MISSISSIPPI FARM BUREAU® FEDERATION



The Voice of Agriculture®

Mike McCormick

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Edward E. Belk Jr., Director of Programs Mississippi Valley Division U.S. Army Corps of Engineers Vicksburg District ATTN: CEMVK-PPMD 4155 East Clay Street Room 248 Vicksburg, MS 39183

Mr. Belk,

On behalf of Mississippi Farm Bureau Federation (MFBF), I appreciate the opportunity to offer our sincere thanks and support to the U.S. Army Corps of Engineers (USACE) and the Environmental Protection Agency (EPA) for their decision to prepare the Supplemental Environmental Impact Statement (SEIS) for the Yazoo Backwater Project (YBP). The South Delta Region of Mississippi is experiencing historic flooding for the third consecutive year, in addition to numerous other flood events dating back to the early 1960s. Contrary to popular belief, these floods are not "natural disasters," rather they are willful, intentional, and foreseeable man-made disasters caused by the failure to complete the YBP as authorized in the Flood Control Act of 1941. MFBF urges USACE to work with EPA to complete the SEIS as soon as possible.

The Yazoo Backwater pumps are the final component of the Mississippi Rivers and Tributaries (MR&T) Act. There are currently 22 other pumps in place within a 200 mile radius of the backwater area. There have been no issues with any of those projects. When comparing basin drainage area, the YBP will be one of the smallest pumps in the MR&T. The Yazoo Backwater area has experienced flooding for three consecutive years, and five of the worst flood events have occurred within the last twelve years. It is long past time to install this pump and provide relief to this area.

We certainly appreciate the willingness to prepare the SEIS and hope you will consider the significant positive impacts to the environment from the YBP. Increased reforestation, improvements to wildlife and aquatic habitat, increased wetland functional capacity units, and certainty in environmental planning are all beneficial environmental improvements. The new proposal which relocates the pumps and added well fields to provide additional water during low-flow periods are also significant improvements to be considered.

The flood of 2019 was one of the most devastating wildlife disasters we have ever witnessed. Thousands of deer were forced into adjacent counties devastating nearby farmland. It was also during the spring when does were birthing fawns. We are still evaluating whether those deer will return to their home range or remain in the new areas. For those deer unable to escape, they became trapped on high ridges and levees. It is estimated between 600-800 deer perished from

starvation, exhaustion, or heat stress from the lack of cover. It is also estimated over the last three years, the Yazoo Backwater area deer population has decreased by eighty percent. In addition, hogs, small furbearing animals, turkeys, and bears were also displaced. The loss of the small furbearing animals is particularly disturbing because they are the majority of the diet for raptors. There is also concern the pumps will affect duck season in the South Delta, however over the past 55 years the pumps would have only operated less than three percent of duck season days.

The plan calls for mitigation of 55,600 acres in reforestation. This is above and beyond the 52,000 plus acres already enrolled in the USDA Wetland Reserve Program and the Conservation Reserve Program. We do not feel the USDA conservation program acreage was given consideration in the 2007 EIS. The 2007 EIS assumed all wetland functional units were sustained by backwater flooding. In an area receiving annual rainfall of 60 inches, there is sufficient rainfall to sustain those wetland acres without the backwater floods.

Because this is a SEIS, I have not mentioned the psychological, societal, and emotional effects of the backwater floods. That does not mean they are not critically important. The counties in the South Delta primarily affected by the backwater floods are some of the most economically depressed in the state. The entire area depends on agriculture for its survival. It is not just the farmland and farmers, but it is the producers, agriculture retailers, crop consultants, aerial applicators, and all the people who work for those people. Without the Yazoo Backwater pumps, there is no prospect that any other industry will consider moving in. The people in the South Delta wake up most days in the spring to look at river gauges and rain forecast with a fear most people never experience. They are resilient, but they are praying for relief. You can help by conducting a fair SIES sufficiently weighing the environmental benefits of the pumps.

Sincerely,

Mike McCormick

President

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