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U.S. Fish and Wildlife Perspective on The Corps of Engineers' Proposed Yazoo Pumps Project

The proposed Yazoo Pumps Project Area comprises a significant portion of the historic Mississippi River floodplain within the State of Mississippi. Because the lands within that area are the lowest and wettest in the Yazoo River Basin, it is a haven for migratory birds, flood plain fisheries and wildlife that thrive in wetlands. The project area is also renowned for excellent deer and waterfowl hunting that is enjoyed by sportsmen and women from around the state and the nation.

More than half of the project area is subject to the "two-year flood," meaning that there is a 50 percent chance that more than 329,000 acres in this area would be flooded during any given year. The Yazoo Backwater Area, which historically functioned as a natural flood-water storage area for the Mississippi and Yazoo rivers, has been isolated from those rivers by a complex levee system. The Yazoo Pumps Project proposed by the U.S. Army Corps of Engineers involves a \$181 million structural approach to draining interior waters that are im ed by those levees during high stages on the Mississippi River.

Agriculture and Wetlands Restoration

While much of the Mississippi Delta supports a thriving agriculture, at tempts to farm the wettest portions of the Yazoo Backwater Area have met with limited success, and are locally known as "lands that should never have been cleared." Despite the tremendous amount of structural flood control and drainage already in place, more than 50,000 acres of high-risk, cleared land have been restored to wetlands since 1985 within the Yazoo Backwater Area.

Of that amount, farmers have restored more than 33,000 acres of privately owned cropland to forested wetlands and other flood-compatible uses. This private landowner-driven trend has occurred with the full cooperation of the U.S. Fish

and Wildlife Service, the Department of Agriculture, and other government agencies. Together, we have replanted oaks, cypress and other hardwood species to help restore wetlands that were lost due to federal flood control and drainage policies dating back to the 1930s that favored agricultural development over wetlands conservation. These outdated policies have resulted in a loss of nearly 1 of every 2 of the Delta's life-sustaining and life-preserving natural wetlands. Federal and state government agen cies are now spending nearly \$8 billion to reverse the damage from similar policies that resulted in the drainage of the Florida Everglades.

Yazoo Backwater Area Reformulation Study

In September 2000, the U.S. Army Corps of Engineers released a 2,000-page document containing their recommended drainage plan for the Yazoo Backwater Area, a plan that is essentially no different than the one first authorized in 1941, some 60 years ago. While the Corps' current proposal recommends the reforestation of 62,500 acres as a "nonstructural approach" to agricultural drainage, the Service's analyses show that this feature is both inadequate and infeasible. We do not believe it can be implemented.

In fact, we believe the Corps' proposed project could ultimately reverse the current landowner-driven wetland restoration trend and move land uses in the Yazoo Backwater Area backward in time by increasing drainage for agriculture, in this instance, to benefit a relatively few landowners. As a consequence, the Corps' recommended plan could result in the trade-off of nationally significant fish and wildlife resources in the name of further agricultural drainage within an area where agriculture has already proven to be a high-risk endeavor at best.

The U.S. Fish and Wildlife Service cannot support the Corps' plan as it is currently proposed. The proposal appears to follow the flood control and drainage policies of the past rather than the current policies and directives for a balanced structural/non-structural approach. The Service does not believe this is the solution to the complex economic and environmental problems confronting the Delta today. Accordingly, the Service's objections to the Yazoo pumps project can be summed up as follows:

The project, as proposed, does not represent a balanced approach to meet present and future economic and environmental needs in the Mississippi Delta.



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Specifically, it:

- does not exercise wise use and development of the nation's floodplains

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- has environmental features that are neither viable nor sustainable
- does not provide solutions to the project area's problems and opportunities
- will not increase economic and environmental sustainability within the Delta, and
- fails to meet policy, procedural and technical requirements of key national environmental legislation.

Service Recommendations

Instead, we support an alternative approach for the Yazoo Backwater Area that will balance agricultural development with flood plain restoration. Such an alternative could incorporate both a structural and a nonstructural approach. The Service recommends that the Corps' plan for the Yazoo Backwater Area be revised to incorporate the following:

- An area specifically targeted for nonstructural flood control that is clearly defined and accurately mapped.
- A clear statement of policy by the Corps that the intent of the project is not to drain, but rather to restore the area designated for nonstructural flood control.
- Floodplain restoration as an explicitly stated project purpose.

On behalf of the people of Mississippi and the nation, to whom we are responsible for conserving healthy ecosystems for fish, wildlife and people, we stand ready to assist and support the Corps in achieving a balanced and sustainable solution in the Yazoo Backwater Area.

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