



EPA Should Veto The Yazoo Pumps

An Outdated Project From Another Era. Relying on an antiquated 66 year old project authorization, the Army Corps of Engineers (Corps) wants to build the world's largest hydraulic pumping plant in one of the most sparsely populated regions in the state of Mississippi. The project is designed to drain agricultural lands by pumping up to 6 million gallons of water a minute from one side of a Corps-built flood control structure to the other side of that structure. The Yazoo Pumps will cost federal taxpayers more than \$220 million, and there is no local cost sharing for this project. The entire financial burden rests on the Federal taxpayers.

Environmentally Devastating. In 2000, the Environmental Protection Agency (EPA) concluded that the Yazoo Pumps will drain and damage over 200,000 acres of ecologically significant wetlands – an area larger than all 5 boroughs of New York City – and will alter the hydrology of the entire 925,000 acre project area. The Corps now acknowledges that 67,000 acres of wetlands will be damaged, but the Corps did not assess all wetland impacts. For example, the Corps has not evaluated impacts to short-hydroperiod wetlands and has not evaluated impacts to wetlands that are not sustained by backwater flooding.

Drained wetlands will include lands managed by the federal government as wetland systems for fish and wildlife habitat in the Panther Swamp National Wildlife Refuge, the Yazoo National Wildlife Refuge, and the Delta National Forest; lands owned and managed by the federal government as mitigation for wetland losses caused by previously constructed federal flood control projects; and lands enrolled in the Wetlands Reserve and Conservation Reserve Programs. The U.S. Fish and Wildlife Service (FWS) has concluded that the Pumps are likely to adversely affect the federally endangered pondberry unless the Corps strictly adheres to the reasonable and prudent alternatives recommended by FWS.

Both EPA and FWS have said the project's impacts are so great that the project must not proceed. EPA has said the project is appropriate for a veto under Clean Water Act Section 404(c) – the Pumps would damage more than 25 times the combined wetland impacts of all other vetoed projects (under EPA's impact assessment). Even under the Corps' incomplete impact assessment, the project would cause more than 8.5 times the combined wetland impacts of all other vetoed projects.

A Bad Investment For The Nation. In addition to the unacceptable environmental costs, the direct costs of construction and operation, and the lost federal investments in WRP, CRP, and federally managed wetland systems, an independent economic analysis shows that the Yazoo Pumps will produce far less than 14 cents of agricultural benefits for each dollar spent on the project, and that the Corps overstated the agricultural benefits of the project by an incredible \$144 million. The Yazoo Pumps are specifically designed to drain wetlands so that agribusiness can intensify production on marginal lands that have always flooded, and some 80 percent of the project's alleged benefits will come from agricultural intensification. The study also shows that if the project is constructed, the

federal government will simply wind up paying more in farm subsidy payments, which will constitute virtually the entire very limited increase in farm profits.

The existing subsidies are already highly concentrated and substantial. From 1996 to 2001, the federal government distributed at least \$15.3 million in federal farm subsidies to landowners in just the 2-year floodplain of the Yazoo Pumps project area. During that period, one of just 51 recipients received \$2.7 million, with four others receiving more than \$1 million each. The federal government already owns permanent flooding easements on more than 19,460 acres of land in the Yazoo Pumps project area.

Not An Effective Way To Address Limited Residential Flooding. It has been argued that the Yazoo Pumps would save homes and lives, and that the residents of the project area need the Pumps because they are at **constant** risk of flooding. However, Federal Emergency Management Agency data shows that residential flooding is very limited in the project area, a fact that this is borne out by anecdotal evidence presented by the local *Deer Creek Pilot* during a 2003 series examining the Yazoo Pumps. During the 24-year period from 1979 to 2002, only 62 properties within the Yazoo Pumps project area filed flood insurance claims under the National Flood Insurance Program. Collectively, these properties filed 209 claims for damages totaling \$1.664 million. At that rate, it would take more than 3,173 years to recoup the \$220 million construction investment in the Yazoo Pumps. To put this in perspective, if the Yazoo Pumps had been built the year Julius Caesar was killed on the floor of the Roman Senate (44 B.C.), it would still be another 1,122 years before the flood damages in the project area would equal the cost of the Yazoo Pumps. There are far more cost-effective ways to address the very limited residential flooding problems in this region.

Broad-Based And Vocal Opposition. The Yazoo Pumps have been opposed by EPA; and are opposed by FWS; a host of national, regional, and state-wide environmental organizations; landowners and other citizens within the project area and throughout the state of Mississippi; and citizens from throughout the Nation. *The Clarion Ledger*, the largest newspaper in the state of Mississippi, the *New York Times*, and papers and magazines from Oregon to England have repeatedly and consistently editorialized against the project.

Violates The Clean Water Act and Federal Policy. The Yazoo Pumps project violates Section 404 of the Clean Water Act because of the magnitude and severity of the environmental impacts that the project will cause, the fact that those impacts could be entirely avoided by the use of a wholly nonstructural flood damage reduction plan, and the Corps' failure to require adequate compensatory mitigation. The Yazoo Pumps are specifically designed to drain wetlands so that landowners can increase agricultural production on marginal lands that have always flooded – 80 percent of the project benefits are from agriculture. Draining wetlands for this purpose violates federal agricultural policies.

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