

## Yazoo Backwater Notice of Intent Public Comment High-Level Summary

**Document Purpose:** This document provides a high-level summary of the comments received on the notice of intent for the environmental impact statement for the authorized Yazoo Basin, Yazoo Backwater, Mississippi, Project. Not all specific or unique comments have been captured in this summary format. Inquiries for individual comments can be sent to [YazooBackwater@usace.army.mil](mailto:YazooBackwater@usace.army.mil).

**Public Comment Overview:** The public comment period closed on August 7, 2023. A total of 20,952 emails were received along with three mailed letters. The majority of the emails received were form letters as described below.

Few of the comments received were from local community members. Of those comments received from local community members, some supported Preferred Alternative while others preferred a non-structural solution. This document includes a summary of the comments received.

### For Comments:

**Overview:** Three letters in support of the project were received. Local community members sent 12 emails of support.

- Expresses support for the Preferred Alternative.
- Indicates more substantial comments during the public comment period for the draft environmental impact statement will be forthcoming.
- Suggests the Preferred Alternative will reduce flooding on agricultural lands and transportation routes.

Examples of Local Landowner letters –

#### Letter 1

*I am a landowner in Onward, MS and operate 3 businesses in the flood zone and approximately 15 miles north of the proposed pump site. My grandfather cleared our land in 1947 and we have lived, farmed, hunted, and improved those 1450+/- acres now for the last 76 years. My grandfather built and operated the first country grain elevator in Mississippi for many years on the corner of Highway 61 and Blanton Road. We have a long history there and I have managed the land ever since his passing 35 years ago. In 1998 I created another company called South Delta Hunting Club, Inc. in which I lease our homes and land out to hunters on an annual basis. In 2015 I formed another company, Delta Precision Shooting, LLC, which teaches marksmanship to both civilians and military personnel. All 3 companies operate in the Yazoo Backwater zone, and it has been extremely difficult. My property ranges from 84-100' elevation and we deal with varying levels of flooding nearly every year. Like most landowners, I have already turned the land below 87' into bottomland hardwood conservation easements such as CRP or WRP and the remaining land is still farmland. When the backwater rises above 87', my hunting business suffers while the deer and other animals are forced out of their habitat, the duck's food is too far below the surface of the water to eat, my farmland floods which decreases its productivity and value, and the shooting range is flooded which closes the school. In 2019 I suffered approximately \$300,000.00 in lost revenue from this preventable, man-made catastrophe and received a compensation check for \$12 (twelve) dollars from the USDA in return. Thank you for coming together with the multiple other groups*

*and finally pushing this project forward after its initial authorization 82 years ago. Please consider lowering the pumping elevation to 87' and widen the planting window... not to eliminate - but to reduce agricultural losses to a reasonable level. Wildlife and plants will still suffer even at that level, but I know that trying to lower it below 87' will not be politically feasible due to outside interests. This project is desperately needed and has my full support. I will be more than happy to provide you with more information should you request it.*

## Letter 2

*I would like to thank the US Army Corps of Engineers for your commitment and diligence in never giving up on the completion of the Yazoo Backwater Area Water Management Project and the opportunity to submit my comments on the current phase of the project, the Intent to prepare an Environmental Impact Statement.*

*The people of the Lower Mississippi Delta have suffered the consequences of backwater flooding far too long. This project should have been completed decades ago and as a result, homes and property have been destroyed over and over again, loaves have been lost, wildlife has been decimated and the entire area has been denied the opportunity to prosper and fulfill its true potential. The continued flooding has greatly contributed to the majority minority area being one of the poorest in the nation. The travesty that has been perpetrated against these residents is the very reason the Environmental Justice Policy was written. Now it is finally time to do the right thing.*

*I would like to go on the record as supporting the completion of the Yazoo Backwater Area Water Management Project*

## **Neutral Comments:**

Overview: 3 of letters/emails received.

- Support for collaborative efforts moving forward.
- Supports the efforts to fully assess alternatives and impacts in the EIS.
- Recognizes the 2008 veto and recommends fully vetting all alternatives.
- Recognizes failed past projects.
- Recommends the Preferred Alternative not have the impacts of past projects.
- Questions scoping through the process.
- Recommends accounting of ecosystem services as part of the cost/benefit analysis
- Recommends a robust Hydrogeomorphic Approach method for modeling

## **Against Comments:**

Overview: 8 letters/emails received.

- Suggests the Preferred Alternative does not support the local communities, only agricultural special interests.
- Calls for a non-structural alternative.

- Calls for a continuation of the 2008 veto.
- Suggests the 2008 veto is still in effect.
- Questions water management at 90' and 93'.
- Calls for USACE to focus on environmental justice issues as opposed to the project.
- Suggests no or limited impact analysis conducted.
- Suggests no mitigation assessment conducted.
- Questions hydraulic modeling used.
- Suggests not documenting valid hydraulic modeling on downstream communities and considering their impacts.
- Suggests the Preferred Alternative will significantly impact communities and the environment, including complete loss of jurisdictional wetlands.
- Questions pump size.

### **Against Comments – Form Letters:**

Overview: 20,929 emails received. Only 8 emails were from people within the state of Mississippi.

*Example form letters -*

*To U.S. Army Corps of Engineers,*

*I am writing to express my opposition to the Corps' initiating a Supplemental Environmental Impact Statement (EIS) on the wasteful, environmentally destructive drainage project known as the Yazoo Backwater Pumps. Instead of spending more time and taxpayer money on a vetoed project while flood-stricken communities in Mississippi's South Delta continue to suffer, I ask that you prioritize immediate, effective flood relief alternatives. The Corps should advance common sense approaches already employed across the U.S. that can help those impacted recover from recent flooding and manage future flood risk.*

*I oppose the Yazoo Pumps because I care deeply about reducing flood risk for people, the integrity of the Clean Water Act and our country's natural resources.*

*I understand that the Corps' own analysis of the 2019 flooding found that under the best-case scenario, 68 percent of the area would continue to flood even with the Pumps in place. This finding makes it clear that the Pumps are not designed to protect people from flooding, but rather to drain or damage 200,000 acres of wetlands to expand a small number of agribusiness operations.*

*Communities plagued by flooding in the Mississippi Delta deserve smart safeguards that get people and property out of harm's way, not false promises. The Corps should not be sidelining proven alternatives, like buy-outs, flood proofing, and easements, in favor of building the costly, destructive Yazoo Pumps.*

*In 2008, the George W. Bush administration vetoed the project through the Clean Water Act based on the Pumps' environmental impacts. As one of 13 vetoes in the law's history, the decision was supported*

*by tens of thousands of Americans. The administration also raised major concerns about the Pumps' economics and found that less damaging, more affordable alternatives to floodplain management had not been adequately considered. The veto was upheld by a federal judge and affirmed by the 5th Circuit Court of Appeals.*

*Situated in the Mississippi River floodplain, the Clean Water Act veto protected some of the nation's "richest wetland and aquatic resources" in the Big Sunflower River watershed, which includes the Delta National Forest. The area is an important part of the Mississippi River ecosystem and critical stop for migrating birds along the Mississippi River Flyway.*

*Instead of plowing ahead with Yazoo Pumps, I urge you to advance project alternatives that will immediately provide affordable flood risk solutions that will protect people and nature.*

#### I oppose the Yazoo Pumps –

*Dear Mike Renacker, USACE Vicksburg District via [YazooBackwater@usace.army.mil](mailto:YazooBackwater@usace.army.mil) This proposed project is ill advised and in my opinion irresponsible. Rivers are the lifeblood of our world, and the EPA is a protector of our environment. It is irresponsible to go against a veto by the EPA, which uses its veto power only in rare circumstances.*

*I OPPOSE the Corps' proposed action to build Yazoo Pumps. The project is not viable because it was vetoed by the EPA in 2008, will increase flood risk for vulnerable communities, and puts 200,000 acres of globally important wetlands at risk.*

#### Nature Based Solutions –

*Dear U.S. Army Corps of Engineers,*

*As someone who cares deeply about our country's birds, wildlife, and habitats, I am writing to urge you to evaluate and advance a fully nature-based and nonstructural alternative in the Yazoo Backwater Area Water Management Project to provide environmentally sustainable, effective flood mitigation solutions that truly benefit vulnerable communities and birds in the Yazoo Backwater Area.*

*The wetlands in this region are so valuable that the George W. Bush administration vetoed the Yazoo Pumps project in 2008 through the Clean Water Act to protect tens of thousands of acres of nationally important wetlands. That rare and definitive action prohibits the Corps' proposed 25,000 cubic-feet-per-second pump and resulting loss of wetland functions. I oppose this and any version of the Yazoo Pumps.*

*Communities plagued by flooding in the Mississippi Delta deserve smart, effective safeguards that keep people and property out of harm's way, such as elevating homes and roads, and compensating farmers to restore cropland to wetlands. Many local community leaders have asked for these commonsense nature-based and nonstructural solutions that would benefit people and wildlife.*

*I urge the Corps not to build the Yazoo Pumps and instead advance proven, environmentally sustainable nature-based flood risk solutions that will protect local communities and globally important wildlife habitat.*

## Stop Pushing the Pumps –

*Dear Mike Renacker,*

*The state of Mississippi has been unable for six decades to convince Congress that funding the Yazoo Backwater Pump project is in the national interest. We, as a nation, concur that wetlands are beneficial, whether along coasts or in flat agricultural regions. 75% of the wetlands in the Mississippi River floodplain have already been converted to agriculture. Climate change is real and is changing the timing and intensity of rainfall from Minnesota to Louisiana, affecting floods for everyone along the Mississippi River. Nutrient pollution in the river itself is an immense problem that degrades water quality in the river states of the Midwest and causes a dead zone in the Gulf of Mexico every summer. Wetlands store flood waters and sequester nutrients. These are all sound reasons to keep 200,000 acres of wetlands intact in the Yazoo Backwater area.*

*We strongly oppose the Yazoo Pumps because there are better, faster ways to solve flooding. The Corps' own analysis of recent flooding found that under the best-case scenario, 68 percent of the area affected in 2019-2020 would continue to flood with the pumps in place. This finding makes it clear that the pumps are not designed to protect communities from flooding, but rather to drain thousands of acres of wetlands to benefit a small number of agribusiness operations. Pumping water out of the Yazoo backwater sump, over the levees, will add water to the Yazoo and Mississippi Rivers during major floods. People living and working downstream don't need more water, adding stress to Mississippi River levees and floodwalls.*

*In 2008, the George W. Bush administration vetoed the project through the Clean Water Act, based on the pumps' environmental impacts. As one of 13 vetoes in the law's history, the decision was supported by tens of thousands of Americans. The administration also raised major concerns about the Yazoo Pumps' economics and found that less damaging, more affordable alternatives to floodplain management were not considered. The veto was upheld by a federal judge and affirmed by the 5th Circuit Court of Appeals. The Army Corps of Engineers seems determined to avoid honoring the 2008 Clean Water act veto and is dramatically increasing the capacity of the Yazoo Pump project.*

*Communities plagued by flooding in the Mississippi Delta deserve smart safeguards that get people and property out of harm's way such as elevating homes and roads, and compensating farmers to restore cropland back to wetlands. The Corps should not be sidelining these proven alternatives, in favor of building the costly, destructive Yazoo Pumps.*

*Therefore we urge you to advance immediate, affordable flood risk solutions that will solve flooding for all local communities, and fall more in line with the broader, national interest.*

## Oppose the Ineffective, Destructive Yazoo Pumps

*Dear Colonel Klein,*

*I am writing to express my strong opposition to the U.S. Army Corps of Engineers (Corps) renewed effort to construct the environmentally devastating agricultural drainage project known as the Yazoo Pumps.*

*I ask that you abandon the 2023 plan and take all variations of the Yazoo Pumps off the table once and for all, and instead prioritize effective nature-based and nonstructural flood solutions that truly benefit vulnerable communities and birds.*

*The Yazoo Pumps would be so harmful that the George W. Bush administration vetoed the project in 2008 through the Clean Water Act to protect tens of thousands of acres of nationally important wetlands. It is appalling that the Corps is now proposing a 78% larger Pump that would be the largest hydraulic pump in the world.*

*The Corps' own studies show that the Pumps will not protect communities from flooding--under the Corps' last Pumps plan, 83% of the lands that flooded in 2019 would still have been underwater with the Pumps operating. Indeed, the Corps admits that 80% of the Pumps' benefits come from draining wetlands so agribusiness can make more money. In fact, the 2023 proposal ties operation of the Pumps solely to planting seasons while 19 billion gallons of water a day would be pushed onto highly vulnerable downstream communities.*

*Communities plagued by flooding in the Mississippi Delta deserve smart safeguards that keep people and property out of harm's way, such as elevating homes and roads, and compensating farmers to restore cropland to wetlands. Many local community leaders have asked for these commonsense nature-based and nonstructural solutions that would benefit people and wildlife.*

*I urge the Corps to stop its misguided efforts to build this--or any--version of the Yazoo Pumps and, instead, work to advance proven, environmentally sustainable flood risk solutions that will protect local communities and globally important wildlife habitats.*