

VICKSBURG DISTRICT AND JAYMAC CONSULTANTS
REVIEW OF EERI

1. In addition to the Shabman Plan for the Yazoo Backwater Area, the Environmental Protection Agency (EPA) submitted another plan to be considered for the area. This plan was submitted to the U.S. Army Corps of Engineers, Vicksburg District, after the release of the draft report in September 2000. It will be discussed in the following paragraphs as part of the final report. The plan was entitled "The Lower Yazoo River Basin Economic and Environmental Initiative." The following "Introduction, Goals, Benefits, and the Initiative" paragraphs are from the EPA document (see paragraphs 2 and 3). To accomplish this initiative, EPA outlined three priorities. These are shown with the Vicksburg District response following each priority.

INTRODUCTION

2. The "Lower Yazoo River Basin Economic and Environmental Restoration Initiative" outlines a strategy for public investments to be used in accomplishing some of the goals and recommendations established by an interagency task force and broad group of stakeholders in the report, "Delta Vision, Delta Voices: The Mississippi Delta Beyond 2000." This Initiative includes new approaches for environmental restoration, as well as approaches for strengthening the economy through expanding markets such as commercial forestry and outdoor recreation businesses. This strategy for the Lower Yazoo River Basin combines components for public health and safety, flood plain reforestation, and community economic development.

a. Goals.

(1) Direct Federal investments in the Lower Yazoo Basin toward a broad range of Delta and Mississippi residents.

(2) Accomplish greater public health protection for all residents of the Basin.

(3) Achieve greater public safety through sustainable flood plain management.

(4) Achieve a great balance between the environment and the economy, both more sustainable and more diversified.

(5) Provide educational and recreational opportunities to Mississippi residents and visitors to the region.

b. Benefits.

(1) Includes investments for programs and on-the-ground projects that will bring greater economic and environmental balance to the region.

(2) Will provide flood protection for structures and roads in the region.

(3) Will lessen the amount of nutrients, sediments, and pesticides entering the waterways within the Yazoo Basin, downstream areas, and the Gulf of Mexico and bring improvements to impaired waterways and the gulf hypoxic zone.

(4) Will build upon other important programs, including nonpoint source pollution abatement, habitat restoration, and landowner assistance programs.

(5) Will help restore habitat for a wide variety of water- and land-dwelling wildlife.

(6) Will raise the awareness of, and protection for, community environmental health.

THE INITIATIVE

3. The following is an outline for an economic and environmental restoration initiative for the Lower Yazoo River Basin--a proposed alternative to the Yazoo Backwater pumping plant project. This initiative was broken down into three priority areas and the associated costs.

Priority 1

4. Priority 1, "Public Safety and Public Health," had three separate parts with the first part being the flood protection of houses, businesses, and roads. The EPA estimates this component to cost approximately \$20 million which would be funded by the Federal Emergency Management Agency (FEMA) with the Vicksburg District performing the work.

5. The Vicksburg District does a great deal of work for FEMA, and this task would be one the Vicksburg District could do for FEMA, but the cost associated with floodproofing/protecting these houses has been estimated by the Vicksburg District to cost considerably more than the costs estimated by EPA. There are approximately 1,576 structures within the 100-year flood plain, with 1,294 being residential structures. The Vicksburg District estimated the cost to raise or floodproof these properties to be in excess of \$94.9 million. The cost to raise the road would add additional costs. The second part of Priority 1 would be for sewage and water infrastructure improvements for disadvantaged communities. The EPA estimates this to cost \$20 million. The EPA stated this would be a U.S. Department of Agriculture (USDA) Rural Development targeted initiative funded through grants in coordination with the EPA revolving fund. The Vicksburg District would suggest this part was underestimated based on costs the Vicksburg District is paying for infrastructure improvements under the Section 592 program in Mississippi. In addition, many of the residential and nonresidential structures are scattered over the entire study area and not in communities.

6. The third part of Priority 1 would be directed toward environmental health. It would include improving awareness and education about water quality, utilizing local and state health agencies, Americorps, and the University of Mississippi. The EPA estimates this part would be funded by them at a cost of \$1 million. The U.S. Geological Survey (USGS) would also fund a Water Quality Assessment Program at a cost of \$6 million, and an environmental health part would be directed toward funding initiatives for children's health. The EPA estimates this would cost \$8 million, with the funding coming from the Federal/State Children's Health Insurance Program. As EPA has indicated, the third part of Priority 1 is not the responsibility of the Vicksburg District. The total cost of the third part of Priority 1 was \$17 million, with a grand total being \$55 million.

Priority 2

7. Priority 2 involved flood plain protection and restoration and community economic development. It includes five parts.

a. Conservation easements from willing sellers on 50,000 to 80,000 acres on the most frequently flooded lands through specially targeted Emergency Wetland Reserve Program (WRP) (Natural Resources Conservation Service (NRCS)/Section 319 (EPA)) initiative. This targeted program would bypass the existing structure, process, and restrictions of WRP and establish a special working group to determine site selection with coequal membership including NRCS, EPA, U.S. Fish and Wildlife Service (FWS), and USGS. The USGS restoration prioritization model developed for the Lower Yazoo would be used for site ranking and selection. The EPA estimated this part to cost \$42 million. This feature is similar to the nonstructural features of several plans carried into the final array. Under the nonstructural features, the Vicksburg District proposed the purchase of perpetual conservation easements from willing sellers and restoration of those lands below the elevation at which a pump station would operate.

b. The EPA does not state whether this initiative would be funded by them or USDA nor does it discuss what happens to the land after the easement is purchased. If similar to WRP, the reforestation costs need to also be included. One would also surmise that to bypass two programs that had previously been authorized by Congress, then Congress would need to address the requirement to bypass the existing rules and regulations. Since the release of this initiative, the Vicksburg District is unaware of any action on the part of EPA to make this happen. Enrollment in WRP has essentially been stopped in the two largest counties in the study area since they have reached the statutory limit under the law.

c. Creation of a new National Wildlife Refuge (NWR) to include a 20,000-acre bottom-land hardwood wetland and deep-water swamp wetland restoration initiative. This project is to assist in meeting objectives of Hypoxia Task Force Plan, approximately 20,000 acres of the most frequently flooded tributary riparian area lands will be targeted for fee-title acquisition. These restorations would maximize wetland plant species diversity, using species endemic to the historical Lower Mississippi Valley bottom-land/swamps, and restore wetland hydrology. Costs to include long-term management by third-party land conservation organizations or Department of the Interior. Restoration will be implemented by the Vicksburg District in cooperation with EPA, USGS (Pearl, Mississippi), and FWS. The EPA estimated this feature to cost \$20 million.

d. The Vicksburg District could certainly be involved, provided funding was made available. However, EPA does not address who will fund the purchase, reforestation, and the annual operation and maintenance (O&M) of this new NWR. Prior to the creation of a new NWR, the Department of Interior or EPA would have to conduct an Environmental Impact Statement (EIS) and draw a boundary line on a map of the land proposed for the refuge. The Vicksburg District is unaware of this being accomplished except for a tract within the Theodore Roosevelt NWR which, when fully implemented, would be approximately 6,600 acres. Review of the Environmental Assessment (EA) for this tract did not indicate it was being acquired as part of this EPA initiative.

e. Landowner assistance, education/technology transfer on sustainable forestry operations and economic development implemented by the U.S. Department of Agriculture Forest Service (USDA FS), private industry, nongovernment organizations. The EPA estimated this to cost \$5 million, but did not address the funding or how the USDA FS or others would undertake these tasks.

f. Assistance to landowners for Best Management Practice (BMP) installation on agricultural lands to be conducted through USDA, EQUIP programs. The EPA estimated this to cost \$5 million and one would assume the funding would come from USDA. However, farmers can already get this assistance if they desire and are willing to cost share with USDA.

g. Development of a model carbon sequestration trading program specific to the Yazoo River Basin; model development coordinated by the Tennessee Valley Authority (TVA) and/or Department of Energy, private and nongovernmental organizations. The EPA estimated this part to cost \$1 million, but does not address how these funds would be appropriated nor does EPA address why a model has to be developed specific to the Yazoo Basin. To date, the Vicksburg District is not aware of any carbon sequestration model being developed by TVA or the Department of Entergy for the Yazoo Basin.

h. The total cost of Priority 2 was estimated to cost \$73 million, with the Vicksburg District being recommended to participate in only the reforestation component of a new refuge. The cost to reforest the 20,000-acre refuge is insignificant; so in essence, the Vicksburg District has no authority to assist in Priority 2.

Priority 3

8. Priority 3 would include economic development through nature-based tourism. It contained several initiatives which are listed below.

a. Establish a National Recreation Area to include the existing complex of refuge and national forest land and the proposed new NWR.

b. Establish a Delta Interpretive Center—within Delta National Forest (NF) or other existing public lands (e.g., NWR lands). The Center would include elevated boardwalks, trail systems, nature center, gift shop, and wide range of interpretive activities and research programs.

c. Develop integrated promotional materials, programs, and activities such as a birdwatching trail system, in the following areas: Delta NF; Panther Swamp NWR; Mahannah, Twin Oaks, Lake George, Anderson Tully, and Shipland Wildlife Management Areas (WMA).

d. In coordination with the Department of Interior and National Forest Service (NFS), and other public and private entities. This Center could be comanaged by a third party such as Audubon Society, patterned after other Audubon Sanctuaries such as Corkscrew Swamp Sanctuary in Florida or Francis Biedler Sanctuary in South Carolina.

e. Community Watershed Assistance Office, within the Interpretive Center, would be staffed by individuals from these organizations/agencies: EPA, nongovernment organizations and/or land trust, Mississippi Museum of Natural Sciences, Mississippi Department of Environmental Quality (MDEQ), or others.

f. Ecotourism Development Office, also within the Interpretive Center, with the mission of creating and expanding ecotourism opportunities in the Yazoo Delta, to include nongovernment organizations and Mississippi Division of Tourism positions. The EPA estimates this part to cost \$40 million, but does not address who will fund.

g. Part 2 of Priority 3 included technical assistance to private landowners for establishing hunting and recreation opportunities, implemented by FWS; Mississippi Department of Wildlife, Fisheries and Parks (MDWFP); and private or nongovernment organizations. The EPA estimates this part to cost \$1 million.

h. Part 3 of Priority 3 included funding for job training in the fields of forest and fish and wildlife management and ecotourism development and business management. The EPA estimated this part to cost \$1 million. Total cost for Priority 3 is \$42 million.

i. While the Vicksburg District has completed a feasibility study for the placement of a multiagency wildlife and environmental interpretive and educational center in the south Delta, this feature was not an initiative of EPA. This center may include portions of Items b and c of Part 1 of Priority 3. However, the remaining initiatives under Priority 3 are not traditional missions of the Vicksburg District and would not be undertaken by the District.

SUMMARY

9. In summary, EPA's Lower Yazoo River Basin Economic and Environmental Restoration Initiative would cost approximately \$170 million. It involves numerous state and Federal agencies, private industry, and nongovernment organizations in programs that are ongoing, but also recommends several new programs that would require congressional authorization and funding.

10. Since the release of EPA's document in September 2000, the Vicksburg District is not aware of any initiative by EPA to go forward with any part of this plan nor have any meetings or discussions with the state and Federal agencies taken place to back their initiative.

11. Due to the fact that EPA has not gone forward with the initiative and that the Vicksburg District has such limited involvement in the implementation of the plan nor does it address the needs of the study area, this plan was dropped from further detailed consideration.



Economic Analysis and Water Resource Planning

215 Santa Anita Drive
Starkville, MS 39759
Phone: 662-324-3862
Cell: 662-312-4553
E-Mail: sandjmcDon@aol.com

March 1, 2006

U.S. Army Engineer District, Vicksburg
ATTN: Mr. Kent Parrish
4155 Clay Street
Vicksburg, Mississippi 39183-3435

Dear Kent,

I have completed comments (Enclosure 1) EPA's "Economic and Environmental Restoration Initiative" for the Lower Yazoo River Basin.

If you have additional comments or questions, please let me know.

Sincerely,

Jesse K. McDonald
President/Senior Economist

Encl

Comments on:
Lower Yazoo River Basin
Economic and Environmental Restoration Initiative

Prepared by:

Jesse K. McDonald
President/Senior Economist
JAYMAC Consultants
215 Santa Anita Drive
Starkville, Mississippi 39759

1. Priority One: Public Safety and Public Health

- a. *Flood protection of structures-houses/business/roads.* In the current economic analysis, several alternatives were analyzed that provided flood protection to houses/business/roads. Alternative 2A provides nonstructural measures for buildings in the 100-year flood plain; i.e., floodproofing all structures damaged by 100-year flood event, Alternative 2B includes 14 ring levees and removing or relocating the remaining structures outside the protected areas of these ring levees.
- b. *Sewer and water infrastructure improvements and Environmental Health.* Although the measures described in these two sections may be in the interest of the residents of the Lower Yazoo River Basin, they are not in the authority of the U.S. Army Corps of Engineers and the Yazoo Backwater Pump Study.

2. Priority Two: Floodplain Protection and Restoration and Community Economic Development

- a. *Conservation Easements from willing sellers on 50,000-80,000 acres on the most frequently-flooded lands through specially targeted Emergency Wetland Reserve Program (NRCS)/Section 319 (EPA) initiatives.* Alternatives analyzed in the current analysis included the land acquisition that ranged from the acquisition of 197,600 acres of agricultural lands between 91 and 100.3 feet, NGVD, through flowage easements (Alternative 2); the purchase of perpetual easements on 124,400 acres of woodlands to be reforested and 81,800 acres of woodlands to prevent any future clearing (Alternative 7); to the acquisition and reforestation/conservation measures on 26,400 acres of agricultural lands through perpetual easements from willing sellers (Alternative 2B). The recommended alternative (Alternative 5) includes the acquisition of conservation easements and reforestation on 55,600 acres of agricultural lands at the lowest elevations.

- b. *Creation of a new National Wildlife Refuge to include a 20,000 acre bottomland hardwood wetland and deep-water swamp wetland restoration initiative; this project is to assist in meeting objectives of Hypoxia Task Force Plan, approximately 20,000 of the most frequently flooded tributary riparian area lands will be targeted for fee-title acquisition.* It is very doubtful, that under existing budget constraints, that any Federal or state agency would be willing or fiscally able, to take on the management and operation of an additional 20,000 acre wildlife refuge.
 - c. *Landowner assistance, education/technology transfer on sustainable forestry operations and economic development implemented by U.S. Forest Service, private industry, non-government organizations.* Even though this may be a useful program for local landowners, it is not in the authority of the current study.
 - d. *Assistance to landowners for best management practice installation on agricultural lands; to be conducted through USDA, EQIP programs.* Even though this may be a useful program for local landowners, it is not in the authority of the current study.
 - e. *Development of a model carbon sequestration trading program specific to the Yazoo River Basin.* Even though markets for carbon sequestration trading seem to exist, specific guidelines on the use of such markets in the evaluation of Federal projects have not been established.
3. Priority Three: Economic Development through Nature Based Tourism
- a. *Establish a National Recreation Area to include the existing complex of refuge and national forest land, and the proposed new National Wildlife Refuge.* The proposed new National Wildlife Refuge has been addressed earlier. Also, as stated earlier, it is highly unlikely that any additional National or state entities can be managed and operated under current budget constraints. In many cases, Federal and state entities are discontinuing or drastically reducing services on existing projects.
 - b. Establish a Delta Interpretative Center within Delta National Forest or other existing public lands. See comments above concerning budget restrictions.
 - c. *Develop integrated promotional materials, programs, and activities, such as bird watching trails.....* These type activities are not within the authority of this study.
 - d. *In coordination with Department of Interior and National Forest Service; other public and private entities.* These type activities are not within the authority of this study.

- e. *Community Watershed Assistance Office.* Probably not sufficient funding in private or state entities to accomplish this task.
- f. *Technical assistance to private landowners for establishing hunting and recreation opportunities.* Again, under current budget constraints, it would probably be very difficult to find an entity that could afford to undertake this task.
- g. *Funding for job training in the fields of forest and fish and wildlife management, and ecotourism development and business management.* These type activities are not within the authority of this study.