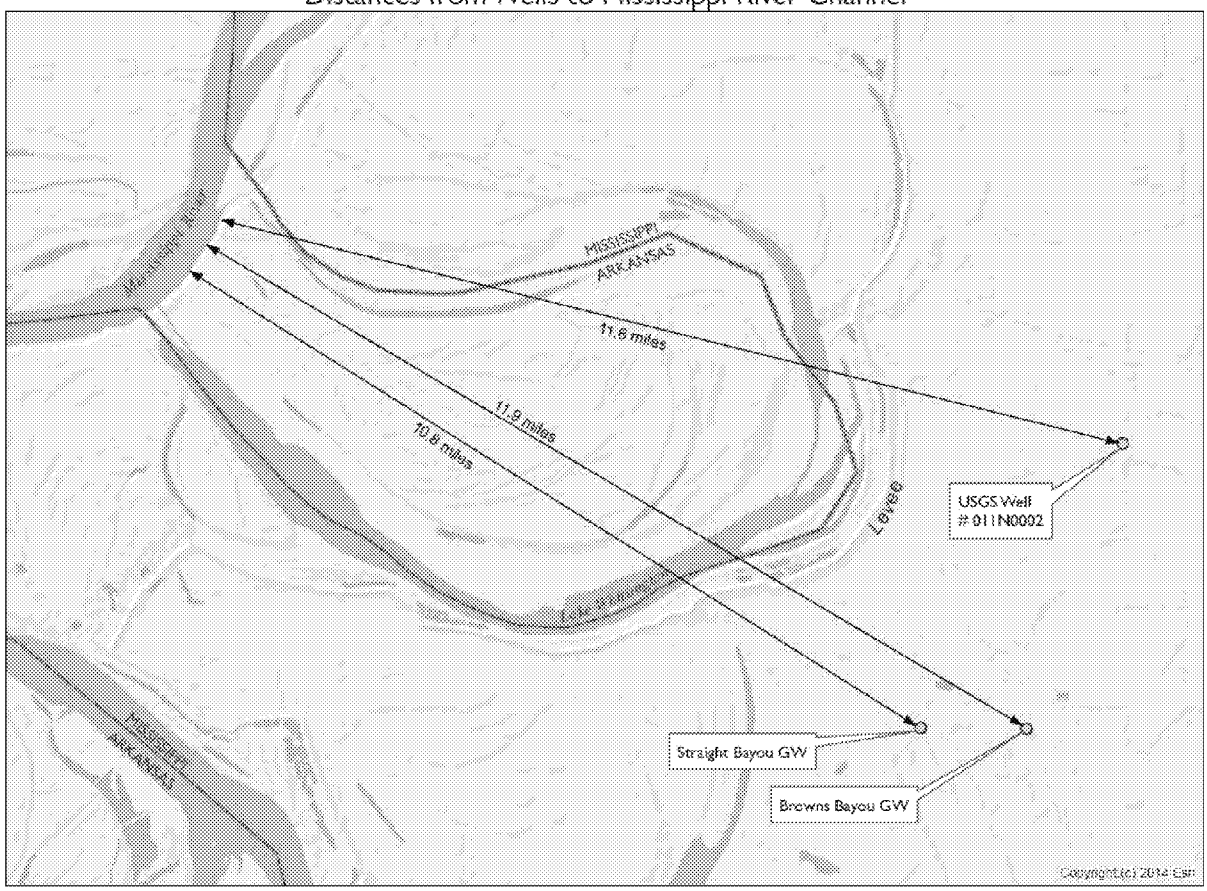
Distances from Wells to Mississippi River Channel



These wells are thus in an area beyond the influence of the River, as shown by *both* the 2001 USGS study and the Comprehensive Plan. In fact, the adjacent USGS groundwater monitoring well shows a significant decline in groundwater levels over time, proving that the River is not recharging this area.[42] The Corps' proposal to drill additional wells will therefore deplete the aquifer and further drawdown baseflows, causing adverse impacts which the Corps has entirely failed to address.

5. Agricultural Lands and Structures

As the Corps is well aware—and as discussed in the Conservation Organizations' Comments on the Draft SEIS—neither the Draft SEIS nor the FSEIS include an analysis of the economic costs or benefits of the Proposed Plan. This precludes a full assessment of the project's impacts under NEPA and prevents the Corps from demonstrating that the project benefits will exceed the project costs, as required by law for all federal flood damage reduction projects.

The FSEIS explicitly acknowledges that "[a]n updated cost estimate has not been developed" for the Proposed Plan.[43] However, simply applying the costs of inflation to the Corps' 2007 cost estimate

[42] USGS Groundwater Watch at 3-4, provided at Attachment M to the Conservation Organizations' Nov. 30, 2020 comments.
[43] FSEIS, Appendix E (Public Comments) at 17.

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demonstrates that the costs of the Yazoo Pumps have ballooned to at least $450 million, as noted in the Conservation Organizations' comments on the Draft SEIS.

The few tidbits of information relating to potential benefits in the FSEIS strongly suggest that these significant costs will be much greater than any potential project benefits. Notably, the FSEIS concludes that just 28,700 acres of crop acres a year are expected to benefit from the project:

> "With existing conditions, the annual damages to the number of agricultural acres total 36,600 while with the pumps in place, the annual agricultural acres damaged decreases to 7,900. The agricultural crop acres benefited are expected to be 28,700 acres per year over the life of the project."[44]

In accounting for any benefits attributable to these acres, the Corps would have to account for the fact that planting can often occur even after flood events, and that agricultural damages can often be offset through other federal and state programs. For example, as noted above, even during the prolonged 2019 flood event, 316,000 acres of crops were grown in the Yazoo Backwater Area (more than 55% of the 10-year average acreage of crops grown in the Yazoo Backwater Area), according to USDA data.[45] In addition, the Conservation Organizations understand that farmers were eligible to receive disaster relief or other forms of compensation to minimize economic losses due to the inability to plant crops on the Yazoo Backwater Area lands that could not be planted as a result of the 2019 flood event.

Since the FSEIS does not assess economic benefits, the public must assume that agricultural benefits would still constitute 80% of project benefits as determined in the 2007 FSEIS, which the current FSEIS is tiered to. However, if 80% of the project benefits would come only from benefits attributable to the 28,700 acres of cropland identified in Appendix F-1, it is extremely unlikely that the project benefits could exceed the costs of the Proposed Plan, which have certainly ballooned to well over $450 million.

The FSEIS provides equally limited information on potential benefits to structures, and provides no information on the source of the structure data or the time period in which the data on structures was collected.[46] The date of any structure inventory is particularly relevant since older data would not account for the precipitous decline in the population of the Yazoo Backwater Area since 2007 and the related decline in the total number of households.[47] In addition, the limited and unsupported structure data provided in the Table at page 21 of the FSEIS is different than the limited structure data provided at page 9 in Appendix F-1.

Moreover, the FSEIS does not include any assessment regarding the primary areas where structural damages occurred during the 2019 flood despite the fact that this information, which is critical to formulating any type of meaningful approach to reducing flood damages to structures, was provided to the Corps in the Conservation Organizations' scoping comments (at pages 24-25). This information, which is provided again below, strongly suggests that limited and very targeted non-structural solutions such as elevating and floodproofing homes, elevating a portion of the roadway, and improving

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[44] FSEIS, Appendix F-1 (Environmental Justice) at 9.
[45] USDA National Agricultural Statistics Service, CropScape Cropland Data Layer.
[46] *See* FSEIS, Table at page 21; Appendix F-1 (Environmental Justice) at 7-9 (which acknowledges that not all of the structures counted actually flood).
[47] *See* FSEIS, Appendix B (Figures), Figure 4.1 at 10 and Figure 4.4 at 13.

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management of Eagle Lake would be the most effective and cost-effective way to reduce structural flood damages in the Yazoo Backwater Area.

During the 2019 flood, structural damages within the Yazoo Backwater counties were highly concentrated with **76% of all structural damage** and **85% of all structural monetary damages** occurring in Warren County, which includes the Eagle Lake community and extensive areas located outside of the boundaries of the Yazoo Backwater Area (*see* Figure below). In 2019, relatively few structures were affected by flooding in Issaquena and Sharkey counties, the two counties located entirely within the Yazoo Backwater Area, according to Mississippi Emergency Management data. Within Issaquena and Sharkey counties a total of 53 homes and 19 mobile homes were affected. Of those, 27 homes had only minor or very minor damage. Data for other counties include large areas that would not be affected by the Pumps.

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YAZOO BACKWATER 2019 FLOOD DAMAGES*

During the prolonged 2019 flood, homes and businesses in the counties that make up the Yazoo Backwater Area sustained $12.3 million in structural damage. This damage was concentrated in Warren County (including the Eagle Lake community). Warren County sustained 85% of the monetary damage. Flood mitigation, such as elevating structures, purchasing floodplain easements, and elevating flood-prone roads, is rarely practiced in the Yazoo Backwater Area.

WASHINGTON COUNTY

NO DAMAGES REPORTED

HUMPREYS, SHARKEY AND YAZOO COUNTIES

HOMES DAMAGED: 62
BUSINESSES DAMAGED: 3

TOTAL MONETARY DAMAGE:
$560,000

WARREN COUNTY

HOMES DAMAGED: 358
BUSINESSES DAMAGED: 14

TOTAL MONETARY DAMAGE:
$10,442,000

% OF ALL FLOOD DAMAGES OCCURRING IN WARREN COUNTY

76% All structures damaged

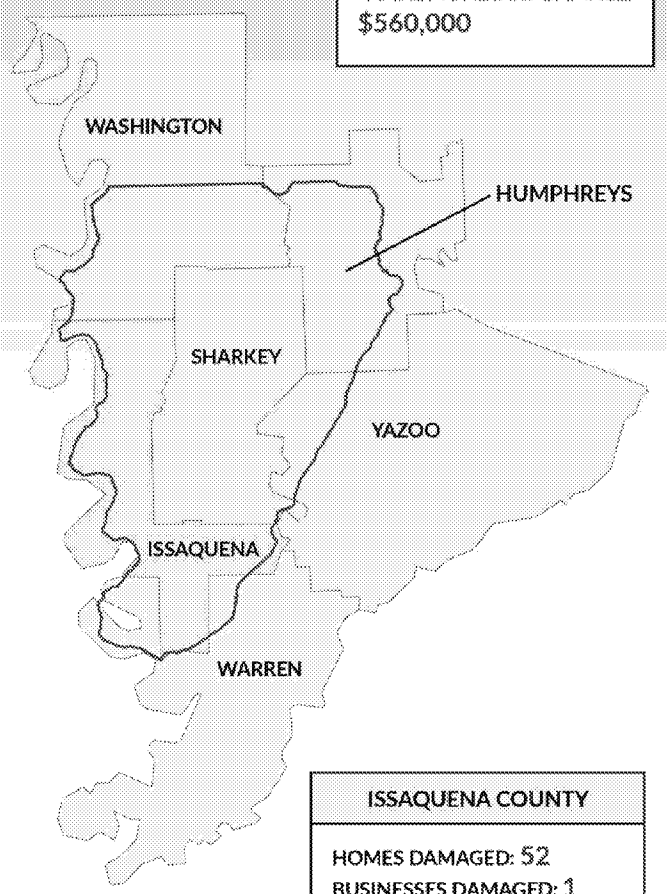
85% All monetary damage

76% Homes damaged

85% Homes-monetary damage

78% Businesses damaged

82% Businesses-monetary damage



ISSAQUENA COUNTY

HOMES DAMAGED: 52
BUSINESSES DAMAGED: 1

TOTAL MONETARY DAMAGE:
$1,335,000

*Estimated damages to homes and businesses in counties that fall within the Yazoo Backwater Area, as reported by the Mississippi Emergency Management Agency. It is unclear how much of the damage reported occurred outside the Yazoo Backwater Area (outlined in blue).

Conclusion

The Conservation Organizations staunchly oppose the Proposed Plan which is clearly prohibited by the 2008 Clean Water Act § 404(c) Final Determination and the Clean Water Act 404(b)(1) Guidelines. The Conservation Organizations urge the Corps to abandon the Proposed Plan and the deeply flawed FSEIS, and instead focus on opportunities for providing meaningful, sustainable, and immediate benefits to the communities in the Yazoo Backwater Area while restoring this ecologically critical region.

Please contact Olivia Dorothy with American Rivers (odorothy@americanrivers.org, 217-390-3658) or Jill Mastrototaro with Audubon Mississippi (jill.Mastrototaro@audubon.org, 504-481-3659) if you have any questions or would like additional information.

Respectfully submitted,

Olivia Dorothy
Director, Upper Mississippi River Basin
American Rivers

Louie Miller
State Director
Mississippi Chapter of the Sierra Club

Jill Mastrototaro
Policy Director
Audubon Mississippi

Brian Moore
Vice-President, Gulf Policy
National Audubon Society

Matt Rota
Senior Policy Director
Healthy Gulf

Dalal Aboulhosn
Deputy Legislative Director
Sierra Club

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Attachment A

Conservation Organizations Comments on the
Final Supplement No. 2 to the 1982 Yazoo Area Pump Project
Final Environmental Impact Statement

DESIGN ID	DESIGN NC	SITE ID	STF	PAN	OVI	DIV	MD	N	N	NEST1	NEST1 WT	STRAT	LONG DD	LAT DD	LONG DMS	LAT DMS	newSTRAT I	newEPAW	newW	newAC	ext base	ext p5	base 5wet	b2 plan	b1 plan
MSW03411-	1	MSW03411-0001	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.953280	32.603523	-90 57 11.807999	32 36 12.682800	Corps	0	3	1	in	in	in	in	in
MSW03411-	2	MSW03411-0002	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766177	32.899246	-90 45 58.237198	32 53 57.285600	Corps	2	0	1	in	in	in	out	out
MSW03411-	3	MSW03411-0003	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.978034	32.546897	-90 58 40.922399	32 32 48.829200	Corps	2	0	1	in	in	in	in	in
MSW03411-	4	MSW03411-0004	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801334	32.785408	-90 48 4.802399	32 47 7.468800	Corps	2	0	1	in	in	in	in	in
MSW03411-	5	MSW03411-0005	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893030	32.591397	-90 53 34.907999	32 35 29.029200	Corps	0	3	1	in	in	in	in	in
MSW03411-	6	MSW03411-0006	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.845267	32.721975	-90 50 42.961199	32 43 19.110000	Corps	0	3	1	in	in	in	in	in
MSW03411-	7	MSW03411-0007	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.626684	32.802933	-90 37 36.062398	32 48 10.558800	Corps	2	0	1	in	in	in	in	in
MSW03411-	8	MSW03411-0008	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.803771	32.741187	-90 48 13.575599	32 44 28.273200	Corps	2	0	1	in	in	in	in	in
MSW03411-	9	MSW03411-0009	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.856535	32.498470	-90 51 23.525999	32 29 54.492000	Corps	2	0	1	in	in	in	in	in
MSW03411-	10	MSW03411-0010	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.886115	32.784079	-90 53 10.013999	32 47 2.684400	Corps	0	0	1	in	in	in	in	in
MSW03411-	11	MSW03411-0011	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766058	33.213506	-90 45 57.808799	33 12 48.621600	Corps	0	0	1	out	out	in	out	out
MSW03411-	12	MSW03411-0012	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.750520	32.772719	-90 45 1.871998	32 46 21.788400	Corps	2	0	1	in	in	in	in	in
MSW03411-	13	MSW03411-0013	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.915135	32.500399	-90 54 54.485999	32 30 1.436400	Corps	2	0	1	in	in	in	in	in
MSW03411-	14	MSW03411-0014	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893849	32.617195	-90 53 37.856399	32 37 1.902000	Corps	0	3	1	in	out	in	in	in
MSW03411-	15	MSW03411-0015	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.782173	32.953953	-90 46 55.822798	32 57 14.230800	Corps	0	0	1	out	out	in	out	out
MSW03411-	16	MSW03411-0016	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.038348	32.814583	-91 2 18.052799	32 48 52.498800	Corps	2	0	1	in	out	in	in	in
MSW03411-	17	MSW03411-0017	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.934277	32.611308	-90 56 3.397199	32 36 40.708800	Corps	0	3	1	in	in	in	in	in
MSW03411-	18	MSW03411-0018	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.994111	32.701448	-90 59 38.799599	32 42 5.212800	Corps	0	0	1	in	in	in	in	in
MSW03411-	19	MSW03411-0019	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.953467	32.456948	-90 57 12.481199	32 27 25.012800	Corps	2	0	1	in	out	in	out	out
MSW03411-	20	MSW03411-0020	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.828365	32.785036	-90 49 42.113999	32 47 6.129600	Corps	2	0	1	in	in	in	in	in
MSW03411-	21	MSW03411-0021	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.887230	32.575552	-90 53 14.027999	32 34 31.987200	Corps	0	0	1	in	in	in	in	in
MSW03411-	22	MSW03411-0022	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.861907	32.826201	-90 51 42.865199	32 49 34.323600	Corps	2	0	1	in	in	in	in	in
MSW03411-	23	MSW03411-0023	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.750511	32.762378	-90 45 1.839598	32 45 44.560800	Corps	2	0	1	in	in	in	in	in
MSW03411-	24	MSW03411-0024	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.779582	32.685170	-90 46 46.495199	32 41 6.612000	Corps	2	0	1	in	in	in	in	in
MSW03411-	25	MSW03411-0025	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.889858	32.502548	-90 53 23.488799	32 30 9.172800	Corps	2	0	1	in	out	in	in	in
MSW03411-	26	MSW03411-0026	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.852285	32.749034	-90 51 8.225999	32 44 56.522400	Corps	0	0	1	in	in	in	in	in
MSW03411-	27	MSW03411-0027	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.068145	33.097930	-91 4 5.321999	33 5 52.548000	Corps	0	0	1	out	out	in	out	out
MSW03411-	28	MSW03411-0028	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.752365	32.681403	-90 45 8.513998	32 40 53.050800	Corps	2	0	1	in	out	in	in	in
MSW03411-	29	MSW03411-0029	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.911339	32.530351	-90 54 40.820399	32 31 49.263600	Corps	2	0	1	in	in	in	in	in
MSW03411-	30	MSW03411-0030	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.823288	32.837883	-90 49 23.836799	32 50 16.378800	Corps	2	0	1	in	in	in	in	in
MSW03411-	31	MSW03411-0031	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.807604	32.883326	-90 48 27.374399	32 52 59.973600	Corps	2	0	1	in	in	in	in	in
MSW03411-	32	MSW03411-0032	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.738619	32.623094	-90 44 19.028398	32 37 23.138400	Corps	0	0	1	in	in	in	in	in
MSW03411-	33	MSW03411-0033	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.925678	32.591267	-90 55 32.440799	32 35 28.561200	Corps	2	0	1	in	out	out	in	in
MSW03411-	34	MSW03411-0034	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.739268	32.906428	-90 44 21.364798	32 54 23.140800	Corps	2	0	1	in	out	in	out	out
MSW03411-	35	MSW03411-0035	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.965723	32.477146	-90 57 56.602799	32 28 37.725600	Corps	2	0	1	in	in	in	in	in
MSW03411-	36	MSW03411-0036	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.807675	32.800842	-90 48 27.629999	32 48 3.031200	Corps	2	0	1	in	in	in	in	in
MSW03411-	37	MSW03411-0037	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.870262	32.532745	-90 52 12.943199	32 31 57.882000	Corps	2	0	1	in	in	in	in	in
MSW03411-	38	MSW03411-0038	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.974408	32.837817	-90 58 27.868799	32 50 16.141200	Corps	2	0	1	out	out	in	out	out
MSW03411-	39	MSW03411-0039	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.747889	32.876854	-90 44 52.400398	32 52 36.674400	Corps	2	0	1	in	in	in	in	in
MSW03411-	40	MSW03411-0040	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.776592	32.721243	-90 46 35.731199	32 43 16.474800	Corps	2	0	1	in	in	in	in	in
MSW03411-	41	MSW03411-0041	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.872116	32.506255	-90 52 19.617599	32 30 22.518000	Corps	2	0	1	in	in	in	in	in
MSW03411-	42	MSW03411-0042	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.893222	32.727480	-90 53 35.599199	32 43 38.928000	Corps	0	3	1	in	in	in	in	in
MSW03411-	43	MSW03411-0043	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.040142	33.039776	-91 2 24.511199	33 2 23.193600	Corps	0	0	1	in	in	in	in	in
MSW03411-	44	MSW03411-0044	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.768170	32.744782	-90 46 5.411999	32 44 41.215200	Corps	2	0	1	in	in	in	in	in
MSW03411-	45	MSW03411-0045	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.935732	32.524618	-90 56 8.635199	32 31 28.624800	Corps	2	0	1	in	in	in	in	in
MSW03411-	46	MSW03411-0046	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.839500	32.821599	-90 50 22.199999	32 49 17.756400	Corps	2	0	1	in	in	in	in	in
MSW03411-	47	MSW03411-0047	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.838650	32.911654	-90 50 19.139999	32 54 41.954400	Corps	0	0	1	in	in	in	out	in
MSW03411-	48	MSW03411-0048	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.790894	32.596030	-90 47 27.218399	32 35 45.708000	Corps	2	0	1	in	out	out	out	out
MSW03411-	49	MSW03411-0049	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.983151	32.618424	-90 58 59.343599	32 37 6.326400	Corps	0	0	1	in	in	in	in	in
MSW03411-	50	MSW03411-0050	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.859155	32.786188	-90 51 32.957999	32 47 10.276800	Corps	2	0	1	in	in	in	in	in
MSW03411-	51	MSW03411-0051	1	1	0	1	1	1	1	80	7.83390141	Corps	-91.063206	32.524526	-91 3 47.541599	32 31 28.293600	Corps	0	0	1	in	in	in	in	in
MSW03411-	52	MSW03411-0052	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.751408	32.784148	-90 45 5.068798	32 47 2.932800	Corps	2	0	1	in	in	in	in	in
MSW03411-	53	MSW03411-0053	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.931911	32.478106	-90 55 54.879599	32 28 41.181600	Corps	2	0	1	in	out	in	out	out
MSW03411-	54	MSW03411-0054	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.840460	32.847150	-90 50 25.655999	32 50 49.740000	Corps	2	0	1	in	in	in	in	in
MSW03411-	55	MSW03411-0055	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.728897	32.783145	-90 43 44.029198	32 46 59.322000	Corps	2	0	1	in	in	in	in	in
MSW03411-	56	MSW03411-0056	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.823265	32.720035	-90 49 23.753999	32 43 12.126000	Corps	2	0	1	in	in	in	in	in
MSW03411-	57	MSW03411-0057	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.913438	32.553868	-90 54 48.376799	32 33 13.924800	Corps	0	0	1	in	in	in	in	in
MSW03411-	58	MSW03411-0058	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.864524	32.767750	-90 51 52.286399	32 46 3.900000	Corps	2	0	1	in	in	in	in	in
MSW03411-	59	MSW03411-0059	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.670445	33.110799	-90 40 13.601998	33 6 38.876400	Corps	2	0	1	in	in	in	in	in
MSW03411-	60	MSW03411-0060	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.762105	32.709220	-90 45 43.577999	32 42 33.192000	Corps	2	0	1	in	in	in	in	in
MSW03411-	61	MSW03411-0061	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.939824	32.530289	-90 56 23.366399	32 31 49.040400	Corps	2	0	1	in	in	in	in	in
MSW03411-	62	MSW03411-0062	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801523	32.767223	-90 48 5.482799	32 46 2.002800	Corps	2	0	1	in	in	in	in	in
MSW03411-	63	MSW03411-0063	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.821744	32.856691	-90 49 18.278399	32 51 24.087600	Corps	0	0	1	in	in	in	in	in
MSW03411-	64	MSW03411-0064	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.803621	32.538527	-90 48 13.035599	32 32 18.697200	Corps	0	0	1	in	in	in	in	in
MSW03411-	65	MSW03411-0065	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.978593	32.551009	-90 58 42.934799	32 33 3.632400	Corps	2	0	1	in	in	in	in	in
MSW03411-	66	MSW03411-0066	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.698003	32.932167	-90 41 52.810798	32 55 55.801200	Corps	2	0	1	in	out	in	out	out
MSW03411-	67	MSW03411-0067	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.997133	32.492877	-90 59 49.678799	32 29 34.357200	Corps	0	0	1	in	in	in	in	in
MSW03411-	68	MSW03411-0068	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.801465	32.791277	-90 48 5.273999	32 47 28.597200	Corps	2	0	1	in	in	in	in	in
MSW03411-	69	MSW03411-0069	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.912535	32.584957	-90 54 45.125999	32 35 5.845200	Corps	2	0	1	in	in	in	in	in
MSW03411-	70	MSW03411-0070	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.904178	32.778629	-90 54 15.040799	32 46 43.064400	Corps	0	0	1	in	in	in	in	in
MSW03411-	71	MSW03411-0071	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.759845	32.840838	-90 45 35.441998	32 50 27.016800	Corps	0	0	1	in	in	in	in	in
MSW03411-	72	MSW03411-0072	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.793630	32.730979	-90 47 37.067999	32 43 51.524400	Corps	2	0	1	in	in	in	in	in
MSW03411-	73	MSW03411-0073	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.913068	32.456571	-90 54 47.044799	32 27 23.655600	Corps	0	0	1	in	out	in	out	out
MSW03411-	74	MSW03411-0074	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.892005	32.757490	-90 53 31.217999	32 45 26.964000	Corps	0	3	1	in	in	in	in	in
MSW03411-	75	MSW03411-0075	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.984067	33.117973	-90 59 2.641199	33 7 4.702800	Corps	2	0	1	in	in	in	in	in
MSW03411-	76	MSW03411-0076	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.782649	32.832652	-90 46 57.536399	32 49 57.547200	Corps	2	0	1	in	out	in	out	out
MSW03411-	77	MSW03411-0077	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.955381	32.527950	-90 57 19.371599	32 31 40.620000	Corps	2	0	1	in	in	in	in	in
MSW03411-	78	MSW03411-0078	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.850957	32.700590	-90 51 3.445199	32 42 2.124000	Corps	2	3	1	in	in	in	in	in
MSW03411-	79	MSW03411-0079	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.766809	32.862050	-90 46 0.512399	32 51 43.380000	Corps	2	0	1	in	in	in	in	in
MSW03411-	80	MSW03411-0080	1	1	0	1	1	1	1	80	7.83390141	Corps	-90.737633	32.666296	-90 44 15.478798	32 39 58.665600	Corps	2	0	1	in	in	out	in	in
MSW03411-	81	MSW03411-0081	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.984492	32.599173	-90 59 4.171199	32 35 57.022800	Corps	2	0	1	in	out	in	in	in
MSW03411-	82	MSW03411-0082	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.811183	32.871424	-90 48 40.258799	32 52 17.126400	Corps	0	0	1	in	in	in	in	in
MSW03411-	83	MSW03411-0083	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.930562	32.550476	-90 55 50.023199	32 33 1.713600	Corps	2	0	1	in	in	in	in	in
MSW03411-	84	MSW03411-0084	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.825915	32.767297	-90 49 33.293999	32 46 2.269200	Corps	2	0	1	in	in	in	in	in
MSW03411-	85	MSW03411-0085	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.926980	32.563803	-90 55 37.127999	32 33 49.690800	Corps	0	0	1	in	in	in	in	in
MSW03411-	86	MSW03411-0086	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.841217	32.735924	-90 50 28.381199	32 44 9.326400	Corps	0	3	1	in	in	in	in	in
MSW03411-	87	MSW03411-0087	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.596336	33.112172	-90 35 46.809597	33 6 43.819200	Corps	0	0	1	in	in	in	in	in
MSW03411-	88	MSW03411-0088	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.752242	32.710100	-90 45 8.071199	32 42 36.360000	Corps	2	0	1	in	in	in	in	in
MSW03411-	89	MSW03411-0089	1	0	1	2	1	1	1	80	7.83390141	Corps	-91.040288	32.492051	-91 2 25.036799	32 29 31.383600	Corps	0	0	1	in	in	in	in	in
MSW03411-	90	MSW03411-0090	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.854765	32.794157	-90 51 17.153999	32 47 38.965200	Corps	0	0	1	in	in	in	in	in
MSW03411-	91	MSW03411-0091	1	0	1	2	1	1	1	80	7.83390141	Corps	-91.060008	32.507667	-91 3 36.028800	32 30 27.601200	Corps	0	0	1	in	in	in	in	in
MSW03411-	92	MSW03411-0092	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.780254	32.790940	-90 46 48.914398	32 47 27.384000	Corps	2	0	1	in	in	in	in	in
MSW03411-	93	MSW03411-0093	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.910965	32.485248	-90 54 39.473999	32 29 6.892800	Corps	2	0	1	in	in	in	in	in
MSW03411-	94	MSW03411-0094	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.895527	32.798620	-90 53 43.897199	32 47 55.032000	Corps	2	0	1	in	in	in	in	in
MSW03411-	95	MSW03411-0095	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.739001	32.778030	-90 44 20.403599	32 46 40.908000	Corps	2	0	1	in	in	in	in	in
MSW03411-	96	MSW03411-0096	1	0	1	2	1	1	1	80	7.83390141	Corps	-90.825151	32.715014	-90 49 30.543599	32 42 54.050400	Corps	2	0	1	in	in	in	in	in
MSW03411-	97	MSW03411-0097	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.933616	32.589938	-90 56 1.017599	32 35 23.776800	Corps	0	3	1	in	in	in	in	in
MSW03411-	98	MSW03411-0098	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.763636	32.940832	-90 45 49.089598	32 56 26.995200	Corps	0	0	1	in	in	in	in	in
MSW03411-	99	MSW03411-0099	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.957787	32.464464	-90 57 28.033199	32 27 52.070400	Corps	2	0	1	in	in	in	in	in
MSW03411-	100	MSW03411-0100	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.782161	32.807301	-90 46 55.779599	32 48 26.283600	Corps	0	3	1	in	in	out	in	in
MSW03411-	101	MSW03411-0101	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.893440	32.527110	-90 53 36.383999	32 31 37.596000	Corps	2	0	1	in	in	in	in	in
MSW03411-	102	MSW03411-0102	1	0	1	4	1	1	1	80	7.83390141	Corps	-91.007839	32.791281	-91 0 28.220399	32 47 28.611600	Corps	2	0	1	in	in	in	in	in
MSW03411-	103	MSW03411-0103	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.694770	32.814065	-90 41 41.171998	32 48 50.634000	Corps	0	0	1	out	out	in	out	out
MSW03411-	104	MSW03411-0104	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.802998	32.709100	-90 48 10.792799	32 42 32.760000	Corps	2	0	1	in	in	in	in	in
MSW03411-	105	MSW03411-0105	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.859736	32.487524	-90 51 35.049599	32 29 15.086400	Corps	2	0	1	in	in	in	in	in
MSW03411-	106	MSW03411-0106	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.879477	32.744594	-90 52 46.117199	32 44 40.538400	Corps	0	3	1	in	in	in	in	in
MSW03411-	107	MSW03411-0107	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.969825	33.072545	-90 58 11.369999	33 4 21.162000	Corps	2	0	1	in	in	in	in	in
MSW03411-	108	MSW03411-0108	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.773271	32.726248	-90 46 23.775599	32 43 34.492800	Corps	2	0	1	out	in	in	out	out
MSW03411-	109	MSW03411-0109	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.971254	32.523010	-90 58 16.514399	32 31 22.836000	Corps	2	0	1	in	in	in	in	in
MSW03411-	110	MSW03411-0110	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.846231	32.688246	-90 50 46.431599	32 41 17.685600	Corps	0	3	1	in	in	in	in	in
MSW03411-	111	MSW03411-0111	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.781977	32.868209	-90 46 55.117199	32 52 5.552400	Corps	2	0	1	in	in	in	in	in
MSW03411-	112	MSW03411-0112	1	0	1	4	1	1	1	80	7.83390141	Corps	-90.772231	32.599697	-90 46 20.031598	32 35 58.909200	Corps	2	0	1	in	in	in	in	in
MSW03411-	113	MSW03411-0113	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.972908	32.576776	-90 58 22.468799	32 34 36.393600	Corps	2	0	1	in	in	in	in	in
MSW03411-	114	MSW03411-0114	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.783321	32.903301	-90 46 59.955599	32 54 11.883600	Corps	0	0	1	in	in	in	in	in
MSW03411-	115	MSW03411-0115	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.995154	32.498863	-90 59 42.554399	32 29 55.906800	Corps	0	0	1	in	in	in	in	in
MSW03411-	116	MSW03411-0116	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.805204	32.761579	-90 48 18.734399	32 45 41.684400	Corps	2	0	1	in	in	in	in	in
MSW03411-	117	MSW03411-0117	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.884315	32.592699	-90 53 3.533999	32 35 33.716400	Corps	0	3	1	in	in	in	in	in
MSW03411-	118	MSW03411-0118	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.851053	32.708880	-90 51 3.790799	32 42 31.968000	Corps	0	3	1	in	in	in	in	in
MSW03411-	119	MSW03411-0119	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.763751	32.847395	-90 45 49.503598	32 50 50.622000	Corps	2	0	1	in	in	in	in	in
MSW03411-	120	MSW03411-0120	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.810424	32.738269	-90 48 37.526399	32 44 17.768400	Corps	2	0	1	in	in	in	in	in
MSW03411-	121	MSW03411-0121	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.861356	32.505281	-90 51 40.881599	32 30 19.011600	Corps	2	0	1	in	in	in	in	in
MSW03411-	122	MSW03411-0122	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.872707	32.771698	-90 52 21.745199	32 46 18.112800	Corps	2	0	1	in	in	in	in	in
MSW03411-	123	MSW03411-0123	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.954650	33.095354	-90 57 16.739999	33 5 43.274400	Corps	2	0	1	in	in	in	in	in
MSW03411-	124	MSW03411-0124	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.802038	32.828791	-90 48 7.336799	32 49 43.647600	Corps	2	0	1	in	in	in	in	in
MSW03411-	125	MSW03411-0125	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.962386	32.507460	-90 57 44.589599	32 30 26.856000	Corps	0	0	1	in	in	in	in	in
MSW03411-	126	MSW03411-0126	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.873927	32.623568	-90 52 26.137199	32 37 24.844800	Corps	0	0	1	in	out	in	in	in
MSW03411-	127	MSW03411-0127	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.780834	32.880497	-90 46 51.002399	32 52 49.789200	Corps	2	0	1	in	in	in	in	in
MSW03411-	128	MSW03411-0128	1	0	1	3	1	1	1	80	7.83390141	Corps	-90.993918	32.970509	-90 59 38.104799	32 58 13.832400	Corps	0	0	1	out	out	in	out	out
MSW03411-	129	MSW03411-0129	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.929122	32.598814	-90 55 44.839199	32 35 55.730400	Corps	2	0	1	in	in	in	in	in
MSW03411-	130	MSW03411-0130	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.700927	33.041062	-90 42 3.337198	33 2 27.823200	Corps	2	0	1	in	in	in	out	out
MSW03411-	131	MSW03411-0131	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.939956	32.455927	-90 56 23.841599	32 27 21.337200	Corps	0	0	1	in	in	in	in	in
MSW03411-	132	MSW03411-0132	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.833301	32.789618	-90 49 59.883599	32 47 22.624800	Corps	2	0	1	in	in	in	in	in
MSW03411-	133	MSW03411-0133	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.880091	32.550212	-90 52 48.327599	32 33 0.763200	Corps	0	0	1	in	in	in	in	in
MSW03411-	134	MSW03411-0134	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.875165	32.812112	-90 52 30.593999	32 48 43.603200	Corps	2	0	1	in	in	in	in	in
MSW03411-	135	MSW03411-0135	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.691594	32.827595	-90 41 29.738398	32 49 39.342000	Corps	0	0	1	in	in	in	in	in
MSW03411-	136	MSW03411-0136	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.815190	32.682011	-90 48 54.683999	32 40 55.239600	Corps	2	0	1	in	in	in	in	in
MSW03411-	137	MSW03411-0137	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.876385	32.494766	-90 52 34.985999	32 29 41.157600	Corps	2	0	1	in	in	in	in	in
MSW03411-	138	MSW03411-0138	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.830196	32.761127	-90 49 48.705599	32 45 40.057200	Corps	0	3	1	in	in	in	in	in
MSW03411-	139	MSW03411-0139	1	0	1	5	1	1	1	80	7.83390141	Corps	-91.041332	33.085039	-91 2 28.795200	33 5 6.140400	Corps	0	0	1	in	in	in	in	in
MSW03411-	140	MSW03411-0140	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.790385	32.743250	-90 47 25.385998	32 44 35.700000	Corps	2	0	1	in	in	in	in	in
MSW03411-	141	MSW03411-0141	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.916918	32.517243	-90 55 0.904799	32 31 2.074800	Corps	2	0	1	in	in	in	in	in
MSW03411-	142	MSW03411-0142	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.829991	32.844349	-90 49 47.967599	32 50 39.656400	Corps	0	3	1	in	in	in	in	in
MSW03411-	143	MSW03411-0143	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.813565	32.886871	-90 48 48.833999	32 53 12.735600	Corps	2	0	1	in	in	in	in	in
MSW03411-	144	MSW03411-0144	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.829103	32.609337	-90 49 44.770799	32 36 33.613200	Corps	2	0	1	in	in	in	in	in
MSW03411-	145	MSW03411-0145	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.973000	32.622016	-90 58 22.799999	32 37 19.257600	Corps	0	0	1	in	in	in	in	in
MSW03411-	146	MSW03411-0146	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.771313	32.905529	-90 46 16.726799	32 54 19.904400	Corps	2	0	1	in	in	in	in	in
MSW03411-	147	MSW03411-0147	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.991547	32.545715	-90 59 29.569199	32 32 44.574000	Corps	2	0	1	in	in	in	in	in
MSW03411-	148	MSW03411-0148	1	0	1	5	1	1	1	80	7.83390141	Corps	-90.792807	32.783877	-90 47 34.105199	32 47 1.957200	Corps	2	0	1	in	in	in	in	in

MSW03411-	149	MSW03411-0149	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.895189	32.592022	-90 53 42.680399	32 35 31.279200	Corps	0	3	1	in	in	in	in	in
MSW03411-	150	MSW03411-0150	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.871965	32.726512	-90 52 19.073999	32 43 35.443200	Corps	0	3	1	in	in	in	in	in
MSW03411-	151	MSW03411-0151	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.638139	32.792468	-90 38 17.300398	32 47 32.884800	Corps	2	0	1	out	out	in	out	out
MSW03411-	152	MSW03411-0152	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.807859	32.719173	-90 48 28.292399	32 43 9.022800	Corps	2	0	1	in	in	in	in	in
MSW03411-	153	MSW03411-0153	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.844793	32.501356	-90 50 41.254799	32 30 4.881600	Corps	0	0	1	in	in	in	in	in
MSW03411-	154	MSW03411-0154	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.888047	32.786526	-90 53 16.969199	32 47 11.493600	Corps	0	3	1	in	in	in	in	in
MSW03411-	155	MSW03411-0155	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.714226	33.218587	-90 42 51.213598	33 13 6.913200	Corps	0	0	1	out	out	in	out	out
MSW03411-	156	MSW03411-0156	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.765310	32.792085	-90 45 55.115999	32 47 31.506000	Corps	2	0	1	in	in	in	in	in
MSW03411-	157	MSW03411-0157	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.939875	32.486212	-90 56 23.549999	32 29 10.363200	Corps	2	0	1	in	in	in	in	in
MSW03411-	158	MSW03411-0158	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.815282	32.676094	-90 48 55.015199	32 40 33.938400	Corps	2	0	1	in	in	in	in	in
MSW03411-	159	MSW03411-0159	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.768157	32.994579	-90 46 5.365198	32 59 40.484400	Corps	0	0	1	out	out	in	out	out
MSW03411-	160	MSW03411-0160	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.829896	32.698780	-90 49 47.625599	32 41 55.608000	Corps	0	3	1	in	in	in	in	in
MSW03411-	161	MSW03411-0161	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.942091	32.584721	-90 56 31.527599	32 35 4.995600	Corps	0	3	1	in	in	in	in	in
MSW03411-	162	MSW03411-0162	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.724818	33.030776	-90 43 29.344798	33 1 50.793600	Corps	0	0	1	out	out	in	out	out
MSW03411-	163	MSW03411-0163	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.943758	32.470128	-90 56 37.528799	32 28 12.460800	Corps	2	0	1	in	in	in	in	in
MSW03411-	164	MSW03411-0164	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.830295	32.799274	-90 49 49.061999	32 47 57.386400	Corps	2	0	1	in	in	in	in	in
MSW03411-	165	MSW03411-0165	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.887209	32.531366	-90 53 13.952399	32 31 52.917600	Corps	2	0	1	in	in	in	in	in
MSW03411-	166	MSW03411-0166	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.849514	32.821799	-90 50 58.250399	32 49 18.476400	Corps	2	0	1	in	in	in	in	in
MSW03411-	167	MSW03411-0167	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.739977	32.881912	-90 44 23.917198	32 52 54.883200	Corps	2	0	1	in	in	in	out	in
MSW03411-	168	MSW03411-0168	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.782640	32.723311	-90 46 57.503999	32 43 23.919600	Corps	2	0	1	in	in	in	in	in
MSW03411-	169	MSW03411-0169	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.900318	32.493795	-90 54 1.144799	32 29 37.662000	Corps	2	0	1	in	in	in	in	in
MSW03411-	170	MSW03411-0170	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.891386	32.717578	-90 53 28.989599	32 43 3.280800	Corps	0	3	1	in	in	in	in	in
MSW03411-	171	MSW03411-0171	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.000278	33.108411	-91 0 1.000799	33 6 30.279600	Corps	2	0	1	in	in	in	in	in
MSW03411-	172	MSW03411-0172	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.772669	32.756742	-90 46 21.608398	32 45 24.271200	Corps	2	0	1	in	in	in	in	in
MSW03411-	173	MSW03411-0173	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.908615	32.527039	-90 54 31.013999	32 31 37.340400	Corps	2	0	1	in	in	in	in	in
MSW03411-	174	MSW03411-0174	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.826008	32.827547	-90 49 33.628799	32 49 39.169200	Corps	2	0	1	in	in	in	in	in
MSW03411-	175	MSW03411-0175	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804596	32.896397	-90 48 16.545599	32 53 47.029200	Corps	0	0	1	in	in	in	in	in
MSW03411-	176	MSW03411-0176	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.815031	32.620727	-90 48 54.111599	32 37 14.617200	Corps	2	0	1	in	in	in	out	out
MSW03411-	177	MSW03411-0177	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.951463	32.582813	-90 57 5.266799	32 34 58.126800	Corps	0	3	1	in	in	in	in	in
MSW03411-	178	MSW03411-0178	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.719152	32.959299	-90 43 8.947198	32 57 33.476400	Corps	2	0	1	in	out	in	in	in
MSW03411-	179	MSW03411-0179	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.955169	32.472793	-90 57 18.608399	32 28 22.054800	Corps	2	0	1	in	in	in	in	in
MSW03411-	180	MSW03411-0180	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.803883	32.814958	-90 48 13.978799	32 48 53.848800	Corps	2	0	1	in	in	in	in	in
MSW03411-	181	MSW03411-0181	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.909508	32.586675	-90 54 34.228799	32 35 12.030000	Corps	2	0	1	in	in	in	in	in
MSW03411-	182	MSW03411-0182	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.916520	32.770377	-90 54 59.471999	32 46 13.357200	Corps	0	0	1	out	out	in	out	out
MSW03411-	183	MSW03411-0183	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.751124	32.842761	-90 45 4.046398	32 50 33.939600	Corps	0	0	1	in	in	in	in	in
MSW03411-	184	MSW03411-0184	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.787805	32.699057	-90 47 16.097999	32 41 56.605200	Corps	2	0	1	in	in	in	in	in
MSW03411-	185	MSW03411-0185	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.892984	32.476589	-90 53 34.742399	32 28 35.720400	Corps	2	0	1	in	in	in	in	in
MSW03411-	186	MSW03411-0186	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.875274	32.761027	-90 52 30.986399	32 45 39.697200	Corps	0	0	1	in	in	in	in	in
MSW03411-	187	MSW03411-0187	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.945634	33.130903	-90 56 44.282399	33 7 51.250800	Corps	0	0	1	out	out	in	out	out
MSW03411-	188	MSW03411-0188	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.776840	32.845162	-90 46 36.623999	32 50 42.583200	Corps	0	0	1	out	out	in	out	out
MSW03411-	189	MSW03411-0189	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.948362	32.510599	-90 56 54.103199	32 30 38.156400	Corps	2	0	1	in	in	in	in	in
MSW03411-	190	MSW03411-0190	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851268	32.695601	-90 51 4.564799	32 41 44.163600	Corps	0	3	1	in	in	in	in	in
MSW03411-	191	MSW03411-0191	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.761192	32.866930	-90 45 40.291199	32 52 0.948000	Corps	2	0	1	in	in	in	in	in
MSW03411-	192	MSW03411-0192	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.793192	32.592490	-90 47 35.491199	32 35 32.964000	Corps	2	0	1	in	in	in	in	in
MSW03411-	193	MSW03411-0193	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.936398	32.618487	-90 56 11.032799	32 37 6.553200	Corps	0	0	1	in	in	in	in	in
MSW03411-	194	MSW03411-0194	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.913750	32.750776	-90 54 49.499999	32 45 2.793600	Corps	0	0	1	in	out	in	in	in
MSW03411-	195	MSW03411-0195	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.016012	32.519155	-91 0 57.643199	32 31 8.958000	Corps	0	0	1	in	in	in	in	in
MSW03411-	196	MSW03411-0196	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.843643	32.809511	-90 50 37.114799	32 48 34.239600	Corps	2	0	1	in	in	in	in	in
MSW03411-	197	MSW03411-0197	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830212	32.548347	-90 49 48.763199	32 32 54.049200	Corps	0	0	1	out	out	in	out	out
MSW03411-	198	MSW03411-0198	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.877632	32.829388	-90 52 39.475199	32 49 45.796800	Corps	2	0	1	in	in	in	in	in
MSW03411-	199	MSW03411-0199	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.735758	32.747733	-90 44 8.728799	32 44 51.838800	Corps	2	0	1	in	in	in	in	in
MSW03411-	200	MSW03411-0200	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.838613	32.705024	-90 50 19.006799	32 42 18.086400	Corps	0	3	1	in	in	in	in	in
MSW03411-	201	MSW03411-0201	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.908210	32.536491	-90 54 29.555999	32 32 11.367600	Corps	0	0	1	in	in	in	in	in
MSW03411-	202	MSW03411-0202	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.847029	32.781661	-90 50 49.304399	32 46 53.979600	Corps	0	0	1	in	in	in	in	in
MSW03411-	203	MSW03411-0203	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.029022	33.165323	-91 1 44.479199	33 9 55.162800	Corps	2	0	1	in	in	in	in	in
MSW03411-	204	MSW03411-0204	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.767924	32.694665	-90 46 4.526399	32 41 40.794000	Corps	0	0	1	in	in	in	in	in
MSW03411-	205	MSW03411-0205	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.927260	32.536357	-90 55 38.135999	32 32 10.885200	Corps	2	0	1	in	in	in	in	in
MSW03411-	206	MSW03411-0206	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.756859	32.795119	-90 45 24.692398	32 47 42.428400	Corps	2	0	1	in	in	in	in	in
MSW03411-	207	MSW03411-0207	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811628	32.845662	-90 48 41.860799	32 50 44.383200	Corps	2	0	1	in	in	in	in	in
MSW03411-	208	MSW03411-0208	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.765400	32.654279	-90 45 55.439999	32 39 15.404400	Corps	2	0	1	in	out	in	out	in
MSW03411-	209	MSW03411-0209	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.962443	32.611840	-90 57 44.794799	32 36 42.624000	Corps	0	0	1	in	out	in	in	in
MSW03411-	210	MSW03411-0210	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.768253	32.917288	-90 46 5.710798	32 55 2.236800	Corps	0	0	1	in	in	in	in	in
MSW03411-	211	MSW03411-0211	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.996863	32.547242	-90 59 48.706799	32 32 50.071200	Corps	2	0	1	in	in	in	in	in
MSW03411-	212	MSW03411-0212	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.796595	32.771024	-90 47 47.741999	32 46 15.686400	Corps	2	0	1	in	in	in	in	in
MSW03411-	213	MSW03411-0213	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.919333	32.547927	-90 55 9.598799	32 32 52.537200	Corps	2	0	1	in	in	in	in	in
MSW03411-	214	MSW03411-0214	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.855835	32.730206	-90 51 21.005999	32 43 48.741600	Corps	0	0	1	in	in	in	in	in
MSW03411-	215	MSW03411-0215	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.631589	32.838275	-90 37 53.720398	32 50 17.790000	Corps	2	0	1	in	out	in	in	in
MSW03411-	216	MSW03411-0216	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830511	32.735874	-90 49 49.839599	32 44 9.146400	Corps	0	3	1	in	in	in	in	in
MSW03411-	217	MSW03411-0217	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.016421	32.490078	-91 0 59.115599	32 29 24.280800	Corps	0	0	1	in	in	in	in	in
MSW03411-	218	MSW03411-0218	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.892218	32.785510	-90 53 31.984799	32 47 7.836000	Corps	0	3	1	in	in	in	in	in
MSW03411-	219	MSW03411-0219	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.680428	33.193543	-90 40 49.540798	33 11 36.754800	Corps	0	0	1	in	in	in	in	in
MSW03411-	220	MSW03411-0220	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.774323	32.795675	-90 46 27.562799	32 47 44.430000	Corps	2	0	1	in	in	in	in	in
MSW03411-	221	MSW03411-0221	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.934880	32.487888	-90 56 5.567999	32 29 16.396800	Corps	2	0	1	in	in	in	in	in
MSW03411-	222	MSW03411-0222	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.829235	32.684253	-90 49 45.245999	32 41 3.310800	Corps	2	0	1	in	in	in	in	in
MSW03411-	223	MSW03411-0223	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.558535	32.912466	-90 33 30.725997	32 54 44.877600	Corps	2	0	1	in	out	in	in	in
MSW03411-	224	MSW03411-0224	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.817401	32.696452	-90 49 2.643599	32 41 47.227200	Corps	2	0	1	in	in	in	in	in
MSW03411-	225	MSW03411-0225	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.915964	32.575479	-90 54 57.470399	32 34 31.724400	Corps	0	0	1	in	in	in	in	in
MSW03411-	226	MSW03411-0226	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.730493	32.905791	-90 43 49.774799	32 54 20.847600	Corps	0	0	1	in	in	in	in	in
MSW03411-	227	MSW03411-0227	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.976472	32.466208	-90 58 35.299199	32 27 58.348800	Corps	2	0	1	in	out	in	out	out
MSW03411-	228	MSW03411-0228	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851777	32.782506	-90 51 6.397199	32 46 57.021600	Corps	0	0	1	in	in	in	in	in
MSW03411-	229	MSW03411-0229	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.889266	32.531472	-90 53 21.357599	32 31 53.299200	Corps	2	0	1	in	in	in	in	in
MSW03411-	230	MSW03411-0230	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.971007	32.829361	-90 58 15.625199	32 49 45.699600	Corps	0	0	1	in	in	in	in	in
MSW03411-	231	MSW03411-0231	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.740064	32.890730	-90 44 24.230398	32 53 26.628000	Corps	2	0	1	in	in	in	in	in
MSW03411-	232	MSW03411-0232	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.783613	32.711953	-90 47 1.006798	32 42 43.030800	Corps	2	0	1	in	out	in	in	in
MSW03411-	233	MSW03411-0233	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.886219	32.484831	-90 53 10.388399	32 29 5.391600	Corps	0	0	1	in	in	in	in	in
MSW03411-	234	MSW03411-0234	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.887528	32.716611	-90 53 15.100799	32 42 59.799600	Corps	0	0	1	in	in	in	in	in
MSW03411-	235	MSW03411-0235	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.989351	33.118685	-90 59 21.663599	33 7 7.266000	Corps	2	0	1	in	in	in	in	in
MSW03411-	236	MSW03411-0236	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.790047	32.750591	-90 47 24.169199	32 45 2.127600	Corps	2	0	1	in	in	in	in	in
MSW03411-	237	MSW03411-0237	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.900933	32.530332	-90 54 3.358799	32 31 49.195200	Corps	2	0	1	in	in	in	in	in
MSW03411-	238	MSW03411-0238	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.833902	32.831801	-90 50 2.047199	32 49 54.483600	Corps	2	0	1	in	in	in	in	in
MSW03411-	239	MSW03411-0239	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.815842	32.919818	-90 48 57.031199	32 55 11.344800	Corps	0	0	1	in	in	in	in	in
MSW03411-	240	MSW03411-0240	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.819019	32.609558	-90 49 8.468399	32 36 34.408800	Corps	2	0	1	in	in	in	in	in
MSW03411-	241	MSW03411-0241	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.984808	32.557251	-90 59 5.308799	32 33 26.103600	Corps	2	0	1	in	in	in	in	in
MSW03411-	242	MSW03411-0242	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.745046	32.975866	-90 44 42.165598	32 58 33.117600	Corps	0	0	1	out	out	in	out	out
MSW03411-	243	MSW03411-0243	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.014981	32.498580	-91 0 53.931599	32 29 54.888000	Corps	0	0	1	out	out	in	out	out
MSW03411-	244	MSW03411-0244	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.813008	32.813350	-90 48 46.828799	32 48 48.060000	Corps	2	0	1	in	in	in	in	in
MSW03411-	245	MSW03411-0245	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.879451	32.590466	-90 52 46.023599	32 35 25.677600	Corps	2	3	1	in	in	in	in	in
MSW03411-	246	MSW03411-0246	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.899389	32.771624	-90 53 57.800399	32 46 17.846400	Corps	0	0	1	in	in	in	in	in
MSW03411-	247	MSW03411-0247	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.748530	32.832881	-90 44 54.707998	32 49 58.371600	Corps	0	0	1	in	in	in	in	in
MSW03411-	248	MSW03411-0248	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.831743	32.723411	-90 49 54.274799	32 43 24.279600	Corps	0	3	1	in	in	in	in	in
MSW03411-	249	MSW03411-0249	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.893448	32.459578	-90 53 36.412799	32 27 34.480800	Corps	0	0	1	out	out	in	out	out
MSW03411-	250	MSW03411-0250	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.883674	32.745196	-90 53 1.226399	32 44 42.705600	Corps	0	3	1	in	in	in	in	in
MSW03411-	251	MSW03411-0251	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.952193	33.128278	-90 57 7.894799	33 7 41.800800	Corps	0	0	1	out	out	in	out	out
MSW03411-	252	MSW03411-0252	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.769441	32.835782	-90 46 9.987598	32 50 8.815200	Corps	2	0	1	in	in	in	in	in
MSW03411-	253	MSW03411-0253	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.950277	32.509876	-90 57 0.997199	32 30 35.553600	Corps	2	0	1	in	in	in	in	in
MSW03411-	254	MSW03411-0254	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.881291	32.704319	-90 52 52.647599	32 42 15.548400	Corps	0	3	1	in	in	in	in	in
MSW03411-	255	MSW03411-0255	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.774354	32.853811	-90 46 27.674399	32 51 13.719600	Corps	2	0	1	in	in	in	in	in
MSW03411-	256	MSW03411-0256	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.694840	32.705912	-90 41 41.423998	32 42 21.283200	Corps	0	0	1	out	out	in	out	out
MSW03411-	257	MSW03411-0257	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.910547	32.620751	-90 54 37.969199	32 37 14.703600	Corps	2	0	1	in	in	in	in	in
MSW03411-	258	MSW03411-0258	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.002508	32.672486	-91 0 9.028799	32 40 20.949600	Corps	2	0	1	in	in	in	in	in
MSW03411-	259	MSW03411-0259	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.022733	32.527068	-91 1 21.838800	32 31 37.444800	Corps	0	0	1	out	out	in	out	out
MSW03411-	260	MSW03411-0260	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.824577	32.802953	-90 49 28.477199	32 48 10.630800	Corps	2	0	1	in	in	in	in	in
MSW03411-	261	MSW03411-0261	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.873210	32.582711	-90 52 23.555999	32 34 57.759600	Corps	2	0	1	in	in	in	in	in
MSW03411-	262	MSW03411-0262	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.847476	32.809881	-90 50 50.913599	32 48 35.571600	Corps	2	0	1	in	in	in	in	in
MSW03411-	263	MSW03411-0263	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.737678	32.768865	-90 44 15.640798	32 46 7.914000	Corps	2	0	1	in	in	in	in	in
MSW03411-	264	MSW03411-0264	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804388	32.674402	-90 48 15.796799	32 40 27.847200	Corps	2	0	1	in	in	in	in	in
MSW03411-	265	MSW03411-0265	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.890311	32.556666	-90 53 25.119599	32 33 23.997600	Corps	0	0	1	in	in	in	in	in
MSW03411-	266	MSW03411-0266	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.845607	32.743346	-90 50 44.185199	32 44 36.045600	Corps	0	0	1	in	in	in	in	in
MSW03411-	267	MSW03411-0267	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.992401	33.130733	-90 59 32.643599	33 7 50.638800	Corps	2	0	1	in	in	in	in	in
MSW03411-	268	MSW03411-0268	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.759604	32.693823	-90 45 34.574398	32 41 37.762800	Corps	2	0	1	in	in	in	in	in
MSW03411-	269	MSW03411-0269	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.924922	32.541572	-90 55 29.719199	32 32 29.659200	Corps	2	0	1	in	in	in	in	in
MSW03411-	270	MSW03411-0270	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.810297	32.818182	-90 48 37.069199	32 49 5.455200	Corps	2	0	1	in	in	in	in	in
MSW03411-	271	MSW03411-0271	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.825592	32.868708	-90 49 32.131199	32 52 7.348800	Corps	2	0	1	in	in	in	in	in
MSW03411-	272	MSW03411-0272	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.766940	32.630784	-90 46 0.983998	32 37 50.822400	Corps	2	0	1	in	in	in	in	in
MSW03411-	273	MSW03411-0273	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.961700	32.639436	-90 57 42.119999	32 38 21.969600	Corps	0	0	1	in	in	in	in	in
MSW03411-	274	MSW03411-0274	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.748906	32.919168	-90 44 56.061599	32 55 9.004800	Corps	2	0	1	out	out	in	out	out
MSW03411-	275	MSW03411-0275	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.003317	32.502965	-91 0 11.941199	32 30 10.674000	Corps	0	0	1	in	in	in	in	in
MSW03411-	276	MSW03411-0276	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.823750	32.775099	-90 49 25.499999	32 46 30.356400	Corps	2	0	1	in	in	in	in	in
MSW03411-	277	MSW03411-0277	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.899938	32.574557	-90 53 59.776799	32 34 28.405200	Corps	0	0	1	in	in	in	in	in
MSW03411-	278	MSW03411-0278	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.851813	32.717666	-90 51 6.526799	32 43 3.597600	Corps	0	3	1	in	in	in	in	in
MSW03411-	279	MSW03411-0279	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.741178	32.849904	-90 44 28.240799	32 50 59.654400	Corps	0	0	1	in	in	in	in	in
MSW03411-	280	MSW03411-0280	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.803271	32.741316	-90 48 11.775599	32 44 28.737600	Corps	2	0	1	in	in	in	in	in
MSW03411-	281	MSW03411-0281	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.840223	32.493662	-90 50 24.802799	32 29 37.183200	Corps	2	0	1	in	in	in	in	in
MSW03411-	282	MSW03411-0282	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.883244	32.788631	-90 52 59.678399	32 47 19.071600	Corps	0	0	1	in	in	in	in	in
MSW03411-	283	MSW03411-0283	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.689186	33.158361	-90 41 21.069598	33 9 30.099600	Corps	0	0	1	in	in	in	in	in
MSW03411-	284	MSW03411-0284	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.776075	32.776177	-90 46 33.869999	32 46 34.237200	Corps	2	0	1	in	in	in	in	in
MSW03411-	285	MSW03411-0285	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.934576	32.501337	-90 56 4.473599	32 30 4.813200	Corps	2	0	1	in	in	in	in	in
MSW03411-	286	MSW03411-0286	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.886064	32.618279	-90 53 9.830399	32 37 5.804400	Corps	0	3	1	in	out	in	in	in
MSW03411-	287	MSW03411-0287	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.762001	32.882764	-90 45 43.203598	32 52 57.950400	Corps	2	0	1	in	in	in	in	in
MSW03411-	288	MSW03411-0288	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.973698	32.987980	-90 58 25.312799	32 59 16.728000	Corps	2	0	1	in	in	in	in	in
MSW03411-	289	MSW03411-0289	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.987671	32.601681	-90 59 15.615599	32 36 6.051600	Corps	0	0	1	in	in	in	in	in
MSW03411-	290	MSW03411-0290	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.699657	33.086088	-90 41 58.765198	33 5 9.916800	Corps	2	0	1	in	in	in	in	in
MSW03411-	291	MSW03411-0291	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.918240	32.464155	-90 55 5.663999	32 27 50.958000	Corps	2	0	1	in	in	in	in	in
MSW03411-	292	MSW03411-0292	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.818238	32.787567	-90 49 5.656799	32 47 15.241200	Corps	2	0	1	in	in	in	in	in
MSW03411-	293	MSW03411-0293	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.825437	32.592129	-90 49 31.573199	32 35 31.664400	Corps	2	0	1	in	in	in	in	in
MSW03411-	294	MSW03411-0294	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.877117	32.811989	-90 52 37.621199	32 48 43.160400	Corps	2	0	1	in	in	in	in	in
MSW03411-	295	MSW03411-0295	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.744648	32.882667	-90 44 40.732798	32 52 57.601200	Corps	2	0	1	out	out	in	out	out
MSW03411-	296	MSW03411-0296	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.796007	32.718433	-90 47 45.625199	32 43 6.358800	Corps	2	0	1	in	in	in	in	in
MSW03411-	297	MSW03411-0297	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.884190	32.510837	-90 53 3.083999	32 30 39.013200	Corps	2	0	1	in	in	in	in	in

MSW03411-	298	MSW03411-0298	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.890887	32.708542	-90 53 27.193199	32 42 30.751200	Corps	0	0	1	in	in	in	in	in
MSW03411-	299	MSW03411-0299	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.051674	33.093052	-91 3 6.026400	33 5 34.987200	Corps	0	0	1	out	out	in	in	in
MSW03411-	300	MSW03411-0300	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.789134	32.738425	-90 47 20.882399	32 44 18.330000	Corps	2	0	1	in	in	in	in	in
MSW03411-	301	MSW03411-0301	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.924363	32.511121	-90 55 27.706799	32 30 40.035600	Corps	2	0	1	in	in	in	in	in
MSW03411-	302	MSW03411-0302	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.830484	32.817203	-90 49 49.742399	32 49 1.930800	Corps	0	0	1	in	in	in	in	in
MSW03411-	303	MSW03411-0303	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.800229	32.891301	-90 48 0.824399	32 53 28.683600	Corps	2	0	1	in	in	in	in	in
MSW03411-	304	MSW03411-0304	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811215	32.616285	-90 48 40.373999	32 36 58.626000	Corps	2	0	1	in	in	in	in	in
MSW03411-	305	MSW03411-0305	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.931012	32.561868	-90 55 51.643199	32 33 42.724800	Corps	2	0	1	in	in	in	in	in
MSW03411-	306	MSW03411-0306	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.766084	32.939926	-90 45 57.902399	32 56 23.733600	Corps	0	0	1	in	in	in	in	in
MSW03411-	307	MSW03411-0307	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.943637	32.472060	-90 56 37.093199	32 28 19.416000	Corps	2	0	1	in	in	in	in	in
MSW03411-	308	MSW03411-0308	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.794171	32.803664	-90 47 39.015599	32 48 13.190400	Corps	2	0	1	in	in	in	in	in
MSW03411-	309	MSW03411-0309	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.878456	32.542176	-90 52 42.441599	32 32 31.833600	Corps	0	0	1	in	in	in	in	in
MSW03411-	310	MSW03411-0310	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.985455	32.802261	-90 59 7.637999	32 48 8.139600	Corps	0	0	1	in	in	in	in	in
MSW03411-	311	MSW03411-0311	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.725697	32.834700	-90 43 32.509198	32 50 4.920000	Corps	0	0	1	in	out	in	out	out
MSW03411-	312	MSW03411-0312	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.774708	32.709648	-90 46 28.948799	32 42 34.732800	Corps	2	0	1	in	in	in	in	in
MSW03411-	313	MSW03411-0313	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.867506	32.476578	-90 52 3.021599	32 28 35.680800	Corps	2	0	1	in	in	in	in	in
MSW03411-	314	MSW03411-0314	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.885169	32.765293	-90 53 6.608399	32 45 55.054800	Corps	0	3	1	in	in	in	in	in
MSW03411-	315	MSW03411-0315	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.045394	33.068422	-91 2 43.418399	33 4 6.319200	Corps	0	0	1	in	in	in	in	in
MSW03411-	316	MSW03411-0316	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.780462	32.743796	-90 46 49.663198	32 44 37.665600	Corps	2	0	1	in	in	in	in	in
MSW03411-	317	MSW03411-0317	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.945817	32.518206	-90 56 44.941199	32 31 5.541600	Corps	2	0	1	in	in	in	in	in
MSW03411-	318	MSW03411-0318	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.866463	32.695260	-90 51 59.266799	32 41 42.936000	Corps	0	3	1	in	in	in	in	in
MSW03411-	319	MSW03411-0319	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.793146	32.878993	-90 47 35.325599	32 52 44.374800	Corps	2	0	1	in	in	in	in	in
MSW03411-	320	MSW03411-0320	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.787858	32.583236	-90 47 16.288799	32 34 59.649600	Corps	2	0	1	in	in	in	in	in
MSW03411-	321	MSW03411-0321	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.992229	32.639359	-90 59 32.024399	32 38 21.692400	Corps	0	0	1	in	out	in	in	in
MSW03411-	322	MSW03411-0322	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.916060	32.732102	-90 54 57.815999	32 43 55.567200	Corps	0	0	1	in	in	in	in	in
MSW03411-	323	MSW03411-0323	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.055343	32.505134	-91 3 19.234800	32 30 18.482400	Corps	0	0	1	in	in	in	in	in
MSW03411-	324	MSW03411-0324	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.767049	32.770325	-90 46 1.376399	32 46 13.170000	Corps	2	0	1	in	in	in	in	in
MSW03411-	325	MSW03411-0325	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.871393	32.595466	-90 52 17.014799	32 35 43.677600	Corps	2	0	1	in	in	in	in	in
MSW03411-	326	MSW03411-0326	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.845770	32.856877	-90 50 44.771999	32 51 24.757200	Corps	2	0	1	in	in	in	in	in
MSW03411-	327	MSW03411-0327	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.702756	32.748853	-90 42 9.921598	32 44 55.870800	Corps	0	0	1	out	out	in	out	out
MSW03411-	328	MSW03411-0328	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.818573	32.713636	-90 49 6.862799	32 42 49.089600	Corps	2	0	1	in	in	in	in	in
MSW03411-	329	MSW03411-0329	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.905156	32.546303	-90 54 18.561599	32 32 46.690800	Corps	0	0	1	in	in	in	in	in
MSW03411-	330	MSW03411-0330	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.859794	32.768333	-90 51 35.258399	32 46 5.998800	Corps	0	0	1	in	in	in	in	in
MSW03411-	331	MSW03411-0331	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.562814	33.043925	-90 33 46.130397	33 2 38.130000	Corps	0	0	1	out	out	in	out	out
MSW03411-	332	MSW03411-0332	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.743193	32.689613	-90 44 35.494798	32 41 22.606800	Corps	2	0	1	in	in	in	in	in
MSW03411-	333	MSW03411-0333	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.943342	32.545969	-90 56 36.031199	32 32 45.488400	Corps	2	0	1	in	in	in	in	in
MSW03411-	334	MSW03411-0334	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.749675	32.828913	-90 44 58.829998	32 49 44.086800	Corps	0	0	1	in	in	in	in	in
MSW03411-	335	MSW03411-0335	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.822720	32.866745	-90 49 21.791999	32 52 0.282000	Corps	2	0	1	in	in	in	in	in
MSW03411-	336	MSW03411-0336	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.776537	32.642308	-90 46 35.533199	32 38 32.308800	Corps	2	0	1	in	in	in	in	in
MSW03411-	337	MSW03411-0337	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.945664	32.612810	-90 56 44.390399	32 36 46.116000	Corps	0	0	1	in	in	in	in	in
MSW03411-	338	MSW03411-0338	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.804623	32.857419	-90 48 16.642799	32 51 26.708400	Corps	2	0	1	in	in	in	in	in
MSW03411-	339	MSW03411-0339	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.955394	32.558004	-90 57 19.418399	32 33 28.814400	Corps	2	0	1	in	out	in	in	in
MSW03411-	340	MSW03411-0340	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.797315	32.762127	-90 47 50.333998	32 45 43.657200	Corps	2	0	1	in	in	in	in	in
MSW03411-	341	MSW03411-0341	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.911486	32.570541	-90 54 41.349599	32 34 13.947600	Corps	0	0	1	in	in	in	in	in
MSW03411-	342	MSW03411-0342	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.865676	32.715688	-90 51 56.433599	32 42 56.476800	Corps	0	3	1	in	in	in	in	in
MSW03411-	343	MSW03411-0343	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.603227	32.842411	-90 36 11.617198	32 50 32.679600	Corps	2	0	1	in	in	in	in	in
MSW03411-	344	MSW03411-0344	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.743035	32.703965	-90 44 34.925998	32 42 14.274000	Corps	2	0	1	in	out	in	in	in
MSW03411-	345	MSW03411-0345	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.045001	32.499875	-91 2 42.003600	32 29 59.550000	Corps	0	0	1	in	in	in	in	in
MSW03411-	346	MSW03411-0346	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.874604	32.801840	-90 52 28.574399	32 48 6.624000	Corps	2	0	1	in	in	in	in	in
MSW03411-	347	MSW03411-0347	1	0	1	3	1 1 1	80	7.83390141	Corps	-91.019789	32.656014	-91 1 11.240399	32 39 21.650400	Corps	2	0	1	in	in	in	in	in
MSW03411-	348	MSW03411-0348	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.760364	32.778802	-90 45 37.310398	32 46 43.687200	Corps	2	0	1	in	in	in	in	in
MSW03411-	349	MSW03411-0349	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.926240	32.487007	-90 55 34.463999	32 29 13.225200	Corps	0	0	1	in	in	in	in	in
MSW03411-	350	MSW03411-0350	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.916903	32.631507	-90 55 0.850799	32 37 53.425200	Corps	2	0	1	in	in	in	in	in
MSW03411-	351	MSW03411-0351	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.738441	32.790480	-90 44 18.387598	32 47 25.728000	Corps	2	0	1	in	in	in	in	in
MSW03411-	352	MSW03411-0352	1	0	1	3	1 1 1	80	7.83390141	Corps	-90.847465	32.691655	-90 50 50.873999	32 41 29.958000	Corps	0	3	1	in	in	in	in	in
MSW03411-	353	MSW03411-0353	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.953104	32.574838	-90 57 11.174399	32 34 29.416800	Corps	2	0	1	in	in	in	in	in
MSW03411-	354	MSW03411-0354	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.712515	32.976211	-90 42 45.053998	32 58 34.359600	Corps	2	0	1	in	out	in	out	out
MSW03411-	355	MSW03411-0355	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.945450	32.487872	-90 56 43.619999	32 29 16.339200	Corps	2	0	1	in	in	in	in	in
MSW03411-	356	MSW03411-0356	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.781642	32.793211	-90 46 53.911198	32 47 35.559600	Corps	2	0	1	in	in	in	in	in
MSW03411-	357	MSW03411-0357	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.870790	32.516450	-90 52 14.843999	32 30 59.220000	Corps	2	0	1	in	in	in	in	in
MSW03411-	358	MSW03411-0358	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.016152	32.817944	-91 0 58.147199	32 49 4.598400	Corps	2	0	1	in	in	in	in	in
MSW03411-	359	MSW03411-0359	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.712951	32.901615	-90 42 46.623598	32 54 5.814000	Corps	2	0	1	in	out	in	out	out
MSW03411-	360	MSW03411-0360	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.794832	32.698306	-90 47 41.395199	32 41 53.901600	Corps	2	0	1	in	in	in	in	in
MSW03411-	361	MSW03411-0361	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.895181	32.498188	-90 53 42.651599	32 29 53.476800	Corps	2	0	1	in	in	in	in	in
MSW03411-	362	MSW03411-0362	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.885036	32.747460	-90 53 6.129599	32 44 50.856000	Corps	0	3	1	in	in	in	in	in
MSW03411-	363	MSW03411-0363	1	0	1	5	1 1 1	80	7.83390141	Corps	-91.035215	33.024774	-91 2 6.774000	33 1 29.186400	Corps	0	0	1	in	in	in	in	in
MSW03411-	364	MSW03411-0364	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.758339	32.752387	-90 45 30.020399	32 45 8.593200	Corps	2	0	1	in	in	in	in	in
MSW03411-	365	MSW03411-0365	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.897125	32.515465	-90 53 49.649999	32 30 55.674000	Corps	2	0	1	in	in	in	in	in
MSW03411-	366	MSW03411-0366	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.865288	32.700284	-90 51 55.036799	32 42 1.022400	Corps	0	3	1	in	in	in	in	in
MSW03411-	367	MSW03411-0367	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.788944	32.918743	-90 47 20.198399	32 55 7.474800	Corps	0	0	1	in	in	in	out	out
MSW03411-	368	MSW03411-0368	1	0	1	5	1 1 1	80	7.83390141	Corps	-90.796931	32.578372	-90 47 48.951599	32 34 42.139200	Corps	2	0	1	in	in	in	in	in
MSW03411-	369	MSW03411-0369	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.959723	32.584095	-90 57 35.002799	32 35 2.742000	Corps	2	0	1	in	in	in	in	in
MSW03411-	370	MSW03411-0370	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.826721	32.898323	-90 49 36.195599	32 53 53.962800	Corps	0	0	1	in	in	in	in	in
MSW03411-	371	MSW03411-0371	1	0	1	4	1 1 1	80	7.83390141	Corps	-91.002167	32.513008	-91 0 7.801199	32 30 46.828800	Corps	0	0	1	in	in	in	in	in
MSW03411-	372	MSW03411-0372	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.814631	32.807377	-90 48 52.671599	32 48 26.557200	Corps	2	0	1	in	in	in	in	in
MSW03411-	373	MSW03411-0373	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.887832	32.596245	-90 53 16.195199	32 35 46.482000	Corps	0	3	1	in	in	in	in	in
MSW03411-	374	MSW03411-0374	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.858642	32.734550	-90 51 31.111199	32 44 4.380000	Corps	0	0	1	in	in	in	in	in
MSW03411-	375	MSW03411-0375	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.747960	32.862528	-90 44 52.655999	32 51 45.100800	Corps	2	0	1	in	in	in	in	in
MSW03411-	376	MSW03411-0376	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.811466	32.747396	-90 48 41.277599	32 44 50.625600	Corps	2	0	1	in	in	in	in	in
MSW03411-	377	MSW03411-0377	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.915381	32.467276	-90 54 55.371599	32 28 2.193600	Corps	2	0	1	in	in	in	in	in
MSW03411-	378	MSW03411-0378	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.894463	32.743976	-90 53 40.066799	32 44 38.313600	Corps	0	3	1	in	in	in	in	in
MSW03411-	379	MSW03411-0379	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.965615	33.112906	-90 57 56.213999	33 6 46.461600	Corps	2	0	1	in	in	in	in	in
MSW03411-	380	MSW03411-0380	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.786564	32.833550	-90 47 11.630399	32 50 0.780000	Corps	2	0	1	in	in	in	out	out
MSW03411-	381	MSW03411-0381	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.955501	32.493403	-90 57 19.803599	32 29 36.250800	Corps	2	0	1	in	in	in	in	in
MSW03411-	382	MSW03411-0382	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.901268	32.635161	-90 54 4.564799	32 38 6.579600	Corps	0	0	1	in	in	in	in	in
MSW03411-	383	MSW03411-0383	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.780189	32.878567	-90 46 48.680399	32 52 42.841200	Corps	2	0	1	in	in	in	in	in
MSW03411-	384	MSW03411-0384	1	0	1	4	1 1 1	80	7.83390141	Corps	-90.999711	33.017278	-90 59 58.959599	33 1 2.200800	Corps	0	0	1	in	in	out	in	in
MSW03411-	385	MSW03411-0385	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.936234	32.605804	-90 56 10.442399	32 36 20.894400	Corps	0	3	1	in	in	in	in	in
MSW03411-	386	MSW03411-0386	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.008787	32.670310	-91 0 31.633199	32 40 13.116000	Corps	2	0	1	in	in	in	in	in
MSW03411-	387	MSW03411-0387	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.075582	32.531312	-91 4 32.095199	32 31 52.723200	Corps	0	0	1	out	out	in	out	out
MSW03411-	388	MSW03411-0388	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.818907	32.798964	-90 49 8.065199	32 47 56.270400	Corps	2	0	1	in	in	in	in	in
MSW03411-	389	MSW03411-0389	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.864320	32.564717	-90 51 51.551999	32 33 52.981200	Corps	0	0	1	in	in	in	in	in
MSW03411-	390	MSW03411-0390	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.859233	32.810553	-90 51 33.238799	32 48 37.990800	Corps	2	0	1	in	in	in	in	in
MSW03411-	391	MSW03411-0391	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.724805	32.768977	-90 43 29.297998	32 46 8.317200	Corps	2	0	1	in	in	in	in	in
MSW03411-	392	MSW03411-0392	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.792205	32.693877	-90 47 31.937999	32 41 37.957200	Corps	2	0	1	in	in	in	in	in
MSW03411-	393	MSW03411-0393	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.895239	32.556140	-90 53 42.860399	32 33 22.104000	Corps	0	0	1	in	in	in	in	in
MSW03411-	394	MSW03411-0394	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.849644	32.760213	-90 50 58.718399	32 45 36.766800	Corps	0	3	1	in	in	in	in	in
MSW03411-	395	MSW03411-0395	1	0	1	2	1 1 1	80	7.83390141	Corps	-91.051449	33.153397	-91 3 5.216399	33 9 12.229200	Corps	2	0	1	in	in	in	in	in
MSW03411-	396	MSW03411-0396	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.747919	32.685243	-90 44 52.508398	32 41 6.874800	Corps	2	0	1	in	in	in	in	in
MSW03411-	397	MSW03411-0397	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.918089	32.501238	-90 55 5.120399	32 30 4.456800	Corps	2	0	1	in	in	in	in	in
MSW03411-	398	MSW03411-0398	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.810534	32.837003	-90 48 37.922399	32 50 13.210800	Corps	2	0	1	in	in	in	in	in
MSW03411-	399	MSW03411-0399	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.801178	32.903780	-90 48 4.240799	32 54 13.608000	Corps	0	0	1	in	in	in	in	in
MSW03411-	400	MSW03411-0400	1	0	1	2	1 1 1	80	7.83390141	Corps	-90.787657	32.638516	-90 47 15.565199	32 38 18.657600	Corps	2	0	1	in	out	out	out	out
MSW03411-	401	MSW03411-0401	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.940081	32.718670	-90 56 24.291599	32 43 7.212000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	402	MSW03411-0402	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.917894	33.008613	-90 55 4.418399	33 0 31.006800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	403	MSW03411-0403	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.054375	33.029112	-91 3 15.749999	33 1 44.803200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	404	MSW03411-0404	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.745053	33.214996	-90 44 42.190798	33 12 53.985600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	405	MSW03411-0405	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.856491	32.842122	-90 51 23.367599	32 50 31.639200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	406	MSW03411-0406	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.731969	32.643673	-90 43 55.088399	32 38 37.222800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	407	MSW03411-0407	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.642376	32.927055	-90 38 32.553598	32 55 37.398000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	408	MSW03411-0408	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.962297	32.541629	-90 57 44.269199	32 32 29.864400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	409	MSW03411-0409	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.830975	32.665840	-90 49 51.509999	32 39 57.024000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	410	MSW03411-0410	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.822305	32.626764	-90 49 20.297999	32 37 36.350400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	411	MSW03411-0411	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.679434	32.902405	-90 40 45.962398	32 54 8.658000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	412	MSW03411-0412	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.961790	33.086412	-90 57 42.443999	33 5 11.083200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	413	MSW03411-0413	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.011064	32.770721	-91 0 39.830399	32 46 14.595600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	414	MSW03411-0414	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.669432	33.104031	-90 40 9.955198	33 6 14.511600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	415	MSW03411-0415	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.704798	32.962462	-90 42 17.272798	32 57 44.863200	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	416	MSW03411-0416	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.012540	32.567588	-91 0 45.143999	32 34 3.316800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	417	MSW03411-0417	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.880654	32.662703	-90 52 50.354399	32 39 45.730800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	418	MSW03411-0418	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.805779	32.534032	-90 48 20.804399	32 32 2.515200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	419	MSW03411-0419	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.041482	32.869081	-91 2 28.335200	32 52 8.691600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	420	MSW03411-0420	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.668450	33.166359	-90 40 6.419998	33 9 58.892400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	421	MSW03411-0421	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.001358	32.805621	-91 0 4.888799	32 48 20.235600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	422	MSW03411-0422	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.659165	33.133248	-90 39 32.993998	33 7 59.692800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	423	MSW03411-0423	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.741320	32.917775	-90 44 28.751998	32 55 3.990000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	424	MSW03411-0424	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.980214	32.586737	-90 58 48.770399	32 35 12.253200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	425	MSW03411-0425	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.808321	32.666751	-90 48 29.955599	32 40 0.303600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	426	MSW03411-0426	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.781828	32.619945	-90 46 54.580798	32 37 11.802000	EPAnot	2	0	0	in	out	in	out	out
MSW03411-	427	MSW03411-0427	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.696168	32.762430	-90 41 46.204798	32 45 44.748000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	428	MSW03411-0428	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.840237	32.528961	-90 50 24.853199	32 31 44.259600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	429	MSW03411-0429	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.080379	32.813195	-91 4 49.364400	32 48 47.502000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	430	MSW03411-0430	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.653992	32.971483	-90 39 14.371198	32 58 17.338800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	431	MSW03411-0431	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.801992	32.936179	-90 48 7.171199	32 56 10.244400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	432	MSW03411-0432	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.046676	32.664974	-91 2 48.033599	32 39 53.906400	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	433	MSW03411-0433	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.961192	32.697877	-90 57 40.291199	32 41 52.357200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	434	MSW03411-0434	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.921418	32.899940	-90 55 17.104799	32 53 59.784000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	435	MSW03411-0435	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.009530	32.885015	-91 0 34.308000	32 53 6.054000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	436	MSW03411-0436	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.755438	33.110235	-90 45 19.576798	33 6 36.846000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	437	MSW03411-0437	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.883177	32.732014	-90 52 59.437199	32 43 55.250400	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	438	MSW03411-0438	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.587116	33.130555	-90 35 13.617598	33 7 49.998000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	439	MSW03411-0439	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.660880	32.910041	-90 39 39.167998	32 54 36.147600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	440	MSW03411-0440	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.989277	32.613342	-90 59 21.397199	32 36 48.031200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	441	MSW03411-0441	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.760427	32.735158	-90 45 37.537199	32 44 6.568800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	442	MSW03411-0442	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.746338	32.646571	-90 44 46.816799	32 38 47.655600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	443	MSW03411-0443	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.599405	32.835550	-90 35 57.857998	32 50 7.980000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	444	MSW03411-0444	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.910398	32.599249	-90 54 37.432799	32 35 57.296400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	445	MSW03411-0445	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-91.057693	32.799695	-91 3 27.694799	32 47 58.902000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	446	MSW03411-0446	2	1	0	1	2 1 1	80	6.95193329	EPAnot	-90.502430	33.051629	-90 30 8.747997	33 3 5.864400	EPAnot	2	0	0	out	out	out	out	out

MSW03411-	447	MSW03411-0447	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.811287	32.913414	-90 48 40.633199	32 54 48.290400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	448	MSW03411-0448	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.039607	32.693421	-91 2 22.585199	32 41 36.315600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	449	MSW03411-0449	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.905148	32.658714	-90 54 18.532799	32 39 31.370400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	450	MSW03411-0450	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.720622	32.686434	-90 43 14.239198	32 41 11.162400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	451	MSW03411-0451	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.718230	32.879854	-90 43 5.627998	32 52 47.474400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	452	MSW03411-0452	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.986276	33.147600	-90 59 10.593599	33 8 51.360000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	453	MSW03411-0453	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.000253	32.749506	-91 0 0.910799	32 44 58.221600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	454	MSW03411-0454	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.616787	33.070527	-90 37 0.433198	33 4 13.897200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	455	MSW03411-0455	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.744644	32.962334	-90 44 40.718398	32 57 44.402400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	456	MSW03411-0456	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.019833	32.586090	-91 1 11.398799	32 35 9.924000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	457	MSW03411-0457	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.905901	32.800681	-90 54 21.243599	32 48 2.451600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	458	MSW03411-0458	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.779176	32.631939	-90 46 45.033599	32 37 54.980400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	459	MSW03411-0459	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.685469	32.735779	-90 41 7.688398	32 44 8.804400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	460	MSW03411-0460	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.985321	32.528956	-90 59 7.155599	32 31 44.241600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	461	MSW03411-0461	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.041696	32.825963	-91 2 30.105599	32 49 33.466800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	462	MSW03411-0462	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.673924	33.011998	-90 40 26.126398	33 0 43.192800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	463	MSW03411-0463	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.730261	33.022647	-90 43 48.939598	33 1 21.529200	NonWet	0	0	0	out	in	out	out	out
MSW03411-	464	MSW03411-0464	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.066911	32.784791	-91 4 0.879599	32 47 5.247600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	465	MSW03411-0465	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.976621	32.736897	-90 58 35.835599	32 44 12.829200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	466	MSW03411-0466	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.894208	32.967089	-90 53 39.148799	32 58 1.520400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	467	MSW03411-0467	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.949266	32.886868	-90 56 57.357599	32 53 12.724800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	468	MSW03411-0468	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.809911	33.183925	-90 48 35.679599	33 11 2.130000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	469	MSW03411-0469	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.787993	32.848701	-90 47 16.774799	32 50 55.323600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	470	MSW03411-0470	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.810071	32.647816	-90 48 36.255599	32 38 52.137600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	471	MSW03411-0471	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.629851	32.859470	-90 37 47.463598	32 51 34.092000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	472	MSW03411-0472	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.848421	32.510864	-90 50 54.315599	32 30 39.110400	EPAnot	2	3	0	in	out	out	out	out
MSW03411-	473	MSW03411-0473	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.907478	32.669138	-90 54 26.920799	32 40 8.896800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	474	MSW03411-0474	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.785143	32.602782	-90 47 6.514799	32 36 10.015200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	475	MSW03411-0475	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.637152	32.854588	-90 38 13.747198	32 51 16.516800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	476	MSW03411-0476	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.809014	32.570161	-90 48 32.450399	32 34 12.579600	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	477	MSW03411-0477	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.971866	32.768091	-90 58 18.717599	32 46 5.127600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	478	MSW03411-0478	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.498900	33.004220	-90 29 56.039997	33 0 15.192000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	479	MSW03411-0479	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-90.671310	32.938669	-90 40 16.715998	32 56 19.208400	NonWet	0	0	0	in	out	in	out	out
MSW03411-	480	MSW03411-0480	2	1	0	1	2	1	1	80	6.95193329	EPAnot	-91.028418	32.545967	-91 1 42.304799	32 32 45.481200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	481	MSW03411-0481	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.925955	32.669707	-90 55 33.437999	32 40 10.945200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	482	MSW03411-0482	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.779973	33.101313	-90 46 47.902799	33 6 4.726800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	483	MSW03411-0483	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.047623	32.832358	-91 2 51.442800	32 49 56.488800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	484	MSW03411-0484	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.778502	33.220064	-90 46 42.607199	33 13 12.230400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	485	MSW03411-0485	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.869052	32.839338	-90 52 8.587199	32 50 21.616800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	486	MSW03411-0486	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.767151	32.631290	-90 46 1.743599	32 37 52.644000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	487	MSW03411-0487	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.718436	32.719476	-90 43 6.369598	32 43 10.113600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	488	MSW03411-0488	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.987941	32.535764	-90 59 16.587599	32 32 8.750400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	489	MSW03411-0489	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.913146	32.662103	-90 54 47.325599	32 39 43.570800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	490	MSW03411-0490	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.743045	32.662633	-90 44 34.961998	32 39 45.478800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	491	MSW03411-0491	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.741706	32.869375	-90 44 30.141598	32 52 9.750000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	492	MSW03411-0492	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.932772	33.236853	-90 55 57.979199	33 14 12.670800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	493	MSW03411-0493	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.986631	32.756982	-90 59 11.871599	32 45 25.135200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	494	MSW03411-0494	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.659861	33.097088	-90 39 35.499598	33 5 49.516800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	495	MSW03411-0495	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.729591	32.989359	-90 43 46.527598	32 59 21.692400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	496	MSW03411-0496	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.989765	32.603991	-90 59 23.153999	32 36 14.367600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	497	MSW03411-0497	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.029100	32.684494	-91 1 44.759999	32 41 4.178400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	498	MSW03411-0498	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.912254	32.915161	-90 54 44.114399	32 54 54.579600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	499	MSW03411-0499	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.997450	32.839537	-90 59 50.819999	32 50 22.333200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	500	MSW03411-0500	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.770739	33.161033	-90 46 14.660399	33 9 39.718800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	501	MSW03411-0501	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.770228	32.834952	-90 46 12.820798	32 50 5.827200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	502	MSW03411-0502	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.808777	32.633074	-90 48 31.597199	32 37 59.066400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	503	MSW03411-0503	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.595809	32.886328	-90 35 44.912398	32 53 10.780800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	504	MSW03411-0504	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.934061	32.629521	-90 56 2.619599	32 37 46.275600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	505	MSW03411-0505	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.742437	32.712310	-90 44 32.773199	32 42 44.316000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	506	MSW03411-0506	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.782638	32.641321	-90 46 57.496799	32 38 28.755600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	507	MSW03411-0507	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.614066	32.848580	-90 36 50.637598	32 50 54.888000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	508	MSW03411-0508	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.860632	32.618374	-90 51 38.275199	32 37 6.146400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	509	MSW03411-0509	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.970679	32.821200	-90 58 14.444399	32 49 16.320000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	510	MSW03411-0510	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.593933	33.041356	-90 35 38.158798	33 2 28.881600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	511	MSW03411-0511	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.676993	32.921697	-90 40 37.174798	32 55 18.109200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	512	MSW03411-0512	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.043014	32.678575	-91 2 34.850399	32 40 42.870000	NonWet	0	0	0	out	out	out	in	in
MSW03411-	513	MSW03411-0513	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.954339	32.711207	-90 57 15.620399	32 42 40.345200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	514	MSW03411-0514	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.931405	32.967347	-90 55 53.057999	32 58 2.449200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	515	MSW03411-0515	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.024714	32.978397	-91 1 28.970399	32 58 42.229200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	516	MSW03411-0516	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.823898	33.210389	-90 49 26.032799	33 12 37.400400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	517	MSW03411-0517	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.923548	32.827119	-90 55 24.772799	32 49 37.628400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	518	MSW03411-0518	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.729607	32.620500	-90 43 46.585198	32 37 13.800000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	519	MSW03411-0519	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.558753	32.910003	-90 33 31.510797	32 54 36.010800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	520	MSW03411-0520	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.930958	32.476866	-90 55 51.448799	32 28 36.717600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	521	MSW03411-0521	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.912695	32.678651	-90 54 45.701999	32 40 43.143600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	522	MSW03411-0522	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.826436	32.616059	-90 49 35.169599	32 36 57.812400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	523	MSW03411-0523	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.607355	32.828696	-90 36 26.477998	32 49 43.305600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	524	MSW03411-0524	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.962993	32.452071	-90 57 46.774799	32 27 7.455600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	525	MSW03411-0525	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.021263	32.779027	-91 1 16.546799	32 46 44.497200	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	526	MSW03411-0526	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.551874	32.975412	-90 33 6.746397	32 58 31.483200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	527	MSW03411-0527	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.689148	32.918984	-90 41 20.932798	32 55 8.342400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	528	MSW03411-0528	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.001899	32.550572	-91 0 6.836399	32 33 2.059200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	529	MSW03411-0529	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.891147	32.651296	-90 53 28.129199	32 39 4.665600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	530	MSW03411-0530	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.807625	32.552038	-90 48 27.449999	32 33 7.336800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	531	MSW03411-0531	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.956147	32.849932	-90 57 22.129199	32 50 59.755200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	532	MSW03411-0532	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.618306	33.149211	-90 37 5.901598	33 8 57.159600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	533	MSW03411-0533	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.014947	32.809388	-91 0 53.809199	32 48 33.796800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	534	MSW03411-0534	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.667893	33.110446	-90 40 4.414798	33 6 37.605600	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	535	MSW03411-0535	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.706157	32.924952	-90 42 22.165198	32 55 29.827200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	536	MSW03411-0536	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.996814	32.579420	-90 59 48.530399	32 34 45.912000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	537	MSW03411-0537	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.800366	32.665458	-90 48 1.317599	32 39 55.648800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	538	MSW03411-0538	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.772573	32.618946	-90 46 21.262798	32 37 8.205600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	539	MSW03411-0539	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.662581	32.789124	-90 39 45.291598	32 47 20.846400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	540	MSW03411-0540	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.846144	32.532074	-90 50 46.118399	32 31 55.466400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	541	MSW03411-0541	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.071881	32.813626	-91 4 18.771600	32 48 49.053600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	542	MSW03411-0542	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.655089	33.019521	-90 39 18.320398	33 1 10.275600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	543	MSW03411-0543	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.851747	32.911096	-90 51 6.289199	32 54 39.945600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	544	MSW03411-0544	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.036391	32.660723	-91 2 11.007599	32 39 38.602800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	545	MSW03411-0545	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.927271	32.717653	-90 55 38.175599	32 43 3.550800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	546	MSW03411-0546	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.847300	33.106712	-90 50 50.279999	33 6 24.163200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	547	MSW03411-0547	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.084747	32.799957	-91 5 5.089199	32 47 59.845200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	548	MSW03411-0548	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.729497	33.231963	-90 43 46.189198	33 13 55.066800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	549	MSW03411-0549	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.863796	32.841770	-90 51 49.665599	32 50 30.372000	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	550	MSW03411-0550	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.741356	32.646619	-90 44 28.881598	32 38 47.828400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	551	MSW03411-0551	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.656943	32.922321	-90 39 24.994798	32 55 20.355600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	552	MSW03411-0552	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.967314	32.551923	-90 58 2.330399	32 33 6.922800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	553	MSW03411-0553	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.832884	32.675965	-90 49 58.382399	32 40 33.474000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	554	MSW03411-0554	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.728042	32.656142	-90 43 40.951198	32 39 22.111200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	555	MSW03411-0555	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.715062	32.883067	-90 42 54.223198	32 52 59.041200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	556	MSW03411-0556	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.998496	33.107057	-90 59 54.585599	33 6 25.405200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	557	MSW03411-0557	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.044321	32.773548	-91 2 39.555599	32 46 24.772800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	558	MSW03411-0558	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.674642	33.088012	-90 40 28.711198	33 5 16.843200	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	559	MSW03411-0559	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.730141	32.937994	-90 43 48.507599	32 56 16.778400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	560	MSW03411-0560	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.019184	32.572642	-91 1 9.062400	32 34 21.511200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	561	MSW03411-0561	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.991174	32.731682	-90 59 28.226399	32 43 54.055200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	562	MSW03411-0562	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.812260	33.007277	-90 48 44.135999	33 0 26.197200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	563	MSW03411-0563	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.956266	32.848995	-90 57 22.557599	32 50 56.382000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	564	MSW03411-0564	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.716021	33.146745	-90 42 57.675598	33 8 48.282000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	565	MSW03411-0565	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.834024	32.769645	-90 50 2.486399	32 46 10.722000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	566	MSW03411-0566	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.556747	33.154440	-90 33 24.289197	33 9 15.984000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	567	MSW03411-0567	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.710310	32.984612	-90 42 37.115998	32 59 4.603200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	568	MSW03411-0568	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.986680	32.569650	-90 59 12.047999	32 34 10.740000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	569	MSW03411-0569	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.807285	32.687259	-90 48 26.225999	32 41 14.132400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	570	MSW03411-0570	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.782072	32.662112	-90 46 55.459199	32 39 43.603200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	571	MSW03411-0571	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.636695	32.808868	-90 38 12.101998	32 48 31.924800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	572	MSW03411-0572	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.860681	32.530856	-90 51 38.451599	32 31 51.081600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	573	MSW03411-0573	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.038576	32.809149	-91 2 18.873600	32 48 32.936400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	574	MSW03411-0574	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.489239	33.037339	-90 29 21.260397	33 2 14.420400	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	575	MSW03411-0575	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.746980	32.915746	-90 44 49.127998	32 54 56.685600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	576	MSW03411-0576	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.048523	32.665333	-91 2 54.682800	32 39 55.198800	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	577	MSW03411-0577	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.031512	32.689738	-91 1 53.443200	32 41 23.056800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	578	MSW03411-0578	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.902049	32.958037	-90 54 7.376399	32 57 28.933200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	579	MSW03411-0579	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.025334	32.895391	-91 1 31.202399	32 53 43.407600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	580	MSW03411-0580	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.660636	33.242780	-90 39 38.289598	33 14 34.008000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	581	MSW03411-0581	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.796860	32.846005	-90 47 48.695999	32 50 45.618000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	582	MSW03411-0582	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.793403	32.635622	-90 47 36.250799	32 38 8.239200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	583	MSW03411-0583	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.610626	32.879163	-90 36 38.253597	32 52 44.986800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	584	MSW03411-0584	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.903038	32.460623	-90 54 10.936799	32 27 38.242800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	585	MSW03411-0585	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.845996	32.653313	-90 50 45.585599	32 39 11.926800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	586	MSW03411-0586	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.804149	32.587485	-90 48 14.936399	32 35 14.946000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	587	MSW03411-0587	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.640329	32.844793	-90 38 25.184398	32 50 41.254800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	588	MSW03411-0588	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.815858	32.575195	-90 48 57.088799	32 34 30.702000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	589	MSW03411-0589	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.978731	32.818718	-90 58 43.431599	32 49 7.384800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	590	MSW03411-0590	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.520647	33.044878	-90 31 14.329197	33 2 41.560800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	591	MSW03411-0591	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.691754	32.923507	-90 41 30.314398	32 55 24.625200	EPAnot	2	0	0	in	out	in	out	out
MSW03411-	592	MSW03411-0592	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.010610	32.530996	-91 0 38.195999	32 31 51.585600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	593	MSW03411-0593	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.928910	32.656810	-90 55 44.075999	32 39 24.516000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	594	MSW03411-0594	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.729344	32.687565	-90 43 45.638398	32 41 15.234000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	595	MSW03411-0595	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.683123	32.824390	-90 40 59.242798	32 49 27.804000	NonWet	0	0	0	out	out	out	out	out

MSW03411-	596	MSW03411-0596	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.956310	33.080300	-90 57 22.715999	33 4 49.080000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	597	MSW03411-0597	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.003895	32.775410	-91 0 14.021999	32 46 31.476000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	598	MSW03411-0598	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.596176	33.097292	-90 35 46.233598	33 5 50.251200	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	599	MSW03411-0599	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.726063	32.936183	-90 43 33.826798	32 56 10.258800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	600	MSW03411-0600	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.979342	32.611551	-90 58 45.631199	32 36 41.583600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	601	MSW03411-0601	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.771833	32.692047	-90 46 18.598799	32 41 31.369200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	602	MSW03411-0602	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.759331	32.609031	-90 45 33.591599	32 36 32.511600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	603	MSW03411-0603	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.718942	32.754311	-90 43 8.191198	32 45 15.519600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	604	MSW03411-0604	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.961838	32.527805	-90 57 42.616799	32 31 40.098000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	605	MSW03411-0605	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.059469	32.842188	-91 3 34.088400	32 50 31.876800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	606	MSW03411-0606	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.627043	33.029225	-90 37 37.354798	33 1 45.210000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	607	MSW03411-0607	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.745357	33.042893	-90 44 43.285198	33 2 34.414800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	608	MSW03411-0608	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.033532	32.746045	-91 2 0.715199	32 44 45.762000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	609	MSW03411-0609	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.957161	32.680287	-90 57 25.779599	32 40 49.033200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	610	MSW03411-0610	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.859683	33.107045	-90 51 34.858799	33 6 25.362000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	611	MSW03411-0611	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.099459	32.811917	-91 5 58.052399	32 48 42.901200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	612	MSW03411-0612	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.757075	33.200668	-90 45 25.469998	33 12 2.404800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	613	MSW03411-0613	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.920992	32.881829	-90 55 15.571199	32 52 54.584400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	614	MSW03411-0614	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.755636	32.633877	-90 45 20.289599	32 38 1.957200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	615	MSW03411-0615	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.646233	32.942529	-90 38 46.438798	32 56 33.104400	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	616	MSW03411-0616	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.972707	32.533958	-90 58 21.745199	32 32 2.248800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	617	MSW03411-0617	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.839378	32.685053	-90 50 21.760799	32 41 6.190800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	618	MSW03411-0618	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.736845	32.654111	-90 44 12.641998	32 39 14.799600	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	619	MSW03411-0619	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.711967	32.891408	-90 42 43.081198	32 53 29.068800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	620	MSW03411-0620	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.997806	33.070663	-90 59 52.101599	33 4 14.386800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	621	MSW03411-0621	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.021558	32.789124	-91 1 17.608799	32 47 20.846400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	622	MSW03411-0622	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.658118	33.085744	-90 39 29.224798	33 5 8.678400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	623	MSW03411-0623	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.761085	32.925370	-90 45 39.905998	32 55 31.332000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	624	MSW03411-0624	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.011073	32.571544	-91 0 39.862799	32 34 17.558400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	625	MSW03411-0625	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.996161	32.712795	-90 59 46.179599	32 42 46.062000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	626	MSW03411-0626	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.789120	32.980291	-90 47 20.831998	32 58 49.047600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	627	MSW03411-0627	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.012811	32.879823	-91 0 46.119599	32 52 47.362800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	628	MSW03411-0628	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.710084	33.151034	-90 42 36.302398	33 9 3.722400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	629	MSW03411-0629	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.884364	32.729384	-90 53 3.710399	32 43 45.782400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	630	MSW03411-0630	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.548717	33.100444	-90 32 55.381197	33 6 1.598400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	631	MSW03411-0631	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.720269	32.986955	-90 43 12.968398	32 59 13.038000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	632	MSW03411-0632	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.945249	32.638839	-90 56 42.896399	32 38 19.820400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	633	MSW03411-0633	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.811120	32.691042	-90 48 40.031999	32 41 27.751200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	634	MSW03411-0634	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.763321	32.668246	-90 45 47.955598	32 40 5.685600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	635	MSW03411-0635	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.633807	32.806074	-90 38 1.705198	32 48 21.866400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	636	MSW03411-0636	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.882398	32.523477	-90 52 56.632799	32 31 24.517200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	637	MSW03411-0637	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.045697	32.816373	-91 2 44.509200	32 48 58.942800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	638	MSW03411-0638	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.500305	33.035750	-90 30 1.097997	33 2 8.700000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	639	MSW03411-0639	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.844096	32.895004	-90 50 38.745599	32 53 42.014400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	640	MSW03411-0640	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.057342	32.661621	-91 3 26.431199	32 39 41.835600	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	641	MSW03411-0641	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.959148	32.730870	-90 57 32.932799	32 43 51.132000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	642	MSW03411-0642	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.909360	32.955759	-90 54 33.695999	32 57 20.732400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	643	MSW03411-0643	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.965630	32.891657	-90 57 56.267999	32 53 29.965200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	644	MSW03411-0644	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.785373	33.182304	-90 47 7.342799	33 10 56.294400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	645	MSW03411-0645	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.765404	32.805396	-90 45 55.454398	32 48 19.425600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	646	MSW03411-0646	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.803146	32.644599	-90 48 11.325599	32 38 40.556400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	647	MSW03411-0647	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.606877	32.873844	-90 36 24.757197	32 52 25.838400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	648	MSW03411-0648	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.829599	32.506633	-90 49 46.556399	32 30 23.878800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	649	MSW03411-0649	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.909492	32.676248	-90 54 34.171199	32 40 34.492800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	650	MSW03411-0650	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.803749	32.605577	-90 48 13.496399	32 36 20.077200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	651	MSW03411-0651	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.631269	32.849826	-90 37 52.568398	32 50 59.373600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	652	MSW03411-0652	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.826736	32.561164	-90 49 36.249599	32 33 40.190400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	653	MSW03411-0653	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.984777	32.793703	-90 59 5.197199	32 47 37.330800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	654	MSW03411-0654	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.540317	32.961030	-90 32 25.141197	32 57 39.708000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	655	MSW03411-0655	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.693198	32.916830	-90 41 35.512798	32 55 0.588000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	656	MSW03411-0656	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.021639	32.568073	-91 1 17.900399	32 34 5.062800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	657	MSW03411-0657	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.903570	32.627595	-90 54 12.851999	32 37 39.342000	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	658	MSW03411-0658	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.723892	32.688203	-90 43 26.011198	32 41 17.530800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	659	MSW03411-0659	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.741339	32.862753	-90 44 28.820398	32 51 45.910800	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	660	MSW03411-0660	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.675415	33.228968	-90 40 31.493998	33 13 44.284800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	661	MSW03411-0661	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.031760	32.814555	-91 1 54.335999	32 48 52.398000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	662	MSW03411-0662	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.580724	33.106127	-90 34 50.606397	33 6 22.057200	EPAnot	0	3	0	in	in	out	out	in
MSW03411-	663	MSW03411-0663	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.712318	32.912193	-90 42 44.344798	32 54 43.894800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	664	MSW03411-0664	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.972234	32.593689	-90 58 20.042399	32 35 37.280400	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	665	MSW03411-0665	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.769290	32.677342	-90 46 9.443999	32 40 38.431200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	666	MSW03411-0666	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.773570	32.608899	-90 46 24.851999	32 36 32.036400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	667	MSW03411-0667	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.743499	32.756581	-90 44 36.596398	32 45 23.691600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	668	MSW03411-0668	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.024821	32.469720	-91 1 29.355599	32 28 10.992000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	669	MSW03411-0669	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.111499	32.811033	-91 6 41.396399	32 48 39.718800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	670	MSW03411-0670	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.638253	32.992331	-90 38 17.710798	32 59 32.391600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	671	MSW03411-0671	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.674487	33.013180	-90 40 28.153198	33 0 47.448000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	672	MSW03411-0672	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.035433	32.765480	-91 2 7.558799	32 45 55.728000	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	673	MSW03411-0673	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.942943	32.709599	-90 56 34.594799	32 42 34.556400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	674	MSW03411-0674	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.873409	32.995091	-90 52 24.272399	32 59 42.327600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	675	MSW03411-0675	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.979288	32.994971	-90 58 45.436799	32 59 41.895600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	676	MSW03411-0676	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.705816	33.191851	-90 42 20.937598	33 11 30.663600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	677	MSW03411-0677	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.850955	32.848636	-90 51 3.437999	32 50 55.089600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	678	MSW03411-0678	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.756177	32.623799	-90 45 22.237198	32 37 25.676400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	679	MSW03411-0679	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.622005	32.953408	-90 37 19.217998	32 57 12.268800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	680	MSW03411-0680	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.952674	32.550970	-90 57 9.626399	32 33 3.492000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	681	MSW03411-0681	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.875521	32.682416	-90 52 31.875599	32 40 56.697600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	682	MSW03411-0682	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.811853	32.599440	-90 48 42.670799	32 35 57.984000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	683	MSW03411-0683	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.693262	32.899797	-90 41 35.743198	32 53 59.269200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	684	MSW03411-0684	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.926638	32.451486	-90 55 35.896799	32 27 5.349600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	685	MSW03411-0685	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.022415	32.785657	-91 1 20.693999	32 47 8.365200	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	686	MSW03411-0686	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.624249	33.053276	-90 37 27.296398	33 3 11.793600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	687	MSW03411-0687	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-90.720392	32.968814	-90 43 13.411198	32 58 7.730400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	688	MSW03411-0688	2	0	1	2	2	1	1	80	6.95193329	EPAnot	-91.008598	32.571115	-91 0 30.952799	32 34 16.014000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	689	MSW03411-0689	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.890800	32.665662	-90 53 26.879999	32 39 56.383200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	690	MSW03411-0690	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.757341	32.990382	-90 45 26.427599	32 59 25.375200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	691	MSW03411-0691	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.952098	32.873378	-90 57 7.552799	32 52 24.160800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	692	MSW03411-0692	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.741159	33.138404	-90 44 28.172399	33 8 18.254400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	693	MSW03411-0693	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.018295	32.827904	-91 1 5.861999	32 49 40.454400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	694	MSW03411-0694	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.654545	33.103587	-90 39 16.361998	33 6 12.913200	NonWet	0	0	0	in	in	out	out	in
MSW03411-	695	MSW03411-0695	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.695625	32.963692	-90 41 44.249998	32 57 49.291200	EPAnot	0	3	0	in	out	out	out	out
MSW03411-	696	MSW03411-0696	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.990686	32.578741	-90 59 26.469599	32 34 43.467600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	697	MSW03411-0697	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.787900	32.674638	-90 47 16.439999	32 40 28.696800	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	698	MSW03411-0698	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.758006	32.655262	-90 45 28.821599	32 39 18.943200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	699	MSW03411-0699	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.634000	32.818685	-90 38 2.399998	32 49 7.266000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	700	MSW03411-0700	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.842976	32.540186	-90 50 34.713599	32 32 24.669600	EPAnot	2	3	0	in	out	out	out	out
MSW03411-	701	MSW03411-0701	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.064725	32.815797	-91 3 53.010000	32 48 56.869200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	702	MSW03411-0702	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.599656	33.018420	-90 35 58.761597	33 1 6.312000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	703	MSW03411-0703	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-90.761894	32.896966	-90 45 42.818399	32 53 49.077600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	704	MSW03411-0704	2	0	1	4	2	1	1	80	6.95193329	EPAnot	-91.031556	32.665410	-91 1 53.601600	32 39 55.476000	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	705	MSW03411-0705	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.010780	32.682562	-91 0 38.807999	32 40 57.223200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	706	MSW03411-0706	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.904860	32.977320	-90 54 17.495999	32 58 38.352000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	707	MSW03411-0707	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.018703	32.907122	-91 1 7.330799	32 54 25.639200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	708	MSW03411-0708	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.793468	33.134865	-90 47 36.484799	33 8 5.514000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	709	MSW03411-0709	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.785801	32.843700	-90 47 8.883599	32 50 37.320000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	710	MSW03411-0710	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.807333	32.623575	-90 48 26.398799	32 37 24.870000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	711	MSW03411-0711	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.599833	32.873334	-90 35 59.758798	32 52 24.002400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	712	MSW03411-0712	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.879373	32.480440	-90 52 45.742799	32 28 49.584000	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	713	MSW03411-0713	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.751473	32.734152	-90 45 5.302798	32 44 2.947200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	714	MSW03411-0714	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.758117	32.662773	-90 45 29.221199	32 39 45.982800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	715	MSW03411-0715	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.644559	32.847157	-90 38 40.412398	32 50 49.765200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	716	MSW03411-0716	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.861384	32.571243	-90 51 40.982399	32 34 16.474800	NonWet	0	0	0	out	out	out	in	in
MSW03411-	717	MSW03411-0717	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.970547	32.834597	-90 58 13.969199	32 50 4.549200	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	718	MSW03411-0718	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.541928	33.016640	-90 32 30.940797	33 0 59.904000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	719	MSW03411-0719	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.689491	32.931485	-90 41 22.167598	32 55 53.346000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	720	MSW03411-0720	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.034793	32.548939	-91 2 5.254800	32 32 56.180400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	721	MSW03411-0721	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.910208	32.639820	-90 54 36.748799	32 38 23.352000	EPAnot	0	3	0	in	out	out	in	in
MSW03411-	722	MSW03411-0722	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.715514	32.692283	-90 42 55.850398	32 41 32.218800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	723	MSW03411-0723	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.745223	32.893922	-90 44 42.802799	32 53 38.119200	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	724	MSW03411-0724	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.960364	33.122106	-90 57 37.310399	33 7 19.581600	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	725	MSW03411-0725	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.978380	32.758931	-90 58 42.167999	32 45 32.151600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	726	MSW03411-0726	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.587085	33.107188	-90 35 13.505998	33 6 25.876800	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	727	MSW03411-0727	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.730222	32.924172	-90 43 48.799198	32 55 27.019200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	728	MSW03411-0728	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.000582	32.586901	-91 0 2.095199	32 35 12.843600	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	729	MSW03411-0729	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.748281	32.673798	-90 44 53.811598	32 40 25.672800	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	730	MSW03411-0730	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.792498	32.606078	-90 47 32.992799	32 36 21.880800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	731	MSW03411-0731	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.720453	32.795801	-90 43 13.630798	32 47 44.883600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	732	MSW03411-0732	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.995843	32.539009	-90 59 45.034799	32 32 20.432400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	733	MSW03411-0733	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.056960	32.832295	-91 3 25.055999	32 49 56.262000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	734	MSW03411-0734	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.594987	33.029753	-90 35 41.953198	33 1 47.110800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	735	MSW03411-0735	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-90.775721	33.060399	-90 46 32.595599	33 3 37.436400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	736	MSW03411-0736	2	0	1	5	2	1	1	80	6.95193329	EPAnot	-91.024775	32.749826	-91 1 29.189999	32 44 59.373600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	737	MSW03411-0737	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.932040	32.680469	-90 55 55.343999	32 40 49.688400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	738	MSW03411-0738	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.802605	33.122166	-90 48 9.377999	33 7 19.797600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	739	MSW03411-0739	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-91.095970	32.796087	-91 5 45.492000	32 47 45.913200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	740	MSW03411-0740	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.750439	33.200830	-90 45 1.580398	33 12 2.988000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	741	MSW03411-0741	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.919456	32.877386	-90 55 10.041599	32 52 38.589600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	742	MSW03411-0742	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.751485	32.607851	-90 45 5.345998	32 36 28.263600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	743	MSW03411-0743	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.643991	32.933583	-90 38 38.367598	32 56 0.898800	EPAnot	0	3	0	out	out	out	in	in
MSW03411-	744	MSW03411-0744	2	0	1	3	2	1	1	80	6.95193329	EPAnot	-90.975445	32.534696	-90 58 31.601999	32 32 4.905600	EPAnot	2	0	0	in	out	out	in	in

MSW03411-	745	MSW03411-0745	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.848513	32.667855	-90 50 54.646799	32 40 4.278000	EPAnot	2	3	0	in	in	out	in	in
MSW03411-	746	MSW03411-0746	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.720437	32.673476	-90 43 13.573198	32 40 24.513600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	747	MSW03411-0747	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.737967	32.872819	-90 44 16.681198	32 52 22.148400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	748	MSW03411-0748	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.980739	33.052632	-90 58 50.660399	33 3 9.475200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	749	MSW03411-0749	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-91.039200	32.793406	-91 2 21.120000	32 47 36.261600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	750	MSW03411-0750	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.666762	33.072167	-90 40 0.343198	33 4 19.801200	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	751	MSW03411-0751	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.740005	32.937648	-90 44 24.017999	32 56 15.532800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	752	MSW03411-0752	2	0	1	3	2 1 1	80	6.95193329	EPAnot	-90.943847	32.571967	-90 56 37.849199	32 34 19.081200	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	753	MSW03411-0753	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.985326	32.709905	-90 59 7.173599	32 42 35.658000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	754	MSW03411-0754	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.902455	32.918371	-90 54 8.837999	32 55 6.135600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	755	MSW03411-0755	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.013448	32.837991	-91 0 48.412799	32 50 16.767600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	756	MSW03411-0756	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.758781	33.177561	-90 45 31.611599	33 10 39.219600	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	757	MSW03411-0757	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.841941	32.793454	-90 50 30.987599	32 47 36.434400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	758	MSW03411-0758	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.559295	33.177846	-90 33 33.461997	33 10 40.245600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	759	MSW03411-0759	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.576384	32.875378	-90 34 34.982397	32 52 31.360800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	760	MSW03411-0760	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.928388	32.617968	-90 55 42.196799	32 37 4.684800	EPAnot	0	3	0	in	in	out	in	in
MSW03411-	761	MSW03411-0761	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.737937	32.729891	-90 44 16.573198	32 43 47.607600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	762	MSW03411-0762	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.761034	32.644759	-90 45 39.722399	32 38 41.132400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	763	MSW03411-0763	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.610969	32.854117	-90 36 39.488398	32 51 14.821200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	764	MSW03411-0764	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.857479	32.602143	-90 51 26.924399	32 36 7.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	765	MSW03411-0765	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.053048	32.822568	-91 3 10.972799	32 49 21.244800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	766	MSW03411-0766	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.513357	33.041511	-90 30 48.085197	33 2 29.439600	NonWet	0	0	0	out	out	out	in	in
MSW03411-	767	MSW03411-0767	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-90.708170	32.929388	-90 42 29.411998	32 55 45.796800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	768	MSW03411-0768	2	0	1	5	2 1 1	80	6.95193329	EPAnot	-91.051848	32.678665	-91 3 6.652799	32 40 43.194000	EPAnot	0	3	0	in	in	out	out	out
MSW03411-	769	MSW03411-0769	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.969419	32.723362	-90 58 9.908399	32 43 24.103200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	770	MSW03411-0770	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.927413	32.965122	-90 55 38.686799	32 57 54.439200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	771	MSW03411-0771	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.005263	32.944159	-91 0 18.946799	32 56 38.972400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	772	MSW03411-0772	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.809183	33.152869	-90 48 33.058799	33 9 10.328400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	773	MSW03411-0773	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.778494	32.813832	-90 46 42.578399	32 48 49.795200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	774	MSW03411-0774	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.791488	32.654161	-90 47 29.356799	32 39 14.979600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	775	MSW03411-0775	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.568852	32.911001	-90 34 7.867197	32 54 39.603600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	776	MSW03411-0776	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.844826	32.514985	-90 50 41.373599	32 30 53.946000	EPAnot	2	3	0	out	out	out	out	out
MSW03411-	777	MSW03411-0777	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.889339	32.681391	-90 53 21.620399	32 40 53.007600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	778	MSW03411-0778	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.798994	32.620452	-90 47 56.378399	32 37 13.627200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	779	MSW03411-0779	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.621209	32.853457	-90 37 16.352398	32 51 12.445200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	780	MSW03411-0780	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.982725	32.459410	-90 58 57.809999	32 27 33.876000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	781	MSW03411-0781	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.030064	32.769318	-91 1 48.230399	32 46 9.544800	EPAnot	0	3	0	out	out	out	out	out
MSW03411-	782	MSW03411-0782	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.561666	32.943580	-90 33 41.997597	32 56 36.888000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	783	MSW03411-0783	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-90.676007	32.916310	-90 40 33.625198	32 54 58.716000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	784	MSW03411-0784	2	0	1	4	2 1 1	80	6.95193329	EPAnot	-91.012947	32.554412	-91 0 46.609199	32 33 15.883200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	785	MSW03411-0785	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.900459	32.609695	-90 54 1.652399	32 36 34.902000	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	786	MSW03411-0786	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.725963	32.697978	-90 43 33.466798	32 41 52.720800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	787	MSW03411-0787	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.034161	32.877465	-91 2 2.979599	32 52 38.874000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	788	MSW03411-0788	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.617263	33.212993	-90 37 2.146798	33 12 46.774800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	789	MSW03411-0789	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.022500	32.808741	-91 1 20.999999	32 48 31.467600	EPAnot	2	0	0	out	out	out	in	in
MSW03411-	790	MSW03411-0790	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.621735	33.138301	-90 37 18.245998	33 8 17.883600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	791	MSW03411-0791	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.739637	32.910932	-90 44 22.693198	32 54 39.355200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	792	MSW03411-0792	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.957479	32.591879	-90 57 26.924399	32 35 30.764400	EPAnot	0	3	0	in	out	out	in	in
MSW03411-	793	MSW03411-0793	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.747346	32.696399	-90 44 50.445599	32 41 47.036400	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	794	MSW03411-0794	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.790420	32.622373	-90 47 25.511999	32 37 20.542800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	795	MSW03411-0795	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.714155	32.754432	-90 42 50.957998	32 45 15.955200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	796	MSW03411-0796	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.058598	32.477013	-91 3 30.952799	32 28 37.246800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	797	MSW03411-0797	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.103366	32.823556	-91 6 12.117600	32 49 24.801600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	798	MSW03411-0798	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.629353	32.964978	-90 37 45.670798	32 57 53.920800	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	799	MSW03411-0799	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-90.720720	33.054750	-90 43 14.591998	33 3 17.100000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	800	MSW03411-0800	2	0	1	2	2 1 1	80	6.95193329	EPAnot	-91.040872	32.695905	-91 2 27.139199	32 41 45.258000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	801	MSW03411-0801	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.751069	33.219145	-90 45 3.848399	33 13 8.922000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	802	MSW03411-0802	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.854264	32.882412	-90 51 15.350399	32 52 56.683200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	803	MSW03411-0803	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.633666	33.023782	-90 38 1.197598	33 1 25.615200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	804	MSW03411-0804	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.615165	32.816597	-90 36 54.593998	32 48 59.749200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	805	MSW03411-0805	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.741057	33.105626	-90 44 27.805198	33 6 20.253600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	806	MSW03411-0806	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.776122	32.999449	-90 46 34.039199	32 59 58.016400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	807	MSW03411-0807	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.907368	32.807157	-90 54 26.524799	32 48 25.765200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	808	MSW03411-0808	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.001767	32.987145	-91 0 6.361199	32 59 13.722000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	809	MSW03411-0809	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.654674	33.227605	-90 39 16.826398	33 13 39.378000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	810	MSW03411-0810	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.750527	32.998970	-90 45 1.897199	32 59 56.292000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	811	MSW03411-0811	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.579368	33.175902	-90 34 45.724798	33 10 33.247200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	812	MSW03411-0812	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.625433	32.870581	-90 37 31.558798	32 52 14.091600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	813	MSW03411-0813	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.645731	33.084743	-90 38 44.631598	33 5 5.074800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	814	MSW03411-0814	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.693884	32.973342	-90 41 37.982398	32 58 24.031200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	815	MSW03411-0815	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.940417	32.743490	-90 56 25.501199	32 44 36.564000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	816	MSW03411-0816	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.835868	32.521779	-90 50 9.124799	32 31 18.404400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	817	MSW03411-0817	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.662281	33.146973	-90 39 44.211598	33 8 49.102800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	818	MSW03411-0818	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.851834	33.099107	-90 51 6.602399	33 5 56.785200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	819	MSW03411-0819	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.529335	32.975773	-90 31 45.605997	32 58 32.782800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	820	MSW03411-0820	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.694156	32.765865	-90 41 38.961598	32 45 57.114000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	821	MSW03411-0821	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.822670	32.634940	-90 49 21.611999	32 38 5.784000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	822	MSW03411-0822	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.946584	32.951234	-90 56 47.702399	32 57 4.442400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	823	MSW03411-0823	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.005325	32.791668	-91 0 19.169999	32 47 30.076800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	824	MSW03411-0824	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.991765	32.527508	-90 59 30.353999	32 31 39.028800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	825	MSW03411-0825	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.797275	33.198498	-90 47 50.189999	33 11 54.592800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	826	MSW03411-0826	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.821376	32.951544	-90 49 16.953599	32 57 5.558400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	827	MSW03411-0827	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.919654	32.694192	-90 55 10.754399	32 41 39.091200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	828	MSW03411-0828	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.987087	32.935509	-90 59 13.513199	32 56 7.832400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	829	MSW03411-0829	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.591050	33.045206	-90 35 27.779998	33 2 42.741600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	830	MSW03411-0830	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.671592	32.852577	-90 40 17.731198	32 51 9.277200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	831	MSW03411-0831	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.961868	32.747124	-90 57 42.724799	32 44 49.646400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	832	MSW03411-0832	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.033456	32.496596	-91 2 0.441600	32 29 47.745600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	833	MSW03411-0833	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.658305	33.229689	-90 39 29.897998	33 13 46.880400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	834	MSW03411-0834	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.798303	33.044121	-90 47 53.890799	33 2 38.835600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	835	MSW03411-0835	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.633087	32.983217	-90 37 59.113198	32 58 59.581200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	836	MSW03411-0836	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.715266	32.744837	-90 42 54.957598	32 44 41.413200	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	837	MSW03411-0837	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.784008	33.153119	-90 47 2.428799	33 9 11.228400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	838	MSW03411-0838	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.909420	32.974159	-90 54 33.911999	32 58 26.972400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	839	MSW03411-0839	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.006409	32.755269	-91 0 23.072399	32 45 18.968400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	840	MSW03411-0840	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.050297	32.785489	-91 3 1.069199	32 47 7.760400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	841	MSW03411-0841	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.813560	33.214101	-90 48 48.815999	33 12 50.763600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	842	MSW03411-0842	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.742319	33.058540	-90 44 32.348398	33 3 30.744000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	843	MSW03411-0843	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.881485	32.631199	-90 52 53.345999	32 37 52.316400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	844	MSW03411-0844	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.039656	32.871130	-91 2 22.761599	32 52 16.068000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	845	MSW03411-0845	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.584730	33.077869	-90 35 5.027997	33 4 40.328400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	846	MSW03411-0846	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.727543	32.851185	-90 43 39.154798	32 51 4.266000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	847	MSW03411-0847	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.001430	32.663892	-91 0 5.147999	32 39 50.011200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	848	MSW03411-0848	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.035833	32.535879	-91 2 8.998800	32 32 9.164400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	849	MSW03411-0849	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.645900	33.197163	-90 38 45.239998	33 11 49.786800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	850	MSW03411-0850	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.760754	33.025773	-90 45 38.714399	33 1 32.782800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	851	MSW03411-0851	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.546094	33.108834	-90 32 45.938397	33 6 31.802400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	852	MSW03411-0852	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.654019	32.771740	-90 39 14.468398	32 46 18.264000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	853	MSW03411-0853	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.805700	32.541728	-90 48 20.519999	32 32 30.220800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	854	MSW03411-0854	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.935390	32.985374	-90 56 7.403999	32 59 7.346400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	855	MSW03411-0855	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.990851	32.810901	-90 59 27.063599	32 48 39.243600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	856	MSW03411-0856	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.848686	32.563123	-90 50 55.269599	32 33 47.242800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	857	MSW03411-0857	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.707024	33.173568	-90 42 25.286398	33 10 24.844800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	858	MSW03411-0858	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.868349	32.980528	-90 52 6.056399	32 58 49.900800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	859	MSW03411-0859	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.861994	32.867223	-90 51 43.178399	32 52 2.002800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	860	MSW03411-0860	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.022664	32.902103	-91 1 21.590399	32 54 7.570800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	861	MSW03411-0861	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.666738	32.990902	-90 40 0.256798	32 59 27.247200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	862	MSW03411-0862	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.702952	32.835496	-90 42 10.627198	32 50 7.785600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	863	MSW03411-0863	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.005393	32.683646	-91 0 19.414799	32 41 1.125600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	864	MSW03411-0864	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.843953	32.521067	-90 50 38.230799	32 31 15.841200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	865	MSW03411-0865	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.727914	33.209918	-90 43 40.490398	33 12 35.704800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	866	MSW03411-0866	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.803319	32.911743	-90 48 11.948399	32 54 42.274800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	867	MSW03411-0867	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.587140	33.004351	-90 35 13.703997	33 0 15.663600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	868	MSW03411-0868	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.705689	32.806345	-90 42 20.480398	32 48 22.842000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	869	MSW03411-0869	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.687322	33.136862	-90 41 14.359198	33 8 12.703200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	870	MSW03411-0870	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.919872	32.937643	-90 55 11.539199	32 56 15.514800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	871	MSW03411-0871	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.740937	32.821382	-90 44 27.373198	32 49 16.975200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	872	MSW03411-0872	3	1	0	1	3 1 1	80	17.20641343	NonWe	-91.112143	32.798496	-91 6 43.714799	32 47 54.585600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	873	MSW03411-0873	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.659777	33.218890	-90 39 35.197198	33 13 8.004000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	874	MSW03411-0874	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.715598	33.063546	-90 42 56.152798	33 3 48.765600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	875	MSW03411-0875	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.854092	32.642396	-90 51 14.731199	32 38 32.625600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	876	MSW03411-0876	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.665492	32.892086	-90 39 55.771198	32 53 31.509600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	877	MSW03411-0877	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.589215	33.087949	-90 35 21.173998	33 5 16.616400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	878	MSW03411-0878	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.747404	32.990517	-90 44 50.654399	32 59 25.861200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	879	MSW03411-0879	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.950887	32.681255	-90 57 3.193199	32 40 52.518000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	880	MSW03411-0880	3	1	0	1	3 1 1	80	17.20641343	NonWe	-90.955296	32.636078	-90 57 19.065599	32 38 9.880800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	881	MSW03411-0881	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.549794	33.198000	-90 32 59.258397	33 11 52.800000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	882	MSW03411-0882	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.023738	32.721333	-91 1 25.456799	32 43 16.798800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	883	MSW03411-0883	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.649595	32.989912	-90 38 58.541998	32 59 23.683200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	884	MSW03411-0884	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.706519	32.821502	-90 42 23.468398	32 49 17.407200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	885	MSW03411-0885	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.715114	33.170708	-90 42 54.410398	33 10 14.548800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	886	MSW03411-0886	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.806952	33.002615	-90 48 25.027199	33 0 9.414000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	887	MSW03411-0887	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.874150	32.886162	-90 52 26.939999	32 53 10.183200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	888	MSW03411-0888	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.004222	32.838637	-91 0 15.199199	32 50 19.093200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	889	MSW03411-0889	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.639331	33.189348	-90 38 21.591598	33 11 21.652800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	890	MSW03411-0890	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.780887	33.022173	-90 46 51.193199	33 1 19.822800	NonWet	0	0	0	in	in	out	out	in
MSW03411-	891	MSW03411-0891	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.539296	33.122842	-90 32 21.465597	33 7 22.231200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	892	MSW03411-0892	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.671909	32.783851	-90 40 18.872398	32 47 1.863600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	893	MSW03411-0893	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.654241	33.134609	-90 39 15.267598	33 8 4.592400	NonWet	0	0	0	in	in	out	out	in

MSW03411-	894	MSW03411-0894	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.929521	33.013838	-90 55 46.275599	33 0 49.816800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	895	MSW03411-0895	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.981850	32.834969	-90 58 54.659999	32 50 5.888400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	896	MSW03411-0896	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.858941	32.576738	-90 51 32.187599	32 34 36.256800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	897	MSW03411-0897	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.803106	33.222253	-90 48 11.181599	33 13 20.110800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	898	MSW03411-0898	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.852762	32.918857	-90 51 9.943199	32 55 7.885200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	899	MSW03411-0899	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.622034	33.019059	-90 37 19.322398	33 1 8.612400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	900	MSW03411-0900	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.671421	32.792213	-90 40 17.115598	32 47 31.966800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	901	MSW03411-0901	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.782488	33.167994	-90 46 56.956799	33 10 4.778400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	902	MSW03411-0902	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.920005	32.892191	-90 55 12.017999	32 53 31.887600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	903	MSW03411-0903	3	0	1	4	3	1	1	80	17.20641343	NonWe	-91.003302	32.802143	-91 0 11.887199	32 48 7.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	904	MSW03411-0904	3	0	1	4	3	1	1	80	17.20641343	NonWe	-91.030039	32.730743	-91 1 48.140399	32 43 50.674800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	905	MSW03411-0905	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.819275	33.239738	-90 49 9.389999	33 14 23.056800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	906	MSW03411-0906	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.721767	33.043029	-90 43 18.361198	33 2 34.904400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	907	MSW03411-0907	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.844632	32.655224	-90 50 40.675199	32 39 18.806400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	908	MSW03411-0908	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.650781	32.954911	-90 39 2.811598	32 57 17.679600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	909	MSW03411-0909	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.625261	33.133598	-90 37 30.939598	33 8 0.952800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	910	MSW03411-0910	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.666967	32.950005	-90 40 1.081198	32 57 0.018000	NonWet	0	0	0	in	out	in	out	out
MSW03411-	911	MSW03411-0911	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.990568	32.654274	-90 59 26.044799	32 39 15.386400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	912	MSW03411-0912	3	0	1	4	3	1	1	80	17.20641343	NonWe	-91.034689	32.551760	-91 2 4.880399	32 33 6.408000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	913	MSW03411-0913	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.760937	33.229258	-90 45 39.373199	33 13 45.328800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	914	MSW03411-0914	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.796544	32.951406	-90 47 47.558399	32 57 5.061600	NonWet	0	0	0	out	out	out	in	out
MSW03411-	915	MSW03411-0915	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.625506	33.046511	-90 37 31.821598	33 2 47.439600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	916	MSW03411-0916	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.660455	32.816843	-90 39 37.637998	32 49 0.634800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	917	MSW03411-0917	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.716354	33.109763	-90 42 58.874398	33 6 35.146800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	918	MSW03411-0918	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.810756	33.017011	-90 48 38.721599	33 1 1.239600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	919	MSW03411-0919	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.944876	32.835390	-90 56 41.553599	32 50 7.404000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	920	MSW03411-0920	3	0	1	3	3	1	1	80	17.20641343	NonWe	-91.044825	32.858345	-91 2 41.370000	32 51 30.042000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	921	MSW03411-0921	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.701177	33.176782	-90 42 4.237198	33 10 36.415200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	922	MSW03411-0922	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.718787	33.015318	-90 43 7.633198	33 0 55.144800	NonWet	0	0	0	in	in	out	out	in
MSW03411-	923	MSW03411-0923	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.543786	33.146774	-90 32 37.629597	33 8 48.386400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	924	MSW03411-0924	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.605256	32.903798	-90 36 18.921598	32 54 13.672800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	925	MSW03411-0925	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.633378	33.099126	-90 38 0.160798	33 5 56.853600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	926	MSW03411-0926	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.754026	32.956860	-90 45 14.493598	32 57 24.696000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	927	MSW03411-0927	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.920932	32.750815	-90 55 15.355199	32 45 2.934000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	928	MSW03411-0928	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.987033	32.626155	-90 59 13.318799	32 37 34.158000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	929	MSW03411-0929	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.618989	33.169669	-90 37 8.360398	33 10 10.808400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	930	MSW03411-0930	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.797872	33.100301	-90 47 52.339199	33 6 1.083600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	931	MSW03411-0931	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.540596	32.981291	-90 32 26.145597	32 58 52.647600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	932	MSW03411-0932	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.676700	32.760081	-90 40 36.119998	32 45 36.291600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	933	MSW03411-0933	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.876382	33.102329	-90 52 34.975199	33 6 8.384400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	934	MSW03411-0934	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.959695	32.915236	-90 57 34.901999	32 54 54.849600	NonWet	0	0	0	out	out	out	in	in
MSW03411-	935	MSW03411-0935	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.944309	32.820906	-90 56 39.512399	32 49 15.261600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	936	MSW03411-0936	3	0	1	5	3	1	1	80	17.20641343	NonWe	-91.013989	32.666607	-91 0 50.360400	32 39 59.785200	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	937	MSW03411-0937	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.847723	33.133195	-90 50 51.802799	33 7 59.502000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	938	MSW03411-0938	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.684248	33.028631	-90 41 3.292798	33 1 43.071600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	939	MSW03411-0939	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.905828	32.674825	-90 54 20.980799	32 40 29.370000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	940	MSW03411-0940	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.997931	32.929273	-90 59 52.551599	32 55 45.382800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	941	MSW03411-0941	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.555043	33.087565	-90 33 18.154797	33 5 15.234000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	942	MSW03411-0942	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.678634	32.866369	-90 40 43.082398	32 51 58.928400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	943	MSW03411-0943	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.983278	32.725089	-90 58 59.800799	32 43 30.320400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	944	MSW03411-0944	3	0	1	5	3	1	1	80	17.20641343	NonWe	-91.039348	32.566610	-91 2 21.652799	32 33 59.796000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	945	MSW03411-0945	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.760076	33.181684	-90 45 36.273598	33 10 54.062400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	946	MSW03411-0946	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.838649	32.888437	-90 50 19.136399	32 53 18.373200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	947	MSW03411-0947	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.649801	33.030744	-90 38 59.283598	33 1 50.678400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	948	MSW03411-0948	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.677406	32.850744	-90 40 38.661598	32 51 2.678400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	949	MSW03411-0949	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.757116	33.105399	-90 45 25.617599	33 6 19.436400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	950	MSW03411-0950	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.782772	33.010979	-90 46 57.979199	33 0 39.524400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	951	MSW03411-0951	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.910951	32.803227	-90 54 39.423599	32 48 11.617200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	952	MSW03411-0952	3	0	1	5	3	1	1	80	17.20641343	NonWe	-91.000820	32.939324	-91 0 2.951999	32 56 21.566400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	953	MSW03411-0953	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.615893	33.226475	-90 36 57.214798	33 13 35.310000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	954	MSW03411-0954	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.697474	33.041855	-90 41 50.906398	33 2 30.678000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	955	MSW03411-0955	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.593567	33.181734	-90 35 36.841197	33 10 54.242400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	956	MSW03411-0956	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.578754	32.875555	-90 34 43.514398	32 52 31.998000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	957	MSW03411-0957	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.682400	33.077432	-90 40 56.639998	33 4 38.755200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	958	MSW03411-0958	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.704514	32.973150	-90 42 16.250398	32 58 23.340000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	959	MSW03411-0959	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.926833	32.787954	-90 55 36.598799	32 47 16.634400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	960	MSW03411-0960	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.849029	32.550436	-90 50 56.504399	32 33 1.569600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	961	MSW03411-0961	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.633045	33.173754	-90 37 58.961998	33 10 25.514400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	962	MSW03411-0962	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.780284	33.083208	-90 46 49.022399	33 4 59.548800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	963	MSW03411-0963	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.560866	32.956944	-90 33 39.117597	32 57 24.998400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	964	MSW03411-0964	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.684530	32.720604	-90 41 4.307998	32 43 14.174400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	965	MSW03411-0965	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.792236	33.136648	-90 47 32.049599	33 8 11.932800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	966	MSW03411-0966	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.938094	32.913568	-90 56 17.138399	32 54 48.844800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	967	MSW03411-0967	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.959941	32.812255	-90 57 35.787599	32 48 44.118000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	968	MSW03411-0968	3	0	1	3	3	1	1	80	17.20641343	NonWe	-91.035737	32.709158	-91 2 8.653199	32 42 32.968800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	969	MSW03411-0969	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.787461	33.147660	-90 47 14.859599	33 8 51.576000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	970	MSW03411-0970	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.706063	33.030370	-90 42 21.826798	33 1 49.332000	EPAnot	2	0	0	out	in	out	out	out
MSW03411-	971	MSW03411-0971	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.856946	32.653546	-90 51 25.005599	32 39 12.765600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	972	MSW03411-0972	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.976703	32.892712	-90 58 36.130799	32 53 33.763200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	973	MSW03411-0973	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.513251	33.054160	-90 30 47.703597	33 3 14.976000	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	974	MSW03411-0974	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.686490	32.893525	-90 41 11.363998	32 53 36.690000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	975	MSW03411-0975	3	0	1	3	3	1	1	80	17.20641343	NonWe	-90.971282	32.687695	-90 58 16.615199	32 41 15.702000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	976	MSW03411-0976	3	0	1	3	3	1	1	80	17.20641343	NonWe	-91.039965	32.541433	-91 2 23.874000	32 32 29.158800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	977	MSW03411-0977	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.776249	33.245015	-90 46 34.496398	33 14 42.054000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	978	MSW03411-0978	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.851932	32.927908	-90 51 6.955199	32 55 40.468800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	979	MSW03411-0979	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.607332	33.002571	-90 36 26.395198	33 0 9.255600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	980	MSW03411-0980	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.704464	32.791851	-90 42 16.070398	32 47 30.663600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	981	MSW03411-0981	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.700213	33.150486	-90 42 0.766798	33 9 1.749600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	982	MSW03411-0982	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.921528	32.912046	-90 55 17.500799	32 54 43.365600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	983	MSW03411-0983	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.755988	32.825766	-90 45 21.556798	32 49 32.757600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	984	MSW03411-0984	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.052862	32.792891	-91 3 10.303200	32 47 34.407600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	985	MSW03411-0985	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.839995	33.234998	-90 50 23.981999	33 14 5.992800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	986	MSW03411-0986	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.731032	33.061239	-90 43 51.715198	33 3 40.460400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	987	MSW03411-0987	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.848873	32.620875	-90 50 55.942799	32 37 15.150000	NonWet	0	0	0	in	in	out	in	in
MSW03411-	988	MSW03411-0988	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.621583	32.940397	-90 37 17.698798	32 56 25.429200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	989	MSW03411-0989	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.608293	33.097956	-90 36 29.854798	33 5 52.641600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	990	MSW03411-0990	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.749530	32.962857	-90 44 58.307999	32 57 46.285200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	991	MSW03411-0991	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.944933	32.668140	-90 56 41.758799	32 40 5.304000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	992	MSW03411-0992	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.927405	32.634822	-90 55 38.657999	32 38 5.359200	EPAnot	2	0	0	in	out	out	in	in
MSW03411-	993	MSW03411-0993	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.589190	33.196397	-90 35 21.083997	33 11 47.029200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	994	MSW03411-0994	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.815276	33.106252	-90 48 54.993599	33 6 22.507200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	995	MSW03411-0995	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.567329	33.103280	-90 34 2.384397	33 6 11.808000	EPAnot	2	0	0	in	in	out	out	in
MSW03411-	996	MSW03411-0996	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.721263	32.774102	-90 43 16.546798	32 46 26.767200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	997	MSW03411-0997	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.691020	32.716317	-90 41 27.671998	32 42 58.741200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	998	MSW03411-0998	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.883922	32.998854	-90 53 2.119199	32 59 55.874400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	999	MSW03411-0999	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.951095	32.777742	-90 57 3.941999	32 46 39.871200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1000	MSW03411-1000	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.836122	32.587365	-90 50 10.039199	32 35 14.514000	NonWet	0	0	0	out	out	in	out	out
MSW03411-	1001	MSW03411-1001	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.738388	33.154559	-90 44 18.196799	33 9 16.412400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1002	MSW03411-1002	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.771686	32.980663	-90 46 18.069599	32 58 50.386800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1003	MSW03411-1003	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.921504	32.872665	-90 55 17.414399	32 52 21.594000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1004	MSW03411-1004	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.958283	32.895595	-90 57 29.818799	32 53 44.142000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1005	MSW03411-1005	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.497472	33.014223	-90 29 50.899197	33 0 51.202800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1006	MSW03411-1006	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.719262	32.861395	-90 43 9.343198	32 51 41.022000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1007	MSW03411-1007	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.930075	32.693088	-90 55 48.269999	32 41 35.116800	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1008	MSW03411-1008	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.985826	32.464936	-90 59 8.973599	32 27 53.769600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1009	MSW03411-1009	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.772446	33.189846	-90 46 20.805599	33 11 23.445600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1010	MSW03411-1010	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.817957	32.862097	-90 49 4.645199	32 51 43.549200	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1011	MSW03411-1011	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.657354	33.048071	-90 39 26.474398	33 2 53.055600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1012	MSW03411-1012	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.669540	32.830749	-90 40 10.343998	32 49 50.696400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1013	MSW03411-1013	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.742242	33.176942	-90 44 32.071199	33 10 36.991200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1014	MSW03411-1014	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.791261	33.005701	-90 47 28.539599	33 0 20.523600	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1015	MSW03411-1015	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.890194	32.855124	-90 53 24.698399	32 51 18.446400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1016	MSW03411-1016	3	0	1	4	3	1	1	80	17.20641343	NonWe	-91.007611	32.852672	-91 0 27.399599	32 51 9.619200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1017	MSW03411-1017	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.652093	33.176445	-90 39 7.534798	33 10 35.202000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1018	MSW03411-1018	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.690148	33.041849	-90 41 24.532798	33 2 30.656400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1019	MSW03411-1019	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.589091	33.163874	-90 35 20.727597	33 9 49.946400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1020	MSW03411-1020	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.574592	32.893809	-90 34 28.531197	32 53 37.712400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1021	MSW03411-1021	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.684599	33.090793	-90 41 4.556398	33 5 26.854800	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1022	MSW03411-1022	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.732625	32.960758	-90 43 57.449998	32 57 38.728800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1023	MSW03411-1023	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.933935	32.768450	-90 56 2.165999	32 46 6.420000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1024	MSW03411-1024	3	0	1	4	3	1	1	80	17.20641343	NonWe	-90.865226	32.607259	-90 51 54.813599	32 36 26.132400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1025	MSW03411-1025	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.629625	33.161667	-90 37 46.649998	33 9 42.001200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1026	MSW03411-1026	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.807719	33.047750	-90 48 27.788399	33 2 51.900000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1027	MSW03411-1027	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.644823	32.966024	-90 38 41.362798	32 57 57.686400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1028	MSW03411-1028	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.712148	32.721320	-90 42 43.732798	32 43 16.752000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1029	MSW03411-1029	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.768911	33.131770	-90 46 8.079598	33 7 54.372000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1030	MSW03411-1030	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.860105	32.916904	-90 51 36.377999	32 55 0.854400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1031	MSW03411-1031	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.983885	32.766066	-90 59 1.985999	32 45 57.837600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1032	MSW03411-1032	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.069358	32.787770	-91 4 9.688799	32 47 15.972000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1033	MSW03411-1033	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.809978	33.154759	-90 48 35.920799	33 9 17.132400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	1034	MSW03411-1034	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.755608	33.076315	-90 45 20.188798	33 4 34.734000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1035	MSW03411-1035	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.876127	32.687815	-90 52 34.057199	32 41 16.134000	NonWet	0	0	0	in	in	in	in	in
MSW03411-	1036	MSW03411-1036	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.054295	32.871276	-91 3 15.461999	32 52 16.593600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1037	MSW03411-1037	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.528208	33.101747	-90 31 41.548797	33 6 6.289200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1038	MSW03411-1038	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.693020	32.881791	-90 41 34.871998	32 52 54.447600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1039	MSW03411-1039	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.991016	32.684492	-90 59 27.657599	32 41 4.171200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1040	MSW03411-1040	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.009103	32.524575	-91 0 32.770799	32 31 28.470000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1041	MSW03411-1041	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.698715	33.219679	-90 41 55.373998	33 13 10.844400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1042	MSW03411-1042	3	0	1	5	3	1	1	80	17.20641343	NonWe	-90.809303	32.926138	-90 48 33.490799	32 55 34.096800	NonWet	0	0	0	in	in	out	out	out

MSW03411-	1043	MSW03411-1043	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.591542	33.011317	-90 35 29.551198	33 0 40.741200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1044	MSW03411-1044	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.654713	32.836131	-90 39 16.966798	32 50 10.071600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1045	MSW03411-1045	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.686158	33.102175	-90 41 10.168798	33 6 7.830000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1046	MSW03411-1046	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.918902	32.927983	-90 55 8.047199	32 55 40.738800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1047	MSW03411-1047	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.918968	32.849104	-90 55 8.284799	32 50 56.774400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1048	MSW03411-1048	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.084371	32.790872	-91 5 3.735600	32 47 27.139200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1049	MSW03411-1049	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.670178	33.210875	-90 40 12.640798	33 12 39.150000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1050	MSW03411-1050	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.735903	33.082044	-90 44 9.250798	33 4 55.358400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1051	MSW03411-1051	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.845537	32.627382	-90 50 43.933199	32 37 38.575200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1052	MSW03411-1052	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.590527	32.917522	-90 35 25.897197	32 55 3.079200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1053	MSW03411-1053	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.649324	33.064984	-90 38 57.566398	33 3 53.942400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1054	MSW03411-1054	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.758166	32.986360	-90 45 29.397599	32 59 10.896000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1055	MSW03411-1055	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.839085	32.769413	-90 50 20.705999	32 46 9.886800	NonWet	0	0	0	in	in	in	out	out
MSW03411-	1056	MSW03411-1056	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.961878	32.629009	-90 57 42.760799	32 37 44.432400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1057	MSW03411-1057	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.635338	33.147252	-90 38 7.216798	33 8 50.107200	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1058	MSW03411-1058	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.806063	33.114633	-90 48 21.826799	33 6 52.678800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1059	MSW03411-1059	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.597380	33.125999	-90 35 50.567998	33 7 33.596400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1060	MSW03411-1060	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.684354	32.742142	-90 41 3.674398	32 44 31.711200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1061	MSW03411-1061	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.715347	32.705943	-90 42 55.249198	32 42 21.394800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1062	MSW03411-1062	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.897418	32.996481	-90 53 50.704799	32 59 47.331600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1063	MSW03411-1063	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.963194	32.770982	-90 57 47.498399	32 46 15.535200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1064	MSW03411-1064	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.979198	32.477717	-90 58 45.112799	32 28 39.781200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1065	MSW03411-1065	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.795109	33.178292	-90 47 42.392398	33 10 41.851200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1066	MSW03411-1066	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.798253	32.963827	-90 47 53.710799	32 57 49.777200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1067	MSW03411-1067	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.917708	32.876524	-90 55 3.748799	32 52 35.486400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1068	MSW03411-1068	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.967893	32.857468	-90 58 4.414799	32 51 26.884800	NonWet	0	0	0	out	out	out	in	in
MSW03411-	1069	MSW03411-1069	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.482838	33.029021	-90 28 58.216797	33 1 44.475600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1070	MSW03411-1070	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.692009	32.852001	-90 41 31.232398	32 51 7.203600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1071	MSW03411-1071	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.921827	32.720574	-90 55 18.577199	32 43 14.066400	EPAnot	2	0	0	in	in	out	in	in
MSW03411-	1072	MSW03411-1072	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.053942	32.477327	-91 3 14.191200	32 28 38.377200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1073	MSW03411-1073	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.748472	33.233981	-90 44 54.499198	33 14 2.331600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1074	MSW03411-1074	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.866218	32.897055	-90 51 58.384799	32 53 49.398000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1075	MSW03411-1075	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.616831	33.034892	-90 37 0.591598	33 2 5.611200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1076	MSW03411-1076	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.649573	32.801314	-90 38 58.462798	32 48 4.730400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1077	MSW03411-1077	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.722991	33.096931	-90 43 22.767598	33 5 48.951600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1078	MSW03411-1078	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.790667	33.025484	-90 47 26.401199	33 1 31.742400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1079	MSW03411-1079	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.891724	32.813024	-90 53 30.206399	32 48 46.886400	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1080	MSW03411-1080	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.973280	32.940000	-90 58 23.807999	32 56 24.000000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1081	MSW03411-1081	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.668984	33.187517	-90 40 8.342398	33 11 15.061200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1082	MSW03411-1082	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.725427	33.006565	-90 43 31.537198	33 0 23.634000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1083	MSW03411-1083	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.557437	33.145139	-90 33 26.773197	33 8 42.500400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1084	MSW03411-1084	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.625908	32.886218	-90 37 33.268798	32 53 10.384800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1085	MSW03411-1085	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.627041	33.095373	-90 37 37.347598	33 5 43.342800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1086	MSW03411-1086	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.696309	32.997129	-90 41 46.712398	32 59 49.664400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1087	MSW03411-1087	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.945343	32.732490	-90 56 43.234799	32 43 56.964000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1088	MSW03411-1088	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.856034	32.528981	-90 51 21.722399	32 31 44.331600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1089	MSW03411-1089	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.611479	33.157719	-90 36 41.324398	33 9 27.788400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1090	MSW03411-1090	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.782368	33.103437	-90 46 56.524798	33 6 12.373200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1091	MSW03411-1091	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.500503	33.011273	-90 30 1.810797	33 0 40.582800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1092	MSW03411-1092	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.724896	32.721440	-90 43 29.625598	32 43 17.184000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1093	MSW03411-1093	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.772477	33.112182	-90 46 20.917199	33 6 43.855200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1094	MSW03411-1094	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.942959	32.944710	-90 56 34.652399	32 56 40.956000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1095	MSW03411-1095	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.947053	32.786924	-90 56 49.390799	32 47 12.926400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1096	MSW03411-1096	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.062966	32.670654	-91 3 46.677599	32 40 14.354400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1097	MSW03411-1097	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.817571	33.158304	-90 49 3.255599	33 9 29.894400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1098	MSW03411-1098	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.696210	33.005957	-90 41 46.355998	33 0 21.445200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1099	MSW03411-1099	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.877312	32.640890	-90 52 38.323199	32 38 27.204000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1100	MSW03411-1100	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.981242	32.880407	-90 58 52.471199	32 52 49.465200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1101	MSW03411-1101	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.580853	33.079639	-90 34 51.070797	33 4 46.700400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1102	MSW03411-1102	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.677225	32.867701	-90 40 38.009998	32 52 3.723600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1103	MSW03411-1103	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.973320	32.697936	-90 58 23.951999	32 41 52.569600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1104	MSW03411-1104	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.043015	32.564337	-91 2 34.853999	32 33 51.613200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1105	MSW03411-1105	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.771260	33.218469	-90 46 16.535998	33 13 6.488400	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1106	MSW03411-1106	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.827576	32.928517	-90 49 39.273599	32 55 42.661200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1107	MSW03411-1107	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.623203	33.001139	-90 37 23.530798	33 0 4.100400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1108	MSW03411-1108	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.672327	32.811944	-90 40 20.377198	32 48 42.998400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1109	MSW03411-1109	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.703240	33.157031	-90 42 11.663998	33 9 25.311600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1110	MSW03411-1110	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.906467	32.913445	-90 54 23.281199	32 54 48.402000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1111	MSW03411-1111	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.967147	32.786770	-90 58 1.729199	32 47 12.372000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1112	MSW03411-1112	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.058533	32.857482	-91 3 30.718800	32 51 26.935200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1113	MSW03411-1113	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.821444	33.248601	-90 49 17.198399	33 14 54.963600	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1114	MSW03411-1114	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.715762	33.054171	-90 42 56.743198	33 3 15.015600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1115	MSW03411-1115	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.901444	32.645007	-90 54 5.198399	32 38 42.025200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1116	MSW03411-1116	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.642273	32.922996	-90 38 32.182798	32 55 22.785600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1117	MSW03411-1117	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.612169	33.142123	-90 36 43.808398	33 8 31.642800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1118	MSW03411-1118	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.652464	32.955070	-90 39 8.870398	32 57 18.252000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1119	MSW03411-1119	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.940413	32.655624	-90 56 25.486799	32 39 20.246400	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1120	MSW03411-1120	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.000432	32.596039	-91 0 1.555199	32 35 45.740400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1121	MSW03411-1121	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.600232	33.183292	-90 36 0.835197	33 10 59.851200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1122	MSW03411-1122	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.768450	33.029288	-90 46 6.419998	33 1 45.436800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1123	MSW03411-1123	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.573001	33.122262	-90 34 22.803597	33 7 20.143200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1124	MSW03411-1124	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.739041	32.794581	-90 44 20.547599	32 47 40.491600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1125	MSW03411-1125	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.810513	32.523980	-90 48 37.846799	32 31 26.328000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	1126	MSW03411-1126	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.878011	33.003263	-90 52 40.839599	33 0 11.746800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1127	MSW03411-1127	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.937437	32.777903	-90 56 14.773199	32 46 40.450800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1128	MSW03411-1128	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.814947	32.586518	-90 48 53.809199	32 35 11.464800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1129	MSW03411-1129	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.729404	33.128314	-90 43 45.854398	33 7 41.930400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1130	MSW03411-1130	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.853536	33.021119	-90 51 12.729599	33 1 16.028400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1131	MSW03411-1131	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.859916	32.800590	-90 51 35.697599	32 48 2.124000	NonWet	0	0	0	in	in	in	out	in
MSW03411-	1132	MSW03411-1132	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.950484	32.885444	-90 57 1.742399	32 53 7.598400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1133	MSW03411-1133	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.672875	32.986641	-90 40 22.349998	32 59 11.907600	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1134	MSW03411-1134	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.710283	32.821001	-90 42 37.018798	32 49 15.603600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1135	MSW03411-1135	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.029321	32.674424	-91 1 45.555600	32 40 27.926400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1136	MSW03411-1136	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.012331	32.477447	-91 0 44.391599	32 28 38.809200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1137	MSW03411-1137	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.773130	33.195727	-90 46 23.267998	33 11 44.617200	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1138	MSW03411-1138	3	0	1	3	3 1 1	80	17.20641343	NonWe	-91.017847	32.727200	-91 1 4.249200	32 43 37.920000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1139	MSW03411-1139	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.675797	33.018140	-90 40 32.869198	33 1 5.304000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1140	MSW03411-1140	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.664139	32.836258	-90 39 50.900398	32 50 10.528800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1141	MSW03411-1141	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.721985	33.180705	-90 43 19.145998	33 10 50.538000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1142	MSW03411-1142	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.817066	33.005662	-90 49 1.437599	33 0 20.383200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1143	MSW03411-1143	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.887975	32.836126	-90 53 16.709999	32 50 10.053600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1144	MSW03411-1144	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.995168	32.853177	-90 59 42.604799	32 51 11.437200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1145	MSW03411-1145	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.638705	33.182244	-90 38 19.337998	33 10 56.078400	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1146	MSW03411-1146	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.746079	33.026807	-90 44 45.884398	33 1 36.505200	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1147	MSW03411-1147	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.551172	33.173078	-90 33 4.219197	33 10 23.080800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1148	MSW03411-1148	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.643863	32.783852	-90 38 37.906798	32 47 1.867200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1149	MSW03411-1149	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.646187	33.120053	-90 38 46.273198	33 7 12.190800	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1150	MSW03411-1150	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.722582	32.941717	-90 43 21.295198	32 56 30.181200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1151	MSW03411-1151	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.746447	32.739224	-90 44 47.209198	32 44 21.206400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1152	MSW03411-1152	3	0	1	3	3 1 1	80	17.20641343	NonWe	-90.856637	32.581462	-90 51 23.893199	32 34 53.263200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1153	MSW03411-1153	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.789223	33.237741	-90 47 21.202799	33 14 15.867600	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1154	MSW03411-1154	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.815893	33.091860	-90 48 57.214799	33 5 30.696000	EPAnot	2	0	0	in	out	out	out	out
MSW03411-	1155	MSW03411-1155	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.618551	32.983193	-90 37 6.783598	32 58 59.494800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1156	MSW03411-1156	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.733663	32.745157	-90 44 1.186798	32 44 42.565200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1157	MSW03411-1157	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.749066	33.162370	-90 44 56.637599	33 9 44.532000	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1158	MSW03411-1158	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.911289	32.960372	-90 54 40.640399	32 57 37.339200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1159	MSW03411-1159	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.989147	32.784243	-90 59 20.929199	32 47 3.274800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1160	MSW03411-1160	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.019618	32.741923	-91 1 10.624799	32 44 30.922800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1161	MSW03411-1161	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.824556	33.216948	-90 49 28.401599	33 13 1.012800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1162	MSW03411-1162	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.753977	33.065355	-90 45 14.317198	33 3 55.278000	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1163	MSW03411-1163	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.815984	32.658220	-90 48 57.542399	32 39 29.592000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1164	MSW03411-1164	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.659279	32.947195	-90 39 33.404398	32 56 49.902000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1165	MSW03411-1165	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.597325	33.085748	-90 35 50.369998	33 5 8.692800	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1166	MSW03411-1166	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.673354	32.977248	-90 40 24.074398	32 58 38.092800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1167	MSW03411-1167	3	0	1	5	3 1 1	80	17.20641343	NonWe	-90.996804	32.659600	-90 59 48.494399	32 39 34.560000	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1168	MSW03411-1168	3	0	1	5	3 1 1	80	17.20641343	NonWe	-91.068722	32.508846	-91 4 7.399199	32 30 31.845600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1169	MSW03411-1169	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.704655	33.199776	-90 42 16.757998	33 11 59.193600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1170	MSW03411-1170	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.781261	32.927303	-90 46 52.539599	32 55 38.290800	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1171	MSW03411-1171	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.613247	32.980622	-90 36 47.689198	32 58 50.239200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1172	MSW03411-1172	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.596213	32.862143	-90 35 46.366798	32 51 43.714800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1173	MSW03411-1173	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.700768	33.108961	-90 42 2.764798	33 6 32.259600	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1174	MSW03411-1174	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.789138	33.032026	-90 47 20.896799	33 1 55.293600	NonWet	0	0	0	in	in	out	out	in
MSW03411-	1175	MSW03411-1175	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.947810	32.834486	-90 56 52.115999	32 50 4.149600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1176	MSW03411-1176	3	0	1	4	3 1 1	80	17.20641343	NonWe	-91.028754	32.846625	-91 1 43.514399	32 50 47.850000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1177	MSW03411-1177	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.670495	33.200797	-90 40 13.781998	33 12 2.869200	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1178	MSW03411-1178	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.721492	33.074544	-90 43 17.371198	33 4 28.358400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1179	MSW03411-1179	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.856674	32.630318	-90 51 24.026399	32 37 49.144800	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1180	MSW03411-1180	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.578524	32.907339	-90 34 42.686397	32 54 26.420400	EPAnot	2	0	0	out	out	out	out	out
MSW03411-	1181	MSW03411-1181	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.660943	33.065619	-90 39 39.394798	33 3 56.228400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1182	MSW03411-1182	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.747319	32.937300	-90 44 50.348398	32 56 14.280000	EPAnot	2	0	0	in	in	out	out	out
MSW03411-	1183	MSW03411-1183	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.885391	32.708629	-90 53 7.407599	32 42 31.064400	NonWet	0	0	0	in	in	out	in	in
MSW03411-	1184	MSW03411-1184	3	0	1	4	3 1 1	80	17.20641343	NonWe	-90.952037	32.646262	-90 57 7.333199	32 38 46.543200	NonWet	0	0	0	in	out	out	in	in
MSW03411-	1185	MSW03411-1185	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.653179	33.137476	-90 39 11.444398	33 8 14.913600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1186	MSW03411-1186	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.816889	33.135094	-90 49 0.800399	33 8 6.338400	NonWet	0	0	0	in	out	out	out	out
MSW03411-	1187	MSW03411-1187	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.577180	33.155134	-90 34 37.847997	33 9 18.482400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1188	MSW03411-1188	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.680630	32.734640	-90 40 50.267998	32 44 4.704000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1189	MSW03411-1189	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.827439	32.652621	-90 49 38.780399	32 39 9.435600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1190	MSW03411-1190	3	0	1	2	3 1 1	80	17.20641343	NonWe	-90.940417	32.946164	-90 56 25.501199	32 56 46.190400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1191	MSW03411-1191	3	0	1	2	3 1 1	80	17.20641343	NonWe	-91.014930	32.820106	-91 0 53.748000	32 49 12.381600	NonWet	0	0	0	in	in	out	in	in

MSW03411-	1192	MSW03411-1192	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.978453	32.510384	-90 58 42.430799	32 30 37.362400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1193	MSW03411-1193	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.783302	33.176798	-90 46 59.887199	33 10 36.465600	NonWet	0	0	0	in	in	out	out	out
MSW03411-	1194	MSW03411-1194	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.832417	32.941478	-90 49 58.701199	32 56 29.313600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1195	MSW03411-1195	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.923985	32.862286	-90 55 26.273999	32 51 44.229600	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1196	MSW03411-1196	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.982875	32.846608	-90 58 58.349999	32 50 47.788800	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1197	MSW03411-1197	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.525971	33.033774	-90 31 33.495597	33 2 1.586400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1198	MSW03411-1198	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.701628	32.842955	-90 42 5.853598	32 50 34.638000	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1199	MSW03411-1199	3	0	1	2	3	1	1	80	17.20641343	NonWe	-90.970778	32.736444	-90 58 14.793599	32 44 11.198400	NonWet	0	0	0	out	out	out	out	out
MSW03411-	1200	MSW03411-1200	3	0	1	2	3	1	1	80	17.20641343	NonWe	-91.045447	32.503468	-91 2 43.609199	32 30 12.477600	NonWet	0	0	0	out	out	out	out	out

Yazoo EMAP Points

Corps	EMAP Coordinates Latitude	EMAP Coordinates Longitude	Actual Location Latitude	Actual Location Longitude	Date	Team	Sample Status	Canopy	Shrub	Herb	Vines	Hydrology Primary	Hydrology Secondary	Soils	Wet Final	NRCS Determination	Comments	EPA5yr pts	EPA2yr pts	Pt in 2yr Floodplain	Pt in 5yr Floodplain	Wet? Site(1)	Potential Impact	Potential impact +	QA
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003	1	Sampled			CARABRO		P6	S2	Hydric	yes	FW				1	1				WBA
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003	1	Sampled	CELA/ACNE	ILDE/ACNE	CARA/SMRO/TOVI/FAQU/TORA	VIRO		S1/S4	Hydric	yes		Soil-subang blocky; area outside greentree but in			2	2		Yes	Yes	WBA
3	[illegible]	[illegible]					Inaccessible										Water			3	3				
4	32.765406	90.601334	32 47.126	90 46.085	6/6/2003	2	Sampled	FRPE/CELA	ILDE/QULY/CARA	TORA/SMSP/BOCY		P3/P6	S3/S3/S4	Hydric	yes		Drainage feature 50' W of pt., organic stains on ped faces			4	4				WBA
5	32.591397	90.89363			6/11/2003	1	Sampled			CARABRO/AMTR		P2/P3/P6		Hydric	yes	PC	WRP			5	5				WBA
6	32.721975	90.645267	32 43.316	90 50.715	6/11/2003	2	Sampled		QUNU	TOVI/CARA/SEEX		P2/P3/P6		Hydric	yes		On concave landscape position			6	6				WBA
7	32.802933	90.626694	32 48.184	90 37.620	6/5/2003	2	Sampled	QUPH	USTR/ULAM/ACRU/ILDE/ULCR		BESC/TORA/AMBR	P3/P6	S1/S3/S4	Hydric	yes		Panther Swamp WMA			7	7		Yes	Yes	WBA
8	32.741187	90.803771	32 44.477	90 46.228	6/12/2003	2	Sampled	QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S3/S3/S4	Hydric	yes					8	8				WBA
9	32.49847	90.858535	32 29.906	90 51.392	6/13/2003	1	Sampled	CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P6		Hydric	yes		"Forced March"			9	9				WBA
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003	2	Sampled			Soybeans			S3/S3	Hydric	yes	FW	WRP 250'W of pt; End of water fall in ditch (silt deposits)			10	10				WBA
11	33.213506	90.766058			6/13/2003	Wiseman	Sited			Open water					no						11				WBA
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003	2	Sampled	QULY/QUNU/CELA	ILDE/CELA/FRPE	CARA/TORA		P3	S3/S4	Hydric	yes					12	12				WBA
13	[illegible]	[illegible]					Inaccessible										Water			13	13				
14	32.617195	90.693849	32 37.032	90 53.631	6/11/2003	1	Sampled			SOAL/RUCR/VEHA/DEIL		NI	NI	Hydric	no		Old field pl'd w/ QUNU			14	14				WBA
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003	1	Sampled			Cotton				Hydric	no	PC	"Dave's Wetland" N bank of Big Sunflower			15	15				WBA
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003	2	Sampled	CAAQ/CELA/QUNU/SAN	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3	S3/S4	Hydric	yes					16	16		yes	yes	WBA
17	32.611306	90.934277	32 36.702	90 56.387	6/13/2003	3	Sampled			CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P6		Hydric	yes		Coordinate evaluated 0.2mi from pt due to hi water			17	17				WBA
18	32.701446	90.994111	32 42.087	90 59.647	6/9/2003	1	Sampled			VEHA/SOAL/DEIL		NI	NI	Hydric	no					18	18				WBA
19	32.456946	90.953467	32 27.417	90 57.208	6/11/2003	1	Sampled	ULAM/CELA		IVAN/POPE		P3/P5	S2	Hydric	yes		Recent cutover (QUNU tops)			19	19				WBA
20	32.765036	90.628365	32 47.103	90 49.706	6/6/2003	2	Sampled	ULCR/CAAQ/CELA	CELA/ILDE	CARA/TORA/SMSP/BOCY		P1/P2/P3/P4/P6		Hydric	yes		Inundation prevented horizon ID			20	20				WBA
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003	3	Sampled			SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5	S1/S4/S6	Hydric	yes					21	21				WBA
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003	2	Sampled	QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P5	S3/S3	Hydric	yes		Edge of clearcut			22	22				WBA
23	32.762376	90.750511	32 45.743	90 45.031	6/5/2003	2	Sampled	QULY/CELA/QUNU/QUPH	ILDE/CRSP	BOCY/BICA		P3/P5		Hydric	yes					23	23				WBA
24	32.68517	90.779562	32 41.112	90 46.774	6/12/2003	2	Sampled	QUNU/QUPH/CAAQ	ILDE	VISP	TORA/SMSP	P3	S3/S4	Hydric	yes		Lichen lines @ 14"			24	24				WBA
25	[illegible]	[illegible]					Inaccessible										Water			25	25				
26	32.749034	90.652265	32 44.944	90 51.137	6/10/2003	2	Sampled		QUNU/QUNU	HIMI/SOSP/POSP			S3/S3/S5	Hydric	yes		S5 = crayfish chimneys			26	26				WBA
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003	1	Sited			Open water					no		Lake Washington			27	27				WBA
28	32.661403	90.752365	32 40.801	90 45.140	6/11/2003	2	Sampled	QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P6	S3/S3/S4	Hydric	yes					28	28				WBA
29	32.530351	90.911339			6/12/2003	1	Sampled	QULY/CAAQ/CELA	ILDE/CELA/ULAM			P1/P3/P4/P6/P6		Hydric	yes		Mahannah WMA			29	29				WBA
30	32.837883	90.623268	32 50.273	90 49.397	6/6/2003	1	Sampled	QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1	Hydric	yes					30	30				WBA
31	32.883326	90.807604	32 53.006	90 48.456	6/6/2003	1	Sampled	CELA/CAAQ/ULAM	ILDE/FRPE	BRCI/VEHA/POPE		P3/P5	S1	Hydric	yes					31	31				WBA
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003	1	Sampled	CAAQ/QULY/FRPE	FOAC			P1/P2		Hydric	yes					32	32				WBA
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003	1	Sited			Open water					no		Pt 471 ft from coordinates			33	33				WBA
34	32.956426	90.739268			6/3/2003	WG	Sited			Open water					no		Slough			34	34				WBA
35	32.477146	90.965723	32 28.721	90 56.106	6/13/2003	3	Sampled	SAN				P1/P2/P3/P6/P6		Hydric	yes		Representative sample taken 0.19 mi from pt @ 124O			35	35				WBA
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003	2	Sampled	QUNU/CELA/ULCR	ILDE/ACNE	TORA/CARA		P2/P3	S3/S3/S4	Hydric	yes					36	36				WBA
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003	1	Sampled	FRPE/QULY	HIMI/CEOC/FOAC	POHY		P1/P2/P3/P6	S1	Hydric	yes		Reporter			37	37				WBA
38	32.837817	90.974408	32 50.266	90 56.471	6/12/2003	1	Sampled	ACNE/FRPE/ULAM	CODR	TORA/AMAR		NI	NI	Hydric	no		Spoil bank of Steele Bayou			38	38				WBA
39	32.876854	90.747869	32 52.611	90 44.073	6/6/2003	1	Sampled	QUNU/ULAM/QULY	CELA/ILDE	CARA			S1/S4	Hydric	yes					39	39				WBA
40	32.721243	90.778592	32 43.212	90 46.607	6/11/2003	2	Sampled	QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4	Hydric	yes					40	40				WBA
41	32.506255	90.872116			6/13/2003	1	Sampled	CAAQ/QUPH/CELA	CELA/CRVI	FRPE/CARA		P3/P5		Hydric	yes		"Forced March"			41	41				WBA
42	32.72746	90.693222	32 43.649	90 53.595	6/5/2003	2	Sampled		QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2	S3/S4	Hydric	yes		Draining rapidly???			42	42				WBA
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003	1	Sited			Open water					no		Lake Washington			43	43				WBA
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003	2	Sampled	QUNU/CELA/QULY	ILDE/FRPE	QULY/AMAR		P1/P3	S3/S3/S4	Hydric	yes		Evidence of recent subsidence/ 2ry watermark @ 3'			44	44				WBA
45	[illegible]	[illegible]					Inaccessible										Water			45	45				
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003	2	Sampled	QUNU/FRPE/CELA	ILDE/CAAQ/RUSP	CARA/JURE		P3	S3/S4	Hydric	yes		Twin Oaks WMA			46	46				WBA
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003	1	Sampled			Corn				Hydric	no	PC				47	47				WBA
48	32.59603	90.790894	32 35.762	90 47.454	6/10/2003	1	Sampled	GLTR/CELA/FRPE/QUNU/UL	ILDE/CELA/ULAM	IVAN/TORA/BRCI		P3	S2	Hydric	yes					48	48				WBA
49	32.618424	90.983151			6/10/2003	1	Sited			Open water					no		Pt in middle of Steele Bayou channel			49	49				WBA
50	32.786186	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled	QULY/CAAQ/FRPE/TADI	CEOC/CAAQ	CEOC/FRPE/AMAR		P1/P2/P3/P6	S3/S3/S4	Hydric	yes					50	50				WBA
51	32.524526	91.063206			6/13/2003	1	Sampled			Zizania		P1		Hydric	yes		Edge of Eagle Lake			51	51				WBA
52	32.784146	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled	QULY/QUNU/FRPE	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4	Hydric	yes		Microtopography			52	52				WBA
53	[illegible]	[illegible]					Inaccessible										Water			53	53				
54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled	CELA/QUNU/FRPE/ULAM	ULAM/ILDE	CARA/TRDI	BESC	P3/P5		Hydric	yes					54	54				WBA
55	32.763145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled	QUNU/CAAQ/CELA/QUPH	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3	S3/S3/S4	Hydric	yes					55	55				WBA
57	32.553866	90.913438	32 33.232	90 54.806	6/13/2003	1	Sited			Sudan grass		P1		Hydric	yes		Site 0.34 mi from coord in inundated field; homogeneous			57	57				WBA
66	32.932167	90.698063	32 55.930	90 41.880	6/3/2003	WG	Sampled	QULY/FRPE/QUNU	ILDE	DIVISAM	VIRO/BESC/TORA	P3/	S1/S2/S4	Hydric	yes					66	66				WBA
EPA																									
401	32.71867	90.940061			6/13/2003	Wiseman	Sampled	QUPH	CAIL/FRPE/CELA/CODR	TORA		P3	S3/S4	Hydric	yes		Ponded due to location								WBA
402	33.008813	90.917894	33 00.515	90 55.074	6/4/2003	WG	Sampled	CELA/CAIL/FRPE/ULAM	CELA/ACRU	LELE/TORA		P3/P4	S1/S4	Hydric	yes										WBA
403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled	TADI/PLAQ	TADI/PLAQ/CEOC	Lemna sp		P1/P2		Hydric	yes			403	403	403	403	yes	yes	yes	WBA
404	33.214996	90.745053	33 12.816	90 44.675	6/4/2003	WG	Sampled			Soybeans				Hydric	no	PC		404	404	404	404	no			WBA
405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled	QUNU/QULY/FRPE	ILDE	CARA/AMAR		P3/P5		Hydric	yes		reference std. (Typical of undisturbed- Wiseman)	405	405	405	405	yes	yes	yes	WBA
406	32.643873	90.731969	32 38.626	90 43.918	6/13/2003	1	Sampled	CELA/ULAM/UST	ULAM/FRPE/UST	CARA/AMBR/SMRO/SMBO/RUTR			S4	Hydric	no		top of ridge in ridge swale topography	406	406	406	406	no			WBA
407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003	WG	Sampled	FRPE/CAAQ/	CEOC	SACE/SAM/LUPA		P1/P2/P3/P6	S4	Hydric	yes									yes	WBA
408	32.541629	90.962297	32 32.496	90 57.738	6/12/2003	1	Sampled	CAIL/CELA	UST/CRVI	AMBR/SMRO/CARA			S4	Hydric	no		Site on more high	408	408	408	408	no			WBA
409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled	QUNU/QUPH/CELA	ILDE	TORA/CARA			S3/S4	Hydric	yes			409	409	409	409	yes	yes	yes	WBA
410	32.626764	90.622305	32 37.606	90 49.338	6/10/2003	1	Sampled	USTI/QUPH/CELA/CAIL	CODR/ILDE/CELA	AMAR/TORA/BRCI			S1/S4	Hydric	yes			410	410	410	410	yes	yes	yes	WBA
411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003	WG	Sampled	CAAQ/QULY/FRPE	ACNE/ACRU/CELA	SAMI/SACE		P3	S3/S4	Hydric	yes		Close to flood line/ area saturated							yes	WBA
412	33.066412	90.98179	33 05.183	90 57.708	6/4/2003	WG	Sampled	CELA/TADI	CELA	BOCY/TORA/AMAR/CARA		P6	S3/S4	Hydric	yes										WBA
413	32.770721	91.011064	32 46.246	91 00.673	6/9/2003	2	Sampled	QUPH/QUNU/FRPE	ILDE/CELA/COST	TORA/JURE/CARA			S3/S4	Hydric	yes		Bryophyte/lichen line 8"	413			413	yes			WBA
414	33.104031	90.669432	33 06.243	90 40.163	6/8/2003	2	Sampled	QUNU/CELA/FRPE/ULAM	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P6	S3/S4	Hydric	yes			414	414	414	414	yes	yes	yes	WBA
415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003	WG	Sampled			ASPE/RUCR/AMTR/IVAN/EOCR			S1/S4	Hydric	yes			415	415	415	415	yes	yes	yes	WBA
416	32.567586	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled	QUNI/CELA/ACNE/UST	CODR	OPHI/RUAR			S1	NON-HYDRIC	no			416			416	no			WBA
417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled	QUPH/QUNU	ILDE/FRPE/UST	TORA/CARA			S3/S4	Hydric	yes		NRCS confirmed soil (DJ)								WBA
418	32.534032	90.805779	32 32.042	90 46.347	6/11/2003	1	Sampled			SOHA/AMAR/DEIL/SOAL		P6			no		Ordinary High Water- pt fell on incline of ditch bank								WBA
419	32.869081	91.041462	32 52.134	91 02.489	6/8/2003	1	Sampled	QULY/CELA/ULAM/SAN/FR	ILDE/CELA/FOAC	LELE/TORA/AMAR/CARA		P2/P4/P6	S2	Hydric	yes			419	419	419	419	yes	yes	yes	WBA
420	33.166359	90.68845	33 16.636	90 66.844	6/4/2003	WG	Sited			Catfish Pond					no	PC		420	420	420	420	no			WBA
421	[illegible]	[illegible]					Inaccessible								[illegible]		[illegible]	421	421	421	421	[illegible]			WBA
422	33.133246	90.659165	33 07.991	90 39.545	6/4/2003	WG	Sampled	CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4	Hydric	no		subangular blocky struc.	422	422	422	422	no			WBA
423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003	WG	Sampled	QUNU/ULAM/FRPE/CELA	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC		S3/S4	Hydric	yes			423			423	yes			WBA
424	32.566737	90.980214			6/10/2003	1	Sampled	QUNU/TADI/CELA/CAAQ/	ILDE			P2/P3/P4/P6/P6		Hydric	yes			424	424	424	424	yes	yes	yes	WBA
425	32.666751	90.808321	32 40.006	90 48.501	6/12/2003	2	Sampled	QUNU/USTI/CELA	ILDE	TORA/CARA			S3/S4	Hydric	yes			425			425	yes			WBA
426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled	USTI/QUPH/CELA/CAIL	ACRU/ULAM/ILDE/	AMBR/FAQU/OPHI/TORA/	SMRO		S4	Hydric	no		Adj 3 sloughs w/in 200' (E, W, N)	426	426	426	426	no			WBA
427	32.76243	90.696168	32 45.747	90 41.770	6/5/2003	2	Sampled	USTI/CAIL	ILDE/CODR	GATR	TORA/AMBR/AMBR		S4	NON-HYDRIC	no		DJ to classify soil (Response rec'd 6-30-03)	427			427	no			WBA
428	32.528961	90.940237	32 31.736	90 56.414	6/11/2003	1	Sampled	CELA/USTI/CAIL	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI	S4	Hydric	no		Soil sub-angular blocky								WBA
429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled	QUNU/ACRU/CAAQ	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4	Hydric	yes										WBA
430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003	WG	Sampled		FRPE/BAHA	CARA/SOAL		NI	NI	Hydric	no	PC	WRP/Dry side Sharkey	430			430	no			WBA
431	32.956179	90.601962			6/5/2003	1	Sited			catfish pond					no			431	431	431	431	no			WBA
432	32.664974	91.046676	32 39.896	91 02.801	6/12/2003	1	Sampled			VEHA/SOAL		NI	NI	NON-HYDRIC	no			432			432	no			WBA
434	32.69994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled	QUNU/CELA	CARYA SP	CARA/TORA/FOAC		P3	S4	Hydric	yes		Area sloped away from pt., ditches on 2 sides	434	434	434	434	yes	yes	yes	WBA
435	32.865015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled	USTI/QUNI/CAIL	CELA/COST	TOVI/GECA/FAQU		NI	NI	Hydric	no										WBA
436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled		CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI	NI	Hydric	no		Subangular blocky, ditched on 2 sides-drained	436			436	no			WBA
437	32.732014	90.683177	32 43.929	90 52.990	6/10/2003	2	Sampled		QUNU/CEOC	IMCA/ASSP			S3/S4	Hydric	yes		Subangular blocky	437	437	437	437	yes	yes	yes	WBA
438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled	USTI/CAAQ/QULY/ULCR	CELA/ULAM	GECA/TORA/CARA/AMAR		NI	S4	Hydric	no		ditched on 2 sides-drained	438	438	438	438	no			WBA
439	32.910041	90.68088	32 91.004	90 66.086	6/4/2003	WG	Sampled			Soybeans			S3	Hydric	no	PC									WBA
440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled	QUNU/FRPE/CELA/QUPH	ULAM/ULCR	AMBR/VICI/CACH		P6	S1/S4	Hydric	yes			440			440	yes			WBA
441	[illegible]	[illegible]					Inaccessible								[illegible]		[illegible]								WBA
442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003	1	Sampled	CELA/ULAM/USTI/QUPH	CELA/	TORA/CARA/AMBR			S4	Hydric	no		top of ridge in ridge swale topography	442	442	442	442	no			WBA
443	32.63555	90.599405	32 50.133	90 35.964	6/5/2003	2	Sampled	QUNU/QUNI	ULCR/QUPH	SOSP	CARA/TORA		S3/S4	Hydric	no (070603)		Adjacent forest w/water lines - Panther Swamp	443	443	443	443	no			WBA
444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003	1	Sampled	CELA/USTI/QUNU/ULAM	ILDE/ULCR/CELA	AMBR/BRCI/TRDE/TORA			S3/S4	Hydric	yes			444	444	444	444	yes	yes	yes	WBA
445	32.799895	91.057693	32 47.981	91 03.461	6/9/2003	2	Sampled			Soybeans				Hydric	no	PC		445	445	445	445	no			WBA
446	33.051829	90.50243	33 03.096	90 30.146	6/5/2003	1	Sampled			CARA/SOAL/VEHA/LUTE/IVAN		NI	NI	NON-HYDRIC	no		Fallow field								WBA
447	32.913414	90.611267			6/5/2003	1	Sampled								yes	FW	Road beside field adjacent to forested area (based on man NRCS t	447	447	447	447	yes	yes	yes	WBA
448	32.693421	91.039667	32 41.605	91 02.376	6/9/2003	2	Sampled	CELA/CAIL/UST	FRPE/CELA	TORA/CARA/AMPO/VICI/CAFR		NI	NI	Hydric	no		Pt. Fell between cottonwood plantat and QULY slough	448			448	no			WBA
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003	2	Sampled	QUPH/QULY/QUNU	USTI/ILDE/FRPE	TORA/JURE/CARA			S3/S4	Hydric	Yes		NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03	449			449	yes			WBA
450	[illegible]	[illegible]					Inaccessible											450	450	450	450	[illegible]			WBA
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG	Sampled	QULY/QUPH/UST	ULAM/CELA	SACE/COVI/CARA		P3	S1/S4	Hydric	yes									yes	WBA
452	33.1476	90.986276			6/5/2003	1	Sampled		CELA	CARA/TORA/DEIL/VEHA/SOHA			S4	Hydric	no		40' from standing water wetland; soil sub-ang blocky	452	452	452	452	no			WBA
453	32.749506	91.000253	32 44.976	91 00.014	6/9/2003	1	Sampled	QUNU/CAIL/UST	CAIL	VEHA/SOHA	SMBO	NI	NI	Hydric	no		Adjacent to slough (100') but on hi grd	453			453	no			WBA
454	33.070527	90.616767	33 414.005	90 3700.38	6/5/2003	1	Sited			Open water					no		20' from coordinate into open water		454	454		no			WBA
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG	Sampled			SOSP/CARA/VEBR/TORA		NI	NI	NON-HYDRIC	no	PC	Former crop field	455			455	no			WBA
456	32.58609	91.019853	32 35.172	91 01.215	6/10/2003	1	Sampled	CELA/USTI/FRPE/	ILDE/	CACH/LELE		P5/P5		Hydric	yes			456			456	yes			WBA
457	32.800881	90.905961	32 48.039	90 54.354	6/13/2003	2	Sampled	CAAQ/FRPE	FOAQ/SAN/FRPE/COST	AMBR/CARA		P1/P2/P3/P4	S3/S4	Hydric	yes		50-60' wide drainage pattern	457	457	457	457	yes	yes	yes	WBA
458	32.631939	-90.77918	32 37.916	90 46.750	6/10/2003	1	Sampled	QUPH/UST	ILDE/	AMBR/SMRO/OPHI/TORA			S4	Hydric	no		Pt on ridge between sloughs	458			458	no			WBA
801	33.219145	90.751069	33 13.246	90 45.046	6/7/2003	2	Sampled			Rice				Hydric	no	PC									WBA
802	32.862412	90.854264	32 52 56.66	90 51 15.34	6/10/2003	3	Sampled			Fallow field				Hydric	no	PC					802				WBA
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003	2	Sited			Catfish ponds					no	PC	open water - aquaculture			803	803				WBA
804	32.816597	90.615165	32 48 59.71	90 36 54.66	6/10/2003	3	Sampled		QUNU/CEOC	CARA/JURE/CARYO/PHRH/NCOS			S3/S4	Hydric	yes	PC	site appears connected to meander cut-off of Big Sun			804	804		yes	yes	WBA
805	33.105626	90.741057	33 06.336	90 44.464	6/8/2003	2	Sampled			Soybeans		NI	NI	Hydric	no	PC									WBA
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003	1	Sampled			Cotton				Hydric	no	PC									WBA
807	32.807157	90.907368	32 48 25.76	90 54 26.46	6/10/2003	3	Sampled			Corn				Hydric	no	PC									WBA
808	32.957145	91.001767	32 59.227	91 00.104	6/10/2003	3	Sampled			Cotton				Hydric	no	PC									WBA
809	33.227805	90.654674	33 13.656	90 39.280	6/7/2003	2	Sampled			Soybeans				Hydric	no	PC					809				WBA
810	32.99897	90.750527	32 59.936	90 45.032	6/8/2003	1	Sampled			Cotton				Hydric	no	PC	Soils heavily compacted								WBA
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003	2	Sampled			Soybeans		P4		Hydric	no	PC	No hydrophytic veg								WBA
812	32.870581	90.625433	32 52 14.29	90 37 28.58	6/10/2003	3	Sampled			Catfish ponds					no	OW	Pt. 230' from coordinate @ 267O				812				WBA
813	33.064743	90.645731	33 05.083	90 36.737	6/7/2003	2	Sampled			Catfish ponds					no	OW	open water - aquaculture				813				WBA
814	32.973342	90.693864	32 58.401	90 41.632	6/3/2003	WG	Sampled			BRCI		NI	NI	Hydric	no	PC				814	814				WBA
815	32.74346	90.940417	32 44.594	90 56.357	6/11/2003	3	Sampled			Cotton				NON-HYDRIC	no	PC									WBA
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003	3	Sampled			Corn				NON-HYDRIC	no	PC/HW					816				WBA
817	[illegible]	[illegible]	[illegible]	[illegible]	6/3/2003	WG	Sampled			[illegible]				[illegible]	no	PC	817 & 817.1 same site [illegible]			817	817				WBA
817.1			[illegible]	[illegible]	[illegible]	2																			
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC									WBA
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003	3	Sampled			Rice				Hydric	no	PC	Pt. Located in rice field 300' S of coordinates								WBA
820	32.765865	90.694156	32 76.596	90 69.418	6/5/2003	2	Sited			Cotton					no	PC	Pt. 962 ft at 36oN into cotton field				820				WBA
821	32.63494	90.82267	32 38 05.75	90 49 21.65	6/11/2003	3	Sampled			Corn				Hydric	no	PC					821				WBA
822	32.951234	90.948594	32 57.0446	90 56.4769	6/10/2003	3	Sampled			Road					no	OW	Road between catfish ponds				822				WBA
823	[illegible]	[illegible]					Inaccessible														823				
824	32.527506	90.991765	32 31 39.04	90 59 30.37	6/11/2003	3	Sampled			Cotton				NON HYDRIC	no	PC/HW									WBA
825	33.198496	90.797275	33 11.922	90 47.827	6/7/2003	2	Sampled			Rice				Hydric	no	PC									WBA
826	32.951544	90.821376	32 57 05.52	90 49 17.06	6/10/2003	3	Sampled			Cotton				NON-HYDRIC	no	PC									WBA
827	32.694192	90.919654	32 41.649	90 55.180	6/11/2003	3	Sampled			Corn				NON-HYDRIC	no	PC				827	827				WBA
828	32.935509	90.987067	32 56.126	90 59.225	6/10/2003	3	Sampled			Corn			S3	Hydric	no	OW	Site located between cornfield and depressional drain								WBA
829	33.045206	90.59105	33 02.713	90 35.464	6/7/2003	2	Sampled			Corn				Hydric	no	PC	Soil very compacted								WBA
830	[illegible]	[illegible]					Inaccessible									PC									
831	32.747124	90.961868	32 44 49.43	90 57 42.74	6/11/2003	3	Sampled			Corn				NON-HYDRIC	no	PC					831				WBA
832	[illegible]	[illegible]					Inaccessible														832				
833	33.229869	90.658305	33 13.783	90 39.500	6/7/2003	2	Sited			Levee of Catfish pond					no	PC	Ditch at 152o of pt at 80'			833	833				WBA
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003	2	Sampled			Soybeans				Hydric	no	PC									WBA
835	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	2	Sampled			[illegible]		NI	NI	[illegible]	no		835 & 835.1 same site [illegible]								WBA
835.1					6/3/2003	WG																			
836	32.744837	90.715266	32 44 41.42	90 42 54.94	6/11/2003	3	Sampled			Fallow field				Hydric	no	PC					836				WBA
837	33.153119	90.784068	33 09.185	90 47.043	6/7/2003	2	Sampled			Cotton			S1	Hydric	no	PC				837	837				WBA
838	32.974159	90.90942	32 58 26.92	90 54 33.96	6/10/2003	3	Sampled			Soybeans			S1	Hydric	no	PC									WBA
839	[illegible]	[illegible]					Inaccessible													839	839				
840	32.765486	91.050297			6/9/2003	2	Sampled			Corn		P4	S3	Hydric	no	PC	Drift lines in concave surfaces				840				WBA
841	33.214101	90.81356	33 12.856	90 46.799	6/7/2003	2	Sited			Catfish ponds					no	PC									WBA
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003	3	Sampled	CAIL		SOHA				Hydric	no	PC	Edge of spoil bank of ditch				842				WBA
843	32.631199	90.881465	32 37 52.32	90 52 53.34	6/11/2003	3	Sampled			Soybeans				Hydric	yes	FW	Farmed wetland			843	843		yes	yes	WBA
844	32.67113	91.039656	32 52.266	91 02.379	6/9/2003	1	Sampled			Soybeans		NI	NI	Hydric	no	PC									WBA
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003	2	Sited			Catfish ponds					no	OW	Open water - aquaculture								WBA
846	32.851185	90.727543	32 51 04.31	90 43 39.13	6/10/2003	3	Sampled			Cotton				Hydric	no	PC				846	846				WBA
847	32.663892	91.00143	32 39 50.01	90 00 05.21	6/11/2003	3	Sampled			Cotton		NI	NI	Hydric	no	PC					847				WBA
848	32.535879	91.035833	32 32 09.16	91 02 08.97	6/11/2003	3	Sampled			Cotton				NON HYDRIC	no	PC/HW					848				WBA
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003	2	Sited			Catfish ponds					no	PC	open water - aquaculture			849	849				WBA
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003	2	Sampled			Corn				Hydric	no	PC	Very compacted soil								WBA
851	33.108834	90.548094	33 06.531	90 32.765	6/12/2003	3	Sampled			Soybeans				Hydric	no	PC				851	851				WBA
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003	3	Sampled	QUN		SOAL/CARA/AMI				Hydric	no	PC				852	852				WBA
853	32.541726	90.8057	32 32.505	90 46.339	6/12/2003	3	Sampled			Corn				Hydric	no	PC/HW									WBA
861	32.990902	90.666738			6/3/2003	WG	Sampled			Soybeans		NI	NI	NI	no										WBA
868	32.806345	90.705699	32 48 22.86	90 42 20.45	6/11/2003	3	Sampled			Cotton				NON-HYDRIC	no						868				
170																				97	129				

Key to Hydrology Indicators
Primary Indicators

P1 = Inundated
P2 = Saturated in the upper 12 inches
P3 = Water marks
P4 = Drift Lines
P5 = Sediment desposits
P6 = Drainage patterns in the wetland

Secondary Indicators
S1 = Oxidized root channels in upper 12 inches
S2 = Water stained leaves
S3 = Local soil survey data
S4 = FAC-neutral test
S5 = Other (explained)

WG = Whole Group

NI = Not Indicated

Note: On 06/02/03 Steele Bayou gates were closed. On 06/05/03 at 1000 hrs gates were opened.

Yazoo EMAP Points

These columns represent the intersection of EMAP wetland (Wet) and nonwetland (Nonwet) points with the 2-year w/ and w/o project floodplain and the 5% duration w/ and w/o project floodplain.

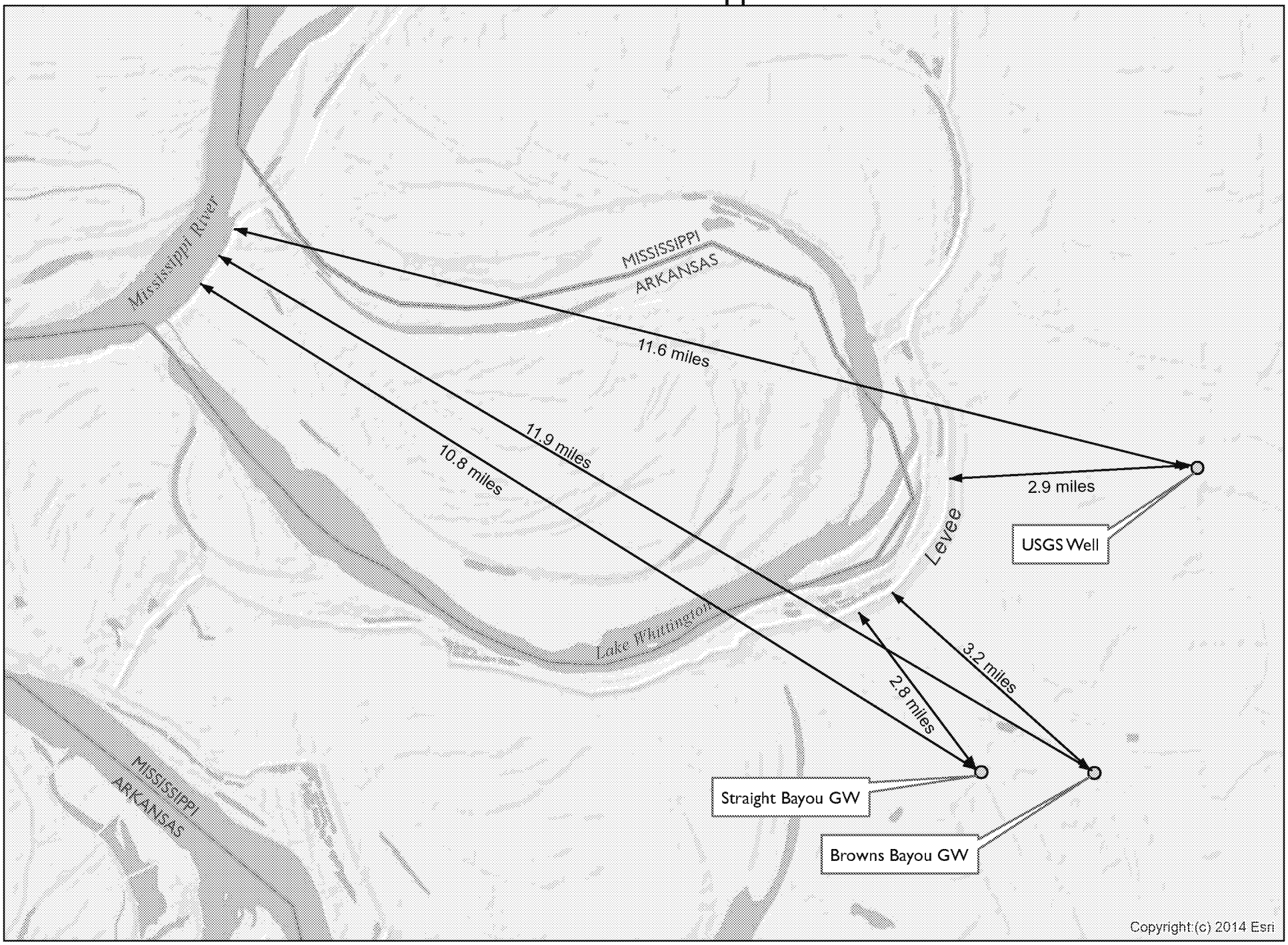
	EMAP Coordinates		Actual Location					Hydroveg				Hydrology		Soils													
Corps	Latitude (d	Longitude (	Latitude	Longitude	Date	Team	Sample Status	Canopy	Shrub	Herb	Vines	Primary	Secondary		Wet Final	NRCS Determinatio	Comments	Base 2 yr Wet	Base 2 yr Nonwet	P5 2yr Wet	P5 2yr Nonwet	Base 5% Wet	Base 5% nonwet	B1 plan5 Wet	B1 plan5 Nonwet	B2 plan5 Wet	B2 plan5 Nonwet
1	32.60352	90.95328	32 36.211	90 57.197	6/11/2003		1 Sampled			CARA/BRCI		P5	S2	Hydric	yes	FW		Yes		Yes		Yes		Yes		Yes	
2	32.89925	90.76618	32 53.955	90 45.970	6/6/2003		1 Sampled	CELA/ACNE	ILDE/ACNE/	CARA/SMRC	VIRO		S1/S4	Hydric	yes		Soil-subang blocky; area outside greentree but hi	Yes		Yes		Yes		Yes		Yes	
3	32.5469	90.97209					Inaccessible										Hi water										
4	32.78541	90.80133	32 47.128	90 48.085	6/6/2003		2 Sampled	FRPE/CELA	ILDE/QULY/I	TORA/SMISP/BOCY		P3/P6	S2/S3/S4	Hydric	yes		Drainage feature 50' W of pt., organic stains on ped faces	Yes		Yes		Yes		Yes		Yes	
5	32.5914	90.89303			6/11/2003		1 Sampled			CARA/BRCI/AMTR		P2/P3/P5		Hydric	yes	PC	WRP	Yes		Yes		Yes		Yes		Yes	
6	32.72198	90.84527	32 43.318	90 50.715	6/11/2003		2 Sampled		QUNU/	TOVI/CARA/SEEX		P2/P3/P5		Hydric	yes		On concave landscape position	Yes		Yes		Yes		Yes		Yes	
7	32.80293	90.62668	32 48.184	90 37.620	6/5/2003		2 Sampled	QUPH	LIST/ULAM/ACRU/ILDE/IL		BESC/TORA	P3/P6	S1/S3/S4	Hydric	yes		Panther Swamp WMA	Yes		Yes		Yes		Yes		Yes	
8	32.74119	90.80377	32 44.477	90 48.228	6/12/2003		2 Sampled	QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
9	32.49847	90.85654	32 29.908	90 51.392	6/13/2003		1 Sampled	CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5		Hydric	yes		"Forced March"	Yes		Yes		Yes		Yes		Yes	
10	32.78408	90.88612	32 47.045	90 53.169	6/9/2003		2 Sampled			Soybeans			S2/S3	Hydric	yes	FW	WRP 250'W of pt; Evid of water fall in ditch (silt deposits)	Yes		Yes		Yes		Yes		Yes	
11	33.21351	90.76606			6/13/2003	Wiseman	Sited			Open water					no								Yes				
12	32.77272	90.75052	32 46.363	90 45.031	6/5/2003		2 Sampled	QULY/QUNU	ILDE/CELA/I	CARA/TORA		P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
13	32.5004	90.91514					Inaccessible										Hi water										
14	32.6172	90.89385	32 37.032	90 53.631	6/11/2003		1 Sampled			SOAL/RUCR/VEHA/DEIL		NI	NI	Hydric	no		Old field plt'd w/ QUNU		Yes		Yes		Yes		Yes		Yes
15	32.95395	90.78217	32 57.236	90 46.932	6/5/2003		1 Sampled			Cotton					no	PC	"Dave's Wetland" Hi bank of Big Sunflower		Yes		Yes		Yes		Yes		Yes
16	32.81458	91.03835	32 48.875	91 02.276	6/10/2003		2 Sampled	CAAQ/CELA	CRSP/CELA	AMAR/TORA/CAAQ		P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
17	32.61131	90.93428	32 36.702	90 56.367	6/13/2003		3 Sampled			CARA/AMTR/QUNU/CEOC		P1/P2/P3/P5		Hydric	yes		Coordinate evaluated 0.2mi from pt due to hi water	Yes		Yes		Yes		Yes		Yes	
18	32.70145	90.99411	32 42.087	90 59.647	6/9/2003		1 Sampled			VEHA/SOAL/DEIL		NI	NI	Hydric	no				Yes		Yes		Yes		Yes		Yes
19	32.45695	90.95347	32 27.417	90 57.208	6/11/2003		1 Sampled	ULAM/CELA		IVAN/POPE		P3/P5	S2	Hydric	yes		Recent cutover (QUNU tops)	Yes		Yes		Yes		Yes		Yes	
20	32.78504	90.82837	32 47.103	90 49.706	6/6/2003		2 Sampled	ULCR/CAAQ	CELA/ILDE/	CARA/TORA/SMISP/BOCY		P1/P2/P3/P4/P6		Hydric	yes		Inundation prevented horizon ID	Yes		Yes		Yes		Yes		Yes	
21	32.57555	90.88723	32 34.531	90 53.237	6/13/2003		3 Sampled			SEEX/POPU/ELSP/CYSP/		P1/P2/P5	S1/S4/S6	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
22	32.8262	90.86191	32 49.572	90 51.715	6/9/2003		2 Sampled	QUNU/QULY	FOAC/ILDE/	JURE/CARA		P3/P6	S2/S3	Hydric	yes		Edge of clearcut	Yes		Yes		Yes		Yes		Yes	
23	32.76238	90.75051	32 45.743	90 45.031	6/5/2003		2 Sampled	QULY/CELA	ILDE/CRSP/	BOCY/BICA		P3/P6		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
24	32.68517	90.77958	32 41.112	90 46.774	6/12/2003		2 Sampled	QUNU/QUPH	ILDE	VISP/	TORA/SMSP	P3	S3/S4	Hydric	yes		Lichen lines @ 14"	Yes		Yes		Yes		Yes		Yes	
25	32.5025	90.98836					Inaccessible										Hi water										
26	32.74903	90.85229	32 44.944	90 51.137	6/10/2003		2 Sampled		QUNI/QUNU	HIMI/SOSP/POSP			S2/S3/S5	Hydric	yes		S5 = crayfish chimneys	Yes		Yes		Yes		Yes		Yes	
27	33.09793	91.06815	33 05.876	91 04.089	6/5/2003		1 Sited			Open water					no		Lake Washington		Yes		Yes		Yes		Yes		Yes
28	32.6814	90.75237	32 40.801	90 45.140	6/11/2003		2 Sampled	QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
29	32.53035	90.91134			6/12/2003		1 Sampled	QULY/CAAQ	ILDE/CELA/ULAM			P1/P3/P4/P5/P6		Hydric	yes		Mahannah WMA	Yes		Yes		Yes		Yes		Yes	
30	32.83788	90.82329	32 50.273	90 49.397	6/6/2003		1 Sampled	QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
31	32.88333	90.8076	32 53.000	90 48.456	6/6/2003		1 Sampled	CELA/CAAQ	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5	S1	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
32	32.62309	90.73862	32 37.386	90 44.317	6/10/2003		1 Sampled	CAAQ/QULY	FOAC			P1/P2		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
33	32.59127	90.92568	32 35.476	90 55.540	6/11/2003		1 Sited			Open water					no		Pt 471 ft from coordinates		Yes		Yes		Yes		Yes		Yes
34	32.90643	90.73927			6/3/2003	WG	Sited			Open water					no		Slough		Yes		Yes		Yes		Yes		Yes
35	32.47715	90.96572	32 28.721	90 58.106	6/13/2003		3 Sampled	SANI				P1/P2/P3/P5/P6		Hydric	yes		Representative sample taken 0.19 mi from pt @ 124O	Yes		Yes		Yes		Yes		Yes	
36	32.80084	90.80768	32 48.041	90 48.482	6/12/2003		2 Sampled	QUNU/CELA	ILDE/ACNE/	TORA/CARA		P2/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
37	32.53275	90.87026	32 31.965	90 52.261	6/11/2003		1 Sampled	FRPE/QULY	HIMI/CEOC/I	POHY		P1/P2/P3/P5	S1	Hydric	yes		Reporter	Yes		Yes		Yes		Yes		Yes	
38	32.83782	90.97441	32 50.268	90 58.471	6/12/2003		1 Sampled	ACNE/FRPE	CODR	TORA/AMAR		NI	NI	Hydric	no		Spoil bank of Steele Bayou		Yes				Yes				
39	32.87685	90.74789	32 52.611	90 44.073	6/6/2003		1 Sampled	QUNU/ULAM	CELA/ILDE	CARA			S1/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
40	32.72124	90.77659	32 43.212	90 46.607	6/11/2003		2 Sampled	QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
41	32.50626	90.87212			6/13/2003		1 Sampled	CAAQ/QUPH	CELA/CRVI	FRPE/CARA		P3/P5		Hydric	yes		"Forced March"	Yes		Yes		Yes		Yes		Yes	
42	32.72748	90.89322	32 43.649	90 53.595	6/13/2003		2 Sampled		QUNU/CEOC	ASSP/POSP/CAREX		P1/P2	S3/S4	Hydric	yes		Draining rapidly???	Yes		Yes		Yes		Yes		Yes	
43	33.03978	91.04014	33 255.138	91 246.646	6/5/2003		1 Sited			Open water					no		Lake Washington		Yes		Yes		Yes		Yes		Yes
44	32.74478	90.76817	32 44.689	90 46.091	6/13/2003		2 Sampled	QUNU/CELA	ILDE/FRPE	QULY/AMAR		P1/P3	S2/S3/S4	Hydric	yes		Evidence of recent subsidence/ 2ry watermark @ 3'	Yes		Yes		Yes		Yes		Yes	
45	32.5248	90.93571					Inaccessible										Hi water										
46	32.8216	90.8395	32 49.295	90 50.370	6/6/2003		2 Sampled	QUNU/FRPE	ILDE/CAAQ/	CARA/JURE		P3	S3/S4	Hydric	yes		Twin Oaks WMA	Yes		Yes		Yes		Yes		Yes	
47	32.91165	90.83865	32 54.699	90 50.319	6/5/2003		1 Sampled			Corn					no	PC			Yes		Yes		Yes		Yes		Yes
48	32.59603	90.79089	32 35.762	90 47.454	6/10/2003		1 Sampled	GLTR/CELA	ILDE/CELA/	IVAN/TORA/BRCI		P3	S2	Hydric	yes			Yes				Yes					
49	32.61842	90.98315			6/10/2003		1 Sited			Open water					no		Pt in middle of Steele Bayou channel		Yes		Yes		Yes		Yes		Yes
50	32.78619	90.85916	32 47.170	90 51.551	6/9/2003		2 Sampled	QULY/CAAQ	CEOC/CAAQ	CEOC/FRPE/AMAR		P1/P2/P3/P6	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
51	32.52453	91.06321			6/13/2003		1 Sampled			Zizania		P1		Hydric	yes		Edge of Eagle Lake	Yes				Yes					
52	32.78415	90.75141	32 47.050	90 45.086	6/5/2003		2 Sampled	QULY/QUNU	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4	Hydric	yes		Microtopography	Yes		Yes		Yes		Yes		Yes	
53	32.4781	90.93191					Inaccessible										Hi water										
54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003		1 Sampled	CELA/QUNU	ULAM/ILDE	CARA/TRDI	BESC	P3/P5		Hydric	yes			Yes		Yes		Yes		Yes		Yes	
55	32.78315	90.7289	32 46.984	90 43.753	6/13/2003		2 Sampled	QUNU/CAAQ	ILDE/FRPE/I	JURE/CARA/AMAR		P1/P2/P3	S2/S3/S4	Hydric	yes			Yes		Yes		Yes		Yes		Yes	
57	32.55387	90.91344	32 33.232	90 54.806	6/13/2003		1 Sited			Sudan grass		P1		Hydric	yes		Site 0.34 mi from coord in inundated field; homogeneous	Yes		Yes		Yes		Yes		Yes	
66	32.93217	90.698	32 55.930	90 41.880	6/3/2003	WG	Sampled	QULY/FRPE	ILDE	DIVI/SAMI	VIRO/BESC/	P3/	S1/S2/S4	Hydric	yes			Yes		Yes		Yes					
EPA																											
401	32.71867	90.94008			6/13/2003	Wiseman	Sampled	QUPH	CAIL/FRPE/	TORA		P3	S2/S4	Hydric	yes		Ponded due to location										
402	33.00861	90.91789	33 00.515	90 55.074	6/4/2003	WG	Sampled	CELA/CAIL/	CELA/ACRU	LELE/TORA		P3/P4	S1/S4	Hydric	yes												
403	33.02911	91.05438	33 01.792	91 03.320	6/5/2003		1 Sampled	TADI/PLAQ	TADI/PLAQ/	Lemna sp		P1/P2		Hydric	yes			Yes		Yes				Yes		Yes	
404	33.215	90.74505	33 12.810	90 44.675	6/4/2003	WG	Sampled			Soybeans					no	PC			Yes		Yes						
405	32.84212	90.85649	32 50.527	90 51.384	6/6/2003		1 Sampled	QUNU/QULY	ILDE	CARA/AMAR		P3/P5		Hydric	yes		reference std.(Typical of undisturbed- Wiseman)	Yes		Yes				Yes			
406	32.64367	90.73197	32 38.620	90 43.918	6/13/2003		1 Sampled	CELA/ULAM	ULAM/FRPE	CARA/AMBR/SMRO/SMBO/RUTR			S4	Hydric	no		top of ridge in ridge swale topography		Yes						Yes		Yes
407	32.92706	90.64238	32 55.623	90 38.543	6/4/2003	WG	Sampled	FRPE/CAAQ	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5	S4	Hydric	yes												
408	32.54163	90.9623	32 32.498	90 57.738	6/12/2003		1 Sampled	CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA			S4	Hydric	no		Site on micro high		Yes		Yes				Yes		Yes
409	32.66584	90.83098	32 39.951	90 49.862	6/12/2003		2 Sampled	QUNU/QUPH	ILDE	TORA/CARA			S3/S4	Hydric	yes			Yes						Yes		Yes	
410	32.62676	90.82231	32 37.606	90 49.338	6/10/2003		1 Sampled	LIST/QUPH/	CODR/ILDE/	AMAR/TORA/BRCI			S1/S4	Hydric	yes			Yes									
411	32.90241	90.67943	32 54.152	90 40.774	6/4/2003	WG	Sampled	CAAQ/QULY	ACNE/ACRU	SAMI/SACE		P3	S2/S4	Hydric	yes		Close to flood line/ area saturated										
412	33.08641	90.96179	33 05.183	90 57.708	6/4/2003	WG	Sampled	CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5	S2/S4	Hydric	yes									Yes		Yes	
413	32.77072	91.01106	32 46.248	91 00.673	6/9/2003		2 Sampled	QUPH/QUNU	ILDE/CELA/	TORA/JURE/CARA			S3/S4	Hydric	yes		Bryophyte/lichen line 8"										
414	33.10403	90.66943	33 06.243	90 40.163	6/8/2003		2 Sampled	QUNU/CELA	COST/ILDE/	AMBR/TORA		P5	S2/S4	Hydric	yes			Yes		Yes							
415	32.96246	90.7048	32 57.747	90 42.288	6/3/2003	WG	Sampled			ASPE/RUCR/AMTR/IVAN/ECCR			S1/S4	Hydric	yes			Yes		Yes				Yes		Yes	
416	32.56759	91.01254	32 34.056	91 00.749	6/13/2003		3 Sampled	QUNI/CELA/	CODR	OPHI/RUAR			S1	NON-HYDR	no												
417	32.6627	90.88065	32 39.762	90 52.837	6/6/2003		2 Sampled	QUPH/QUNU	ILDE/FRPE/I	TORA/CARA			S3/S4	Hydric	yes		NRCS confirmed soil (DJ)										
418	32.53403	90.80578	32 32.042	90 48.347	6/11/2003		1 Sampled			SOHA/AMAR/DEIL/SOAL		P5			no		Ordinary High Water- pt fell on incline of ditch bank										
419	32.86908	91.04148	32 52.134	91 02.489	6/8/2003		1 Sampled	QULY/CELA	ILDE/CELA/	LELE/TORA/AMAR.CARA		P2/P4/P6	S2	Hydric	yes			Yes									
420	33.16636	90.66845	33 16.636	90 66.844	6/4/2003	WG	Sited			Catfish Pond					no	PC			Yes								
421	32.8058	91.00128					Inaccessible								xxxx		Behind locked gate										
422	33.13325	90.65917	33 07.991	90 39.545	6/4/2003	WG	Sampled	CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4	Hydric	no		subangular blocky struc.		Yes		Yes						
423	32.91778	90.74132	32 55.067	90 44.475	6/3/2003	WG	Sampled	QUNU/ULAM	ILDE/ACRU/	TORA/AMAR	VIRO/BESC		S2/S4	Hydric	yes												
424	32.58674	90.98021			6/10/2003		1 Sampled	QUNU/TADI/	ILDE			P2/P3/P4/P5/P6		Hydric	yes			Yes		Yes				Yes		Yes	
425	32.66675	90.80832	32 40.000	90 48.501	6/12/2003		2 Sampled	QUNU/LIST/	ILDE	TORA/CARA			S3/S4	Hydric	yes												
426	32.61995	90.78183	32 37.197	90 46.910	6/10/2003		1 Sampled	LIST/QUPH/	ACRU/ULAM	AMBR/PAQU	SMRO		S4	Hydric	no		Adj 3 sloughs w/in 200' (E, W, N)		Yes		Yes				Yes		Yes
427	32.76243	90.69617	32 45.747	90 41.770	6/5/2003		2 Sampled	LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR		S4	NON-HYDR	no		DJ to classify soil (Response rec'd 6-30-03)										
428	32.52896	90.84024	32 31.738	90 50.414	6/11/2003		1 Sampled	CELA/LIST/	QUNI	PAQU/GECA/COCA/TORA		NI	S4	Hydric	no		Soil sub-angular blocky										
429	32.8132	91.08038	32 48.794	91 04.822	6/9/2003		2 Sampled	QUNU/ACRU	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4	Hydric	yes												
430	32.97148	90.65399	32 58.287	90 39.237	6/3/2003	WG	Sampled		FRPE/BAHA	CARA/SOAL		NI	NI	Hydric	no	PC	WRP/Dry side Sharkey										
431	32.93618	90.80199			6/5/2003		1 Sited			catfish pond					no				Yes		Yes				Yes		Yes
432	32.66497	91.04668	32 39.898	91 02.801	6/9/2003		1 Sampled			VEHA/SOAL		NI	NI	NON-HYDR	no												
434	32.89994	90.92142	32 53.996	90 55.285	6/6/2003		1 Sampled	QUNU/CELA	CARYA SP	CARA/TORA/FOAC		P3	S4	Hydric	yes		Area sloped away from pt., ditches on 2 sides	Yes		Yes							
435	32.88502	91.00953	32 53.101	91 00.572	6/9/2003		1 Sampled	LIST/QUNI/	CELA/COST	TOVI/GECA/PAQU		NI	NI	Hydric	no												
436	33.11024	90.75544	33 06.614	90 45.326	6/5/2003		1 Sampled		CELA/FRPE	CARA/RUAR/SOAL/TORA/		NI	NI	Hydric	no		Subangular blocky, ditched on 2 sides-drained										
437	32.73201	90.88318	32 43.920	90 52.990	6/10/2003		2 Sampled		QUNU/CEOC	IMCA/ASSP			S3/S4	Hydric	yes		Subangular blocky	Yes		Yes				Yes		Yes	
438	33.13056	90.58712	33 07.833	90 35.227	6/5/2003		1 Sampled	LIST/CAAQ/	CELA/ULAM	GECA/TORA/CARA/AMAR		NI	S4	Hydric	no		ditched on 2 sides-drained		Yes		Yes						
439	32.91004	90.66088	32 91.004	90 66.086	6/4/2003	WG	Sampled			Soybeans			S3	Hydric	no	PC											
440	32.61334	90.98928	32 36.799	90 59.359	6/10/2003		1 Sampled	QUNU/FRPE	ULAM/ULCR	AMAR/MICI/CACH		P5	S1/S4	Hydric	yes												
441	32.7351	90.76045			6/10/2003		2 Inaccessible								xxxx		Inaccessible due to deep ditch beside road										
442	32.64657	90.74634	32 38.794	90 44.780	6/13/2003		1 Sampled	CELA/ULAM	CELA/	TORA/CARA/AMBR			S4	Hydric	no		top of ridge in ridge swale topography		Yes						Yes		Yes
443	32.83555	90.59941	32 50.133	90 35.964	6/5/2003		2 Sampled	QUNU/QUNI	ULCR/QUPH	SOSP	CARA/TORA		S3/S4	Hydric	no (070803)		Adjacent forest w/water lines - Panther Swamp		Yes		Yes						
444	32.59925	90.9104	32 35.955	90 54.624	6/11/2003		1 Sampled	CELA/LIST/	ILDE/ULCR/	AMAR/BRCI/TRDE/TORA			S2/S4	Hydric	yes			Yes		Yes				Yes		Yes	
445	32.7997	91.05769	32 47.981	91 03.461	6/9/2003		2 Sampled			Soybeans				Hydric	no	PC			Yes								
446	33.05163	90.50243	33 03.098	90 30.146	6/5/2003		1 Sampled			CARA/SOAL/VEHA/JUTE/		NI	NI	NON-HYDR	no		Fallow field										
447	32.91341	90.81129			6/5/2003		1 Sampled								yes	FW	Road beside field adjacent to forested area (based on map N	Yes		Yes							
448	32.69342	91.03961	32 41.605	91 02.376	6/9/2003		1 Sampled	CELA/CAIL/	FRPE/CELA	TORA/CARA/VIRO/MICI/		NI	NI	Hydric	no		Pt. Fell between cottonwood plantal and QULY slough										
449	32.65871	90.90515	32 39.522	90 54.313	6/6/2003		2 Sampled	QUPH/QULY	LIST/ILDE/F	TORA/JURE/CARA			S3/S4	Hydric	Yes		NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03										
450	32.8864	90.7236					Inaccessible								xxxx												
451	32.87985	90.71823	32 52.971	90 43.096	6/4/2003	WG	Sampled	QULY/QUPH	ULAM/CELA	SACE/COVI/CARA		P3	S1/S4	Hydric	yes												
452	33.1476	90.98628			6/5/2003		1 Sampled		CELA	CARA/TORA/DEIL/VEHA/SOHA			S4	Hydric	no		40' from siding water wetland; soil sub-ang blocky		Yes								
453	32.74951	91.00025	32 44.970	91 00.014	6/9/2003		1 Sampled	QUNU/CAIL/	CAIL/	VEHA/SOHA	SMBO	NI	NI	Hydric	no		Adjacent to slough (100') but on hi grd				Yes				Yes		Yes
454	33.07053	90.61679	33 414.005	90 3700.38	6/5/2003		1 Sited			Open water					no		20' from coordinate into open water		Yes								
455	32.96233	90.74464	32 57.741	90 44.675	6/3/2003	WG	Sampled			SOSP/CARA/VEBR/TORA		NI	NI	NON-HYDR	no	PC	Former crop field				Yes				Yes		Yes
456	32.58609	91.01983	32 35.172	90 01.215	6/10/2003		1 Sampled	CELA/LIST/F	ILDE/	CACH/LELE		P5/P6		Hydric	yes												
457	32.80068	90.9059	32 48.039	90 54.354	6/13/2003		2 Sampled	CAAQ/FRPE	FOAC/SANI/	AMAR/CARA		P1/P2/P3/P4	S3/S4	Hydric	yes		50-60' wide drainage pattern	Yes									
458	32.63194	-90.77918	32 37.916	90 46.750	6/10/2003		1 Sampled	QUPH/LIST	ILDE/	AMBR/SMRO/OPHI/TORA			S4	Hydric	no		Pt on ridge between sloughs										
801	33.21915	90.75107	33 13.248	90 45.046	6/7/2003		2 Sampled			Rice				Hydric	no	PC											
802	32.88241	90.85426	32 52 56.6	90 51 15.3	6/10/2003		3 Sampled			Fallow field				Hydric	no	PC											
803	33.02378	90.63367	33 01.397	90 38.037	6/7/2003		2 Sited			Catfish ponds					no	PC	open water - aquaculture		Yes		Yes						
804	32.8166	90.61517	32 48 59.7	90 36 54.6	6/10/2003		3 Sampled		QUNU/CEOC	CARA/JUEF/CARYOPH/RHYNCOS			S3/S4	Hydric	yes	PC	site appears connected to meander cut-off of Big Sun	Yes		Yes				Yes			
805	33.10563	90.74106	33 06.338	90 44.464	6/8/2003		2 Sampled			Soybeans		NI	NI	Hydric	no	PC											
806	32.99945	90.77612	32 59.967	90 46.567	6/8/2003		1 Sampled			Cotton				Hydric	no	PC											
807	32.80716	90.90737	32 48 25.7	90 54 26.4	6/10/2003		3 Sampled			Corn				Hydric	no	PC											
808	32.98715	91.00177	32 59.227	91 00.104	6/10/2003		3 Sampled			Cotton				Hydric	no	PC											
809	33.22761	90.65467	33 13.656	90 39.280	6/7/2003		2 Sampled			Soybeans				Hydric	no	PC											
810	32.99897	90.75053	32 59.938	90 45.032	6/8/2003		1 Sampled			Cotton				Hydric	no	PC	Soils heavily compacted										
811	33.1759	90.57937	33 10.554	90 34.763	6/7/2003		2 Sampled			Soybeans		P4		Hydric	no	PC	No hydrophytic veg										
812	32.87058	90.62543	32 52 14.2	90 37 28.5	6/10/2003		3 Sampled			Catfish ponds					no	OW	Pt. 230' from coordinate @ 267O										
813	33.08474	90.64573	33 05.083	90 36.737	6/7/2003		2 Sampled			Catfish ponds					no	OW	open water - aquaculture										
814	32.97334	90.69388	32 58.401	90 41.632	6/3/2003	WG	Sampled			BRCI		NI	NI	Hydric	no	PC			Yes		Yes						
815	32.74349	90.94042	32 44.594	90 56.357	6/11/2003		3 Sampled			Cotton				NON-HYDR	no	PC											
816	32.52178	90.83587	32 31.309	90 50.154	6/12/2003		3 Sampled			Corn				NON-HYDR	no	PC/NW											
817	32.14637	90.88229	33 08.820	90 36.733	6/4/2003	WG	Sampled			Corn				Hydric	no	PC	817 & 817.1 same site revisited for soil sample		Yes		Yes						
817.1			33 08.818	90 36.737	6/8/2003		2																				
818	33.09911	90.85183	33 05.946	90 51.110	6/8/2003		2 Sampled			Soybeans				Hydric	no	PC											
819	32.97577	90.52934	32 58.596	90 31.768	6/10/2003		3 Sampled			Rice				Hydric	no	PC	Pt. Located in rice field 300' S of coordinates										
820	32.76587	90.69416	32 76.590	90 69.418	6/5/2003		2 Sited			Cotton					no	PC	Pt. 982 ft at 36oN into cotton field										
821	32.63494	90.82267	32 38 05.7	90 49 21.6	6/11/2003		3 Sampled			Corn				Hydric	no	PC											
822	32.95123	90.94658	32 57.0446	90 56.4769	6/10/2003		3 Sampled			Road					no	OW	Road between catfish ponds										
823	32.79109	91.00522					Inaccessible																				
824	32.52751	90.99177	32 31 39.0	90 59 30.3	6/11/2003		3 Sampled			Cotton				NON HYD	no	PC/NW											
825	33.1985	90.79728	33 11.922	90 47.827	6/7/2003		2 Sampled			Rice				Hydric	no	PC											
826	32.95154	90.82138	32 57 05.5	90 49 17.0	6/10/2003		3 Sampled			Cotton				NON-HYDR	no	PC											
827	32.69419	90.91965	32 41.649	90 55,180	6/11/2003		3 Sampled			Corn				NON-HYDR	no	PC			Yes		Yes						
828	32.93551	90.98709	32 56.128	90 59.225	6/10/2003		3 Sampled			Corn			S3	Hydric	no	OW	Site located between cornfield and depressional drain										
829	33.04521	90.59105	33 02.713	90 35.464	6/7/2003		2 Sampled			Corn				Hydric	no	PC	Soil very compacted										
830	32.85256	90.87199					Inaccessible									PC											
831	32.74712	90.96187	32 44 49.4	90 57 42.7	6/11/2003		3 Sampled			Corn				NON-HYDR	no	PC											
832	32.4969	91.02346					Inaccessible																				
833	33.22969	90.65831	33 13.783	90 39.500	6/7/2003		2 Sited			Levee of Catfish pond					no	PC	Ditch at 152o of pt at 80'		Yes								
834	33.04412	90.7983	33 02.654	90 47.899	6/8/2003		2 Sampled			Soybeans				Hydric	no	PC					Yes						
835	32.98323	90.63209	32 58 59.5	90 27 59.3	6/10/2003		3 Sampled			Cotton		NI	NI	Hydric	no		835 & 835.1 same site revisited for soil sample										
835.1					6/3/2003	WG																					
836	32.74484	90.71527	32 44 41.4	90 42 54.9	6/11/2003		3 Sampled			Fallow field				Hydric	no	PC											
837	33.15312	90.78401	33 09.185	90 47.043	6/7/2003		2 Sampled			Cotton			S1	Hydric	no	PC			Yes		Yes						
838	32.97416	90.90942	32 58 26.9	90 54 33.9	6/10/2003		3 Sampled			Soybeans			S1	Hydric	no	PC											
839	32.75527	91.00641					Inaccessible																				
840	32.78549	91.0503			6/9/2003		2 Sampled			Corn		P4	S3	Hydric	no	PC	Drift lines in concave surfaces										
841	33.2141	90.81356	33 12.850	90 48.799	6/7/2003		2 Sited			Catfish ponds					no	PC											

842	33.05854	90.74232	33 03.512	90 44.539	6/8/2003		3	Sampled	GAIL	SOHA			Hydric	no	PC	Edge of spoil bank of ditch											
843	32.6312	90.88149	32 37 52.3	90 52 53.3	6/11/2003		3	Sampled		Soybeans			Hydric	yes	PW	Farmed wetland	Yes		Yes				Yes				
844	32.87113	91.03966	32 52.268	91 02.379	6/9/2003		1	Sampled		Soybeans	NI	NI	Hydric	no	PC												
845	33.07787	90.58473	33 04.643	90 35.095	6/7/2003		2	Sited		Catfish ponds				no	OW	Open water - aquaculture											
846	32.85119	90.72754	32 51 04.3	90 43 39.1	6/10/2003		3	Sampled		Cotton			Hydric	no	PC			Yes		Yes				Yes			
847	32.66389	91.00143	32 39 50.0	90 00 05.2	6/11/2003		3	Sampled		Cotton	NI	NI	Hydric	no	PC												
848	32.53588	91.03583	32 32 08.1	91 02 08.9	6/11/2003		3	Sampled		Cotton			NON HYD	no	PC/NW												
849	33.19716	90.6459	33 11.813	90 39.001	6/7/2003		2	Sited		Catfish ponds				no	PC	open water - aquaculture		Yes		Yes							
850	33.02577	90.76075	33 01.546	90 45.645	6/8/2003		2	Sampled		Corn			Hydric	no	PC	Very compacted soil											
851	33.10883	90.54603	33 06.531	90 32.765	6/12/2003		3	Sampled		Soybeans			Hydric	no	PC			Yes		Yes							
852	32.77174	90.65402	32 46.304	90 39.240	6/12/2003		3	Sampled	QUNI	SOALCARAVANM			Hydric	no	PC			Yes		Yes				Yes		Yes	
853	32.54173	90.8057	32 32.505	90 48.339	6/12/2003		3	Sampled		Corn			Hydric	no	PC/NW												
861	32.9909	90.66674			6/3/2003	WG		Sampled		Soybeans	NI	NI	NI	no													
868	32.80635	90.70569	32 48 22.8	90 42 20.4	6/11/2003		3	Sampled		Cotton			NON-HYD	no													
170																											
Total																	56	33	50	28	41	11	48	18	45	17	

Attachment B

Conservation Organizations Comments on the
Final Supplement No. 2 to the 1982 Yazoo Area Pump Project
Final Environmental Impact Statement

Distances from Wells to Mississippi River and Levee



Yazoo EMAP Points

Corps	EMAP Coordinates Latitude (dd	Longitude (dd)	Actual Location Latitude	Longitude	Date	Team		Sample Status
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003		1	Sampled
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003		1	Sampled
3	32.546897	90.978034						**Inaccessible**
4	32.785408	90.801334	32 47.128	90 48.085	6/6/2003		2	Sampled
5	32.591397	90.89303			6/11/2003		1	Sampled
6	32.721975	90.845267	32 43.318	90 50.715	6/11/2003		2	Sampled
7	32.802933	90.626684	32 48.184	90 37.620	6/5/2003		2	Sampled
8	32.741187	90.803771	32 44.477	90 48.228	6/12/2003		2	Sampled
9	32.49847	90.856535	32 29.908	90 51.392	6/13/2003		1	Sampled
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003		2	Sampled
11	33.213506	90.766058			6/13/2003	Wiseman		**Sited**
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003		2	Sampled
13	32.500399	90.915135						**Inaccessible**
14	32.617195	90.893849	32 37.032	90 53.631	6/11/2003		1	Sampled
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003		1	Sampled
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003		2	Sampled
17	32.611308	90.934277	32 36.702	90 56.367	6/13/2003		3	Sampled
18	32.701448	90.994111	32 42.087	90 59.647	6/9/2003		1	Sampled
19	32.456948	90.953467	32 27.417	90 57.208	6/11/2003		1	Sampled
20	32.785036	90.828365	32 47.103	90 49.706	6/6/2003		2	Sampled
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003		3	Sampled
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003		2	Sampled
23	32.762378	90.750511	32 45.743	90 45.031	6/5/2003		2	Sampled
24	32.68517	90.779582	32 41.112	90 46.774	6/12/2003		2	Sampled
25	32.502548	90.889858						**Inaccessible**
26	32.749034	90.852285	32 44.944	90 51.137	6/10/2003		2	Sampled
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003		1	**Sited**
28	32.681403	90.752365	32 40.801	90 45.140	6/11/2003		2	Sampled
29	32.530351	90.911339			6/12/2003		1	Sampled
30	32.837883	90.823288	32 50.273	90 49 397	6/6/2003		1	Sampled
31	32.883326	90.807604	32 53.000	90 48.456	6/6/2003		1	Sampled
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003		1	Sampled
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003		1	**Sited**
34	32.906428	90.739268			6/3/2003	WG		**Sited**
35	32.477146	90.965723	32 28.721	90 58.106	6/13/2003		3	Sampled
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003		2	Sampled
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003		1	Sampled
38	32.837817	90.974408	32 50.268	90 58.471	6/12/2003		1	Sampled
39	32.876854	90.747889	32 52.611	90 44.073	6/6/2003		1	Sampled
40	32.721243	90.776592	32 43.212	90 46.607	6/11/2003		2	Sampled
41	32.506255	90.872116			6/13/2003		1	Sampled
42	32.72748	90.893222	32 43.649	90 53.595	6/13/2003		2	Sampled
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003		1	**Sited**
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003		2	Sampled
45	32.524618	90.935732						**Inaccessible**
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003		2	Sampled
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003		1	Sampled
48	32.59603	90.790894	32 35.762	90 47.454	6/10/2003		1	Sampled
49	32.618424	90.983151			6/10/2003		1	**Sited**

Hydroveg				Hydrol
Canopy	Shrub	Herb	Vines	Primary
		CARA/BRCI		P5
CELA/ACNE	ILDE/ACNE/	CARA/SMRO/TOVI/PAQU/TORA	VIRO	
FRPE/CELA	ILDE/QULY/CARA	TORA/SMISP/BOCY		P3/P6
		CARA/BRCI/AMTR		P2/P3/P5
	QUNU/	TOVI/CARA/SEEX		P2/P3/P5
QUPH	LIST/ULAM/ACRU/ILDE/ILCR		BESC/TORA/AMBR	P3/P6
QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3
CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5
		Soybeans		
		Open water		
QULY/QUNU/CELA	ILDE/CELA/FRPE	CARA/TORA		P3
		SOAL/RUCR/VEHA/DEIL		NI
		Cotton		
CAAQ/CELA/QUNU/SANI	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3
		CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P5
		VEHA/SOAL/DEIL		NI
ULAM/CELA		IVAN/POPE		P3/P5
ULCR/CAAQ/CELA	CELA/ILDE/	CARA/TORA/SMISP/BOCY		P1/P2/P3/P4/P6
		SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5
QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P6
QULY/CELA/QUNU/QUPH	ILDE/CRSP/	BOCY/BICA		P3/P6
QUNU/QUPH/CAAQ	ILDE	VISP/	TORA/SMSP	P3
	QUNI/QUNU	HIMI/SOSP/POSP		
		Open water		
QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5/P6
QULY/CAAQ/CELA	ILDE/CELA/ULAM			P1/P3/P4/P5/P6
QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4
CELA/CAAQ/ULAM	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5
CAAQ/QULY/FRPE	FOAC			P1/P2
		Open water		
		Open water		
SANI				P1/P2/P3/P5/P6
QUNU/CELA/ULCR/	ILDE/ACNE/	TORA/CARA		P2/P3
FRPE/QULY	HIMI/CEOC/FOAC	POHY		P1/P2/P3/P5
ACNE/FRPE/ULAM	CODR	TORA/AMAR		NI
QUNU/ULAM/QULY	CELA/ILDE	CARA		
QUNU/QULY	ILDE/CAAQ	CARA		P2/P3
CAAQ/QUPH/CELA	CELA/CRVI	FRPE/CARA		P3/P5
	QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2
		Open water		
QUNU/CELA/QULY	ILDE/FRPE	QULY/AMAR		P1/P3
QUNU/FRPE/CELA	ILDE/CAAQ/RUSP/	CARA/JURE		P3
		Corn		
GLTR/CELA/FRPE/QUNU/L	ILDE/CELA/ULAM/	IVAN/TORA/BRCI		P3
		Open water		

ogy Secondary	Soils	**Wet Final**	NRCS Determination
S2	Hydric	yes	FW
S1/S4	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	PC
	Hydric	yes	
S1/S3/S4	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S2/S3	Hydric	yes	FW
		no	
S3/S4	Hydric	yes	
NI	Hydric	no	
		no	PC
S3/S4	Hydric	yes	
	Hydric	yes	
NI	Hydric	no	
S2	Hydric	yes	
	Hydric	yes	
S1/S4/S6	Hydric	yes	
S2/S3	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
S2/S3/S5	Hydric	yes	
		no	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S1	Hydric	yes	
S1	Hydric	yes	
	Hydric	yes	
		no	
		no	
	Hydric	yes	
S2/S3/S4	Hydric	yes	
S1	Hydric	yes	
NI	Hydric	no	
S1/S4	Hydric	yes	
S3/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
		no	
S2/S3/S4	Hydric	yes	
S3/S4	Hydric	yes	
		no	PC
S2	Hydric	yes	
		no	

Comments	EPA5yr pts
Soil-subang blocky; area outside greentree but hi	
Hi water	
Drainage feature 50' W of pt., organic stains on ped faces	
WRP	
On concave landscape position	
Panther Swamp WMA	
"Forced March"	
WRP 250'W of pt; Evid of water fall in ditch (silt deposits)	
Hi water	
Old field plt'd w/ QUNU	
"Dave's Wetland" Hi bank of Big Sunflower	
Coordinate evaluated 0.2mi from pt due to hi water	
Recent cutover (QUNU tops)	
Inundation prevented horizon ID	
Edge of clearcut	
Lichen lines @ 14"	
Hi water	
S5 = crayfish chimneys	
Lake Washington	
Mahannah WMA	
Pt 471 ft from coordinates	
Slough	
Representative sample taken 0.19 mi from pt @ 124O	
Reporter	
Spoil bank of Steele Bayou	
"Forced March"	
Draining rapidly???	
Lake Washington	
Evidence of recent subsidence/ 2ry watermark @ 3'	
Hi water	
Twin Oaks WMA	
Pt in middle of Steele Bayou channel	

EPA2yr pts	Pt in 2yr Floodplain	Pt in 5yr Floodplain	Wet? Site(1)	Potential Impact	Potential Impact +	QA
	1	1				WBA
	2	2		Yes	Yes	WBA
	3	3				
	4	4				WBA
	5	5				WBA
	6	6				WBA
	7	7		Yes	Yes	WBA
	8	8				WBA
	9	9				WBA
	10	10				WBA
		11				WBA
	12	12				WBA
	13	13				
	14	14				WBA
	15	15				WBA
	16	16		yes	yes	WBA
	17	17				WBA
	18	18				WBA
	19	19				WBA
	20	20				WBA
	21	21				WBA
	22	22				WBA
	23	23				WBA
	24	24				WBA
	25	25				
	26	26				WBA
	27	27				WBA
	28	28				WBA
	29	29				WBA
	30	30				WBA
	31	31				WBA
	32	32				WBA
	33	33				WBA
	34	34				WBA
	35	35				WBA
	36	36				WBA
	37	37				WBA
	38	38				WBA
	39	39				WBA
	40	40				WBA
	41	41				WBA
	42	42				WBA
	43	43				WBA
	44	44				WBA
	45	45				
	46	46				WBA
	47	47				WBA
	48	48				WBA
	49	49				WBA

Key to Hydrology Indicators

Primary Indicators

P1 = Inundated
P2 = Saturated in the upper 12 inches
P3 = Water marks
P4 = Drift Lines
P5 = Sediment desposits
P6 = Drainage patterns in the wetland

Secondary Indicators

S1 = Oxidized root channels in upper 12 inches
S2 = Water stained leaves
S3 = Local soil survey data
S4 = FAC-neutral test
S5 = Other (explained)

WG = Whole Group

NI = Not Indicated

Note: On 06/02/03 Steele Bayou gates were closed. On 06/05/03 at 1000 hrs gates were opened.

	50	32.786188	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled
	51	32.524526	91.063206			6/13/2003	1	Sampled
	52	32.784148	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled
	53	32.478106	90.931911					**Inaccessible**
	54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled
	55	32.783145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled
	57	32.553868	90.913438	32 33.232	90 54.806	6/13/2003	1	**Sited**
	66	32.932167	90.698003	32 55.930	90 41.880	6/3/2003 WG		Sampled
EPA								
	401	32.71867	90.940081			6/13/2003 Wiseman		Sampled
	402	33.008613	90.917894	33 00.515	90 55.074	6/4/2003 WG		Sampled
	403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled
	404	33.214996	90.745053	33 12.810	90 44.675	6/4/2003 WG		Sampled
	405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled
	406	32.643673	90.731969	32 38.620	90 43.918	6/13/2003	1	Sampled
	407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003 WG		Sampled
	408	32.541629	90.962297	32 32.498	90 57.738	6/12/2003	1	Sampled
	409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled
	410	32.626764	90.822305	32 37.606	90 49.338	6/10/2003	1	Sampled
	411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003 WG		Sampled
	412	33.086412	90.96179	33 05.183	90 57.708	6/4/2003 WG		Sampled
	413	32.770721	91.011064	32 46.248	91 00.673	6/9/2003	2	Sampled
	414	33.104031	90.669432	33 06.243	90 40.163	6/8/2003	2	Sampled
	415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003 WG		Sampled
	416	32.567588	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled
	417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled
	418	32.534032	90.805779	32 32.042	90 48.347	6/11/2003	1	Sampled
	419	32.869081	91.041482	32 52.134	91 02.489	6/8/2003	1	Sampled
	420	33.166359	90.66845	33 16.636	90 66.844	6/4/2003 WG		**Sited**
	421	32.805621	91.001358					**Inaccessible**
	422	33.133248	90.659165	33 07.991	90 39.545	6/4/2003 WG		Sampled
	423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003 WG		Sampled
	424	32.586737	90.980214			6/10/2003	1	Sampled
	425	32.666751	90.808321	32 40.000	90 48.501	6/12/2003	2	Sampled
	426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled
	427	32.76243	90.696168	32 45.747	90 41.770	6/5/2003	2	Sampled
	428	32.528961	90.840237	32 31.738	90 50.414	6/11/2003	1	Sampled
	429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled
	430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003 WG		Sampled
	431	32.936179	90.801992			6/5/2003	1	**Sited**
	432	32.664974	91.046676	32 39.898	91 02.801	6/9/2003	1	Sampled
	434	32.89994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled
	435	32.885015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled
	436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled
	437	32.732014	90.883177	32 43.920	90 52.990	6/10/2003	2	Sampled
	438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled
	439	32.910041	90.66088	32 91.004	90 66.086	6/4/2003 WG		Sampled
	440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled
	441	32.735158	90.760427			6/10/2003	2	**Inaccessible**
	442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003	1	Sampled
	443	32.83555	90.599405	32 50.133	90 35.964	6/5/2003	2	Sampled
	444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003	1	Sampled

QULY/CAAQ/FRPE/TADI	CEOC/CAAQ/	CEOC/FRPE/AMAR		P1/P2/P3/P6
		Zizania		P1
QULY/QUNU/FRPE	ILDE/CAAQ	CARA/JURE/MORU		P3
CELA/QUNU/FRPE/ULAM	ULAM/ILDE	CARA/TRDI	BESC	P3/P5
QUNU/CAAQ/CELA/QUPH	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3
		Sudan grass		P1
QULY/FRPE/QUNU	ILDE	DIVI/SAMI	VIRO/BESC/TORA	P3/
QUPH	CAIL/FRPE/CELA/CODR	TORA		P3
CELA/CAIL/FRPE/ULAM	CELA/ACRU	LELE/TORA		P3/P4
TADI/PLAQ	TADI/PLAQ/CEOC	Lemmna sp		P1/P2
		Soybeans		
QUNU/QULY/FRPE	ILDE	CARA/AMAR		P3/P5
CELA/ULAM/LIST	ULAM/FRPE/LIST	CARA/AMBR/SMRO/SMBO/RUTR		
FRPE/CAAQ/	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5
CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA		
QUNU/QUPH/CELA	ILDE	TORA/CARA		
LIST/QUPH/CELA/CAIL	CODR/ILDE/CELA	AMAR/TORA/BRCI		
CAAQ/QULY/FRPE	ACNE/ACRU/CELA	SAMI/SACE		P3
CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5
QUPH/QUNU/FRPE	ILDE/CELA/COST/	TORA/JURE/CARA		
QUNU/CELA/FRPE/ULAM	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P5
		ASPE/RUCR/AMTR/IVAN/ECCR		
QUNI/CELA/ACNE/LIST	CODR	OPHI/RUAR		
QUPH/QUNU	ILDE/FRPE/LIST	TORA/CARA		
		SOHA/AMAR/DEIL/SOAL		P5
QULY/CELA/ULAM/SANI/FF	ILDE/CELA/FOAC	LELE/TORA/AMAR.CARA		P2/P4/P6
		Catfish Pond		
CELA/QUPH	CELA	CATA/GECA/COCA/BESC		
QUNU/ULAM/FRPE/CELA	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC	
QUNU/TADI/CELA/CAAQ/	ILDE			P2/P3/P4/P5/P6
QUNU/LIST/CELA	ILDE	TORA/CARA		
LIST/QUPH/CELA/CAIL	ACRU/ULAM/LIDE/	AMBR/PAQU/OPHI/TORA/	SMRO	
LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR	
CELA/LIST/CAIL/	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI
QUNU/ACRU/CAAQ	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC		
	FRPE/BAHA	CARA/SOAL		NI
		catfish pond		
		VEHA/SOAL		NI
QUNU/CELA	CARYA SP.	CARA/TORA/FOAC		P3
LIST/QUNI/CAIL	CELA/COST	TOVI/GECA/PAQU		NI
	CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI
	QUNU/CEOC	IMCA/ASSP		
LIST/CAAQ/QULY/ULCR	CELA/ULAM	GECA/TORA/CARA/AMAR		NI
		Soybeans		
QUNU/FRPE/CELA/QUPH	ULAM/ULCR	AMAR/VICI/CACH		P5
CELA/ULAM/LIST/QUPH	CELA/	TORA/CARA/AMBR		
QUNU/QUNI	ULCR/QUPH/	SOSP	CARA/TORA	
CELA/LIST/QUNU/ULAM	ILDE/ULCR/CELA	AMAR/BRCI/TRDE/TORA		

S2/S3/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
	Hydric	yes	
S2/S3/S4	Hydric	yes	
	Hydric	yes	
S1/S2/S4	Hydric	yes	
S2/S4	Hydric	yes	
S1/S4	Hydric	yes	
	Hydric	yes	
		no	PC
	Hydric	yes	
S4	Hydric	no	
S4	Hydric	yes	
S4	Hydric	no	
S3/S4	Hydric	yes	
S1/S4	Hydric	yes	
S2/S4	Hydric	yes	
S2/S4	Hydric	yes	
S3/S4	Hydric	yes	
S2/S4	Hydric	yes	
S1/S4	Hydric	yes	
S1	NON-HYDRIC	no	
S3/S4	Hydric	yes	
		no	
S2	Hydric	yes	
		no	PC
		xxxxx	
S4	Hydric	no	
S2/S4	Hydric	yes	
	Hydric	yes	
S3/S4	Hydric	yes	
S4	Hydric	no	
S4	NON-HYDRIC	no	
S4	Hydric	no	
S3/S4	Hydric	yes	
NI	Hydric	no	PC
		no	
NI	NON-HYDRIC	no	
S4	Hydric	yes	
NI	Hydric	no	
NI	Hydric	no	
S3/S4	Hydric	yes	
S4	Hydric	no	
S3	Hydric	no	PC
S1/S4	Hydric	yes	
		xxxxx	
S4	Hydric	no	
S3/S4	Hydric	no (070803)	
S2/S4	Hydric	yes	

Edge of Eagle Lake
Microtopography
Hi water

Site 0.34 mi from coord in inundated field; homogeneous

Ponded due to location

403
404
reference std.(Typical of undisturbed- Wiseman) 405
top of ridge in ridge swale topography 406

Site on micro high 408
409
410
Close to flood line/ area saturated

Bryophyte/lichen line 8" 413
414
415
416
NRCS confirmed soil (DJ)
Ordinary High Water- pt fell on incline of ditch bank
419
420
Behind locked gate 421
subangular blocky struc. 422
423
424
425
Adj 3 sloughs w/in 200' (E, W, N) 426
DJ to classify soil (Response rec'd 6-30-03) 427
Soil sub-angular blocky

WRP/Dry side Sharkey 430
431
432
Area sloped away from pt., ditches on 2 sides 434

Subangular blocky; ditched on 2 sides-drained 436
Subangular blocky 437
ditched on 2 sides-drained 438

440
Inaccessible due to deep ditch beside road
top of ridge in ridge swale topography 442
Adjacent forest w/water lines - Panther Swamp 443
444

	50	50				WBA
	51	51				WBA
	52	52				WBA
	53	53				
	54	54				WBA
	55	55				WBA
	57	57				WBA
	66	66				WBA
						WBA
						WBA
403	403	403	yes	yes	yes	WBA
404	404	404	no			WBA
405	405	405	yes	yes	yes	WBA
406	406	406	no			WBA
					yes	WBA
408	408	408	no			WBA
409	409	409	yes	yes	yes	WBA
410	410	410	yes	yes	yes	WBA
					yes	WBA
						WBA
		413	yes			WBA
414	414	414	yes	yes	yes	WBA
415	415	415	yes	yes	yes	WBA
		416	no			WBA
						WBA
						WBA
419	419	419	yes	yes	yes	WBA
420	420	420	no			WBA
421	421	421	xxxxx			WBA
422	422	422	no			WBA
		423	yes			WBA
424	424	424	yes	yes	yes	WBA
		425	yes			WBA
426	426	426	no			WBA
		427	no			WBA
						WBA
						WBA
		430	no			WBA
431	431	431	no			WBA
		432	no			WBA
434	434	434	yes	yes	yes	WBA
						WBA
		436	no			WBA
437	437	437	yes	yes	yes	WBA
438	438	438	no			WBA
						WBA
		440	yes			WBA
						WBA
442	442	442	no			WBA
443	443	443	no			WBA
444	444	444	yes	yes	yes	WBA

445	32.799695	91.057693	32 47.981	91 03.461	6/9/2003		2	Sampled
446	33.051629	90.50243	33 03.098	90 30.146	6/5/2003		1	Sampled
447	32.913414	90.811287			6/5/2003		1	Sampled
448	32.693421	91.039607	32 41.605	91 02.376	6/9/2003		1	Sampled
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003		2	Sampled
450	32.686434	90.720622						**Inaccessible**
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG		Sampled
452	33.1476	90.986276			6/5/2003		1	Sampled
453	32.749506	91.000253	32 44.970	91 00.014	6/9/2003		1	Sampled
454	33.070527	90.616787	33 414.005	90 3700.383	6/5/2003		1	**Sited**
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG		Sampled
456	32.58609	91.019833	32 35.172	90 01.215	6/10/2003		1	Sampled
457	32.800681	90.905901	32 48.039	90 54.354	6/13/2003		2	Sampled
458	32.631939	-90.779176	32 37.916	90 46.750	6/10/2003		1	Sampled
Non								
801	33.219145	90.751069	33 13.248	90 45.046	6/7/2003		2	Sampled
802	32.882412	90.854264	32 52 56.667	90 51 15.342	6/10/2003		3	Sampled
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003		2	**Sited**
804	32.816597	90.615165	32 48 59.71	90 36 54.66	6/10/2003		3	Sampled
805	33.105626	90.741057	33 06.338	90 44.464	6/8/2003		2	Sampled
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003		1	Sampled
807	32.807157	90.907368	32 48 25.760	90 54 26.468	6/10/2003		3	Sampled
808	32.987145	91.001767	32 59.227	91 00.104	6/10/2003		3	Sampled
809	33.227605	90.654674	33 13.656	90 39.280	6/7/2003		2	Sampled
810	32.99897	90.750527	32 59.938	90 45.032	6/8/2003		1	Sampled
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003		2	Sampled
812	32.870581	90.625433	32 52 14.258	90 37 28.588	6/10/2003		3	Sampled
813	33.084743	90.645731	33 05.083	90 36.737	6/7/2003		2	Sampled
814	32.973342	90.693884	32 58.401	90 41.632	6/3/2003	WG		Sampled
815	32.74349	90.940417	32 44.594	90 56.357	6/11/2003		3	Sampled
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003		3	Sampled
817	33.146973	90.662281	33 08.820	90 39.733	6/4/2003	WG		Sampled
817.1			33 08.818	90 39.737	6/8/2003		2	
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003		2	Sampled
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003		3	Sampled
820	32.765865	90.694156	32 76.590	90 69.418	6/5/2003		2	**Sited**
821	32.63494	90.82267	32 38 05.751	90 49 21.658	6/11/2003		3	Sampled
822	32.951234	90.946584	32 57.0446	90 56.4769	6/10/2003		3	Sampled
823	32.791688	91.005325						**Inaccessible**
824	32.527508	90.991765	32 31 39.040	90 59 30.370	6/11/2003		3	Sampled
825	33.198498	90.797275	33 11.922	90 47.827	6/7/2003		2	Sampled
826	32.951544	90.821376	32 57 05.522	90 49 17.002	6/10/2003		3	Sampled
827	32.694192	90.919654	32 41.649	90 55,180	6/11/2003		3	Sampled
828	32.935509	90.987087	32 56.128	90 59.225	6/10/2003		3	Sampled
829	33.045206	90.59105	33 02.713	90 35.464	6/7/2003		2	Sampled
830	32.852577	90.671592						**Inaccessible**
831	32.747124	90.961868	32 44 49.431	90 57 42.741	6/11/2003		3	Sampled
832	32.496596	91.033456						**Inaccessible**
833	33.229689	90.658305	33 13.783	90 39.500	6/7/2003		2	**Sited**
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003		2	Sampled
835	32.983217	90.633087	32 58 59.523	90 37 59.211	6/10/2003		3	Sampled
835.1					6/3/2003	WG		

		Soybeans		
		CARA/SOAL/VEHA/JUTE/IVAN		NI
CELA/CAIL/LIST	FRPE/CELA	TORA/CARA/VIRO/VICI/CAFR		NI
QUPH/QULY/QUNU	LIST/ILDE/FRPE	TORA/JURE/CARA		
QULY/QUPH/LIST	ULAM/CELA	SACE/COVI/CARA		P3
	CELA	CARA/TORA/DEIL/VEHA/SOHA		
QUNU/CAIL/LIST	CAIL/	VEHA/SOHA	SMBO	NI
		Open water		
		SOSP/CARA/VEBR/TORA		NI
CELA/LIST/FRPE/	ILDE/	CACH/LELE		P5/P6
CAAQ/FRPE	FOAC/SANI/FRPE/COST	AMAR/CARA		P1/P2/P3/P4/P6
QUPH/LIST	ILDE/	AMBR/SMRO/OPHI/TORA		
		Rice		
		Fallow field		
		Catfish ponds		
	QUNU/CEOC/	CARA/JUEF/CARYOPH/RHYNCOS		
		Soybeans		NI
		Cotton		
		Corn		
		Cotton		
		Soybeans		
		Cotton		
		Soybeans		P4
		Catfish ponds		
		Catfish ponds		
		BRCI		NI
		Cotton		
		Corn		
		Corn		
		Soybeans		
		Rice		
		Cotton		
		Corn		
		Road		
		Cotton		
		Rice		
		Cotton		
		Corn		
		Corn		
		Corn		
		Corn		
		Levee of Catfish pond		
		Soybeans		
		Cotton		NI

	Hydric	no	PC
NI	NON-HYDRIC	no	
		yes	FW
NI	Hydric	no	
S3/S4	Hydric	Yes	
		xxxxx	
S1/S4	Hydric	yes	
S4	Hydric	no	
NI	Hydric	no	
		no	
NI	NON-HYDRIC	no	PC
	Hydric	yes	
S3/S4	Hydric	yes	
S4	Hydric	no	
	Hydric	no	PC
	Hydric	no	PC
		no	PC
S3/S4	Hydric	yes	PC
NI	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
		no	OW
		no	OW
NI	Hydric	no	PC
	NON-HYDRIC	no	PC
	NON-HYDRIC	no	PC/NW
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
		no	PC
	Hydric	no	PC
		no	OW
	NON_HYDRIC	no	PC/NW
	Hydric	no	PC
	NON-HYDRIC	no	PC
	NON-HYDRIC	no	PC
S3	Hydric	no	OW
	Hydric	no	PC
			PC
	NON-HYDRIC	no	PC
		no	PC
	Hydric	no	PC
NI	Hydric	no	

445

Fallow field

Road beside field adjacent to forested area (based on map NRCS thought point fell in forested wetland) 447

Pt. Fell between cottonwood plantat and QULY slough 448

NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03 449

450

40' from stding water wetland; soil sub-ang blocky 452

Adjacent to slough (100') but on hi grd 453

20' from coordinate into open water

Former crop field 455

456

50-60' wide drainage pattern 457

Pt on ridge between sloughs 458

open water - aquaculture

site appears connected to meander cut-off of Big Sun

Soils heavily compacted

No hydrophytic veg

Pt. 230' from coordinate @ 267O

open water - aquaculture

817 & 817.1 same site revisited for soil sample

Pt. Located in rice field 300' S of coordinates

Pt. 982 ft at 36oN into cotton field

Road between catfish ponds

Site located between cornfield and depressional drain

Soil very compacted

Ditch at 152o of pt at 80'

835 & 835.1 same site revisited for soil sample

445	445	445	no			WBA
						WBA
447	447	447	yes	yes	yes	WBA
		448	no			WBA
		449	yes			WBA
450	450	450	xxxxx			WBA
					yes	WBA
452	452	452	no			WBA
		453	no			WBA
454	454		no			WBA
		455	no			WBA
		456	yes			WBA
457	457	457	yes	yes	yes	WBA
		458	no			WBA
						WBA
		802				WBA
	803	803				WBA
	804	804		yes	yes	WBA
						WBA
						WBA
						WBA
						WBA
		809				WBA
						WBA
						WBA
		812				WBA
		813				WBA
	814	814				WBA
						WBA
		816				WBA
	817	817				WBA
						WBA
						WBA
		820				WBA
		821				WBA
		822				WBA
		823				
						WBA
						WBA
						WBA
	827	827				WBA
						WBA
						WBA
		831				WBA
		832				
	833	833				WBA
						WBA
						WBA

836	32.744837	90.715266	32 44 41.425	90 42 54.941	6/11/2003		3	Sampled
837	33.153119	90.784008	33 09.185	90 47.043	6/7/2003		2	Sampled
838	32.974159	90.90942	32 58 26.926	90 54 33.955	6/10/2003		3	Sampled
839	32.755269	91.006409						**Inaccessible**
840	32.785489	91.050297			6/9/2003		2	Sampled
841	33.214101	90.81356	33 12.850	90 48.799	6/7/2003		2	**Sited**
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003		3	Sampled
843	32.631199	90.881485	32 37 52.329	90 52 53.341	6/11/2003		3	Sampled
844	32.87113	91.039656	32 52.268	91 02.379	6/9/2003		1	Sampled
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003		2	**Sited**
846	32.851185	90.727543	32 51 04.311	90 43 39.131	6/10/2003		3	Sampled
847	32.663892	91.00143	32 39 50.016	90 00 05.219	6/11/2003		3	Sampled
848	32.535879	91.035833	32 32 09.164	91 02 08.975	6/11/2003		3	Sampled
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003		2	**Sited**
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003		2	Sampled
851	33.108834	90.546094	33 06.531	90 32.765	6/12/2003		3	Sampled
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003		3	Sampled
853	32.541728	90.8057	32 32.505	90 48.339	6/12/2003		3	Sampled
861	32.990902	90.666738			6/3/2003	WG		Sampled
868	32.806345	90.705689	32 48 22.889	90 42 20.459	6/11/2003		3	Sampled

	Fallow field	
	Cotton	
	Soybeans	
	Corn	P4
	Catfish ponds	
CAIL	SOHA	
	Soybeans	
	Soybeans	NI
	Catfish ponds	
	Cotton	
	Cotton	NI
	Cotton	
	Catfish ponds	
	Corn	
	Soybeans	
QUNI	SOAL/CARA/ANVI	
	Corn	
	Soybeans	NI
	Cotton	

	Hydric	no	PC
S1	Hydric	no	PC
S1	Hydric	no	PC
S3	Hydric	no	PC
		no	PC
	Hydric	no	PC
	Hydric	yes	FW
NI	Hydric	no	PC
		no	OW
	Hydric	no	PC
NI	Hydric	no	PC
	NON_HYDRIC	no	PC/NW
		no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC
	Hydric	no	PC/NW
NI	NI	no	
	NON-HYDRIC	no	

Drift lines in concave surfaces

Edge of spoil bank of ditch
Farmed wetland

Open water - aquaculture

open water - aquaculture
Very compacted soil

	836			WBA
837	837			WBA
				WBA
839	839			
	840			WBA
				WBA
	842			WBA
843	843	yes	yes	WBA
				WBA
				WBA
846	846			WBA
	847			WBA
	848			WBA
849	849			WBA
				WBA
851	851			WBA
852	852			WBA
				WBA
				WBA
	868			
97	129			

Yazoo EMAP Points

Corps	EMAP Coordinates Latitude (dd	Longitude (dd)	Actual Location Latitude	Longitude	Date	Team	Sample Status
1	32.603523	90.95328	32 36.211	90 57.197	6/11/2003	1	Sampled
2	32.899246	90.766177	32 53.955	90 45.970	6/6/2003	1	Sampled
3	32.546897	90.978034					**Inaccessible**
4	32.785408	90.801334	32 47.128	90 48.085	6/6/2003	2	Sampled
5	32.591397	90.89303			6/11/2003	1	Sampled
6	32.721975	90.845267	32 43.318	90 50.715	6/11/2003	2	Sampled
7	32.802933	90.626684	32 48.184	90 37.620	6/5/2003	2	Sampled
8	32.741187	90.803771	32 44.477	90 48.228	6/12/2003	2	Sampled
9	32.49847	90.856535	32 29.908	90 51.392	6/13/2003	1	Sampled
10	32.784079	90.886115	32 47.045	90 53.169	6/9/2003	2	Sampled
11	33.213506	90.766058			6/13/2003	Wiseman	**Sited**
12	32.772719	90.75052	32 46.363	90 45.031	6/5/2003	2	Sampled
13	32.500399	90.915135					**Inaccessible**
14	32.617195	90.893849	32 37.032	90 53.631	6/11/2003	1	Sampled
15	32.953953	90.782173	32 57.236	90 46.932	6/5/2003	1	Sampled
16	32.814583	91.038348	32 48.875	91 02.276	6/10/2003	2	Sampled
17	32.611308	90.934277	32 36.702	90 56.367	6/13/2003	3	Sampled
18	32.701448	90.994111	32 42.087	90 59.647	6/9/2003	1	Sampled
19	32.456948	90.953467	32 27.417	90 57.208	6/11/2003	1	Sampled
20	32.785036	90.828365	32 47.103	90 49.706	6/6/2003	2	Sampled
21	32.575552	90.88723	32 34.531	90 53.237	6/13/2003	3	Sampled
22	32.826201	90.861907	32 49.572	90 51.715	6/9/2003	2	Sampled
23	32.762378	90.750511	32 45.743	90 45.031	6/5/2003	2	Sampled
24	32.68517	90.779582	32 41.112	90 46.774	6/12/2003	2	Sampled
25	32.502548	90.889858					**Inaccessible**
26	32.749034	90.852285	32 44.944	90 51.137	6/10/2003	2	Sampled
27	33.09793	91.068145	33 05.876	91 04.089	6/5/2003	1	**Sited**
28	32.681403	90.752365	32 40.801	90 45.140	6/11/2003	2	Sampled
29	32.530351	90.911339			6/12/2003	1	Sampled
30	32.837883	90.823288	32 50.273	90 49 397	6/6/2003	1	Sampled
31	32.883326	90.807604	32 53.000	90 48.456	6/6/2003	1	Sampled
32	32.623094	90.738619	32 37.386	90 44.317	6/10/2003	1	Sampled
33	32.591267	90.925678	32 35.476	90 55.540	6/11/2003	1	**Sited**
34	32.906428	90.739268			6/3/2003	WG	**Sited**
35	32.477146	90.965723	32 28.721	90 58.106	6/13/2003	3	Sampled
36	32.800842	90.807675	32 48.041	90 48.482	6/12/2003	2	Sampled
37	32.532745	90.870262	32 31.965	90 52.261	6/11/2003	1	Sampled
38	32.837817	90.974408	32 50.268	90 58.471	6/12/2003	1	Sampled
39	32.876854	90.747889	32 52.611	90 44.073	6/6/2003	1	Sampled
40	32.721243	90.776592	32 43.212	90 46.607	6/11/2003	2	Sampled
41	32.506255	90.872116			6/13/2003	1	Sampled
42	32.72748	90.893222	32 43.649	90 53.595	6/13/2003	2	Sampled
43	33.039776	91.040142	33 255.138	91 246.646	6/5/2003	1	**Sited**
44	32.744782	90.76817	32 44.689	90 46.091	6/13/2003	2	Sampled
45	32.524618	90.935732					**Inaccessible**
46	32.821599	90.8395	32 49.295	90 50.370	6/6/2003	2	Sampled
47	32.911654	90.83865	32 54.699	90 50.319	6/5/2003	1	Sampled

Hydroveg				Hydrology	
Canopy	Shrub	Herb	Vines	Primary	Secondary
		CARA/BRCI		P5	S2
CELA/ACNE	ILDE/ACNE/	CARA/SMRO/TOVI/PAQU/TORA	VIRO		S1/S4
FRPE/CELA	ILDE/QULY/CARA	TORA/SMISP/BOCY		P3/P6	S2/S3/S4
		CARA/BRCI/AMTR		P2/P3/P5	
	QUNU/	TOVI/CARA/SEEX		P2/P3/P5	
QUPH	LIST/ULAM/ACRU/ILDE/ILCR		BESC/TORA/AMBR	P3/P6	S1/S3/S4
QUNU/QULY	ILDE/CELA	TORA/AMAR		P1/P3	S2/S3/S4
CAAQ/CELA	FRPE/CEOC	AMAR/IVAN		P3/P4/P5	
		Soybeans			S2/S3
		Open water			
QULY/QUNU/	ILDE/CELA/FRPE	CARA/TORA		P3	S3/S4
		SOAL/RUCR/VEHA/DEIL		NI	NI
		Cotton			
CAAQ/CELA/	CRSP/CELA/ILDE	AMAR/TORA/CAAQ		P3	S3/S4
		CARA/AMTR/QUNU/CEOC/POPE		P1/P2/P3/P5	
		VEHA/SOAL/DEIL		NI	NI
ULAM/CELA		IVAN/POPE		P3/P5	S2
ULCR/CAAQ/	CELA/ILDE/	CARA/TORA/SMISP/BOCY		P1/P2/P3/P4/P6	
		SEEX/POPU/ELSP/CYSP/ALPH		P1/P2/P5	S1/S4/S6
QUNU/QULY	FOAC/ILDE/QUNU	JURE/CARA		P3/P6	S2/S3
QULY/CELA/	ILDE/CRSP/	BOCY/BICA		P3/P6	
QUNU/QUPH	ILDE	VISP/	TORA/SMSP	P3	S3/S4
	QUNI/QUNU	HIMI/SOSP/POSP			S2/S3/S5
		Open water			
QUNU/QUPH	ILDE		TORA/SMSP	P2/P3/P4/P5/P6	S2/S3/S4
QULY/CAAQ/	ILDE/CELA/ULAM			P1/P3/P4/P5/P6	
QUNU/CELA	ILDE/CELA	FRPE/CARA/AMAR/TORA		P3/P4	S1
CELA/CAAQ/	ILDE/FRPE/	BRCI/VEHA/POPE		P3/P5	S1
CAAQ/QULY/	FOAC			P1/P2	
		Open water			
		Open water			
SANI				P1/P2/P3/P5/P6	
QUNU/CELA/	ILDE/ACNE/	TORA/CARA		P2/P3	S2/S3/S4
FRPE/QULY	HIMI/CEOC/FOAC	POHY		P1/P2/P3/P5	S1
ACNE/FRPE/	CODR	TORA/AMAR		NI	NI
QUNU/ULAM/	CELA/ILDE	CARA			S1/S4
QUNU/QULY	ILDE/CAAQ	CARA		P2/P3	S3/S4
CAAQ/QUPH/	CELA/CRVI	FRPE/CARA		P3/P5	
	QUNU/CEOC/SEEX	ASSP/POSP/CAREX		P1/P2	S3/S4
		Open water			
QUNU/CELA/	ILDE/FRPE	QULY/AMAR		P1/P3	S2/S3/S4
QUNU/FRPE/	ILDE/CAAQ/RUSP/	CARA/JURE		P3	S3/S4
		Corn			

Soils	**Wet Final**	NRCS Determination
Hydric	yes	FW
Hydric	yes	
Hydric	yes	
Hydric	yes	PC
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	FW
	no	
Hydric	yes	
Hydric	no	
	no	PC
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	
	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	
Hydric	yes	
Hydric	yes	
	no	PC

Comments

Soil-subang blocky; area outside greentree but hi
Hi water
Drainage feature 50' W of pt., organic stains on ped faces
WRP
On concave landscape position
Panther Swamp WMA

"Forced March"
WRP 250'W of pt; Evid of water fall in ditch (silt deposits)

Hi water
Old field plt'd w/ QUNU
"Dave's Wetland" Hi bank of Big Sunflower

Coordinate evaluated 0.2mi from pt due to hi water

Recent cutover (QUNU tops)
Inundation prevented horizon ID

Edge of clearcut

Lichen lines @ 14"
Hi water
S5 = crayfish chimneys
Lake Washington

Mahannah WMA

Pt 471 ft from coordinates
Slough
Representative sample taken 0.19 mi from pt @ 124O

Reporter
Spoil bank of Steele Bayou

"Forced March"
Draining rapidly???
Lake Washington
Evidence of recent subsidence/ 2ry watermark @ 3'
Hi water
Twin Oaks WMA

These columns represent the intersection of EMAP wetland (Wet) and nonwetland (Nonwet) points with the 2-year w/ and w/o project floodplain and the 5% duration w/ and w/o project floodplain.

Base 2 yr Wet	Base 2 yr Nonwet
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
	Yes
	Yes
Yes	
Yes	
	Yes
Yes	
Yes	
Yes	
Yes	
Yes	
Yes	
	Yes
Yes	
Yes	
Yes	
Yes	
Yes	
	Yes
	Yes
Yes	
Yes	
Yes	
	Yes
Yes	
Yes	
Yes	
Yes	
	Yes
Yes	
Yes	
	Yes

P5 2yr Wet	P5 2yr Nonwet	Base 5% Wet	Base 5% nonwet	B1_plan5 Wet	B1_plan5 Nonwet	B2_plan5 Wet	B2_plan5 Nonwet
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
			Yes				
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
			Yes				
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes
Yes		Yes		Yes		Yes	
Yes		Yes		Yes		Yes	
	Yes		Yes		Yes		Yes

	48	32.59603	90.790894	32 35.762	90 47.454	6/10/2003	1	Sampled
	49	32.618424	90.983151			6/10/2003	1	**Sited**
	50	32.786188	90.859155	32 47.170	90 51.551	6/9/2003	2	Sampled
	51	32.524526	91.063206			6/13/2003	1	Sampled
	52	32.784148	90.751408	32 47.050	90 45.086	6/5/2003	2	Sampled
	53	32.478106	90.931911					**Inaccessible**
	54	32.84715	90.84046	32 50.829	90 50.428	6/6/2003	1	Sampled
	55	32.783145	90.728897	32 46.984	90 43.753	6/13/2003	2	Sampled
	57	32.553868	90.913438	32 33.232	90 54.806	6/13/2003	1	**Sited**
	66	32.932167	90.698003	32 55.930	90 41.880	6/3/2003 WG		Sampled
EPA								
	401	32.71867	90.940081			6/13/2003 Wiseman		Sampled
	402	33.008613	90.917894	33 00.515	90 55.074	6/4/2003 WG		Sampled
	403	33.029112	91.054375	33 01.792	91 03.320	6/5/2003	1	Sampled
	404	33.214996	90.745053	33 12.810	90 44.675	6/4/2003 WG		Sampled
	405	32.842122	90.856491	32 50.527	90 51.384	6/6/2003	1	Sampled
	406	32.643673	90.731969	32 38.620	90 43.918	6/13/2003	1	Sampled
	407	32.927055	90.642376	32 55.623	90 38.543	6/4/2003 WG		Sampled
	408	32.541629	90.962297	32 32.498	90 57.738	6/12/2003	1	Sampled
	409	32.66584	90.830975	32 39.951	90 49.862	6/12/2003	2	Sampled
	410	32.626764	90.822305	32 37.606	90 49.338	6/10/2003	1	Sampled
	411	32.902405	90.679434	32 54.152	90 40.774	6/4/2003 WG		Sampled
	412	33.086412	90.96179	33 05.183	90 57.708	6/4/2003 WG		Sampled
	413	32.770721	91.011064	32 46.248	91 00.673	6/9/2003	2	Sampled
	414	33.104031	90.669432	33 06.243	90 40.163	6/8/2003	2	Sampled
	415	32.962462	90.704798	32 57.747	90 42.288	6/3/2003 WG		Sampled
	416	32.567588	91.01254	32 34.056	91 00.749	6/13/2003	3	Sampled
	417	32.662703	90.880654	32 39.762	90 52.837	6/6/2003	2	Sampled
	418	32.534032	90.805779	32 32.042	90 48.347	6/11/2003	1	Sampled
	419	32.869081	91.041482	32 52.134	91 02.489	6/8/2003	1	Sampled
	420	33.166359	90.66845	33 16.636	90 66.844	6/4/2003 WG		**Sited**
	421	32.805621	91.001358					**Inaccessible**
	422	33.133248	90.659165	33 07.991	90 39.545	6/4/2003 WG		Sampled
	423	32.917775	90.74132	32 55.067	90 44.475	6/3/2003 WG		Sampled
	424	32.586737	90.980214			6/10/2003	1	Sampled
	425	32.666751	90.808321	32 40.000	90 48.501	6/12/2003	2	Sampled
	426	32.619945	90.781828	32 37.197	90 46.910	6/10/2003	1	Sampled
	427	32.76243	90.696168	32 45.747	90 41.770	6/5/2003	2	Sampled
	428	32.528961	90.840237	32 31.738	90 50.414	6/11/2003	1	Sampled
	429	32.813195	91.080379	32 48.794	91 04.822	6/9/2003	2	Sampled
	430	32.971483	90.653992	32 58.287	90 39.237	6/3/2003 WG		Sampled
	431	32.936179	90.801992			6/5/2003	1	**Sited**
	432	32.664974	91.046676	32 39.898	91 02.801	6/9/2003	1	Sampled
	434	32.89994	90.921418	32 53.996	90 55.285	6/6/2003	1	Sampled
	435	32.885015	91.00953	32 53.101	91 00.572	6/9/2003	1	Sampled
	436	33.110235	90.755438	33 06.614	90 45.326	6/5/2003	1	Sampled
	437	32.732014	90.883177	32 43.920	90 52.990	6/10/2003	2	Sampled
	438	33.130555	90.587116	33 07.833	90 35.227	6/5/2003	1	Sampled
	439	32.910041	90.66088	32 91.004	90 66.086	6/4/2003 WG		Sampled
	440	32.613342	90.989277	32 36.799	90 59.359	6/10/2003	1	Sampled
	441	32.735158	90.760427			6/10/2003	2	**Inaccessible**

GLTR/CELA/F	ILDE/CELA/ULAM/	IVAN/TORA/BRCI		P3	S2
		Open water			
QULY/CAAQ/	CEOC/CAAQ/	CEOC/FRPE/AMAR		P1/P2/P3/P6	S2/S3/S4
		Zizania		P1	
QULY/QUNU/	ILDE/CAAQ	CARA/JURE/MORU		P3	S3/S4
CELA/QUNU/	ULAM/ILDE	CARA/TRDI	BESC	P3/P5	
QUNU/CAAQ	ILDE/FRPE/FOAC	JURE/CARA/AMAR		P1/P2/P3	S2/S3/S4
		Sudan grass		P1	
QULY/FRPE/(	ILDE	DIVI/SAMI	VIRO/BESC/TORA	P3/	S1/S2/S4
QUPH	CAIL/FRPE/CELA/CODR	TORA		P3	S2/S4
CELA/CAIL/FI	CELA/ACRU	LELE/TORA		P3/P4	S1/S4
TADI/PLAQ	TADI/PLAQ/CEOC	Lemmna sp		P1/P2	
		Soybeans			
QUNU/QULY/	ILDE	CARA/AMAR		P3/P5	
CELA/ULAM/I	ULAM/FRPE/LIST	CARA/AMBR/SMRO/SMBO/RUTR			S4
FRPE/CAAQ/	CEOC	SACE/SAMI/LUPA		P1/P2/P3/P5	S4
CAIL/CELA	LIST/CRVI	AMBR/SMRO/CARA			S4
QUNU/QUPH	ILDE	TORA/CARA			S3/S4
LIST/QUPH/C	CODR/ILDE/CELA	AMAR/TORA/BRCI			S1/S4
CAAQ/QULY/	ACNE/ACRU/CELA	SAMI/SACE		P3	S2/S4
CELA/TADI/	CELA	BOCY/TORA/AMAR/CARA		P5	S2/S4
QUPH/QUNU	ILDE/CELA/COST/	TORA/JURE/CARA			S3/S4
QUNU/CELA/	COST/ILDE/ULAM/DIVI/ULCR	AMBR/TORA		P5	S2/S4
		ASPE/RUCR/AMTR/IVAN/ECCR			S1/S4
QUNI/CELA/A	CODR	OPHI/RUAR			S1
QUPH/QUNU	ILDE/FRPE/LIST	TORA/CARA			S3/S4
		SOHA/AMAR/DEIL/SOAL		P5	
QULY/CELA/(	ILDE/CELA/FOAC	LELE/TORA/AMAR.CARA		P2/P4/P6	S2
		Catfish Pond			
CELA/QUPH	CELA	CATA/GECA/COCA/BESC			S4
QUNU/ULAM/	ILDE/ACRU/FRPE	TORA/AMAR	VIRO/BESC		S2/S4
QUNU/TADI/(	ILDE			P2/P3/P4/P5/P6	
QUNU/LIST/C	ILDE	TORA/CARA			S3/S4
LIST/QUPH/C	ACRU/ULAM/LIDE/	AMBR/PAQU/OPHI/TORA/	SMRO		S4
LIST/CAIL/	ILDE/CODR/	GATR	TORA/AMBR/AMBR		S4
CELA/LIST/C/	QUNI	PAQU/GECA/COCA/TORA/VIFL		NI	S4
QUNU/ACRU	ILDE/FRPE	POSP/AMAR/JURE/RUSP/BESC			S3/S4
	FRPE/BAHA	CARA/SOAL		NI	NI
		catfish pond			
		VEHA/SOAL		NI	NI
QUNU/CELA	CARYA SP.	CARA/TORA/FOAC		P3	S4
LIST/QUNI/C/	CELA/COST	TOVI/GECA/PAQU		NI	NI
	CELA/FRPE	CARA/RUAR/SOAL/TORA/DEIL		NI	NI
	QUNU/CEOC	IMCA/ASSP			S3/S4
LIST/CAAQ/C	CELA/ULAM	GECA/TORA/CARA/AMAR		NI	S4
		Soybeans			S3
QUNU/FRPE/	ULAM/ULCR	AMAR/VICI/CACH		P5	S1/S4

Hydric	yes	
	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
	no	PC
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	yes	
NON-HYDRIC	no	
Hydric	yes	
	no	
Hydric	yes	
	no	PC
	xxxxx	
Hydric	no	
Hydric	yes	
Hydric	yes	
Hydric	yes	
Hydric	no	
NON-HYDRIC	no	
Hydric	no	
Hydric	yes	
Hydric	no	PC
	no	
NON-HYDRIC	no	
Hydric	yes	
Hydric	no	
Hydric	no	
Hydric	yes	
Hydric	no	
Hydric	no	PC
Hydric	yes	
	xxxxx	

Pt in middle of Steele Bayou channel

Edge of Eagle Lake
Microtopography
Hi water

Site 0.34 mi from coord in inundated field; homogeneous

Ponded due to location

reference std.(Typical of undisturbed- Wiseman)
top of ridge in ridge swale topography

Site on micro high

Close to flood line/ area saturated

Bryophyte/lichen line 8"

NRCS confirmed soil (DJ)
Ordinary High Water- pt fell on incline of ditch bank

Behind locked gate
subangular blocky struc.

Adj 3 sloughs w/in 200' (E, W, N)
DJ to classify soil (Response rec'd 6-30-03)
Soil sub-angular blocky

WRP/Dry side Sharkey

Area sloped away from pt., ditches on 2 sides

Subangular blocky; ditched on 2 sides-drained
Subangular blocky
ditched on 2 sides-drained

Inaccessible due to deep ditch beside road

Yes

Yes

Yes
Yes
Yes

Yes
Yes
Yes
Yes

Yes

Yes

Yes

Yes

Yes
Yes

Yes
Yes

Yes

Yes

Yes

Yes

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Yes Yes

Yes
Yes Yes Yes

Yes

Yes Yes Yes
Yes Yes Yes

Yes Yes Yes

Yes

Yes Yes Yes
Yes

442	32.646571	90.746338	32 38.794	90 44.780	6/13/2003		1	Sampled
443	32.83555	90.599405	32 50.133	90 35.964	6/5/2003		2	Sampled
444	32.599249	90.910398	32 35.955	90 54.624	6/11/2003		1	Sampled
445	32.799695	91.057693	32 47.981	91 03.461	6/9/2003		2	Sampled
446	33.051629	90.50243	33 03.098	90 30.146	6/5/2003		1	Sampled
447	32.913414	90.811287			6/5/2003		1	Sampled
448	32.693421	91.039607	32 41.605	91 02.376	6/9/2003		1	Sampled
449	32.658714	90.905148	32 39.522	90 54.313	6/6/2003		2	Sampled
450	32.686434	90.720622						**Inaccessible**
451	32.879854	90.71823	32 52.971	90 43.096	6/4/2003	WG		Sampled
452	33.1476	90.986276			6/5/2003		1	Sampled
453	32.749506	91.000253	32 44.970	91 00.014	6/9/2003		1	Sampled
454	33.070527	90.616787	33 414.005	90 3700.383	6/5/2003		1	**Sited**
455	32.962334	90.744644	32 57.741	90 44.675	6/3/2003	WG		Sampled
456	32.58609	91.019833	32 35.172	90 01.215	6/10/2003		1	Sampled
457	32.800681	90.905901	32 48.039	90 54.354	6/13/2003		2	Sampled
458	32.631939	-90.779176	32 37.916	90 46.750	6/10/2003		1	Sampled
Non								
801	33.219145	90.751069	33 13.248	90 45.046	6/7/2003		2	Sampled
802	32.882412	90.854264	32 52 56.667	90 51 15.342	6/10/2003		3	Sampled
803	33.023782	90.633666	33 01.397	90 38.037	6/7/2003		2	**Sited**
804	32.816597	90.615165	32 48 59.71	90 36 54.66	6/10/2003		3	Sampled
805	33.105626	90.741057	33 06.338	90 44.464	6/8/2003		2	Sampled
806	32.999449	90.776122	32 59.967	90 46.567	6/8/2003		1	Sampled
807	32.807157	90.907368	32 48 25.760	90 54 26.468	6/10/2003		3	Sampled
808	32.987145	91.001767	32 59.227	91 00.104	6/10/2003		3	Sampled
809	33.227605	90.654674	33 13.656	90 39.280	6/7/2003		2	Sampled
810	32.99897	90.750527	32 59.938	90 45.032	6/8/2003		1	Sampled
811	33.175902	90.579368	33 10.554	90 34.763	6/7/2003		2	Sampled
812	32.870581	90.625433	32 52 14.258	90 37 28.588	6/10/2003		3	Sampled
813	33.084743	90.645731	33 05.083	90 36.737	6/7/2003		2	Sampled
814	32.973342	90.693884	32 58.401	90 41.632	6/3/2003	WG		Sampled
815	32.74349	90.940417	32 44.594	90 56.357	6/11/2003		3	Sampled
816	32.521779	90.835868	32 31.309	90 50.154	6/12/2003		3	Sampled
817	33.146973	90.662281	33 08.820	90 39.733	6/4/2003	WG		Sampled
817.1			33 08.818	90 39.737	6/8/2003		2	
818	33.099107	90.851834	33 05.946	90 51.110	6/8/2003		2	Sampled
819	32.975773	90.529335	32 58.596	90 31.768	6/10/2003		3	Sampled
820	32.765865	90.694156	32 76.590	90 69.418	6/5/2003		2	**Sited**
821	32.63494	90.82267	32 38 05.751	90 49 21.658	6/11/2003		3	Sampled
822	32.951234	90.946584	32 57.0446	90 56.4769	6/10/2003		3	Sampled
823	32.791688	91.005325						**Inaccessible**
824	32.527508	90.991765	32 31 39.040	90 59 30.370	6/11/2003		3	Sampled
825	33.198498	90.797275	33 11.922	90 47.827	6/7/2003		2	Sampled
826	32.951544	90.821376	32 57 05.522	90 49 17.002	6/10/2003		3	Sampled
827	32.694192	90.919654	32 41.649	90 55,180	6/11/2003		3	Sampled
828	32.935509	90.987087	32 56.128	90 59.225	6/10/2003		3	Sampled
829	33.045206	90.59105	33 02.713	90 35.464	6/7/2003		2	Sampled
830	32.852577	90.671592						**Inaccessible**
831	32.747124	90.961868	32 44 49.431	90 57 42.741	6/11/2003		3	Sampled
832	32.496596	91.033456						**Inaccessible**

CELA/ULAM/I	CELA/	TORA/CARA/AMBR			S4
QUNU/QUNI	ULCR/QUPH/	SOSP	CARA/TORA		S3/S4
CELA/LIST/Q	ILDE/ULCR/CELA	AMAR/BRCI/TRDE/TORA			S2/S4
		Soybeans			
		CARA/SOAL/VEHA/JUTE/IVAN		NI	NI
CELA/CAIL/LI	FRPE/CELA	TORA/CARA/VIRO/VICI/CAFR		NI	NI
QUPH/QULY/	LIST/ILDE/FRPE	TORA/JURE/CARA			S3/S4
QULY/QUPH/	ULAM/CELA	SACE/COVI/CARA		P3	S1/S4
	CELA	CARA/TORA/DEIL/VEHA/SOHA			S4
QUNU/CAIL/L	CAIL/	VEHA/SOHA	SMBO	NI	NI
		Open water			
		SOSP/CARA/VEBR/TORA		NI	NI
CELA/LIST/FI	ILDE/	CACH/LELE		P5/P6	
CAAQ/FRPE	FOAC/SANI/FRPE/COST	AMAR/CARA		P1/P2/P3/P4/P6	S3/S4
QUPH/LIST	ILDE/	AMBR/SMRO/OPHI/TORA			S4
		Rice			
		Fallow field			
		Catfish ponds			
	QUNU/CEOC/	CARA/JUEF/CARYOPH/RHYNCOS			S3/S4
		Soybeans		NI	NI
		Cotton			
		Corn			
		Cotton			
		Soybeans			
		Cotton			
		Soybeans		P4	
		Catfish ponds			
		Catfish ponds			
		BRCI		NI	NI
		Cotton			
		Corn			
		Corn			
		Soybeans			
		Rice			
		Cotton			
		Corn			
		Road			
		Cotton			
		Rice			
		Cotton			
		Corn			
		Corn			S3
		Corn			
		Corn			

Hydric	no	
Hydric	no (070803)	
Hydric	yes	
Hydric	no	PC
NON-HYDRIC	no	
	yes	FW
Hydric	no	
Hydric	Yes	
	xxxxx	
Hydric	yes	
Hydric	no	
Hydric	no	
	no	
NON-HYDRIC	no	PC
Hydric	yes	
Hydric	yes	
Hydric	no	
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	yes	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	OW
	no	OW
Hydric	no	PC
NON-HYDRIC	no	PC
NON-HYDRIC	no	PC/NW
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	no	PC
	no	OW
NON_HYDRIC	no	PC/NW
Hydric	no	PC
NON-HYDRIC	no	PC
NON-HYDRIC	no	PC
Hydric	no	OW
Hydric	no	PC
		PC
NON-HYDRIC	no	PC

top of ridge in ridge swale topography
Adjacent forest w/water lines - Panther Swamp

Fallow field
Road beside field adjacent to forested area (based on map NRCS thought point fell in forested wetland)
Pt. Fell between cottonwood plantat and QULY slough
NRCS confirmed soil (DJ)/ DJ confirmed call 7-14-03

40' from stding water wetland; soil sub-ang blocky
Adjacent to slough (100') but on hi grd
20' from coordinate into open water
Former crop field

50-60' wide drainage pattern
Pt on ridge between sloughs

open water - aquaculture
site appears connected to meander cut-off of Big Sun

Soils heavily compacted
No hydrophytic veg
Pt. 230' from coordinate @ 267O
open water - aquaculture

817 & 817.1 same site revisited for soil sample

Pt. Located in rice field 300' S of coordinates
Pt. 982 ft at 36oN into cotton field

Road between catfish ponds

Site located between cornfield and depressional drain
Soil very compacted

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

Yes Yes
Yes
Yes Yes Yes

Yes

Yes Yes Yes

Yes Yes Yes

Yes
Yes Yes

Yes

Yes

Yes

833	33.229689	90.658305	33 13.783	90 39.500	6/7/2003		2	**Sited**
834	33.044121	90.798303	33 02.654	90 47.899	6/8/2003		2	Sampled
835	32.983217	90.633087	32 58 59.523	90 37 59.211	6/10/2003		3	Sampled
835.1					6/3/2003	WG		
836	32.744837	90.715266	32 44 41.425	90 42 54.941	6/11/2003		3	Sampled
837	33.153119	90.784008	33 09.185	90 47.043	6/7/2003		2	Sampled
838	32.974159	90.90942	32 58 26.926	90 54 33.955	6/10/2003		3	Sampled
839	32.755269	91.006409						**Inaccessible**
840	32.785489	91.050297			6/9/2003		2	Sampled
841	33.214101	90.81356	33 12.850	90 48.799	6/7/2003		2	**Sited**
842	33.05854	90.742319	33 03.512	90 44.539	6/8/2003		3	Sampled
843	32.631199	90.881485	32 37 52.329	90 52 53.341	6/11/2003		3	Sampled
844	32.87113	91.039656	32 52.268	91 02.379	6/9/2003		1	Sampled
845	33.077869	90.58473	33 04.643	90 35.095	6/7/2003		2	**Sited**
846	32.851185	90.727543	32 51 04.311	90 43 39.131	6/10/2003		3	Sampled
847	32.663892	91.00143	32 39 50.016	90 00 05.219	6/11/2003		3	Sampled
848	32.535879	91.035833	32 32 09.164	91 02 08.975	6/11/2003		3	Sampled
849	33.197163	90.6459	33 11.813	90 39.001	6/7/2003		2	**Sited**
850	33.025773	90.760754	33 01.546	90 45.645	6/8/2003		2	Sampled
851	33.108834	90.546094	33 06.531	90 32.765	6/12/2003		3	Sampled
852	32.77174	90.654019	32 46.304	90 39.240	6/12/2003		3	Sampled
853	32.541728	90.8057	32 32.505	90 48.339	6/12/2003		3	Sampled
861	32.990902	90.666738			6/3/2003	WG		Sampled
868	32.806345	90.705689	32 48 22.889	90 42 20.459	6/11/2003		3	Sampled

170

Total

	Levee of Catfish pond		
	Soybeans		
	Cotton	NI	NI
	Fallow field		
	Cotton		S1
	Soybeans		S1
	Corn	P4	S3
	Catfish ponds		
CAIL	SOHA		
	Soybeans		
	Soybeans	NI	NI
	Catfish ponds		
	Cotton		
	Cotton	NI	NI
	Cotton		
	Catfish ponds		
	Corn		
	Soybeans		
QUNI	SOAL/CARA/ANVI		
	Corn		
	Soybeans	NI	NI
	Cotton		

	no	PC
Hydric	no	PC
Hydric	no	
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
	no	PC
Hydric	no	PC
Hydric	yes	FW
Hydric	no	PC
	no	OW
Hydric	no	PC
Hydric	no	PC
NON_HYDRIC	no	PC/NW
	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC
Hydric	no	PC/NW
NI	no	
NON-HYDRIC	no	

Ditch at 152o of pt at 80'

835 & 835.1 same site revisited for soil sample

Drift lines in concave surfaces

Edge of spoil bank of ditch
Farmed wetland

Open water - aquaculture

open water - aquaculture
Very compacted soil

Yes

Yes

Yes

Yes

Yes

Yes

Yes

56 33

Yes

Yes

Yes Yes

Yes Yes

Yes

Yes
Yes Yes Yes

50 28 41 11 48 18 45 17

DESIGN_ID	DESIGN_NO	SITE_ID	STRATUM	PANEL	OVERSAMP	DIVISION	MD_CATY	NEST_ID
MSW03411-	1	MSW03411-0001	1	1	0	1	1	1
MSW03411-	2	MSW03411-0002	1	1	0	1	1	1
MSW03411-	3	MSW03411-0003	1	1	0	1	1	1
MSW03411-	4	MSW03411-0004	1	1	0	1	1	1
MSW03411-	5	MSW03411-0005	1	1	0	1	1	1
MSW03411-	6	MSW03411-0006	1	1	0	1	1	1
MSW03411-	7	MSW03411-0007	1	1	0	1	1	1
MSW03411-	8	MSW03411-0008	1	1	0	1	1	1
MSW03411-	9	MSW03411-0009	1	1	0	1	1	1
MSW03411-	10	MSW03411-0010	1	1	0	1	1	1
MSW03411-	11	MSW03411-0011	1	1	0	1	1	1
MSW03411-	12	MSW03411-0012	1	1	0	1	1	1
MSW03411-	13	MSW03411-0013	1	1	0	1	1	1
MSW03411-	14	MSW03411-0014	1	1	0	1	1	1
MSW03411-	15	MSW03411-0015	1	1	0	1	1	1
MSW03411-	16	MSW03411-0016	1	1	0	1	1	1
MSW03411-	17	MSW03411-0017	1	1	0	1	1	1
MSW03411-	18	MSW03411-0018	1	1	0	1	1	1
MSW03411-	19	MSW03411-0019	1	1	0	1	1	1
MSW03411-	20	MSW03411-0020	1	1	0	1	1	1
MSW03411-	21	MSW03411-0021	1	1	0	1	1	1
MSW03411-	22	MSW03411-0022	1	1	0	1	1	1
MSW03411-	23	MSW03411-0023	1	1	0	1	1	1
MSW03411-	24	MSW03411-0024	1	1	0	1	1	1
MSW03411-	25	MSW03411-0025	1	1	0	1	1	1
MSW03411-	26	MSW03411-0026	1	1	0	1	1	1
MSW03411-	27	MSW03411-0027	1	1	0	1	1	1
MSW03411-	28	MSW03411-0028	1	1	0	1	1	1
MSW03411-	29	MSW03411-0029	1	1	0	1	1	1
MSW03411-	30	MSW03411-0030	1	1	0	1	1	1
MSW03411-	31	MSW03411-0031	1	1	0	1	1	1
MSW03411-	32	MSW03411-0032	1	1	0	1	1	1
MSW03411-	33	MSW03411-0033	1	1	0	1	1	1
MSW03411-	34	MSW03411-0034	1	1	0	1	1	1
MSW03411-	35	MSW03411-0035	1	1	0	1	1	1
MSW03411-	36	MSW03411-0036	1	1	0	1	1	1
MSW03411-	37	MSW03411-0037	1	1	0	1	1	1
MSW03411-	38	MSW03411-0038	1	1	0	1	1	1
MSW03411-	39	MSW03411-0039	1	1	0	1	1	1
MSW03411-	40	MSW03411-0040	1	1	0	1	1	1
MSW03411-	41	MSW03411-0041	1	1	0	1	1	1
MSW03411-	42	MSW03411-0042	1	1	0	1	1	1
MSW03411-	43	MSW03411-0043	1	1	0	1	1	1
MSW03411-	44	MSW03411-0044	1	1	0	1	1	1
MSW03411-	45	MSW03411-0045	1	1	0	1	1	1
MSW03411-	46	MSW03411-0046	1	1	0	1	1	1
MSW03411-	47	MSW03411-0047	1	1	0	1	1	1
MSW03411-	48	MSW03411-0048	1	1	0	1	1	1
MSW03411-	49	MSW03411-0049	1	1	0	1	1	1
MSW03411-	50	MSW03411-0050	1	1	0	1	1	1

NEST1	NEST1_N	NEST1_WT	STRAT_NAME	LONG_DD	LAT_DD	LONG_DMS	LAT_DMS
1	80	7.83390141	Corps	-90.953280	32.603523	-90 57 11.807999	32 36 12.682800
1	80	7.83390141	Corps	-90.766177	32.899246	-90 45 58.237198	32 53 57.285600
1	80	7.83390141	Corps	-90.978034	32.546897	-90 58 40.922399	32 32 48.829200
1	80	7.83390141	Corps	-90.801334	32.785408	-90 48 4.802399	32 47 7.468800
1	80	7.83390141	Corps	-90.893030	32.591397	-90 53 34.907999	32 35 29.029200
1	80	7.83390141	Corps	-90.845267	32.721975	-90 50 42.961199	32 43 19.110000
1	80	7.83390141	Corps	-90.626684	32.802933	-90 37 36.062398	32 48 10.558800
1	80	7.83390141	Corps	-90.803771	32.741187	-90 48 13.575599	32 44 28.273200
1	80	7.83390141	Corps	-90.856535	32.498470	-90 51 23.525999	32 29 54.492000
1	80	7.83390141	Corps	-90.886115	32.784079	-90 53 10.013999	32 47 2.684400
1	80	7.83390141	Corps	-90.766058	33.213506	-90 45 57.808799	33 12 48.621600
1	80	7.83390141	Corps	-90.750520	32.772719	-90 45 1.871998	32 46 21.788400
1	80	7.83390141	Corps	-90.915135	32.500399	-90 54 54.485999	32 30 1.436400
1	80	7.83390141	Corps	-90.893849	32.617195	-90 53 37.856399	32 37 1.902000
1	80	7.83390141	Corps	-90.782173	32.953953	-90 46 55.822798	32 57 14.230800
1	80	7.83390141	Corps	-91.038348	32.814583	-91 2 18.052799	32 48 52.498800
1	80	7.83390141	Corps	-90.934277	32.611308	-90 56 3.397199	32 36 40.708800
1	80	7.83390141	Corps	-90.994111	32.701448	-90 59 38.799599	32 42 5.212800
1	80	7.83390141	Corps	-90.953467	32.456948	-90 57 12.481199	32 27 25.012800
1	80	7.83390141	Corps	-90.828365	32.785036	-90 49 42.113999	32 47 6.129600
1	80	7.83390141	Corps	-90.887230	32.575552	-90 53 14.027999	32 34 31.987200
1	80	7.83390141	Corps	-90.861907	32.826201	-90 51 42.865199	32 49 34.323600
1	80	7.83390141	Corps	-90.750511	32.762378	-90 45 1.839598	32 45 44.560800
1	80	7.83390141	Corps	-90.779582	32.685170	-90 46 46.495199	32 41 6.612000
1	80	7.83390141	Corps	-90.889858	32.502548	-90 53 23.488799	32 30 9.172800
1	80	7.83390141	Corps	-90.852285	32.749034	-90 51 8.225999	32 44 56.522400
1	80	7.83390141	Corps	-91.068145	33.097930	-91 4 5.321999	33 5 52.548000
1	80	7.83390141	Corps	-90.752365	32.681403	-90 45 8.513998	32 40 53.050800
1	80	7.83390141	Corps	-90.911339	32.530351	-90 54 40.820399	32 31 49.263600
1	80	7.83390141	Corps	-90.823288	32.837883	-90 49 23.836799	32 50 16.378800
1	80	7.83390141	Corps	-90.807604	32.883326	-90 48 27.374399	32 52 59.973600
1	80	7.83390141	Corps	-90.738619	32.623094	-90 44 19.028398	32 37 23.138400
1	80	7.83390141	Corps	-90.925678	32.591267	-90 55 32.440799	32 35 28.561200
1	80	7.83390141	Corps	-90.739268	32.906428	-90 44 21.364798	32 54 23.140800
1	80	7.83390141	Corps	-90.965723	32.477146	-90 57 56.602799	32 28 37.725600
1	80	7.83390141	Corps	-90.807675	32.800842	-90 48 27.629999	32 48 3.031200
1	80	7.83390141	Corps	-90.870262	32.532745	-90 52 12.943199	32 31 57.882000
1	80	7.83390141	Corps	-90.974408	32.837817	-90 58 27.868799	32 50 16.141200
1	80	7.83390141	Corps	-90.747889	32.876854	-90 44 52.400398	32 52 36.674400
1	80	7.83390141	Corps	-90.776592	32.721243	-90 46 35.731199	32 43 16.474800
1	80	7.83390141	Corps	-90.872116	32.506255	-90 52 19.617599	32 30 22.518000
1	80	7.83390141	Corps	-90.893222	32.727480	-90 53 35.599199	32 43 38.928000
1	80	7.83390141	Corps	-91.040142	33.039776	-91 2 24.511199	33 2 23.193600
1	80	7.83390141	Corps	-90.768170	32.744782	-90 46 5.411999	32 44 41.215200
1	80	7.83390141	Corps	-90.935732	32.524618	-90 56 8.635199	32 31 28.624800
1	80	7.83390141	Corps	-90.839500	32.821599	-90 50 22.199999	32 49 17.756400
1	80	7.83390141	Corps	-90.838650	32.911654	-90 50 19.139999	32 54 41.954400
1	80	7.83390141	Corps	-90.790894	32.596030	-90 47 27.218399	32 35 45.708000
1	80	7.83390141	Corps	-90.983151	32.618424	-90 58 59.343599	32 37 6.326400
1	80	7.83390141	Corps	-90.859155	32.786188	-90 51 32.957999	32 47 10.276800

newSTRAT_NAME	newEPAWET	newWRP100	newACEWET	ext_base	ext_p5	base_5wet	b2_plan	b1_plan
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	out	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	out	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	out	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	out	out	in	in
Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	out	in
Corps	2	0	1	in	out	out	out	out
Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in

MSW03411-	51	MSW03411-0051	1	1	0	1	1	1
MSW03411-	52	MSW03411-0052	1	1	0	1	1	1
MSW03411-	53	MSW03411-0053	1	1	0	1	1	1
MSW03411-	54	MSW03411-0054	1	1	0	1	1	1
MSW03411-	55	MSW03411-0055	1	1	0	1	1	1
MSW03411-	56	MSW03411-0056	1	1	0	1	1	1
MSW03411-	57	MSW03411-0057	1	1	0	1	1	1
MSW03411-	58	MSW03411-0058	1	1	0	1	1	1
MSW03411-	59	MSW03411-0059	1	1	0	1	1	1
MSW03411-	60	MSW03411-0060	1	1	0	1	1	1
MSW03411-	61	MSW03411-0061	1	1	0	1	1	1
MSW03411-	62	MSW03411-0062	1	1	0	1	1	1
MSW03411-	63	MSW03411-0063	1	1	0	1	1	1
MSW03411-	64	MSW03411-0064	1	1	0	1	1	1
MSW03411-	65	MSW03411-0065	1	1	0	1	1	1
MSW03411-	66	MSW03411-0066	1	1	0	1	1	1
MSW03411-	67	MSW03411-0067	1	1	0	1	1	1
MSW03411-	68	MSW03411-0068	1	1	0	1	1	1
MSW03411-	69	MSW03411-0069	1	1	0	1	1	1
MSW03411-	70	MSW03411-0070	1	1	0	1	1	1
MSW03411-	71	MSW03411-0071	1	1	0	1	1	1
MSW03411-	72	MSW03411-0072	1	1	0	1	1	1
MSW03411-	73	MSW03411-0073	1	1	0	1	1	1
MSW03411-	74	MSW03411-0074	1	1	0	1	1	1
MSW03411-	75	MSW03411-0075	1	1	0	1	1	1
MSW03411-	76	MSW03411-0076	1	1	0	1	1	1
MSW03411-	77	MSW03411-0077	1	1	0	1	1	1
MSW03411-	78	MSW03411-0078	1	1	0	1	1	1
MSW03411-	79	MSW03411-0079	1	1	0	1	1	1
MSW03411-	80	MSW03411-0080	1	1	0	1	1	1
MSW03411-	81	MSW03411-0081	1	0	1	2	1	1
MSW03411-	82	MSW03411-0082	1	0	1	2	1	1
MSW03411-	83	MSW03411-0083	1	0	1	2	1	1
MSW03411-	84	MSW03411-0084	1	0	1	2	1	1
MSW03411-	85	MSW03411-0085	1	0	1	2	1	1
MSW03411-	86	MSW03411-0086	1	0	1	2	1	1
MSW03411-	87	MSW03411-0087	1	0	1	2	1	1
MSW03411-	88	MSW03411-0088	1	0	1	2	1	1
MSW03411-	89	MSW03411-0089	1	0	1	2	1	1
MSW03411-	90	MSW03411-0090	1	0	1	2	1	1
MSW03411-	91	MSW03411-0091	1	0	1	2	1	1
MSW03411-	92	MSW03411-0092	1	0	1	2	1	1
MSW03411-	93	MSW03411-0093	1	0	1	2	1	1
MSW03411-	94	MSW03411-0094	1	0	1	2	1	1
MSW03411-	95	MSW03411-0095	1	0	1	2	1	1
MSW03411-	96	MSW03411-0096	1	0	1	2	1	1
MSW03411-	97	MSW03411-0097	1	0	1	4	1	1
MSW03411-	98	MSW03411-0098	1	0	1	4	1	1
MSW03411-	99	MSW03411-0099	1	0	1	4	1	1
MSW03411-	100	MSW03411-0100	1	0	1	4	1	1
MSW03411-	101	MSW03411-0101	1	0	1	4	1	1

1	80	7.83390141	Corps	-91.063206	32.524526	-91 3 47.541599	32 31 28.293600
1	80	7.83390141	Corps	-90.751408	32.784148	-90 45 5.068798	32 47 2.932800
1	80	7.83390141	Corps	-90.931911	32.478106	-90 55 54.879599	32 28 41.181600
1	80	7.83390141	Corps	-90.840460	32.847150	-90 50 25.655999	32 50 49.740000
1	80	7.83390141	Corps	-90.728897	32.783145	-90 43 44.029198	32 46 59.322000
1	80	7.83390141	Corps	-90.823265	32.720035	-90 49 23.753999	32 43 12.126000
1	80	7.83390141	Corps	-90.913438	32.553868	-90 54 48.376799	32 33 13.924800
1	80	7.83390141	Corps	-90.864524	32.767750	-90 51 52.286399	32 46 3.900000
1	80	7.83390141	Corps	-90.670445	33.110799	-90 40 13.601998	33 6 38.876400
1	80	7.83390141	Corps	-90.762105	32.709220	-90 45 43.577999	32 42 33.192000
1	80	7.83390141	Corps	-90.939824	32.530289	-90 56 23.366399	32 31 49.040400
1	80	7.83390141	Corps	-90.801523	32.767223	-90 48 5.482799	32 46 2.002800
1	80	7.83390141	Corps	-90.821744	32.856691	-90 49 18.278399	32 51 24.087600
1	80	7.83390141	Corps	-90.803621	32.538527	-90 48 13.035599	32 32 18.697200
1	80	7.83390141	Corps	-90.978593	32.551009	-90 58 42.934799	32 33 3.632400
1	80	7.83390141	Corps	-90.698003	32.932167	-90 41 52.810798	32 55 55.801200
1	80	7.83390141	Corps	-90.997133	32.492877	-90 59 49.678799	32 29 34.357200
1	80	7.83390141	Corps	-90.801465	32.791277	-90 48 5.273999	32 47 28.597200
1	80	7.83390141	Corps	-90.912535	32.584957	-90 54 45.125999	32 35 5.845200
1	80	7.83390141	Corps	-90.904178	32.778629	-90 54 15.040799	32 46 43.064400
1	80	7.83390141	Corps	-90.759845	32.840838	-90 45 35.441998	32 50 27.016800
1	80	7.83390141	Corps	-90.793630	32.730979	-90 47 37.067999	32 43 51.524400
1	80	7.83390141	Corps	-90.913068	32.456571	-90 54 47.044799	32 27 23.655600
1	80	7.83390141	Corps	-90.892005	32.757490	-90 53 31.217999	32 45 26.964000
1	80	7.83390141	Corps	-90.984067	33.117973	-90 59 2.641199	33 7 4.702800
1	80	7.83390141	Corps	-90.782649	32.832652	-90 46 57.536399	32 49 57.547200
1	80	7.83390141	Corps	-90.955381	32.527950	-90 57 19.371599	32 31 40.620000
1	80	7.83390141	Corps	-90.850957	32.700590	-90 51 3.445199	32 42 2.124000
1	80	7.83390141	Corps	-90.766809	32.862050	-90 46 0.512399	32 51 43.380000
1	80	7.83390141	Corps	-90.737633	32.666296	-90 44 15.478798	32 39 58.665600
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1	80	7.83390141	Corps	-90.811183	32.871424	-90 48 40.258799	32 52 17.126400
1	80	7.83390141	Corps	-90.930562	32.550476	-90 55 50.023199	32 33 1.713600
1	80	7.83390141	Corps	-90.825915	32.767297	-90 49 33.293999	32 46 2.269200
1	80	7.83390141	Corps	-90.926980	32.563803	-90 55 37.127999	32 33 49.690800
1	80	7.83390141	Corps	-90.841217	32.735924	-90 50 28.381199	32 44 9.326400
1	80	7.83390141	Corps	-90.596336	33.112172	-90 35 46.809597	33 6 43.819200
1	80	7.83390141	Corps	-90.752242	32.710100	-90 45 8.071199	32 42 36.360000
1	80	7.83390141	Corps	-91.040288	32.492051	-91 2 25.036799	32 29 31.383600
1	80	7.83390141	Corps	-90.854765	32.794157	-90 51 17.153999	32 47 38.965200
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1	80	7.83390141	Corps	-90.780254	32.790940	-90 46 48.914398	32 47 27.384000
1	80	7.83390141	Corps	-90.910965	32.485248	-90 54 39.473999	32 29 6.892800
1	80	7.83390141	Corps	-90.895527	32.798620	-90 53 43.897199	32 47 55.032000
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1	80	7.83390141	Corps	-90.825151	32.715014	-90 49 30.543599	32 42 54.050400
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1	80	7.83390141	Corps	-90.763636	32.940832	-90 45 49.089598	32 56 26.995200
1	80	7.83390141	Corps	-90.957787	32.464464	-90 57 28.033199	32 27 52.070400
1	80	7.83390141	Corps	-90.782161	32.807301	-90 46 55.779599	32 48 26.283600
1	80	7.83390141	Corps	-90.893440	32.527110	-90 53 36.383999	32 31 37.596000

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Corps	2	0	1	in	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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1	80	7.83390141	Corps	-90.694770	32.814065	-90 41 41.171998	32 48 50.634000
1	80	7.83390141	Corps	-90.802998	32.709100	-90 48 10.792799	32 42 32.760000
1	80	7.83390141	Corps	-90.859736	32.487524	-90 51 35.049599	32 29 15.086400
1	80	7.83390141	Corps	-90.879477	32.744594	-90 52 46.117199	32 44 40.538400
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1	80	7.83390141	Corps	-90.773271	32.726248	-90 46 23.775599	32 43 34.492800
1	80	7.83390141	Corps	-90.971254	32.523010	-90 58 16.514399	32 31 22.836000
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1	80	7.83390141	Corps	-90.781977	32.868209	-90 46 55.117199	32 52 5.552400
1	80	7.83390141	Corps	-90.772231	32.599697	-90 46 20.031598	32 35 58.909200
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Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
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1	80	7.83390141	Corps	-90.888047	32.786526	-90 53 16.969199	32 47 11.493600
1	80	7.83390141	Corps	-90.714226	33.218587	-90 42 51.213598	33 13 6.913200
1	80	7.83390141	Corps	-90.765310	32.792085	-90 45 55.115999	32 47 31.506000
1	80	7.83390141	Corps	-90.939875	32.486212	-90 56 23.549999	32 29 10.363200
1	80	7.83390141	Corps	-90.815282	32.676094	-90 48 55.015199	32 40 33.938400
1	80	7.83390141	Corps	-90.768157	32.994579	-90 46 5.365198	32 59 40.484400
1	80	7.83390141	Corps	-90.829896	32.698780	-90 49 47.625599	32 41 55.608000
1	80	7.83390141	Corps	-90.942091	32.584721	-90 56 31.527599	32 35 4.995600
1	80	7.83390141	Corps	-90.724818	33.030776	-90 43 29.344798	33 1 50.793600
1	80	7.83390141	Corps	-90.943758	32.470128	-90 56 37.528799	32 28 12.460800
1	80	7.83390141	Corps	-90.830295	32.799274	-90 49 49.061999	32 47 57.386400
1	80	7.83390141	Corps	-90.887209	32.531366	-90 53 13.952399	32 31 52.917600
1	80	7.83390141	Corps	-90.849514	32.821799	-90 50 58.250399	32 49 18.476400
1	80	7.83390141	Corps	-90.739977	32.881912	-90 44 23.917198	32 52 54.883200
1	80	7.83390141	Corps	-90.782640	32.723311	-90 46 57.503999	32 43 23.919600
1	80	7.83390141	Corps	-90.900318	32.493795	-90 54 1.144799	32 29 37.662000
1	80	7.83390141	Corps	-90.891386	32.717578	-90 53 28.989599	32 43 3.280800
1	80	7.83390141	Corps	-91.000278	33.108411	-91 0 1.000799	33 6 30.279600
1	80	7.83390141	Corps	-90.772669	32.756742	-90 46 21.608398	32 45 24.271200
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1	80	7.83390141	Corps	-90.804596	32.896397	-90 48 16.545599	32 53 47.029200
1	80	7.83390141	Corps	-90.815031	32.620727	-90 48 54.111599	32 37 14.617200
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1	80	7.83390141	Corps	-90.909508	32.586675	-90 54 34.228799	32 35 12.030000
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1	80	7.83390141	Corps	-90.945634	33.130903	-90 56 44.282399	33 7 51.250800
1	80	7.83390141	Corps	-90.776840	32.845162	-90 46 36.623999	32 50 42.583200
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1	80	7.83390141	Corps	-90.843643	32.809511	-90 50 37.114799	32 48 34.239600
1	80	7.83390141	Corps	-90.830212	32.548347	-90 49 48.763199	32 32 54.049200
1	80	7.83390141	Corps	-90.877632	32.829388	-90 52 39.475199	32 49 45.796800
1	80	7.83390141	Corps	-90.735758	32.747733	-90 44 8.728799	32 44 51.838800
1	80	7.83390141	Corps	-90.838613	32.705024	-90 50 19.006799	32 42 18.086400
1	80	7.83390141	Corps	-90.908210	32.536491	-90 54 29.555999	32 32 11.367600
1	80	7.83390141	Corps	-90.847029	32.781661	-90 50 49.304399	32 46 53.979600
1	80	7.83390141	Corps	-91.029022	33.165323	-91 1 44.479199	33 9 55.162800

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Corps	2	0	1	in	in	in	in	in
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1	80	7.83390141	Corps	-90.811628	32.845662	-90 48 41.860799	32 50 44.383200
1	80	7.83390141	Corps	-90.765400	32.654279	-90 45 55.439999	32 39 15.404400
1	80	7.83390141	Corps	-90.962443	32.611840	-90 57 44.794799	32 36 42.624000
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1	80	7.83390141	Corps	-90.952193	33.128278	-90 57 7.894799	33 7 41.800800
1	80	7.83390141	Corps	-90.769441	32.835782	-90 46 9.987598	32 50 8.815200
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Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	out	in	out	in
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Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	3	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	0	3	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	3	1	in	in	in	in	in

MSW03411-	255	MSW03411-0255	1	0	1	5	1	1
MSW03411-	256	MSW03411-0256	1	0	1	5	1	1
MSW03411-	257	MSW03411-0257	1	0	1	3	1	1
MSW03411-	258	MSW03411-0258	1	0	1	3	1	1
MSW03411-	259	MSW03411-0259	1	0	1	3	1	1
MSW03411-	260	MSW03411-0260	1	0	1	3	1	1
MSW03411-	261	MSW03411-0261	1	0	1	3	1	1
MSW03411-	262	MSW03411-0262	1	0	1	3	1	1
MSW03411-	263	MSW03411-0263	1	0	1	3	1	1
MSW03411-	264	MSW03411-0264	1	0	1	3	1	1
MSW03411-	265	MSW03411-0265	1	0	1	3	1	1
MSW03411-	266	MSW03411-0266	1	0	1	3	1	1
MSW03411-	267	MSW03411-0267	1	0	1	3	1	1
MSW03411-	268	MSW03411-0268	1	0	1	3	1	1
MSW03411-	269	MSW03411-0269	1	0	1	3	1	1
MSW03411-	270	MSW03411-0270	1	0	1	3	1	1
MSW03411-	271	MSW03411-0271	1	0	1	3	1	1
MSW03411-	272	MSW03411-0272	1	0	1	3	1	1
MSW03411-	273	MSW03411-0273	1	0	1	2	1	1
MSW03411-	274	MSW03411-0274	1	0	1	2	1	1
MSW03411-	275	MSW03411-0275	1	0	1	2	1	1
MSW03411-	276	MSW03411-0276	1	0	1	2	1	1
MSW03411-	277	MSW03411-0277	1	0	1	2	1	1
MSW03411-	278	MSW03411-0278	1	0	1	2	1	1
MSW03411-	279	MSW03411-0279	1	0	1	2	1	1
MSW03411-	280	MSW03411-0280	1	0	1	2	1	1
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MSW03411-	282	MSW03411-0282	1	0	1	2	1	1
MSW03411-	283	MSW03411-0283	1	0	1	2	1	1
MSW03411-	284	MSW03411-0284	1	0	1	2	1	1
MSW03411-	285	MSW03411-0285	1	0	1	2	1	1
MSW03411-	286	MSW03411-0286	1	0	1	2	1	1
MSW03411-	287	MSW03411-0287	1	0	1	2	1	1
MSW03411-	288	MSW03411-0288	1	0	1	2	1	1
MSW03411-	289	MSW03411-0289	1	0	1	4	1	1
MSW03411-	290	MSW03411-0290	1	0	1	4	1	1
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MSW03411-	299	MSW03411-0299	1	0	1	4	1	1
MSW03411-	300	MSW03411-0300	1	0	1	4	1	1
MSW03411-	301	MSW03411-0301	1	0	1	4	1	1
MSW03411-	302	MSW03411-0302	1	0	1	4	1	1
MSW03411-	303	MSW03411-0303	1	0	1	4	1	1
MSW03411-	304	MSW03411-0304	1	0	1	4	1	1
MSW03411-	305	MSW03411-0305	1	0	1	3	1	1

1	80	7.83390141	Corps	-90.774354	32.853811	-90 46 27.674399	32 51 13.719600
1	80	7.83390141	Corps	-90.694840	32.705912	-90 41 41.423998	32 42 21.283200
1	80	7.83390141	Corps	-90.910547	32.620751	-90 54 37.969199	32 37 14.703600
1	80	7.83390141	Corps	-91.002508	32.672486	-91 0 9.028799	32 40 20.949600
1	80	7.83390141	Corps	-91.022733	32.527068	-91 1 21.838800	32 31 37.444800
1	80	7.83390141	Corps	-90.824577	32.802953	-90 49 28.477199	32 48 10.630800
1	80	7.83390141	Corps	-90.873210	32.582711	-90 52 23.555999	32 34 57.759600
1	80	7.83390141	Corps	-90.847476	32.809881	-90 50 50.913599	32 48 35.571600
1	80	7.83390141	Corps	-90.737678	32.768865	-90 44 15.640798	32 46 7.914000
1	80	7.83390141	Corps	-90.804388	32.674402	-90 48 15.796799	32 40 27.847200
1	80	7.83390141	Corps	-90.890311	32.556666	-90 53 25.119599	32 33 23.997600
1	80	7.83390141	Corps	-90.845607	32.743346	-90 50 44.185199	32 44 36.045600
1	80	7.83390141	Corps	-90.992401	33.130733	-90 59 32.643599	33 7 50.638800
1	80	7.83390141	Corps	-90.759604	32.693823	-90 45 34.574398	32 41 37.762800
1	80	7.83390141	Corps	-90.924922	32.541572	-90 55 29.719199	32 32 29.659200
1	80	7.83390141	Corps	-90.810297	32.818182	-90 48 37.069199	32 49 5.455200
1	80	7.83390141	Corps	-90.825592	32.868708	-90 49 32.131199	32 52 7.348800
1	80	7.83390141	Corps	-90.766940	32.630784	-90 46 0.983998	32 37 50.822400
1	80	7.83390141	Corps	-90.961700	32.639436	-90 57 42.119999	32 38 21.969600
1	80	7.83390141	Corps	-90.748906	32.919168	-90 44 56.061599	32 55 9.004800
1	80	7.83390141	Corps	-91.003317	32.502965	-91 0 11.941199	32 30 10.674000
1	80	7.83390141	Corps	-90.823750	32.775099	-90 49 25.499999	32 46 30.356400
1	80	7.83390141	Corps	-90.899938	32.574557	-90 53 59.776799	32 34 28.405200
1	80	7.83390141	Corps	-90.851813	32.717666	-90 51 6.526799	32 43 3.597600
1	80	7.83390141	Corps	-90.741178	32.849904	-90 44 28.240799	32 50 59.654400
1	80	7.83390141	Corps	-90.803271	32.741316	-90 48 11.775599	32 44 28.737600
1	80	7.83390141	Corps	-90.840223	32.493662	-90 50 24.802799	32 29 37.183200
1	80	7.83390141	Corps	-90.883244	32.788631	-90 52 59.678399	32 47 19.071600
1	80	7.83390141	Corps	-90.689186	33.158361	-90 41 21.069598	33 9 30.099600
1	80	7.83390141	Corps	-90.776075	32.776177	-90 46 33.869999	32 46 34.237200
1	80	7.83390141	Corps	-90.934576	32.501337	-90 56 4.473599	32 30 4.813200
1	80	7.83390141	Corps	-90.886064	32.618279	-90 53 9.830399	32 37 5.804400
1	80	7.83390141	Corps	-90.762001	32.882764	-90 45 43.203598	32 52 57.950400
1	80	7.83390141	Corps	-90.973698	32.987980	-90 58 25.312799	32 59 16.728000
1	80	7.83390141	Corps	-90.987671	32.601681	-90 59 15.615599	32 36 6.051600
1	80	7.83390141	Corps	-90.699657	33.086088	-90 41 58.765198	33 5 9.916800
1	80	7.83390141	Corps	-90.918240	32.464155	-90 55 5.663999	32 27 50.958000
1	80	7.83390141	Corps	-90.818238	32.787567	-90 49 5.656799	32 47 15.241200
1	80	7.83390141	Corps	-90.825437	32.592129	-90 49 31.573199	32 35 31.664400
1	80	7.83390141	Corps	-90.877117	32.811989	-90 52 37.621199	32 48 43.160400
1	80	7.83390141	Corps	-90.744648	32.882667	-90 44 40.732798	32 52 57.601200
1	80	7.83390141	Corps	-90.796007	32.718433	-90 47 45.625199	32 43 6.358800
1	80	7.83390141	Corps	-90.884190	32.510837	-90 53 3.083999	32 30 39.013200
1	80	7.83390141	Corps	-90.890887	32.708542	-90 53 27.193199	32 42 30.751200
1	80	7.83390141	Corps	-91.051674	33.093052	-91 3 6.026400	33 5 34.987200
1	80	7.83390141	Corps	-90.789134	32.738425	-90 47 20.882399	32 44 18.330000
1	80	7.83390141	Corps	-90.924363	32.511121	-90 55 27.706799	32 30 40.035600
1	80	7.83390141	Corps	-90.830484	32.817203	-90 49 49.742399	32 49 1.930800
1	80	7.83390141	Corps	-90.800229	32.891301	-90 48 0.824399	32 53 28.683600
1	80	7.83390141	Corps	-90.811215	32.616285	-90 48 40.373999	32 36 58.626000
1	80	7.83390141	Corps	-90.931012	32.561868	-90 55 51.643199	32 33 42.724800

Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	0	0	1	out	out	in	out	out
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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Corps	0	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in

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MSW03411-	308	MSW03411-0308	1	0	1	3	1	1
MSW03411-	309	MSW03411-0309	1	0	1	3	1	1
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MSW03411-	320	MSW03411-0320	1	0	1	3	1	1
MSW03411-	321	MSW03411-0321	1	0	1	5	1	1
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MSW03411-	323	MSW03411-0323	1	0	1	5	1	1
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MSW03411-	354	MSW03411-0354	1	0	1	5	1	1
MSW03411-	355	MSW03411-0355	1	0	1	5	1	1
MSW03411-	356	MSW03411-0356	1	0	1	5	1	1

1	80	7.83390141	Corps	-90.766084	32.939926	-90 45 57.902399	32 56 23.733600
1	80	7.83390141	Corps	-90.943637	32.472060	-90 56 37.093199	32 28 19.416000
1	80	7.83390141	Corps	-90.794171	32.803664	-90 47 39.015599	32 48 13.190400
1	80	7.83390141	Corps	-90.878456	32.542176	-90 52 42.441599	32 32 31.833600
1	80	7.83390141	Corps	-90.985455	32.802261	-90 59 7.637999	32 48 8.139600
1	80	7.83390141	Corps	-90.725697	32.834700	-90 43 32.509198	32 50 4.920000
1	80	7.83390141	Corps	-90.774708	32.709648	-90 46 28.948799	32 42 34.732800
1	80	7.83390141	Corps	-90.867506	32.476578	-90 52 3.021599	32 28 35.680800
1	80	7.83390141	Corps	-90.885169	32.765293	-90 53 6.608399	32 45 55.054800
1	80	7.83390141	Corps	-91.045394	33.068422	-91 2 43.418399	33 4 6.319200
1	80	7.83390141	Corps	-90.780462	32.743796	-90 46 49.663198	32 44 37.665600
1	80	7.83390141	Corps	-90.945817	32.518206	-90 56 44.941199	32 31 5.541600
1	80	7.83390141	Corps	-90.866463	32.695260	-90 51 59.266799	32 41 42.936000
1	80	7.83390141	Corps	-90.793146	32.878993	-90 47 35.325599	32 52 44.374800
1	80	7.83390141	Corps	-90.787858	32.583236	-90 47 16.288799	32 34 59.649600
1	80	7.83390141	Corps	-90.992229	32.639359	-90 59 32.024399	32 38 21.692400
1	80	7.83390141	Corps	-90.916060	32.732102	-90 54 57.815999	32 43 55.567200
1	80	7.83390141	Corps	-91.055343	32.505134	-91 3 19.234800	32 30 18.482400
1	80	7.83390141	Corps	-90.767049	32.770325	-90 46 1.376399	32 46 13.170000
1	80	7.83390141	Corps	-90.871393	32.595466	-90 52 17.014799	32 35 43.677600
1	80	7.83390141	Corps	-90.845770	32.856877	-90 50 44.771999	32 51 24.757200
1	80	7.83390141	Corps	-90.702756	32.748853	-90 42 9.921598	32 44 55.870800
1	80	7.83390141	Corps	-90.818573	32.713636	-90 49 6.862799	32 42 49.089600
1	80	7.83390141	Corps	-90.905156	32.546303	-90 54 18.561599	32 32 46.690800
1	80	7.83390141	Corps	-90.859794	32.768333	-90 51 35.258399	32 46 5.998800
1	80	7.83390141	Corps	-90.562814	33.043925	-90 33 46.130397	33 2 38.130000
1	80	7.83390141	Corps	-90.743193	32.689613	-90 44 35.494798	32 41 22.606800
1	80	7.83390141	Corps	-90.943342	32.545969	-90 56 36.031199	32 32 45.488400
1	80	7.83390141	Corps	-90.749675	32.828913	-90 44 58.829998	32 49 44.086800
1	80	7.83390141	Corps	-90.822720	32.866745	-90 49 21.791999	32 52 0.282000
1	80	7.83390141	Corps	-90.776537	32.642308	-90 46 35.533199	32 38 32.308800
1	80	7.83390141	Corps	-90.945664	32.612810	-90 56 44.390399	32 36 46.116000
1	80	7.83390141	Corps	-90.804623	32.857419	-90 48 16.642799	32 51 26.708400
1	80	7.83390141	Corps	-90.955394	32.558004	-90 57 19.418399	32 33 28.814400
1	80	7.83390141	Corps	-90.797315	32.762127	-90 47 50.333998	32 45 43.657200
1	80	7.83390141	Corps	-90.911486	32.570541	-90 54 41.349599	32 34 13.947600
1	80	7.83390141	Corps	-90.865676	32.715688	-90 51 56.433599	32 42 56.476800
1	80	7.83390141	Corps	-90.603227	32.842411	-90 36 11.617198	32 50 32.679600
1	80	7.83390141	Corps	-90.743035	32.703965	-90 44 34.925998	32 42 14.274000
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Corps	0	0	1	in	in	in	in	in
Corps	0	0	1	in	in	in	in	in
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Corps	2	0	1	in	in	in	in	in
Corps	2	0	1	in	in	in	in	in
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EPAnot	2	0	0	in	in	out	out	out
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NonWet	0	0	0	out	out	out	out	out
NonWet	0	0	0	in	out	out	out	out
EPAnot	2	0	0	in	out	out	in	in
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EPAnot	2	0	0	in	out	out	out	out
NonWet	0	0	0	out	out	out	out	out
EPAnot	0	3	0	out	out	out	out	out
EPAnot	2	0	0	out	out	out	out	out
EPAnot	2	3	0	out	out	out	out	out
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NonWet	0	0	0	out	out	out	out	out
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EPAnot	2	0	0	in	out	out	in	in
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NonWet	0	0	0	out	out	out	out	out
NonWet	0	0	0	in	in	out	out	out
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NonWet	0	0	0	out	out	out	out	out
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Message

From: Goodin, John [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3EAC342F280A4B9DB4079C81F66D1913-JGOODIN]
Sent: 2/26/2021 10:47:02 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: Re: Yazoo Resilience Alternative

Thanks, Jill, for forwarding this and your previous comments.
John

On Feb 26, 2021, at 5:39 PM, Mastrototaro, Jill <Jill.Mastrototaro@audubon.org> wrote:

Good Afternoon, Mr. Goodin,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information. This updated alternative also has been shared with CEQ.

Kind regards,
Jill Mastrototaro

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

<Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf>

Message

From: Melissa Samet [sametm@nwf.org]
Sent: 10/22/2021 7:42:56 PM
To: Goodin, John [Goodin.John@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Nalven, Heidi [Nalven.Heidi@epa.gov]; Lambert, Matthew [Lambert.Matthew@epa.gov]; Heather Gange [heather.gange@usdoj.gov]; Hough, Palmer [Hough.Palmer@epa.gov]
CC: Louie Miller [louie.miller@sierraclub.org]; Olivia Dorothy [odorothy@americanrivers.org]; Andrew Whitehurst [andrew@healthygulf.org]; Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant
Attachments: Funding Opportunties_Yazoo Backwater Area Resilience Alternative_as of 10-21-2021.docx

Good afternoon everyone,

I wanted to share some additional information regarding the availability of funding for alternatives solutions for the Yazoo Backwater Area, and the continued importance of EPA reasserting the 404(c) veto.

First, as you'll see from the attached document, there is a significant amount of funding that is currently available to provide prompt natural infrastructure and non-structural flood risk reduction for the Yazoo Backwater Area. Significant additional funding would also be available under the current Reconciliation and Bipartisan Infrastructure proposals. This funding could be effectively targeted to quickly protect communities in the YBWA through an interagency task force.

Second, it is clear that EPA will have to reassert the veto to stop the Yazoo Pumps as the Corps continues to push ahead with planning the project, including by purchasing rights-of-ways, according to Peter Nimrod, Chief Engineer of the Mississippi Levee Board (as reported in an October 12 Vicksburg Post story):

> Presently, Nimrod said, the Corps is continuing work on the pumps project.
>
> "They're working on the preconstruction engineering and design and looking at the Deer Creek pump site and started acquiring rights of way," he said. "They're starting talking with state DEQ (Department of Environmental Quality) about what they're going to need for a state water quality certificate.
>
> "They're working hard right now on the project."

I have also been told that the Corps' Vicksburg District Commander continues to meet with the MS Congressional delegation (including just last week) to advocate for the Yazoo Pumps.

Please don't hesitate to reach out if you have any questions or would like additional information.

Thank you.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation
(o) 415-762-8264
(c) 415-577-9193
sametm@nwf.org

From: Melissa Samet
Sent: Wednesday, September 15, 2021 9:49 AM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoj.gov; hough.palmer@epa.gov
Cc: Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst

<andrew@healthygulf.org>; Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant

Good morning everyone,

We recently received new information on the Yazoo Pumps that I wanted to share. As you can see in the attached map, the Corps approved construction of the pumps on lands permanently protected by a Wetlands Reserve Easement that was established in 1998. The Corps would have to extinguish these permanent protections through the extraordinary measures of eminent domain and/or condemnation before it could build on the Deer Creek site.

The 2020 FSEIS does not provide any of this information, and does not explain why the Corps selected an alternative that sites the pumping plant in wetlands that have been permanently protected for more than two decades. The 2020 FSEIS also fails to examine the impacts of operating the pumps on the many other Wetlands Reserve Easements in the project area, among many other significant failings.

Please don't hesitate to reach out if you have any questions or if I can provide additional information.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation
(o) 415-762-8264
(c) 415-577-9193
sametm@nwf.org

From: Melissa Samet
Sent: Friday, July 2, 2021 12:10 PM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoj.gov; hough.palmer@epa.gov
Cc: Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst <andrew@healthygulf.org>; Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant

Good Afternoon,

As a follow-up to our meeting, we wanted to share the attached letter that was sent today to Administrator Regan urging EPA to restore the CWA 404(c) veto for the Yazoo Pumps. This letter is signed by the CEOs of American Rivers, Earthjustice, Healthy Gulf, Izaak Walton League of America, League of Conservation Voters, National Audubon Society, National Wildlife Federation, Natural Resources Defense Council, Sierra Club, and Theodore Roosevelt Conservation Partnership.

We've also provided the requested background information on some of the north Vicksburg communities at particular risk from operation of the Yazoo Pumps. The primarily African American, low income Ford Subdivision/Chickasaw communities already flood on a regular basis when the Yazoo or Mississippi Rivers overflow their banks.

In addition, we wanted to provide some more clarity regarding our concerns with the Corps' removal of information from the National Levee Database, which occurred after the Corps finalized its approval of the Yazoo Pumps. The Database was authorized by Congress in 2007 as an important response to the devastating levee failures in New Orleans following Hurricane Katrina. Congress intended the Database to provide vital information to communities on the safety of the levees that they rely on. The Corps' removal of information documenting the significant public safety risks surrounding the Yazoo Backwater Levee undermines the very purpose of the Database and keeps vital public safety information from the public. The removal of this information is unacceptable under any circumstances, and it is particularly troubling that the Corps appears to have pushed for the removal of this information in an attempt to obfuscate the risks posed by the Yazoo Pumps.

Thank you again for meeting with us and for your careful attention to this matter. As always, please don't hesitate to reach out if you have any questions or would like additional information.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation
(o) 415-762-8264
(c) 415-577-9193
sametm@nwf.org

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Tuesday, June 22, 2021 11:03 AM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoj.gov; hough.palmer@epa.gov
Cc: Melissa Samet <sametm@nwf.org>; Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst <andrew@healthygulf.org>
Subject: (Follow Up) CWA 404(c)/Yazoo Backwater Pumping Plant

Good Afternoon,

On behalf of the National Audubon Society, Sierra Club, American Rivers, National Wildlife Federation, and Healthy Gulf, please accept our thanks for virtually meeting with us last week about our concerns regarding the Yazoo Pumps. We greatly appreciate your time and the opportunity to highlight the critical importance of reasserting EPA's Clean Water Act 404(c) veto of the project and of advancing an alternative strategy that would provide prompt, effective flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources ***(see attached*** *Yazoo Backwater Area - A Resilience Alternative)*.

We respectfully urge EPA to immediately restore the 2008 veto protection that was revoked by the Trump Administration, to reconfirm that the veto applies to the Corps' current plan, and to advance meaningful environmental justice by partnering with the Council on Environmental Quality (CEQ) to develop an interagency task force that can implement prompt, effective flood relief for vulnerable communities by drawing on our alternative strategy.

As you know, EPA's Final Determination was based on an extensive record that remains as valid today as it was when it was issued in 2008 ***(see attached*** *Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps)*. New data from the Army Corps shows that under the best-case scenario, 83% of the Yazoo Backwater Area that flooded in 2019 - a 25-year event - would still have been underwater if the Yazoo Pumps had been in operation, and it would have taken more than 2 months for the Pumps to drain the water from the remaining acres ***(see attached*** *2019 Flood Inundation Map)*.

Clearly, the Pumps are not designed to protect communities from flooding. Instead, as the Corps found in 2007, this is an agricultural drainage project with 80% of the project benefits coming from draining tens of thousands of acres of wetlands to intensify farming. To protect the region's communities, our organizations urge EPA to work with CEQ to convene an interagency task force to advance natural and non-structural solutions that can provide sustainable, lasting benefits for Yazoo Backwater communities and the region's globally significant wetlands.

We will be providing the additional information requested during the meeting shortly. Meanwhile, please do not hesitate to reach out to let us know how we can be helpful (contact information below).

Attachments: Yazoo Backwater Area Pumping Project

- 2019 Flood Inundation Map
- Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps
- Yazoo Backwater Area - A Resilience Alternative Resilience

Sincerely,
Jill

Jill Mastrototaro
Mississippi Policy Director, Audubon Delta
(504) 481-3659
jill.mastrototaro@audubon.org

Melissa Samet
Senior Water Resources Counsel, National Wildlife Federation
(415) 762-8264
sametm@nwf.org

Louie Miller
State Director, Mississippi Sierra Club
(601) 624-3503
louie.miller@sierraclub.org

Olivia Dorothy
Upper Mississippi River Basin Director, American Rivers
(217) 390-3658
odorothy@americanrivers.org

Andrew Whitehurst
Water Program Director, Healthy Gulf
(601) 954-7236
andrew@healthygulf.org

Yazoo Backwater Area Resilience Alternative
Funding Opportunities as of October 2021
Additional details on the highlighted programs can be found in the Resilience Alternative for the Yazoo Backwater Area dated February 2021

1. FEMA Post-Disaster Recovery Programs

The Yazoo Backwater Area is currently covered by a [HYPERLINK "https://www.fema.gov/press-release/20210830/58-mississippi-counties-added-hurricane-ida-emergency-declaration"] (see [HYPERLINK "https://www.fema.gov/disaster/3569"] for more details on Disaster Declaration 3569-EM-MS which was declared on August 28, 2021). As a result, post-disaster recovery funding is available for the Yazoo Backwater Area through at least August 28, 2022. There also may be opportunities to utilize some unspent HUD CDBG-DR grant funding for the Yazoo Backwater Area.

- **FEMA Hazard Mitigation Grant Program:** Funding is available, and applications are accepted from state and local governments, in areas covered by an open Presidential disaster declaration. FEMA accepts HMGP applications for one year after a federal disaster declaration with the possibility of up to a 180-day extension at the state's request

- **USDA Community Facilities Grant Program:** Funding is available, and applications are accepted from rural communities with up to 20,000 residents, in areas covered by a Presidential disaster declaration.

- **HUD CDBG-DR Grants:** Mississippi has a number [HYPERLINK "https://www.hud.gov/sites/dfiles/CPD/documents/CDBG-DR-Grant-Expenditure-Report-2021-10-01.pdf"]. It is possible that the Yazoo Backwater Area may be eligible for funding under one of these grants (alternatively, opportunities may exist for diverting some of these funds to the Yazoo Backwater Area).

2. FEMA BRIC Program

A. **BRIC COVID-19 Funding**: On August 25, 2021, FEMA announced that the state of [HYPERLINK "https://www.dhs.gov/news/2021/08/05/biden-administration-commits-historic-346-billion-hazard-mitigation-funds-reduce"] as part of the response to the COVID-19 global pandemic. This funding will be distributed through the BRIC program (this *appears to be* in addition to the $1 billion FY21 BRIC program allocation).

B. **BRIC FY21 Funding**: [HYPERLINK "https://www.fema.gov/fact-sheet/notice-funding-opportunity-fiscal-year-2021-building-resilient-infrastructure-and" \l "1"] (the Mississippi Emergency Management Agency has set an [HYPERLINK "https://www.msema.org/about/hazard-mitigation/"]).[1] The FY21 BRIC Program will distribute up to $1 billion, with each state/territory able to receive **up to $1 million**. An additional $919,000,000 (estimated) will be distributed through a National Competition for Mitigation Projects.

- <u>New BRIC Program Criteria for FY21 Relevant to the Yazoo Backwater Area</u>:

[1] Mississippi did not apply for any BRIC funding during the FY20 funding cycle. One article reports that only two Mississippi cities, Oxford and Columbus, applied for the funding and MEMA acted on its own to grant the requests.

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- Includes a new priority to enhance climate resilience and adaptation.
- Includes a new priority to prioritize benefits to incentivize natural hazard risk reduction activities that mitigate risk to public infrastructure and includes disadvantaged communities as defined in [HYPERLINK "https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02177.pdf"] – Tackling the Climate Crisis at Home and Abroad.
- Prioritizes assistance that benefits disadvantaged communities as referenced in Executive Order 14008 - Tackling the Climate Crisis at Home and Abroad, in line with the Administration's [HYPERLINK "https://protect-us.mimecast.com/s/siX5COYE2rc55A88ukVuGV?domain=whitehouse.gov/"] to promote equity.
- Revises the title of a "Small Impoverished Community" to "Economically Disadvantaged Rural Communities" (an economically disadvantaged rural community is a community of 3,000 or fewer individuals identified by the applicant that is economically disadvantaged, with residents having an average per capita annual income not exceeding 80% of the national per capita income, based on best available data).
- Economically disadvantaged rural communities are eligible for an increase in federal cost share up to 90% federal/10% non-federal.
- Doubles the number of communities to which FEMA is offering non-financial Direct Technical Assistance, from 10 to 20, to help build capability and capacity at the local level and includes disadvantaged communities

- Additional Important Information from Mississippi Emergency Management Agency: A Mississippi community may be eligible for a reduction in the 10-25% match requirements if they prepare a letter to MEMA that explains how the community is experiencing a hardship, according to Jana Henderson/MEMA Office of Mitigation Director.

C. **BRIC Non-Financial Technical Assistance**: FEMA will select up to 20 communities for [HYPERLINK "https://www.fema.gov/sites/default/files/documents/fema_fy21-bric-direct-technical-assistance-psm.pdf"]. Multiple communities located near one another with similar disaster challenges are highly encouraged to coordinate in making a single request. To apply, communities submit a Letter of Intent directly to FEMA (bypassing the state).

D. **Potential BRIC Funding Under the BIF:** $1 billion, with $200 million available for FY22-25.

3. FEMA Flood Mitigation Assistance Grants

A. **Current FMA Funding Opportunity**: [HYPERLINK "https://www.fema.gov/fact-sheet/notice-funding-opportunity-fiscal-year-2021-flood-mitigation-assistance-grants"]; MEMA has established an [HYPERLINK "https://www.msema.org/about/hazard-mitigation/"]. FEMA will distribute **up to $160 million** through this program, including for:
- Project Scoping (up to $10 million).
- Community Flood Mitigation (up to $70 million).
- Flood hazard mitigation planning.
- Individual flood mitigation projects.

B. **Potential FMA Funding Under the BIF:**

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- $3.5 billion for FEMA's Flood Mitigation Assistance Program, which is named "National Flood Insurance Fund" in the final text, with $700 million/year FY22-25.
- The BIF also provides $500 million for the STORM Act, which establishes a FEMA program to help states establish revolving loan funds for mitigation projects (Stafford Act Sec 205).

C. **Potential Funding Under Reconciliation:** $495 million for FEMAs Hazard Mitigation Revolving Loan Fund.

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4. Wetland Reserve and Floodplain Easement Programs (USDA)

A. **Current WRE Funding:** Funding is available yearly, and the [HYPERLINK "https://www.nrcs.usda.gov/wps/portal/nrcs/detail/ms/newsroom/releases/?cid=NRCSEPRD1829259"]. The Wetland Reserve Easement Program is typically oversubscribed; applications can be submitted year round.

B. **Potential USDA Reconciliation Funding Applicable to Restoration in the Yazoo Backwater Area:**
   - Agricultural Conservation Easement Program (ACEP), which includes Wetland Reserve Easements potentially will receive $1.5 billion.
   - USDA NRCS Emergency Watershed Protection Program potentially will receive $300 million.
   - USDA Conservation Technical Assistance Program potentially will receive $200 million.
   - USDA Rural Partnership Program potentially will receive $4 billion. This program provides flexible grants to rural communities impacted by economic transitions and climate change, to support job growth, economic resilience, and economic recovery.

5. Economic Development Administration (Commerce Department)

The Resilience Alternative highlights opportunities for driving economic growth in the Yazoo Backwater Area through the promotion of wildlife and cultural heritage-associated in collaboration with the Mississippi Delta National Heritage Area, the Delta Blues Trail, the Delta National Forest, and the Theodore Roosevelt National Wildlife Refuge Complex.

Current Funding Opportunities: Funding could be pursued through the Economic Development Administration's (EDA) American Rescue Plan [HYPERLINK "https://protect-us.mimecast.com/s/XONYCG6Y2jiWWWEXs7GGfm?domain=grants.gov" \o "Travel, Tourism & Outdoor Recreation"]. EDA is focused on accelerating the recovery of communities that rely on the travel, tourism and outdoor recreation sectors. EDA's American Rescue Plan funds are allocated to support the following efforts:

- State Tourism Grants: $510 million in non-competitive awards to help states quickly invest in marketing, infrastructure, workforce and other projects to rejuvenate safe leisure, business and international travel. [HYPERLINK "https://protect-us.mimecast.com/s/A8-_CJ6Y2mipppIMszGP-h?domain=eda.gov"] in State Tourism Grants.
- Competitive Grants: $240 million to help communities that have been hardest hit by challenges facing the travel, tourism and outdoor recreation sectors to invest in infrastructure, workforce or other projects to support the recovery of the industry and economic resilience of the community in the future. While there is no deadline for applying for these grants, [HYPERLINK "https://www.grants.gov/web/grants/view-opportunity.html?oppId=334748"].

6. Other Potential Funding Through Reconciliation

The U.S. Fish and Wildlife Service potentially will receive the following program dollars that could be used to help improve conditions in the Yazoo Backwater Area:

- $100 million for restoration and resiliency work in the National Wildlife Refuge System and other federal assets to address damage and threats from climate-induced weather events.
- $10 million for wildlife corridor mapping, assistance to states and tribes on corridors.

ED_006580_00000042-00004

Message

From: Melissa Samet [sametm@nwf.org]
Sent: 7/2/2021 7:10:05 PM
To: Goodin, John [Goodin.John@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Nalven, Heidi [Nalven.Heidi@epa.gov]; Lambert, Matthew [Lambert.Matthew@epa.gov]; Heather Gange [heather.gange@usdoj.gov]; Hough, Palmer [Hough.Palmer@epa.gov]
CC: Louie Miller [louie.miller@sierraclub.org]; Olivia Dorothy [odorothy@americanrivers.org]; Andrew Whitehurst [andrew@healthygulf.org]; Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant
Attachments: CEO Ltr_Restore Yazoo Pumps Veto_Final_06-02-21.pdf; Ford Subdivision_Flooding and Demographics.pdf

Good Afternoon,

As a follow-up to our meeting, we wanted to share the attached letter that was sent today to Administrator Regan urging EPA to restore the CWA 404(c) veto for the Yazoo Pumps. This letter is signed by the CEOs of American Rivers, Earthjustice, Healthy Gulf, Izaak Walton League of America, League of Conservation Voters, National Audubon Society, National Wildlife Federation, Natural Resources Defense Council, Sierra Club, and Theodore Roosevelt Conservation Partnership.

We've also provided the requested background information on some of the north Vicksburg communities at particular risk from operation of the Yazoo Pumps. The primarily African American, low income Ford Subdivision/Chickasaw communities already flood on a regular basis when the Yazoo or Mississippi Rivers overflow their banks.

In addition, we wanted to provide some more clarity regarding our concerns with the Corps' removal of information from the National Levee Database, which occurred after the Corps finalized its approval of the Yazoo Pumps. The Database was authorized by Congress in 2007 as an important response to the devastating levee failures in New Orleans following Hurricane Katrina. Congress intended the Database to provide vital information to communities on the safety of the levees that they rely on. The Corps' removal of information documenting the significant public safety risks surrounding the Yazoo Backwater Levee undermines the very purpose of the Database and keeps vital public safety information from the public. The removal of this information is unacceptable under any circumstances, and it is particularly troubling that the Corps appears to have pushed for the removal of this information in an attempt to obfuscate the risks posed by the Yazoo Pumps.

Thank you again for meeting with us and for your careful attention to this matter. As always, please don't hesitate to reach out if you have any questions or would like additional information.

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National Wildlife Federation
(o) 415-762-8264
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From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Tuesday, June 22, 2021 11:03 AM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoj.gov; hough.palmer@epa.gov
Cc: Melissa Samet <sametm@nwf.org>; Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst <andrew@healthygulf.org>
Subject: (Follow Up) CWA 404(c)/Yazoo Backwater Pumping Plant

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We respectfully urge EPA to immediately restore the 2008 veto protection that was revoked by the Trump Administration, to reconfirm that the veto applies to the Corps' current plan, and to advance meaningful environmental justice by partnering with the Council on Environmental Quality (CEQ) to develop an interagency task force that can implement prompt, effective flood relief for vulnerable communities by drawing on our alternative strategy.

As you know, EPA's Final Determination was based on an extensive record that remains as valid today as it was when it was issued in 2008 *(**see attached** Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps)*. New data from the Army Corps shows that under the best-case scenario, 83% of the Yazoo Backwater Area that flooded in 2019 - a 25-year event - would still have been underwater if the Yazoo Pumps had been in operation, and it would have taken more than 2 months for the Pumps to drain the water from the remaining acres *(**see attached** 2019 Flood Inundation Map).*

Clearly, the Pumps are not designed to protect communities from flooding. Instead, as the Corps found in 2007, this is an agricultural drainage project with 80% of the project benefits coming from draining tens of thousands of acres of wetlands to intensify farming. To protect the region's communities, our organizations urge EPA to work with CEQ to convene an interagency task force to advance natural and non-structural solutions that can provide sustainable, lasting benefits for Yazoo Backwater communities and the region's globally significant wetlands.

We will be providing the additional information requested during the meeting shortly. Meanwhile, please do not hesitate to reach out to let us know how we can be helpful (contact information below).

Attachments: Yazoo Backwater Area Pumping Project

- 2019 Flood Inundation Map
- Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps
- Yazoo Backwater Area - A Resilience Alternative Resilience

Sincerely,
Jill

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Mississippi Policy Director, Audubon Delta
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jill.mastrototaro@audubon.org

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Senior Water Resources Counsel, National Wildlife Federation
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State Director, Mississippi Sierra Club
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Olivia Dorothy

Upper Mississippi River Basin Director, American Rivers
(217) 390-3658
odorothy@americanrivers.org

Andrew Whitehurst
Water Program Director, Healthy Gulf
(601) 954-7236
andrew@healthygulf.org

American Rivers • Earthjustice
Healthy Gulf • Izaak Walton League of America
League of Conservation Voters • National Audubon Society
National Wildlife Federation • Natural Resources Defense Council
Sierra Club • Theodore Roosevelt Conservation Partnership

July 2, 2021

The Honorable Michael Regan
Administrator
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Mail Code 1101A

Re: Restore Essential Wetland Protections Revoked by the Trump Administration

Dear Administrator Regan:

On behalf of the millions of members and supporters our organizations represent, we call on you to restore the Clean Water Act 404(c) veto of the Yazoo Backwater Pumping Plant that was revoked at the very end of the Trump Administration. Immediate action is required to prevent the destruction of tens of thousands of acres of the nation's richest wetland and aquatic resources and to help protect environmental justice communities from unacceptable flooding risks. Instead, we encourage the Biden Administration to establish an interagency task force to deploy effective, sustainable flood relief solutions that reflect the best available science and truly support underserved communities in the Yazoo Backwater Area.

In 2008, the Environmental Protection Agency under the Bush Administration exercised its Clean Water Act 404(c) authority to veto the Yazoo Pumps, which would intensify agricultural production on marginal lands, to prevent "unacceptable damage" to "some of the richest wetland and aquatic resources in the nation. " This veto has ultimately ensured protection of up to 200,000 acres of hemispherically important wetlands in the Mississippi Flyway—wetlands that support 450 species of birds, fish and wildlife; are used by more than 28 million migrating birds each year; and include thousands of acres of wetlands on federal, state, and privately-owned conservation lands.

Without the required scientific analysis or process, the Trump Administration summarily revoked the veto, claiming that it does not prohibit a renewed proposal to build the same massive Yazoo Backwater Pumping Plant. This abrupt revocation contravenes the veto's extensive factual and scientific findings, ignores the facts on the ground, and was issued without the required public notice and comment. EPA's last-minute revocation paved the way for the Corps of Engineers to approve the Yazoo Pumps just five days before the Trump Administration left office, despite overwhelming opposition from the U.S. Fish and Wildlife Service, the scientific community, the conservation community, the public, and EPA's own scientists.

Construction and operation of the Yazoo Pumps would undermine the Biden Administration's most fundamental environmental justice and social justice priorities. The Yazoo Pumps are designed to

increase agriculture production on marginal lands, not protect vulnerable communities downstream. Had the Pumps been operating in 2019 (a 25-year flood in the Yazoo Backwater Area), 83 percent of the lands that flooded in the Yazoo Backwater Area would still have flooded. And because operation of the Yazoo Pumps would pump water directly into the Yazoo River, vulnerable downstream communities in Vicksburg, Mississippi would also be at heightened risk during floods as the already swollen Yazoo River would take on an additional nine billion gallons of water a day from the project. This massive influx of extra water could also breach the levee that protects the Yazoo Backwater Area from high water in the Yazoo River, exposing the very same backwater communities that the Pumps are purported to protect to the full force of a Yazoo River flood. This levee is so low that it is not accredited to handle a 100-year flood, as acknowledged by the Federal Emergency Management Agency and the Corps of Engineers. These serious safety risks cannot be, and are not, offset by the alleged flood protection benefits of the Yazoo Pumps.

The Yazoo Pumps will increase the nation's vulnerability to climate change by draining nationally significant wetlands that store tens of billions of gallons of floodwaters and provide tens of thousands of acres of vital fish and wildlife habitat. These critical wetlands also improve water quality, facilitate groundwater recharge, and sequester carbon.

As an alternative, the conservation community has repeatedly called on the Corps to consider a suite of proven, low-cost, natural infrastructure and non-structural measures that would provide prompt, effective, and environmentally sustainable relief to vulnerable communities in the Yazoo Backwater Area, while making those communities and the nation's wetlands and wildlife more resilient to climate change. The Corps of Engineers refused to consider any alternatives before the Trump Administration reapproved the destructive Yazoo Pumps in 2021, despite repeated requests to do so by EPA, the U.S. Fish and Wildlife Service, and the public.

Despite all of this, the Corps of Engineers continues to move ahead with the Yazoo Pumps project, which is why EPA action is required to immediately restore the 404(c) veto. There is a safer, more just, and more equitable path to take. We urge you to work with the Council on Environmental Quality to convene an interagency task force to deliver sustainable, nature-based, and non-structural flood relief to vulnerable Yazoo Backwater Area communities, while protecting nationally significant wetland and wildlife resources.

Thank you for attention to this critical matter.

Sincerely,

Tom Kiernan
President and CEO
American Rivers

Gene Karpinski
President
League of Conservation Voters

Abigail Dillen
President
Earthjustice

Collin O'Mara
President and CEO
National Wildlife Federation

Cynthia Sarthou
Executive Director
Healthy Gulf

Elizabeth Gray, Ph.D.
Acting CEO
National Audubon Society

Scott Kovarovics
Executive Director
Izaak Walton League of America

Mitchell Bernard
President & Chief Counsel
Natural Resources Defense Council

Whit Fosburgh
President and CEO
Theodore Roosevelt Conservation Partnership

Michael Brune
Executive Director
Sierra Club

cc:
Janet McCabe, Deputy Administrator, EPA
Radhika Fox, Assistant Administrator, Office of Water, EPA
Brenda Mallory, Chair, Council on Environmental Quality
Jaime Pinkham, Acting, Assistant Secretary of the Army for Civil Works

Ford Subdivision and Chickasaw Communities, Vicksburg MS
Environmental Justice Communities at Risk From Operation of the Yazoo Pumps

Operation of the Yazoo Pumps will increase flood risks for downstream communities by pushing an additional nine billion gallons of water a day into an already swollen Yazoo River. Communities at risk include the Ford Subdivision/Chickasaw communities in the northern part of Vicksburg. These primarily African American and low income neighborhoods already flood on a regular basis when the Mississippi and/or Yazoo Rivers overflow their banks. The EPA EJ Screen indicates that 93% of the people living in these communities are people of color and that 61% live in low-income households (households with incomes less than or equal to twice the federal "poverty level").

These neighborhoods, which are located just off U.S. Highway 61 North Business, are identified repetitive loss flood areas under the National Flood Insurance Community Rating System Program. For example, in 2016 some homes in these communities flooded to the roof. In 2011, some homes were inundated by 7 feet of water. In 2008, these communities were flooded by a half foot of water. Clarion Ledger, Mississippi River flooding drives folks out again, January 12, 2016; see also, Vicksburg's Ford Subdivision Under Water (May 2011 video); Miss. River flood hits Vicksburg in 2016 (January 2016 video).

Ford Subdivision 2016 Flood, *Clarion Ledger*

ED_006580_00000045-00001

Ford Subdivision Flooding, June 11, 2011 *Clarion Ledger*

The Association of State Floodplain Managers (ASFPM) highlights the challenges facing efforts to buyout repetitive loss properties in the Ford Subdivision (referred to as the Kings Ford region). As highlighted by ASFPM, the "Kings Ford region is an impoverished area with a lot of generational land" and buyouts in this area are challenging because the "Kings Ford residents are highly resistant to selling." Association of State Floodplain Managers, Memorandum of Understanding Helps Vicksburg Facilitate Buy-outs of Repetitive Loss Properties. ASFPM further notes that:

> Because the city does not want to force people that either cannot afford to mitigate or have no desire to leave out of their homes, Vicksburg has created a Memorandum of Understanding. The MOU states that if the property owner cleans out the property and moves back in they are in violation of the Floodplain Damage Prevention Ordinance. If the property owner moves back in, they will be taken to court and if found guilty, they are in violation of article 1316 of the National Flood Protection Act. This violation means they can no longer receive any assistance after future flood events. In effect, it prevents the homeowner from being eligible for any flood insurance or disaster mitigation benefits.
>
> * * *
>
> Many of the properties in [the Kings Ford neighborhood] are generational, meaning a family lives in the same house their parents, grandparents, and/or great-grandparents did. These homeowners are far less interested in money but very interested in keeping their property because they want to continue that family legacy. As a result, the MOU, in essence, gives the authority back to the property owners. This is because the property owner gets to decide how many times they want to personally repair their homes before voluntarily deciding to tear them down. In addition, the MOU allows the homeowner to keep the property in the family even though the physical structures were forfeited to the flooding. According to Gray-Lewis this aspect of the MOU seems to have helped the city to overcome property-owners resistance to relinquishing their homes.

ED_006580_00000045-00002

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 4:02:53 PM
To: Goodin, John [Goodin.John@epa.gov]
Subject: Yazoo Pumps Update

Hello Mr. Goodin,

I wanted to let you know that yesterday Audubon and partners filed a lawsuit against the Corps and FWS challenging the Yazoo Pumps. Our press release follows and our complaint can be downloaded here.

Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Please do not hesitate to reach out with questions or for more details.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

Lawsuit challenges Army Corps' unlawful approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

The Yazoo Pumps project would involve construction of a 14,000 cubic-feet-per-second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, the Corps admitted in 2007 that 80 percent of the project's benefits would be for agriculture.

"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally endangered species, such as the pondberry. Also, the Yazoo Pumps would increase flood risk for downstream communities while failing to provide the promised level of relief to communities in the Yazoo Backwater Area.

Instead of the ineffective, antiquated pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. See: Alternative Flood Relief Solutions to the Yazoo Pumps .

The conservation groups' legal complaint can be downloaded here.

####

CONTACTS:
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Melissa Samet [sametm@nwf.org]
Sent: 9/15/2021 4:49:12 PM
To: Goodin, John [Goodin.John@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Nalven, Heidi [Nalven.Heidi@epa.gov]; Lambert, Matthew [Lambert.Matthew@epa.gov]; Heather Gange [heather.gange@usdoj.gov]; Hough, Palmer [Hough.Palmer@epa.gov]
CC: Louie Miller [louie.miller@sierraclub.org]; Olivia Dorothy [odorothy@americanrivers.org]; Andrew Whitehurst [andrew@healthygulf.org]; Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant
Attachments: Yazoo Pumps_Deer Creek Site Protected by Permanent WRE_09-2021.pdf

Good morning everyone,

We recently received new information on the Yazoo Pumps that I wanted to share. As you can see in the attached map, the Corps approved construction of the pumps on lands permanently protected by a Wetlands Reserve Easement that was established in 1998. The Corps would have to extinguish these permanent protections through the extraordinary measures of eminent domain and/or condemnation before it could build on the Deer Creek site.

The 2020 FSEIS does not provide any of this information, and does not explain why the Corps selected an alternative that sites the pumping plant in wetlands that have been permanently protected for more than two decades. The 2020 FSEIS also fails to examine the impacts of operating the pumps on the many other Wetlands Reserve Easements in the project area, among many other significant failings.

Please don't hesitate to reach out if you have any questions or if I can provide additional information.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation
(o) 415-762-8264
(c) 415-577-9193
sametm@nwf.org

From: Melissa Samet
Sent: Friday, July 2, 2021 12:10 PM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoj.gov; hough.palmer@epa.gov
Cc: Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst <andrew@healthygulf.org>; Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: Additional Information: CWA 404(c)/Yazoo Backwater Pumping Plant

Good Afternoon,

As a follow-up to our meeting, we wanted to share the attached letter that was sent today to Administrator Regan urging EPA to restore the CWA 404(c) veto for the Yazoo Pumps. This letter is signed by the CEOs of American Rivers, Earthjustice, Healthy Gulf, Izaak Walton League of America, League of Conservation Voters, National Audubon Society, National Wildlife Federation, Natural Resources Defense Council, Sierra Club, and Theodore Roosevelt Conservation Partnership.

We've also provided the requested background information on some of the north Vicksburg communities at particular risk from operation of the Yazoo Pumps. The primarily African American, low income Ford Subdivision/Chickasaw communities already flood on a regular basis when the Yazoo or Mississippi Rivers overflow their banks.

In addition, we wanted to provide some more clarity regarding our concerns with the Corps' removal of information from the National Levee Database, which occurred after the Corps finalized its approval of the Yazoo Pumps. The Database was authorized by Congress in 2007 as an important response to the devastating levee failures in New Orleans following Hurricane Katrina. Congress intended the Database to provide vital information to communities on the safety of the levees that they rely on. The Corps' removal of information documenting the significant public safety risks surrounding the Yazoo Backwater Levee undermines the very purpose of the Database and keeps vital public safety information from the public. The removal of this information is unacceptable under any circumstances, and it is particularly troubling that the Corps appears to have pushed for the removal of this information in an attempt to obfuscate the risks posed by the Yazoo Pumps.

Thank you again for meeting with us and for your careful attention to this matter. As always, please don't hesitate to reach out if you have any questions or would like additional information.

Melissa Samet
Senior Water Resources Counsel
National Wildlife Federation
(o) 415-762-8264
(c) 415-577-9193
sametm@nwf.org

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Tuesday, June 22, 2021 11:03 AM
To: Goodin.John@epa.gov; Frazer.Brian@epa.gov; Neugeboren.Steven@epa.gov; Wehling.Carrie@epa.gov; Nalven.Heidi@epa.gov; Lambert.Matthew@epa.gov; heather.gange@usdoi.gov; hough.palmer@epa.gov
Cc: Melissa Samet <sametm@nwf.org>; Louie Miller <louie.miller@sierraclub.org>; Olivia Dorothy <odorothy@americanrivers.org>; Andrew Whitehurst <andrew@healthygulf.org>
Subject: (Follow Up) CWA 404(c)/Yazoo Backwater Pumping Plant

Good Afternoon,

On behalf of the National Audubon Society, Sierra Club, American Rivers, National Wildlife Federation, and Healthy Gulf, please accept our thanks for virtually meeting with us last week about our concerns regarding the Yazoo Pumps. We greatly appreciate your time and the opportunity to highlight the critical importance of reasserting EPA's Clean Water Act 404(c) veto of the project and of advancing an alternative strategy that would provide prompt, effective flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources *(**see attached** Yazoo Backwater Area - A Resilience Alternative).*

We respectfully urge EPA to immediately restore the 2008 veto protection that was revoked by the Trump Administration, to reconfirm that the veto applies to the Corps' current plan, and to advance meaningful environmental justice by partnering with the Council on Environmental Quality (CEQ) to develop an interagency task force that can implement prompt, effective flood relief for vulnerable communities by drawing on our alternative strategy.

As you know, EPA's Final Determination was based on an extensive record that remains as valid today as it was when it was issued in 2008 *(**see attached** Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps).* New data from the Army Corps shows that under the best-case scenario, 83% of the Yazoo Backwater Area that flooded in 2019 - a 25-year event - would still have been underwater if the Yazoo Pumps had been in operation, and it would have taken more than 2 months for the Pumps to drain the water from the remaining acres *(**see attached** 2019 Flood Inundation Map).*

Clearly, the Pumps are not designed to protect communities from flooding. Instead, as the Corps found in 2007, this is an agricultural drainage project with 80% of the project benefits coming from draining tens of thousands of acres of wetlands to intensify farming. To protect the region's communities, our organizations urge EPA to work with CEQ to

convene an interagency task force to advance natural and non-structural solutions that can provide sustainable, lasting benefits for Yazoo Backwater communities and the region's globally significant wetlands.

We will be providing the additional information requested during the meeting shortly. Meanwhile, please do not hesitate to reach out to let us know how we can be helpful (contact information below).

Attachments: Yazoo Backwater Area Pumping Project

- 2019 Flood Inundation Map
- Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps
- Yazoo Backwater Area - A Resilience Alternative Resilience

Sincerely,
Jill

Jill Mastrototaro
Mississippi Policy Director, Audubon Delta
(504) 481-3659
jill.mastrototaro@audubon.org

Melissa Samet
Senior Water Resources Counsel, National Wildlife Federation
(415) 762-8264
sametm@nwf.org

Louie Miller
State Director, Mississippi Sierra Club
(601) 624-3503
louie.miller@sierraclub.org

Olivia Dorothy
Upper Mississippi River Basin Director, American Rivers
(217) 390-3658
odorothy@americanrivers.org

Andrew Whitehurst
Water Program Director, Healthy Gulf
(601) 954-7236
andrew@healthygulf.org

The Deer Creek Yazoo Pumps Location Includes Land Protected by a Permanent Wetland Reserve Easement

The Corps of Engineers approved construction of the Yazoo Pumps at a location in the Yazoo Backwater Area that includes lands permanently protected by a Wetlands Reserve Easement (WRE) since 1998. The 2020 FSEIS does not provide this information, and does not explain why the Corps selected an alternative that sites a 14,000 cfs pumping plant in wetlands that have been permanently protected for more than two decades. The 2020 FSEIS also fails to examine the impacts of operating the pumps on the many other WREs in the project area, among many other significant failings. The Corps would have to use the extraordinary measures of eminent domain and/or condemnation to extinguish the permanent protections provided by the WRE before it could build on the Deer Creek site.

Area Outlined in Red:
Yazoo Pumps Deer Creek pump site (Fig. 1-9, 2020 Yazoo Pumps FSEIS, Appendix B at 8)

Bright Green-Hatched Area:
300-acre permanent WRE which overlays a portion of the Deer Creek Site (easement established 1998).

Sage Green-Hatched Areas:
Additional permanent WREs near the Deer Creek pump site (all established more than 15 years ago).

ED_006580_00000048-00001

Land Ownership Data:
According to Warren County parcel data from 2019, the area of the pump site covered by the easement is owned by Lower Deer Properties LLC. The area of the pump site not covered by an easement is owned by Ol Susie Club LLC.

GIS Attributes of the Pump Site Location:
Area of the new Deer Creek pump site covered by a Wetland Reserve Easement
ADDRESS1 113 MAISON RUE
CITY VICKSBURG
OWNERNAME LOWER DEER CREEK PROPERTIES,LLC
PARCEL_NUM 019 15 9999 000300
RANGE 04
SECTION 15
Shape Polygon
STATE MS
TOTAL_AC 183
TOWNSHIP 18

Area of new Deer Creek pump site not covered by WRE
ADDRESS C/O ERIC HENNINGTON
ADDRESS2 PO BOX 4381
CITY HOUSTON
OWNERNAME OL SUSIE CLUB LLC
PARCEL_NUM 019 15 9999 000500
RANGE 04
SECTION 15
Shape Polygon
STATE TX
TOTAL_AC 89.5
TOWNSHIP 18

ED_006580_00000048-00002

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/12/2021 7:45:19 PM
To: Goodin, John [Goodin.John@epa.gov]
Subject: Yazoo Fact Sheet
Attachments: Fact Sheet_Immediate Action Required to Stop the Yazoo Pumps_Final_01-21-21.pdf

Hello Mr. Goodin,

In the hope it can be helpful to you and your colleagues, attached please find a summary outlining the multitude of problems and concerns associated with the Yazoo Pumps.

Please do not hesitate to reach out with questions or for more details.

My best,
Jill Mastrototaro

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 6/22/2021 6:03:07 PM
To: Goodin, John [Goodin.John@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Nalven, Heidi [Nalven.Heidi@epa.gov]; Lambert, Matthew [Lambert.Matthew@epa.gov]; Heather Gange [heather.gange@usdoj.gov]; Hough, Palmer [Hough.Palmer@epa.gov]
CC: Melissa Samet [sametm@nwf.org]; Louie Miller [louie.miller@sierraclub.org]; Olivia Dorothy [odorothy@americanrivers.org]; Andrew Whitehurst [andrew@healthygulf.org]
Subject: (Follow Up) CWA 404(c)/Yazoo Backwater Pumping Plant
Attachments: 2019 Flood Inundation Map_6-22-21.pdf; Fact Sheet_Immediate Action Required to Stop the Yazoo Pumps_Final_01-21-21.pdf; Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf

Good Afternoon,

On behalf of the National Audubon Society, Sierra Club, American Rivers, National Wildlife Federation, and Healthy Gulf, please accept our thanks for virtually meeting with us last week about our concerns regarding the Yazoo Pumps. We greatly appreciate your time and the opportunity to highlight the critical importance of reasserting EPA's Clean Water Act 404(c) veto of the project and of advancing an alternative strategy that would provide prompt, effective flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources *(**see attached** Yazoo Backwater Area - A Resilience Alternative)*.

We respectfully urge EPA to immediately restore the 2008 veto protection that was revoked by the Trump Administration, to reconfirm that the veto applies to the Corps' current plan, and to advance meaningful environmental justice by partnering with the Council on Environmental Quality (CEQ) to develop an interagency task force that can implement prompt, effective flood relief for vulnerable communities by drawing on our alternative strategy.

As you know, EPA's Final Determination was based on an extensive record that remains as valid today as it was when it was issued in 2008 *(**see attached** Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps)*. New data from the Army Corps shows that under the best-case scenario, 83% of the Yazoo Backwater Area that flooded in 2019 - a 25-year event - would still have been underwater if the Yazoo Pumps had been in operation, and it would have taken more than 2 months for the Pumps to drain the water from the remaining acres *(**see attached** 2019 Flood Inundation Map)*.

Clearly, the Pumps are not designed to protect communities from flooding. Instead, as the Corps found in 2007, this is an agricultural drainage project with 80% of the project benefits coming from draining tens of thousands of acres of wetlands to intensify farming. To protect the region's communities, our organizations urge EPA to work with CEQ to convene an interagency task force to advance natural and non-structural solutions that can provide sustainable, lasting benefits for Yazoo Backwater communities and the region's globally significant wetlands.

We will be providing the additional information requested during the meeting shortly. Meanwhile, please do not hesitate to reach out to let us know how we can be helpful (contact information below).

Attachments: Yazoo Backwater Area Pumping Project

- 2019 Flood Inundation Map
- Fact Sheet_Immediate Action is Required to Stop the Yazoo Pumps
- Yazoo Backwater Area - A Resilience Alternative Resilience

Sincerely,
Jill

Jill Mastrototaro
Mississippi Policy Director, Audubon Delta

(504) 481-3659
jill.mastrototaro@audubon.org

Melissa Samet
Senior Water Resources Counsel, National Wildlife Federation
(415) 762-8264
sametm@nwf.org

Louie Miller
State Director, Mississippi Sierra Club
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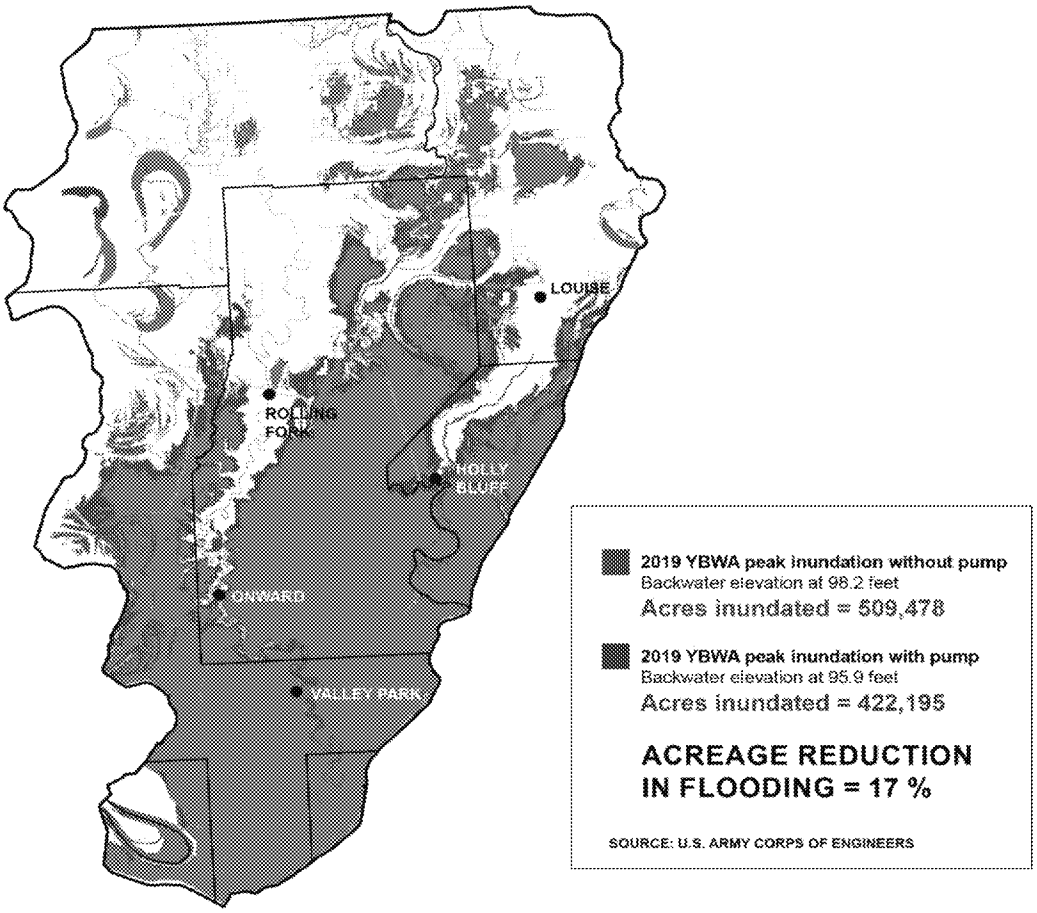
louie.miller@sierraclub.org

Olivia Dorothy
Upper Mississippi River Basin Director, American Rivers
(217) 390-3658
odorothy@americanrivers.org

Andrew Whitehurst
Water Program Director, Healthy Gulf
(601) 954-7236
andrew@healthygulf.org

2019 Flood Inundation Map With and Without the Pumps



Army Corps' data shows that had the Yazoo Pumps been in operation during the 2019 flood, 422,195 acres (shown in blue)—**83% of the lands that flooded in 2019**—would still have been underwater. Just 17% of the acreage that flooded in 2019–87,283 acres shown in red—would have been drained by the Yazoo Pumps.

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 1/11/2021 10:27:09 PM
To: Goodin, John [Goodin.John@epa.gov]
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS
Attachments: Conservation Organization Comments on Final SEIS_Yazoo Pumps_Final with attachments_01-11-21.pdf; EPA_FOIA_FinalEMAPSubmittal.xlsx; EPA_FOIA_pt5out.xlsx

Good Afternoon, Mr. Goodin,

On behalf of American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi, please find attached our comments with two supporting documents on the Final Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Kind regards,

Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/26/2021 9:36:03 PM
To: Goodin, John [Goodin.John@epa.gov]
Subject: Yazoo Resilience Alternative
Attachments: Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf

Good Afternoon, Mr. Goodin,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information. This updated alternative also has been shared with CEQ.

Kind regards,
Jill Mastrototaro

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/10/2021 10:12:35 PM
To: Goodin, John [Goodin.John@epa.gov]
Subject: Yazoo Notice of Intent Filed on ESA
Attachments: Yazoo Pumps - Notice of Intent ESA_2-9-21.pdf

Good Afternoon, Mr. Goodin,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Appointment

From: Weiler, Katherine [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b2ca8131db564daa8ccc9639f70f6235-KWeiler]
Sent: 5/28/2021 4:21:57 PM
To: Goodin, John [Goodin.John@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]; odorothy@americanrivers.org; andrew@healthygulf.org; louie.miller@sierraclub.org; sametm@nwf.org
CC: Nalven, Heidi [Nalven.Heidi@epa.gov]; Lambert, Matthew [Lambert.Matthew@epa.gov]; Gange, Heather (ENRD) [Heather.Gange@usdoj.gov]; Hough, Palmer [Hough.Palmer@epa.gov]

Subject: CWA 404(c)/Yazoo Backwater Pumping Plant - Meeting with Audubon Delta
Attachments: Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf
Location: ZOOM LINK

Start: 6/16/2021 3:30:00 PM
End: 6/16/2021 4:00:00 PM
Show Time As: Busy

Required Attendees: Goodin, John; Frazer, Brian; Neugeboren, Steven; Wehling, Carrie; Mastrototaro, Jill; odorothy@americanrivers.org; andrew@healthygulf.org; louie.miller@sierraclub.org; sametm@nwf.org
Optional Attendees: Nalven, Heidi; Lambert, Matthew; Gange, Heather (ENRD); Hough, Palmer

Important Meeting Update!!

We are no longer using Teams for this meeting.

Please use the following zoom link for the meeting - https://audubon.zoom.us/j/962943422

If you have any audio/visual issues with the link, please join via phone: (646) 876 9923 or (669) 900-6833 // Meeting ID: 962-943-422

Thanks you!

Topic:
Importance of retaining the Clean Water Act 404(c) veto of the Yazoo Backwater Pumping Plant and the opportunity to implement a Resilience Alternative to the Yazoo Pumps that would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources.
The attending groups have developed this Resilience Alternative, which has been shared with EPA staff at Region 4 and headquarters. Please find it attached and also it can be downloaded here.

Message

From: Hicks, Matt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EAA50F546C9B440A98C82F4E9BD5BD69-HICKS, MATTHEW]
Sent: 2/10/2021 10:27:56 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Notice of Intent Filed on ESA

Thank you Ms. Mastrototaro. I will forward to folks here a EPA Region 4.

Matt

Matthew L. Hicks
Associate Regional Counsel
EPA Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
404-562-9670
hicks.matthew@epa.gov

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Wednesday, February 10, 2021 5:11 PM
To: Hicks, Matt <Hicks.Matthew@epa.gov>
Subject: Yazoo Notice of Intent Filed on ESA

Hello Mr. Hicks,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
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Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

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The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

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The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

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Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Hicks, Matt [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EAA50F546C9B440A98C82F4E9BD5BD69-HICKS, MATTHEW]
Sent: 4/15/2021 7:10:43 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Pumps Update

Thank you Ms. Mastrototaro. The complaint and press release are being distributed to appropriate folks within Region 4.

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Thursday, April 15, 2021 11:58 AM
To: Hicks, Matt <Hicks.Matthew@epa.gov>
Subject: Yazoo Pumps Update

Hello Mr. Hicks,

I wanted to let you know that yesterday Audubon and partners filed a lawsuit against the Corps and FWS challenging the Yazoo Pumps. Our press release follows and our complaint can be downloaded here.

Some of the media coverage includes –

- AP: Conservation groups sue Engineer Corps over Yazoo Pumps
- E&E News: Greens sue Army Corps over Miss. flood project
- Local TV: Conservation groups file federal lawsuit to challenge Yazoo Pumps

Please do not hesitate to reach out with questions or for more details.

Kind regards,
Jill

FOR IMMEDIATE RELEASE
April 14, 2021

Conservation Groups File Federal Lawsuit to Uphold Law, Science & Public Participation

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WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice filed a lawsuit today challenging the U.S. Army Corps of Engineers' rushed approval of a massive drainage project in Mississippi's South Delta, commonly known as the Yazoo Pumps, in the closing days of the Trump Administration. The lawsuit, filed in federal court in the District of Columbia, also challenges the U.S. Fish and Wildlife Service for abdicating its obligations under the Endangered Species Act.

The George W. Bush Administration's Environmental Protection Agency stopped the destructive project by issuing a Clean Water Act veto in 2008, citing unacceptable damage to some of the nation's richest wetland and water resources.

However, last spring the Corps revived the Yazoo Pumps in a calculated push that culminated in official approval of the project in the final days of the Trump administration. The unprecedented effort included illegally revoking EPA's 2008 long-standing veto and circumventing bedrock environmental laws such as the Clean Water Act, the Endangered Species Act, and the National Environmental Policy Act. More than 55,000 citizens, scientists, and public interest groups objected to the Corps' incomplete and inadequate analysis of the project, submitting extensive comments demonstrating that the Corps ignored the scientific data and law.

"Instead of making a decision based on the science and law, the Corps recklessly approved this ineffective, destructive, and wasteful project," said **Earthjustice attorney Stu Gillespie**. "The Corps failed to inform the public about the project's unacceptable costs and refused to consider alternatives that would provide prompt, effective and environmentally sound flood relief to communities."

"The Yazoo Pumps would increase flood risk for many people in the area," said **Tom Kiernan, President and CEO of American Rivers**. "The Corps' continued focus on building the Yazoo Pumps is irresponsible when there are better, more cost-effective solutions available."

"Time after time, the Yazoo Pumps have been shown to be the big lie," said **Louie Miller, State Director for the Mississippi Chapter of the Sierra Club.** "The Pumps are not intended to protect communities from flooding but are designed to benefit agribusiness by draining wetlands to intensify farming."

"Not only will the Corps' latest proposal degrade at least 39,000 acres of globally significant wetlands but over 82 percent of the Yazoo Backwater Area will continue to flood with the Pumps in place," said **Jill Mastrototaro, Audubon's Mississippi Policy Director**. "This lawsuit is a last line of defense to protect birds, wildlife and people by ensuring local communities get the effective flood relief solutions they deserve."

The Yazoo Pumps project would involve construction of a 14,000 cubic-feet-per-second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, the Corps admitted in 2007 that 80 percent of the project's benefits would be for agriculture.

"The Pump project's results will contradict one of its planned purposes," said **Andrew Whitehurst, Water Program Director for Healthy Gulf**. "The Corps of Engineers estimated in its public meeting response to questions that almost 9,700 acres could be converted to crop land by the pumps even though one of the basic objectives listed by the project's Supplemental EIS is to provide reduced levels of agricultural intensification."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally endangered species, such as the pondberry. Also, the Yazoo Pumps would increase flood risk for downstream communities while failing to provide the promised level of relief to communities in the Yazoo Backwater Area.

Instead of the ineffective, antiquated pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. See: Alternative Flood Relief Solutions to the Yazoo Pumps .

The conservation groups' legal complaint can be downloaded here.

####

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Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
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---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 3:58:06 PM
To: Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: Yazoo Pumps Update

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Jill

FOR IMMEDIATE RELEASE
April 14, 2021

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---
Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/26/2021 9:30:07 PM
To: Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: Yazoo Resilience Alternative
Attachments: Yazoo Backwater Area Resilience Alternative (rev)_2-25-21.pdf

Good Afternoon, Mr. Hicks,

I wanted to share the attached copy of an updated Resilience Alternative to the Yazoo Pumps that is fully supported by the conservation groups working to stop this project.

Implementing this Resilience Alternative would provide immediate, sustainable flood relief to underserved communities in the Yazoo Backwater Area while protecting the region's hemispherically significant wildlife resources. Also, it would advance the 30x30 Initiative by permanently protecting 80,000 acres of critical wetlands.

Please do not hesitate to reach out with questions or for additional information.

Kind regards,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/12/2021 7:41:34 PM
To: Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: Yazoo Fact Sheet
Attachments: Fact Sheet_Immediate Action Required to Stop the Yazoo Pumps_Final_01-21-21.pdf

Hello Mr. Hicks,

In the hope it can be helpful to you and your colleagues, attached please find a summary outlining the multitude of problems and concerns associated with the Yazoo Pumps.

Please do not hesitate to reach out with questions or for more details.

My best,
Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 4/15/2021 7:59:18 PM
To: Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: RE: Yazoo Pumps Update

Much appreciated, take care.

From: Hicks, Matt <Hicks.Matthew@epa.gov>
Sent: Thursday, April 15, 2021 2:11 PM
To: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Subject: RE: Yazoo Pumps Update

Thank you Ms. Mastrototaro. The complaint and press release are being distributed to appropriate folks within Region 4.

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FOR IMMEDIATE RELEASE
April 14, 2021

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Jill Mastrototaro
Mississippi Policy Director
504.481.3659

Audubon Delta
PO Box 2026
Ridgeland, MS 39158

Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 2/10/2021 10:11:16 PM
To: Hicks, Matt [Hicks.Matthew@epa.gov]
Subject: Yazoo Notice of Intent Filed on ESA
Attachments: Yazoo Pumps - Notice of Intent ESA_2-9-21.pdf

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FOR IMMEDIATE RELEASE
February 9, 2021

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Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

WASHINGTON, D.C. — A coalition of conservation organizations represented by Earthjustice, a legal non-profit, filed notice today that they intend to sue the U.S. Army Corps of Engineers (Corps), along with the U.S. Fish and Wildlife Service (Service), for violating the Endangered Species Act as part of the Corps' rushed effort in the closing days of the Trump Administration to approve a massive drainage project in Mississippi's South Delta commonly known as the Yazoo Pumps.

The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

The Service, however, wholly disagreed based on its review of the best available science, and urged the Corps to fulfill its legal obligation by consulting with the Service to ensure the Pumps would not jeopardize the survival of the pondberry. Instead, on January 15, 2021, the Corps disregarded its obligations under the ESA and issued a Record of Decision approving the project.

"The Corps disregarded the Fish and Wildlife Service's repeated calls for formal consultation to ensure compliance with the Endangered Species Act," said **Earthjustice attorney Stu Gillespie**. "Instead of complying with that bedrock

environmental law and making a decision based on the science, the Corps recklessly approved this expensive, ineffective and destructive project."

The Yazoo Pumps would drain tens of thousands of acres of ecologically rich wetlands that support over 450 species of fish and wildlife, including several federally listed species such as the endangered pondberry. The pondberry is a key indicator of wetland health and land clearing and drainage activities have reduced its territory to bottomland hardwood forests of the Mississippi River's alluvial valley.

"The Corps' unlawful defiance of science at the expense of this globally significant area will not be tolerated," said **Jill Mastrototaro, Audubon Mississippi's Policy Director**. "The Pumps will degrade at least 39,000 acres of wetlands and over 80 percent of the Yazoo Backwater Area will continue to flood – clearly this a bad deal for birds, wildlife and local communities."

The Yazoo Pumps project would involve construction of a 14,000 cubic feet per second pumping plant in the Yazoo Backwater Area to drain water, primarily from low-lying agricultural lands, during certain types of flood events to facilitate increased agricultural production on those lands. Although authorized by Congress in 1941 to theoretically provide flood control, in 2007 the Corps admitted that 80 percent of the project's benefits would be for agriculture.

Instead of the ineffective, antiquated Pumps, the conservation groups are calling for commonsense solutions to reduce flood risk using natural infrastructure and non-structural approaches that can help protect people's lives, property and livelihoods. These available measures include elevating homes and roads, and paying farmers to restore cropland back to wetlands. (See: Alternative Flood Relief Solutions to the Yazoo Pumps)

####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
PO Box 2026
Ridgeland, MS 39158
http://ms.audubon.org/

Message

From: Daguillard, Robert [Daguillard.Robert@epa.gov]
Sent: 2/24/2021 2:09:22 PM
To: Andrew Whitehurst [andrew@healthygulf.org]
Subject: RE: Inquiry to Public Affairs - open email address to use for member letters to EPA

Good morning Andrew

Yes, I've forwarded your inquiry to our Southeast regional office in Atlanta. They're your point of contact.

Thanks, R.

Robert Daguillard
Public Affairs Officer
U.S. Environmental Protection Agency
Washington, DC
+1 (202) 564-6618 (o)
+1 (202) 360-0476 (m)

From: Andrew Whitehurst <andrew@healthygulf.org>
Sent: Tuesday, February 23, 2021 6:01 PM
To: Daguillard, Robert <Daguillard.Robert@epa.gov>
Subject: Re: Inquiry to Public Affairs - open email address to use for member letters to EPA

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Andrew

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> Best, R.
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> **Robert Daguillard**
> **Public Affairs Officer**
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> **U.S. Environmental Protection Agency**
> **Washington, DC**
> **+1 (202) 564-6618 (o)**
> **+1 (202) 360-0476 (m)**
>
> ---
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> **From:** Andrew Whitehurst <andrew@healthygulf.org>
> **Sent:** Friday, February 19, 2021 12:29 PM

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Andrew Whitehurst

Healthy Gulf

Madison, Ms.

--

Andrew Whitehurst

Water Program Director

601 954 7236 (Cell)

P.O. Box 582
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Protect What You Love

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Message

From: Andrew Whitehurst [andrew@healthygulf.org]
Sent: 3/1/2021 3:55:27 PM
To: Jenkins, Brandi [Jenkins.Brandi@epa.gov]
Subject: Re: FW: Inquiry to Public Affairs - open email address to use for member letters to EPA

Thanks for writing Brandi. Could you let me know something one way or another this week, Mar1-5?
Andrew

On Fri, Feb 26, 2021 at 6:48 PM Jenkins, Brandi <Jenkins.Brandi@epa.gov> wrote:

Good evening Mr. Whitehurst,

Thank you for your email. We have received your request and are looking at the information you have provided.

Thank you,

Brandi Jenkins, Director

Outreach and External Engagement Office

U.S. Environmental Protection Agency – Region 4

404-562-9124 (office)

678-575-2148 (cell)

Twitter: @EPASoutheast

Facebook: U.S. EPA Southeast Region

Webpage: EPA Region 4 (Southeast Region)

From: Daguillard, Robert <Daguillard.Robert@epa.gov>
Sent: Wednesday, February 24, 2021 9:09 AM

To: Andrew Whitehurst <andrew@healthygulf.org>
Subject: RE: Inquiry to Public Affairs - open email address to use for member letters to EPA

Good morning Andrew

Yes, I've forwarded your inquiry to our Southeast regional office in Atlanta. They're your point of contact.

Thanks, R.

Robert Daguillard
Public Affairs Officer

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Message

From: Jenkins, Brandi [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9B3EA7AACD1A44C0AB3EE9A8F0A2EA3F-JENKINS, BRANDI]
Sent: 2/27/2021 12:48:11 AM
To: Andrew Whitehurst [andrew@healthygulf.org]
CC: Grantham, Nancy [Grantham.Nancy@epa.gov]
Subject: FW: Inquiry to Public Affairs - open email address to use for member letters to EPA

Good evening Mr. Whitehurst,

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Message

From: Palmer, Leif [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D43408D25CF047A8B43AEC713A5EE837-PALMER, LEIF]
Sent: 2/10/2021 10:15:23 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Subject: RE: Yazoo Notice of Intent Filed on ESA

Thank you Jill. I'll pass this along.

Hope you are safe – cheers,

Leif Palmer
Regional Counsel
US EPA Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303
(404) 562-9542
(770) 856-2876 (cell)

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Wednesday, February 10, 2021 5:11 PM
To: Palmer, Leif <Palmer.Leif@epa.gov>
Subject: Yazoo Notice of Intent Filed on ESA

Hello Mr. Palmer,

I wanted to let you know that yesterday Audubon and partners filed a 60-day NOI to challenge the Yazoo Pumps' compliance with ESA. Our press release is below and NOI is attached.

I hope you are doing well and staying healthy.

Kind regards,
Jill Mastrototaro

FOR IMMEDIATE RELEASE
February 9, 2021

CONTACTS
Stu Gillespie | Earthjustice | (303) 996-9616 | sgillespie@earthjustice.org
Jill Mastrototaro | Audubon Mississippi | (504) 481-3659 | jill.mastrototaro@audubon.org
Olivia Dorothy | American Rivers | (217) 390-3658 | odorothy@americanrivers.org
Andrew Whitehurst | Healthy Gulf | (601) 954-7236 | andrew@healthygulf.org
Louie Miller | Mississippi Sierra Club | (601) 624-3503 | louie.miller@sierraclub.org

Conservation Groups Threaten Lawsuit over Endangered Species Act Violations

Notice filed challenges Corps' approval of Yazoo Pumps

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The George W. Bush Administration's Environmental Protection Agency (EPA) stopped the destructive project citing unacceptable damage to some of the nation's richest wetland and water resources. In recent months, the Trump Administration hastily revived the Yazoo Pumps by illegally revoking EPA's long-standing veto. This effort included an attempt to sidestep the Endangered Species Act (ESA) by claiming that the project would not likely adversely affect the pondberry, a wetland plant federally listed as endangered.

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####

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
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Sent: 1/11/2021 9:57:20 PM
To: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]; Walker, Mary [walker.mary@epa.gov]; Ashbee, Blake [ashbee.blake@epa.gov]
Subject: RE: Conservation Orgs Letter on Yazoo Pumps Final SEIS

Hello Ms. Mastrototaro – I'm confirming receipt of your email.

Thank you,

Leif Palmer
Regional Counsel
US EPA Region 4
61 Forsyth Street SW
Atlanta, Georgia 30303
(404) 562-9542
(770) 856-2876 (cell)

From: Mastrototaro, Jill <Jill.Mastrototaro@audubon.org>
Sent: Monday, January 11, 2021 4:52 PM
To: Walker, Mary <walker.mary@epa.gov>; Palmer, Leif <Palmer.Leif@epa.gov>; Ashbee, Blake <ashbee.blake@epa.gov>
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS

Good Afternoon, Administrator Walker, Mr. Palmer, and Mr. Ashbee,

On behalf of American Rivers, Healthy Gulf, National Audubon Society, Sierra Club, Sierra Club Mississippi, and Audubon Mississippi, please find attached our comments with two supporting documents on the Final Draft Supplement No. 2 To The 1982 Yazoo Area Pump Project Final Environmental Impact Statement (FSEIS).

Please confirm receipt of this email.

Thank you,

Jill

Jill Mastrototaro
Policy Director
504.481.3659

Audubon Mississippi
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Message

From: Mastrototaro, Jill [Jill.Mastrototaro@audubon.org]
Sent: 1/11/2021 9:51:49 PM
To: Walker, Mary [walker.mary@epa.gov]; Palmer, Leif [Palmer.Leif@epa.gov]; Ashbee, Blake [ashbee.blake@epa.gov]
Subject: Conservation Orgs Letter on Yazoo Pumps Final SEIS
Attachments: Conservation Organization Comments on Final SEIS_Yazoo Pumps_Final with attachments_01-11-21.pdf; EPA_FOIA_FinalEMAPSubmittal.xlsx; EPA_FOIA_pt5out.xlsx

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Message

From: Abigail Dillen [adillen@earthjustice.org]
Sent: 12/1/2021 10:41:02 PM
To: Regan, Michael [Regan.Michael@epa.gov]
Subject: Thank you on behalf of Earthjustice and our clients
Attachments: AdministratorRegan_AbigailDillen.pdf

Dear Administrator Regan,

Attached is a letter conveying our very deep appreciation for the actions that you and your staff have taken to prevent enormous threatened harm from the proposed Yazoo Pumps project.

Thank you for all you are doing to advance the mission of the Environmental Protection Agency.

All my best,

Abbie

Abigail Dillen
President
50 California Street, Suite 500
San Francisco, CA 94111
415-217-2000

earthjustice.org

EARTHJUSTICE

The information contained in this email message may be privileged, confidential and protected from disclosure.
If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.
If you think that you have received this email message in error, please notify the sender by reply email and delete the message and any attachments.

EARTHJUSTICE
BECAUSE THE EARTH NEEDS A GOOD LAWYER

December 1, 2021 [sent via email]

Mr. Michael S. Regan
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

On behalf of Earthjustice and our clients American Rivers, National Audubon Society, Sierra Club, and Healthy Gulf, we write to thank you for reinstating the 2008 Clean Water Act 404(c) veto of the Yazoo Backwater Pumping Plant ("Yazoo Pumps"). EPA's decision demonstrates its commitment to upholding the law while prioritizing solutions to deliver effective flood relief for vulnerable local communities and to protect the region's wetlands.

By withdrawing its November 2020 letter and reasserting its previous veto, EPA has signaled that it will uphold the Clean Water Act and follow the recommendations of career scientists who were silenced during the Trump Administration. EPA's decision also reflects the input of more than 230 conservation groups, social justice organizations, and scientific professionals who delivered comments opposing the Yazoo Pumps during the federal government's attempt to revive it in 2020.

We also laud EPA's work to partner with the Council on Environmental Quality to convene other federal agencies to provide prompt, effective non-structural and nature-based flood solutions for vulnerable backwater communities while benefiting birds and other wildlife. As our clients outlined in the Resilience Alternative, this path will be help redress systemic environmental injustices while protecting the region's globally significant wetlands and strengthening the nation's resilience to climate change.

Earthjustice and I sincerely appreciate EPA's decision in this matter.

Sincerely,

Abigail Dillen
President
adillen@earthjustice.org