

Wildlife Management Institute

Donald F. McKenzie, *Field Representative*

2396 Cocklebur Road, Ward, AR 72176

Phone (501)941-7994; FAX (501)941-7995

wmidm@ipa.net

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Colonel Dan W. Krueger
Memphis District Corps of Engineers
ATTN: CEMVM-PD-R
167 North Main Street
Room B-202
Memphis, TN 38103-1894

Dear Colonel Krueger:

The Wildlife Management Institute (WMI) appreciates this opportunity to provide comments on the Final Environmental Impact Statement (FEIS) for the Grand Prairie Area Demonstration Project (GPADP). These comments supplement our September 21, 1998 comments on the Draft Environmental Impact Statement. The Institute is a non-profit conservation organization, staffed by professional natural resource managers, that has been dedicated since 1911 to the restoration and improved management of wildlife and related natural resources.

Although several improvements around the edges of the project plan are recognizable, WMI believes the GPADP still constitutes unsound public policy. The project simply is a shortsighted and expensive band-aid for the symptoms of a much larger societal problem--how to equitably share and sustainably manage the finite public water resources of eastern Arkansas. WMI further believes the Demonstration Project is based on flawed assumptions, relies too heavily on unacceptable conservation trade-offs, and will be ultimately unsuccessful at its number one objective--"protect and preserve the alluvial aquifer." In sum, WMI is opposed to the Grand Prairie Area Demonstration Project, even as modified in the FEIS.

The GPADP constitutes unsound public policy.

WMI believes the entire challenge of irrigation water availability and allocation has been addressed *backwards* from the beginning. The agriculture community is responsible for depleting the alluvial aquifer, by the combined acts of draining away the Delta's surface water (the sources of aquifer recharge) and pumping from the aquifer at unsustainable rates. Yet, the GPADP demands that the people of Arkansas and the U.S.

bear the burden of paying--with public tax dollars and with yet another compromised water resource--for the actions of the agriculture community. WMI rejects this premise as inappropriate.

WMI believes that the agriculture community should shoulder most of the burden and the costs of solving the problems in ways that infringe no further on the natural resources that belong to all the people of Arkansas.

The GPADP also is based on the erroneous assumption that farmers are unquestionably entitled to and must be provided indefinitely an uninterrupted flow of water for irrigation. WMI disputes that assumption, and asserts that any solution to this difficult challenge of water allocation must *begin* with serious efforts to reduce the agricultural withdrawals of ground and surface waters. No such serious effort has even been made in Arkansas. Instead, farmers, the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS), the Arkansas Soil and Water Conservation Commission (ASWCC) and the U.S. Army Corps of Engineers (Corps) have collectively demonstrated the lack of resolve to manage the alluvial aquifer responsibly. When that resource was depleted, these same entities have simply turned to the next water resource, the White River ecosystem, as if expecting to have the same free rein with it.

WMI contends that any expensive structural project that would tap and compromise yet another public water resource is premature and inappropriate, and should be withdrawn until all nonstructural options are attempted and exhausted.

The GPADP is a \$270 million big-government subsidy that apparently would serve *at most* only about 1,000 farmer landowners. Ironically, it is a largely unwanted project that is being thrust on the majority by the minority. Substantially less than 50% of the affected landowners (those who stand to benefit) want the project, even after years of planning and debate. If the needed 51% of landowners do finally agree to the project, the GPADP subsidy amounts to more than one-half million dollars per interested farmer, or one-quarter million dollars per affected farmer. It might be easier to simply *give* each interested farmer \$500,000 to build reservoirs to solve his water problems on his own, with the stipulation that the groundwater, the White River and its tributaries, and the remaining wetlands be left alone.

Even after 60 years of supply management by the U.S. Department of Agriculture and five years of "Freedom to Farm," the nation's farm economy continues to struggle with perennial commodity surpluses and low prices. Some 35 million acres of unneeded cropland in this country currently are being retired by USDA in programs originally intended to manage supplies, including surpluses of rice. Today in Arkansas, tens of thousands of acres of surplus, marginal cropland are on the waiting list for enrollment in the Wetlands Reserve Program. This waiting list exists because our nation's and our state's excessive agricultural production capacities make it unprofitable for many farmers to continue production.

Given the reality of surplus commodities, surplus cropland and low commodity prices, WMI believes it is illogical and unjustifiable to spend \$270 million of tax money to subsidize the perpetuation of surplus commodity production, especially in a way that further compromises the White River ecosystem.

The alluvial aquifer is likely to be depleted, regardless.

Despite that the very first project objective is to "protect and preserve the alluvial aquifer," the GPADP contains no protections whatsoever for the aquifer. As long as wells and pumps are in place, as long as there are no restrictions against pumping, and as long as there is water to pump, WMI is convinced that farmers will continue to pump. The lack of acknowledgement of the need for pumping restrictions seems almost designed to ensure that the project fails to meet its primary objective of protecting the aquifer. WMI thinks it makes only good sense to deal with a problem before it becomes a genuine crisis. There should be little doubt that regulation of groundwater and surface water withdrawals are inevitable *regardless* of whether the GPADP is implemented. For \$270 million, farmers ought to be expected and willing to make some sacrifices.

WMI urges that farmers, the Arkansas Soil and Water Conservation Commission and all public stakeholders immediately initiate a constructive and inclusive process leading to fair, reasonable and effective restrictions to reduce groundwater pumping to sustainable levels.

Environmental trade-offs are unacceptable.

The GPADP plan trumpets 38,000 acres of flooded harvested ricefields as a waterfowl habitat benefit, in exchange for some expected conversions of natural wetland habitats. However, in WMI's opinion, this projected benefit diminishes in value when placed in context. First, the proposed 38,000 acres depends solely on the willingness of landowners in the project area to volunteer to provide them. Second, well over 200,000 acres of privately owned, harvested rice fields in the Delta region of Arkansas already are under winter water management. Most of these fields are under agreements with the Arkansas Game & Fish Commission, Ducks Unlimited or the U.S. Fish and Wildlife Service. This acreage already meets the acreage objective for the state for this habitat type under the North American Waterfowl Management Plan, even without the addition of any acreage from the GPADP.

Third, flooded harvested rice fields are demonstrated to be a relatively low-quality waterfowl and wetland wildlife habitat when compared acre-for-acre with more natural and diverse habitats. In contrast to many natural habitats, harvested rice fields have relatively low food availability, of relatively poor nutritional quality, with a relatively short "shelf life" when inundated. Rice fields also have relatively low invertebrate populations (an essential source of protein), provide poor habitat structure as shelter, and potentially expose foraging birds to residual pesticides. Despite these shortcomings,

WMI recognizes and acknowledges some genuine resource and recreational value in winter-flooded harvested rice fields. However, such habitats, as proposed by the FEIS in the context of trade-offs, do not merit the substantial project benefits awarded to them.

WMI would concede legitimate project benefits of this habitat type only if substantial public hunting opportunity were guaranteed on 38,000 acres of mandatory winter-flooded rice fields.

Because the vast majority of Arkansas' natural wetlands already have been converted by the agriculture community and the Corps, the remaining natural wetlands--even if no longer in pristine condition--are very valuable to waterfowl and a diverse array of other wetland wildlife. However, WMI is concerned that GPADP irrigation reservoirs and other structural features will be constructed in wetland sites. The Section 404 permit requirement will have no more than symbolic effect in protecting the wetlands, since the Corps that is charged with designing the GPADP is the same Corps that has authority to issue 404 permits. One need only look at the favorable reception currently being given by NRCS and the Corps to an irrigation reservoir proposed atop a 51-acre natural wetland in St. Francis County, Arkansas to be convinced that many such reservoirs in the GPADP will similarly convert wetlands. The GPADP's proposed trade-off of wetlands for reservoirs and flooded harvested rice fields is unacceptable.

WMI urges the adoption of a firm, enforceable guarantee that no reservoirs or other structural features will be constructed in wetlands.

Finally, WMI remains unconvinced by all assurances to date that minimum flows in the White River will be protected by the GPADP. History provides ample proof of the political reality to the contrary. Once structures and mechanisms are in place to logistically provide benefits to farmers, institutional safeguards likely will be ineffective at tempering the cultural expectation of "benefits on demand." That is, no matter whether the Corps, NRCS, the ASWCC, or the irrigation district holds the "keys to the pumps," the pumps surely will continue to run whenever farmers need water, no matter the status of White River flows. WMI does not endorse the prospective tradeoff of White River below-minimum flows in exchange for water pooled in weired creeks and ditches.

WMI urges the adoption of ironclad, legal guarantees administered by some objective, uninterested third party, to provide any meaningful assurances of protection for minimum flows in the White River.

The GPADP FEIS is based on the best-case scenario that all the project's voluntary features and assurances will be implemented as envisioned. WMI, on the other hand, expects a reality that falls short of this ideal. Our long-term involvement in such water resource projects leads us to conclude that many of the environmental promises will be forgotten as soon as the agricultural production elements of the project are completed. *Therefore, WMI reiterates its earlier comments that all of the project's environmental features such as winter waterfowl habitat, prairie vegetation, water conservation and wetland avoidance must be made mandatory.*

Cumulative impacts are unknown.

The GPADP is problematic enough, by itself. However, when coupled with the several other similar irrigation projects that are in various stages of conception, study or planning--including at least three others that would withdraw from the White River or its tributaries--along with the proposed navigation project and others, the probable cumulative impacts on the White River ecosystem are unacceptable. It is a serious oversight and even a legal problem that the Corps is proceeding with the GPADP with no assessment of the impacts on the environment of all the envisioned projects combined. The token cumulative impact assessment contained in the FEIS is so grossly inadequate as to serve no purpose.

WMI strongly urges the Corps to conduct a thorough cumulative impacts analysis of the full range of environmental effects of all the currently authorized, proposed and envisioned projects, before the GPADP or any other major water resource project is undertaken in the White River basin.

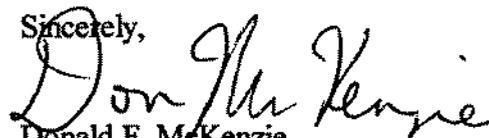
A comprehensive, inclusive process is needed in eastern Arkansas.

In sum, WMI continues to oppose the GPADP in anything resembling the form of the Final EIS. On the other hand, WMI acknowledges the seriousness of the water issues and the very real need for meaningful, long-term solutions.

The Institute strongly supports starting over from the beginning, with a thorough, inclusive public planning process to objectively review and evaluate all of the water issues of the Grand Prairie and eastern Arkansas, leaving no options out of consideration. The objective should be to devise a socially equitable and environmentally sound comprehensive solution to the package of interrelated water resource problems faced not only by farmers, but also by cities, towns and all citizens of eastern Arkansas, as well as the Natural State's fish and wildlife resources.

Thank you for accepting and considering these comments.

Sincerely,


Donald F. McKenzie
Field Representative