



August 27, 2024

The Honorable Michael Conner
Assistant Secretary of the Army (Civil Works)
U.S. Army Corps of Engineers
Department of Defense
108 Army Pentagon
Washington, DC 20310-0108

Colonel [Jeremiah A. Gipson](#)
Commander
U.S. Army Corps of Engineers
Vicksburg District
4155 Clay Street
Vicksburg, MS 39183-3435

Subject: Opposing the Yazoo Pumps Project

Dear Assistant Secretary Conner and Colonel Gipson:

I write on behalf of Taxpayers for Common Sense (TCS) to express our vehement opposition to the Yazoo Pumps Project, currently under review through an updated Environmental Impact Statement (EIS). Our opposition is due to the fact this project continues to be fiscally, environmentally, and socially unacceptable for taxpayers.

The draft EIS is currently proposing a 25,000 cfs pumping plant, which would have a pumping capacity 78% larger than the 14,000 cfs pumps prohibited by the longstanding Clean Water Act 404(c) veto of the Yazoo Pumps. Pumps of this size would likely cost federal taxpayers well over \$1.4 billion.¹ These pumps would be operated on a schedule driven by the desires of large agricultural producers who are farming mostly marginal lands that have always and already receive substantial federal subsidies. We believe that such a sizable investment of taxpayer money must be justified by broad public benefit, which this project clearly lacks. A point we believe your agency implicitly agrees with, as you have chosen not to undertake an updated Economic Analysis to determine what would clearly produce a low Benefit-Cost Assessment.

The potential environmental repercussions are equally troubling. A pumping plant of this size would unquestionably drain and damage 89,800 to more than 93,300 acres² of vital wetlands, including thousands of acres that the federal taxpayers have already paid to protect. This flagrant

¹ The West Closure Complex in New Orleans is currently the world's largest pump station, with a pumping capacity of 19,000 cfs powered by 5,000 horsepower diesel engines. The West Closure Complex cost \$1.1 billion in 2014. New Orleans Times Picayune, [The West Closure Complex: How it works](#) (updated July 18, 2019); NOLA.com, Photos: [Largest pump station in the world, located 30 minutes from New Orleans, gets ready for hurricane season](#) (May 12, 2022).

² The Corps has identified two identical preliminary preferred alternatives (Alternatives 2 and 3) except for operating plans that differ by just 9 days. The Corps has proposed compensatory mitigation of just 5,722 to 7,650 acres, depending on the operating plan selected. U.S. Army Corps of Engineers, Draft Environmental Impact Statement for the Yazoo Backwater Area Water Management Project (July 2024) at 38, Wetland Appendix at 34.

disregard for environmental concerns not only undermines the \$100 million already invested by taxpayers in these conservation lands but also stands in contradiction to the Clean Water Act.³

We are also alarmed by the social and environmental justice implications of the Yazoo Pumps Project. The potential negative impact on predominantly Black communities in North Vicksburg and other downstream locations is unacceptable. Dozens of Black community members and leaders, such as Ty Pinkins of the Pyramid Project and representatives from the Education, Economics, Environmental, Climate & Health Organization (EEEECHO), have repeatedly voiced strong opposition to the Yazoo Pumps as an environmental injustice designed to serve wealthy farm owners at the expense of marginalized communities.

Our analysis highlights the disproportionate benefits accruing to large agricultural producers, primarily white, who already receive significant farm subsidies. Indeed, the top 5 recipients in each YBWA zip code receive an average of \$215,000 annually for the last 25 years, exacerbating economic inequalities in a region where many households earn less than \$15,000 and substantial portions of the population live in poverty.

We urge you to abandon the Yazoo Pumps once and for all. In its place, you should explore the many viable options for reducing flood damages through nonstructural and natural and nature-based measures, including enrolling lands in the Wetland Reserve Easement Program (WRE) and Conservation Reserve Program (CRP), which offer more cost-effective and environmentally friendly solutions to the region's flooding issues. Multiple organizations have proposed a suite of environmentally sound, equitable, and taxpayer friendly solutions that could and should be implemented.

The Yazoo Pumps Project is neither fiscally responsible nor environmentally sound and raises alarming social and environmental justice concerns. For these reasons, we firmly oppose any efforts to move forward with this project and urge you to seek alternatives that are more aligned with the public interest.

We appreciate the opportunity to comment on this critical issue. Should you have any questions or require further information, please feel free to contact us.

Sincerely,

Steve Ellis
President
Taxpayers for Common Sense

³ American Rivers. "Mapping Out an Argument for Stopping the Yazoo Pumps." American Rivers, April 2018, <https://www.americanrivers.org/2018/04/mapping-out-an-argument-for-stopping-the-yazoo-pumps/>.