

July 2, 2001

## **Grand Prairie Area Demonstration Project**

### **U.S. Fish and Wildlife Letter**

The Memphis District received a letter from the US Fish and Wildlife Service (USFWS) dated June 26, 2001, signed by Ms. Margaret Harney as acting Field Supervisor of the Conway Field Office. In this letter, the USFWS said that the project does not have a formal mechanism for regulating or protecting the aquifer, the project reliability was 87.6% and that it could meet 100% of the needs only 57% of time. This led to doubts about the viability of large-scale irrigation projects in Arkansas. This letter also endorsed the rationale and concepts of the McKenzie plan. However, Mr. Allan Muller, Field Supervisor of the Conway Field Office, voted on the Governor's Grand Prairie Engineering Review Oversight Committee and the Governor's Committee on Water Resources to move ahead with project construction including features to remove excess water from the White River.

No one has officially provided the proposal referenced in the letter to the Corps or the project sponsors. However, members of the Corps, the Natural Resources Conservation Service (NRCS), and the project sponsors held a meeting on May 15, 2001, with USFWS and other irrigation experts and ground water experts from various organizations to discuss two major points of the so called "sustainable alternative" that is being touted by Mr. Don McKenzie of the Wildlife Management Institute and others. These points were first presented in a paper on strategy to prevent implementation of the Grand Prairie project. These points were that 80% efficiency was achievable over the project area and that the project would not protect the aquifers. Irrigation experts from the University of Arkansas Agricultural Extension Service, that Mr. Mueller 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. Aquifer experts also agreed that the project as planned would protect the Sparta aquifer and the alluvial aquifer, even if all of the average annual unmet need was 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. No one disputed the planned irrigation efficiencies or 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. Again, even if all of the unmet need was withdrawn for the alluvial aquifer, aquifer recharge would exceed withdrawals. A monitoring program is included 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 USFWS participated, is seasonal supplementation from the Arkansas River. Aquifer experts with the US Department of Agriculture's National Water Management Center further offered to meet with USFWS staff to develop a better understanding of the aquifer characteristics.

The GRR states that some crops may not be fully irrigated or that some areas would be dryland 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 2 feet. If all of the cropland were not fully irrigated and the shortfall was evenly distributed, the crops would receive approximately 3 inches less water than their full demand over a years 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 feasibility, environmentally sound, and protects the aquifers.

The plan discussed in the letter is in fact not sustainable with the numbers presented in the plan. The plan has been considered and an analysis of the plan is attached.

A paper entitled “A Central Valley of California Perspective on the Grand Prairie Area Demonstration Project and Ideas that Could be Incorporated into a Grand Prairie Alternative” was provided to members of the Grand Prairie on-farm environmental team. This proposal discusses a “Grand Prairie Alternative” or GPA that appears very similar to the so called “sustainable alternative.” This paper contained a mobilization strategy quoted as follows:

#### **“Proposed GPA Mobilization Strategy**

Given that the crucial Congressional Appropriations cycle is rapidly approaching, there may be insufficient time to become immersed in a GPA feasibility analysis that strives for a 100% level of certainty. Rather, it might be more important to quickly join forces with agricultural opponents of the GPADP with a moderately well researched GPA and attempt to cast a reasonable doubt over Congress’ considerations of the \$319 million GPADP appropriation. This potentially could fit in the with the new administration’s desire to reduce government spending. It also might be a good idea to develop the GPA behind the scenes and seek an influential local farmer – or group of producers – to take credit for the proposal and sell it to others in the community, particularly if they have any links to the Governor’s Water Task Force.”

The so-called “sustainable alternative” appears to be very similar to the GPA plan described. The so called “sustainable alternative” has been considered and found to lack analyses and detail, and appears to be without merit, have no means of implementation, and to be

solely an attempt to halt funding. No one is attempting to fund it's implementation. Irrigation experts USFWS cited have agreed that the 80% efficiency is not achievable over the project area.

The Grand Prairie project was analyzed and conclusions drawn on project impacts based on sound science. These studies, in which USFWS 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 plan whose concepts and rationale USFWS endorsed claimed adverse impacts not based on sound science, but on rhetoric and speculation. This speculation appears at odds with the scientific evaluations in which USFWS participated.

However, Ms. Harney stated in telephone conversation with Mr. Edward Lambert of the Corps 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, the 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 and that the project will preserve both aquifers and the economic viability of the region. No other alternative, including the so-called "sustainable alternative", has been identified that can accomplish these purposes. This alternative has been considered. It is not technically achievable and will not meet project goals for aquifer protection and maintaining irrigated agriculture in the Grand Prairie.