

**ATTACHMENT 6D**

**RESPONSES TO 2000 DRAFT REPORT  
E-MAIL CORRESPONDENCE**

# YAZOO BACKWATER AREA REFORMULATION

## APPENDIX 5 COORDINATION

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#### INTRODUCTION

The following comments were consolidated and summarized from individual e-mail correspondence received after the Yazoo Backwater Reformulation draft report release. This attachment contains the U.S. Army Corps of Engineers, Vicksburg District, official response to the issues raised.

1. Comment: Drain and damage 200,000 acres of wetlands, two times the number of acres destroyed each year across the country by all public and private projects combined.

Response: Independent estimates made by the Vicksburg District and the Environmental Protection Agency (EPA) for the final report both place the total wetland resources in the project area at approximately 200,000 acres (Vicksburg District 189,000 and EPA 212,000). The Vicksburg District estimate only includes wetlands sustained by backwater flooding, while the EPA estimate includes wetlands sustained by either precipitation or flooding. This total extent of wetlands will not be impacted by the project. Using conservative estimates, assuming that the wetlands are only sustained by backwater flooding (rather than other sources of hydrology) indicates that 26,300 acres of wetlands could be impacted and may lose wetland characteristics, while 40,700 acres of wetlands could be impacted by changed hydrology, but retain wetland characteristics. The baseline wetland functional capacity is 885,300 functional capacity units (FCU), and the net functional loss is 14,200 FCUs. This loss represents 1.6 percent of the baseline functional capacity. The functions performed by these impacted wetlands will be offset by 3,858 acres of reforestation, part of the total 55,600 acres of reforestation of cropland within the 1- and 2-year flood plain.

2. Comment: Not make a single home free from flooding.

Response: There are approximately 1,300 homes that are impacted under existing conditions by a 100-year frequency flood. With implementation of the proposed Yazoo Backwater Area Project, approximately 800 of these homes would be free from flooding by the 100-year event. The project would also reduce the damages and duration of flooding for the remaining structures.

Flooding impacts even those residents whose homes have not flooded in the past. Residents contend with significant flooding of roads and bridges and other appurtenances in the study area. Flooding of transportation facilities in the area disrupts educational activities, access by emergency vehicles, access to doctor and dental offices by area residents, purchasing food to maintain proper nutrition, as well as creating other problems for area residents in their daily lives. Health, safety, and welfare of area residents were primary factors in developing the recommended alternative. This proposed project would help to alleviate much of the hardship of flooding in the study area.

3. Comment: Promote increased pesticide and fertilizer use in a region already plagued by toxic contamination.

Response: Reforestation of up to 55,600 acres of cropland will reduce erosion and nonpoint source runoff of sediment, pesticides (DDT and toxaphene), and fertilizers into study area streams. As these lands are converted to forest lands, applications of current use pesticides and fertilizers will also be reduced. In addition, the Hydrogeomorphic (HGM) wetland functional analysis shows that reforestation of frequently flooded land should increase the removal of these agricultural chemicals from floodwaters. The U.S. Department of Agriculture (USDA) and EPA report that fertilizer and pesticide use has not increased over the past 20 years, but has remained constant. The trend has been toward pesticides that are less toxic and less persistent in the environment than the organochlorine pesticides, DDT and toxaphene. The Vicksburg District does not believe the flood protection provided by the recommended alternative will alter current land use such that additional acres of existing forest will be cleared. Preproject forested acres will remain forested, and agricultural acres should remain in agriculture or be converted to forests. Existing agriculture land that is not reforested will continue to export sediment and other agricultural chemicals into study area water bodies at current rates. Overall, reforestation will reduce future pesticide and fertilizer use and will reduce the amount of these materials entering study area waters through erosion processes.

4. Comment: Waste millions of tax dollars to increase agricultural production when the Federal government is spending billions on farm subsidies and on taking excess and sensitive croplands out of production.

Response: If implemented, the project will reforest up to 55,600 acres of agricultural land, removing these acres from production and helping to reduce the surplus of acres currently in crop production. Project implementation would reduce the amount of agricultural land in the Yazoo Backwater Area, not increase. In the case of the Yazoo Backwater Area, the proposed project would not change the extent of the 1-year frequency flood. Therefore, the agricultural benefits associated with this project would be limited to adjusting to modern farming practices (planting earlier in the growing season), thereby increasing yields on the remaining cropland.

5. Comment: I strongly urge that this wasteful project that only benefits a handful of people be dropped.

Response: The purpose of this report is to identify and recommend water resource solutions that ensure the most cost-effective and least environmentally impacting alternatives for the Nation. This process is documented throughout the document and recommends a project that returns \$1.40 for every dollar invested. The number of people impacted by flooding in the Yazoo Backwater Project Area is important, but is not utilized in determining the benefit-cost ratio of the project. Our purpose with this document was to follow the guidance given by Congress in addressing the flood control needs of the Yazoo Backwater Project Area.

6. Comment: The pumps would destroy some of the best remaining forest along the lower Mississippi River, which provide habitat for bald eagles, alligator, bobcat, deer, and the threatened Louisiana black bear.

Response. The Vicksburg District acknowledges the view presented by the comment. The project could potentially change the wetland status on 26,300 acres. Of these, 10,700 acres are in public control and are protected. Private timber and wildlife management concerns own 5,000 acres and have provided the local sponsor with letters stating they will not convert these lands. The remaining 1,000 acres of forested wetlands affected by the project are in small, scattered blocks. The Vicksburg District completed formal consultation with FWS regarding the endangered plant pondberry and informal consultation on the threatened Louisiana black bear. The FWS concurred with the Vicksburg District determination that the project is not likely to adversely affect the threatened Louisiana black bear. The FWS did not concur that the project was not likely to adversely affect pondberry. However, FWS determined the project will not jeopardize the continued existence of the endangered plant pondberry. The Vicksburg District, in consultation with FWS, will also implement conservation and recovery measures, which include establishing two new pondberry populations and additional research in support of the pondberry recovery plan.

7. Comment: The project threatens highly productive freshwater lakes and swamps that support a burgeoning hunting, fishing and ecotourism industry.

Response. The project does not threaten highly productive freshwater lakes and swamps. Operation of the pump station would reduce water levels in 121 acres of backwater lakes in the 2-year frequency flood plain. This represents 1.4 percent of backwater lake acreage within the base 2-year frequency flood plain. This effect assumes that backwater flooding is the sole source of water to maintain these lakes, and that the 51 inches of annual precipitation has no role in maintaining lake levels. The pump station is designed for a nominal pump-on elevation of 87.0 feet, NGVD (1-year frequency flood at the Steele Bayou structure). At this elevation, 216,000 acres would be flooded. The reforestation of up to 55,600 acres of agricultural land will increase the available resources for hunting, fishing, and ecotourism while providing an additional source of nutrients to sustain the productivity within the lakes and swamps.

8. Comment: The pumps would also establish a dangerous precedent for the Nation's flood control policy by draining wetlands, not to save homes and lives, but so that agribusiness can intensify production. It is no wonder that Secretary of the Interior, Bruce Babbitt, called the Yazoo Pumps "a cockamamie project."

Response: Plan formulation for the proposed project fully meets the intent of EO 11988 on Floodplain Management. The Vicksburg District has considered a range of alternatives to avoid adverse impacts in the flood plain. At elevation 87 feet, NGVD, the size of the 1-year flood plain and its resources will not be affected. By raising the pump-on elevation from 80.0 to 87.0 feet, NGVD, the recommended plan avoids adverse effects to terrestrial, wetland, waterfowl, and aquatic resources on approximately 216,000 acres.

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9. Comment: Mississippi cannot afford to lose any more wildlife and have more species go extinct for useless reasons. Also, there are many health considerations.

Response: Separate habitat-based analyses for waterfowl, wetland, terrestrial, and aquatic resources have documented both positive and negative impacts to the environment from the recommended plan. These studies showed that terrestrial resources would increase 11.2 percent, wetland resources would increase 19.5 percent, waterfowl resources would increase 52.8 percent, aquatic rearing resources would increase 8.0 percent, and aquatic spawning resources would increase 30.3 percent.

There are many health considerations from long duration floods as were demonstrated during the 1993 floods in the Upper Mississippi River Basin and the 1991 flood in the Upper Yazoo Basin. Many municipal water and wastewater treatment facilities in Iowa were flooded in 1993, and it took several months to get them back in service. This created both immediate and long-term health risks. The 1991 headwater flood in the upper Mississippi Delta created different health risks. Several communities in the upper Yazoo Basin were protected by ring levees, which lessened damage. These communities were largely unsewered. The floodwaters outside the ring levees raised ground-water levels to the ground surface or above and rendered their septic systems unusable, which created a health risk to the communities. Flood protection provides the only means to reduce the health risks associated with flooding.

The Yazoo Backwater project will not increase sediment, pesticide, or nutrient loading within the study area. The same water will be discharged into the Yazoo and Mississippi Rivers--only the timing of the discharge will change. The Vicksburg District carefully evaluated the settling capacity of backwater areas and found that the flood duration reduction benefits of the project would not interfere with the duration needed to assure adequate settling of sediments of the water column. The nonstructural flood protection component, reforestation, will reduce erosion and the nonpoint source runoff of sediment and the agricultural chemicals attached to those sediments (i.e., pesticide and nutrients). In addition, reforestation of frequently flooded lands will improve the wetland functions associated with sediment, pesticide, and nutrient removal on those lands. Overall, the project should reduce the amount of agricultural chemicals and sediment entering the Yazoo and Mississippi Rivers. Citizen concerns about pesticide concentration in the study area were addressed in Appendix 16.

The Vicksburg District completed formal consultation with FWS regarding the endangered plant pondberry and informal consultation on the threatened Louisiana black bear. The FWS concurred with the Vicksburg District determination that the project is not likely to adversely affect the threatened Louisiana black bear. The FWS did not concur that the project was not likely to adversely affect pondberry. However, FWS determined that the project will not jeopardize the continued existence of the endangered plant pondberry. The Vicksburg District, in consultation with FWS, will also implement conservation and recovery measures, which include establishing two new pondberry populations and additional research in support of the pondberry recovery plan.

10. Comment: This is a tremendously wasteful project, which only benefits a few people. It is an outrage that the Corps is advocating taking my money and using it for this unacceptable boondoggle.

Response: The Vicksburg District acknowledges the view presented by the comment. See response 5.

11. Comment: This wasteful project would benefit only a handful of people at tremendous expense to taxpayers and the environment. Taxpayers for Common Sense called the plan, at upwards of \$181 million, a "giant make-work project."

Response: The Vicksburg District acknowledges the view presented by the comment. See response 5.