



Reply to
Attention of:

DEPARTMENT OF THE ARMY
MEMPHIS DISTRICT, CORPS OF ENGINEERS
167 NORTH MAIN STREET B-202
MEMPHIS, TENNESSEE 38103-1894

July 27, 2001

Planning, Programs, and Project Management Division
Project Management Branch

Mr. Allan Mueller
Field Supervisor, Conway Field Office
U.S. Fish and Wildlife Service
1500 Museum Road, Suite 105
Conway, Arkansas 72032

Dear Mr Mueller:

This letter is in response to the letter from your office dated June 26, 2001, signed by Ms. Margaret Harney acting in your absence. I would like to thank you for this opportunity to officially comment on the so-called "sustainable alternative" that is being recommended by Mr. Don McKenzie of the Wildlife Management Institute and others. Neither the Natural Resources Conservation Service, the Grand Prairie project sponsor, nor I have been officially provided this documentation. This plan appears to have been developed by a few individuals without coordination of agencies, local sponsors, or any public review.

The Grand Prairie Area Demonstration Project has been formulated and evaluated in an open context and in coordination with a local irrigation district elected by local citizens and state and Federal agencies including your agency. The Grand Prairie project was analyzed and conclusions drawn on project impacts based on scientific data. These studies, in which you fully participated, found that the project had no significant adverse environmental impacts, that the project would protect and preserve both the alluvial and Sparta aquifers, and that the project would have significant environmental benefits. The project Environmental Impact Statement has completed public review and a record of decision issued. The Corps has maintained close coordination with your agency through an engineering review of project water sources, which you voted to endorse. Your agency recommended construction of the project including the excess water withdrawal features and construction of the on-farm features. Furthermore, your agency reached these endorsements by participating on an on-farm environmental review team.

Increased irrigation efficiencies are a major point of the so-called "sustainable alternative" with claims that 80%

efficiency or greater is achievable over the project area. Members of my staff, the Natural Resources Conservation Service (NRCS), and the project sponsors held a meeting on May 15, 2001, with you and your staff and other irrigation experts and ground water experts from various organizations to discuss irrigation efficiencies and ground water. Irrigation experts from the Arkansas Agricultural Extension Service, that you had previously cited in conversations and invited to the meeting, stated that efficiencies greater than 70% were not possible over the project area and that 70% was appropriate for project planning agreeing with the experts from the NRCS. I have attached a record of the meeting. Even if the alternative's claims were accurate, only a small increase in irrigated acreage would be realized for an investment of \$158 million. The local economy would lose more than 60% of the currently irrigated cropland with national, regional, and local effects including tax base, agricultural processing, and all segments of the agriculturally based economy. The sustainable alternative is in fact not sustainable with the numbers presented in the plan. The plan has been considered and our analysis of the plan is attached.

In your letter, you also questioned the aquifer protection benefits of the project. Aquifer experts agreed at the meeting of May 15, 2001, that the project as planned would protect the Sparta aquifer and the alluvial aquifer, even if all of the average annual unmet needs were pumped from the alluvial aquifer. This is possible because a conservative number was used for the safe yield. As presented in the Grand Prairie Area Demonstration Project General Reevaluation Report (GRR), the estimated annual aquifer recharge rate is much greater than the estimated safe yield. The GRR also describes the procedures used to calculate safe yield. Even if enough additional water was pumped from the aquifer to meet 100% of the irrigation demand, the withdrawals from the aquifer would be less than the recharge. My staff has informed me that neither you nor your staff disputed the project's aquifer protection in the meeting. Mr. Randy Young, the Executive Director of the Arkansas Soil and Water Conservation Commission, has stated that he does not believe that regulation would be necessary if the project is constructed. I have included a monitoring program in the plan. If the analyses indicate that the aquifers are not being protected, measures will be examined to provide for protection of the aquifers.

One method already identified during the engineering review, in which you participated, is seasonal supplementation from the Arkansas River. You also questioned the Grand Prairie Area Demonstration Project not meeting 100% of the irrigation demands of the project area. The GRR states that some crops may not be fully irrigated or that some areas would be dry land farmed

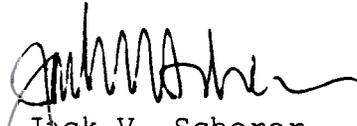
(farmed without irrigation). Much of the area is not fully irrigated (not receiving 100% of the optimum demand) now due to the shortage of water. If during any 10-day period water was not available to meet all of the water demands, it was considered an unmet demand. The total yearly demand for the project area is 481,195 acre-feet. The average annual unmet demand is 59,791 acre-feet. To attempt to put this in perspective, the average demand per acre in the Grand Prairie is approximately two feet. If all of the cropland were not fully irrigated and the shortfall was evenly distributed, the crops would receive approximately three inches less water than their full demand over a year's time. Alternatively, some of the area could be considered to not be irrigated and the water shortage could be directly translated into a reduction in irrigation acres for analytical purposes. More than half the time, all of the full water demand of the crops for the total area can be met with the project as currently planned. The GRR evaluated and presented several options that would have provided increased reliability. However, the project as currently planned provides the economic optimum while protecting both the Sparta and Mississippi Valley Alluvial aquifer. The project reliability does not cast doubt on the sustainability of irrigation projects in Arkansas. Far from it, the GRR confirms that the Grand Prairie project is both economically feasible, environmentally sound, and protects the aquifers.

I was pleased to hear that Ms. Harney stated in a telephone conversation with Mr. Edward Lambert of my staff that the official US Fish and Wildlife Service position of not opposing the Grand Prairie Area Demonstration Project has not changed.

When considering recommendations to proceed with the project, project impacts and benefits were examined. The consequences of not constructing the project were also examined. These consequences include not only the economic impact to all people in the Grand Prairie region due to the 77% reduction in crop production and impacts throughout the agricultural based economy, but the impacts of depletion of the Sparta aquifer, which is used for drinking water, and the alluvial aquifer, with its connections to the rivers and wetlands. Scientific analyses indicate that the project has no significant adverse impacts, that the project will preserve both aquifers and the economic viability of the region. No other alternative, including the one you are currently discussing, has been identified that can accomplish these purposes. The sustainable alternative has been

considered, is not technically achievable and will not meet project goals for aquifer protection and maintaining irrigated agriculture in the Grand Prairie.

Sincerely,



Jack V. Scherer
Colonel, Corps of Engineers
District Engineer

Enclosures