



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TX 75202-2733

May 2, 2011

Brian LaBarre  
Vicksburg District  
U.S. Army Corps of Engineers  
4155 Clay Street  
Vicksburg, MS 39183-3435

**SUBJECT: Southeast Arkansas Boeuf-Tensas Feasibility Study Development**

Dear Mr. LaBarre:

In accordance with your letter dated March 28, 2011, the U.S. Environmental Protection Agency (EPA) Region 6 is providing the following comments for the proposed feasibility study. The proposed project diverts water from the Arkansas River, channelizes it in a southerly direction, to provide additional water for agricultural irrigation and for increased flows into Bayou Bartholomew to sustain aquatic habitats during low flows.

**Water Quality**

EPA is concerned about water being transported from one watershed to another and wants to reiterate that the feasibility study should adequately detail that the transfer of water containing higher minerals concentrations from the Arkansas River will not impact aquatic life in Deep Bayou or Bayou Bartholomew. EPA encourages the USACE to share the Quality Assurance Project Plan (QAPP) used to evaluate the methodology for developing this component of the study.

**Air Quality**

Any demolition, construction, rehabilitation, repair, dredging, or filling activities have the potential to emit air pollutants and EPA recommends best management practices be implemented to minimize the impact of any air pollutants, including the use of clean, lower-emissions equipment and technologies to reduce pollution. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and Federal statutes and regulations.

**Environmental Justice/Socioeconomic**

Some potential environmental justice and Tribal concerns exist. Because all four potential alternatives propose the introduction of Arkansas River water through Deep Bayou to Bayou Bartholomew via a culvert gravity structure placed through the mainline levee, there is a potential for the introduction of Asian carp from the Arkansas River into Bayou Bartholomew.

Sampling will be conducted to determine if the carp are already present in Bayou Bartholomew, and if they are not, then special methods and mechanisms should be utilized to ensure that this invasive species is not introduced into Bayou Bartholomew. In addition to potentially degrading the ecosystem, Asian carp can affect local fishing. The introduction of Asian carp into Bayou Bartholomew would have a disproportionate and adverse impact on low-income and minority populations in this area because they can affect native fish populations. Low income and minority populations, including Indians, often

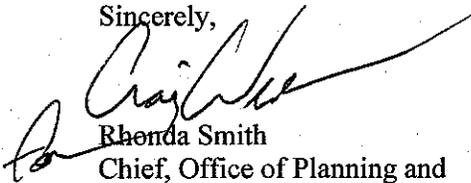
practice subsistence fishing and if native fish populations are depleted, their diets will be impacted because it's more difficult for low-income populations to purchase other sources of protein.

### **Wetlands**

EPA recommends that any channelization should avoid wetlands and natural streams and recommends that the proposed project avoid clearing riparian zones. EPA encourages the USACE to share any mitigation plan early on in the development stages.

We appreciate the opportunity to provide comments for the draft feasibility study. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or [macfarlane.john@epa.gov](mailto:macfarlane.john@epa.gov), should you have any questions or concerns regarding this letter.

Sincerely,



Rhenda Smith  
Chief, Office of Planning and  
Coordination