

Reprint From



MISSOURI

Governor Mel Carnahan

The Corps' DEIS and preferred alternative are deeply flawed due to errors, faulty logic and improper methodology, and they should be withdrawn immediately. The current management strategy has worked well during both drought and flood. It should not be replaced by an untested preferred alternative based on bad science and misguided intent.

Missouri continues to oppose the spring rise, a split navigation season and a higher permanent pool.

In light of the Great Flood of '93, it is unbelievable that the Corps proposes to create an artificial flood each year. The Corps has failed to adequately evaluate the impact that such floods would have on Missouri. The Corps is abandoning its traditional role in protecting people and their property from floods.

The Corps has not considered the fact that the spring rise will substantially devalue farmland along the Missouri. When the federal government raises the level of a navigable river, such as the Missouri, and maintains it continuously at that level, the government is liable for the impact that such a change will cause on adjacent private property. Raising the river level constitutes an unconstitutional taking of any private land that is flooded as a result.

Federal programs are required to minimize their contribution to the unnecessary and irreversible conversion of farmland to nonagricultural uses. However, the Corps has not even attempted to balance the value of farmland against other interests, such as recreation. Farmland and the nation's preeminence in the international grain market are much more important than recreation.

Missouri does recognize that recreation is important to the upstream states. Therefore, we suggest establishing a \$75 million fund for devel-

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oping recreational facilities in the upper basin.

The spring rise in the preferred alternative would supposedly mimic the "natural hydrograph" and benefit the threatened pallid sturgeon, but it is neither natural nor beneficial to the pallid sturgeon. The Corps should consider other ways, such as fish ladders and revising stocking policies, to help species recover.

Navigation would probably not survive the drastic alteration that the spring rise would cause in the river's flow, and transportation costs would subsequently rise. In addition, the preferred alternative cuts November and, in many years, October from the navigation season. The modified navigation criteria and reduced navigation season length appear calculated to eliminate navigation on the Missouri. Missouri also vehemently opposes a split navigation season.

Raising the permanent pool would significantly increase flooding by reducing the reservoirs' capacity to hold back flood water. It also would unfairly transfer water from the lower basin to the upper basin.

The Corps has failed to adequately evaluate how operation of the Missouri River will affect the Mississippi River. This omission, arguably the most serious flaw in the DEIS, is compounded by errors in methodology, which have caused the Corps to underestimate the negative impact on Mississippi River navigation.

Another misconception holds that the system's benefits are unfairly distributed in favor of the lower basin. In reality, if benefits are figured on a per-capita basis, there's a strong bias in favor of the upper basin. The average citizen of Missouri now receives only \$20 worth of benefits, while the average citizen of the Dakotas receives \$225 worth of benefits, 11 times as much.

In particular, the federal government should reconsider its allocation of hydropower benefits, giving special attention to the inordinately small ap-

portionment of those benefits to the basin's Indian tribes.

For at least two years, the Corps has ignored Missouri's concerns about the project. Recently, Missouri has identified additional concerns that are even more serious. Since significant new information has come to light, the Corps should prepare a supplemental impact statement, as required by law. Management of the Missouri River is so complex that changing one factor can cause changes in many other areas. Therefore, the Corps should re-evaluate all the related issues, not just a select few. Because the DEIS contains so many serious errors, the Corps should abandon it, along with the entire preferred alternative, and start from scratch.

Missouri supports the recovery of native species, the revitalization of the river corridor and improvements to water quality. However, these goals should not be pursued at the cost of existing uses and values.