

February 9, 2004

Mr. Johnny Morris  
Bass Pro Shops Corporate Headquarters  
2500 East Kearney Street  
Springfield, MO 65898  
Subject: Environmental issues at proposed location in North Little Rock, Arkansas

Dear Mr. Morris:

The American Fisheries Society, Arkansas Chapter and its membership have a long history of supporting and endorsing businesses that promote outdoor and recreational activities. Bass Pro Shops for many years has served to foster recreation as well as good environmental stewardship. Your support of the Conservation and Reinvestment Act, which would provide additional dedicated federal funding for state fish and wildlife agencies, is one of many examples of your commitment to the environment. Therefore, a proposed development project of Belz-Burrow/Hocker (The Shoppes at North Hills, North Little Rock, AR) of which you will be a primary tenant, appears inconsistent with past efforts of your corporation. Perhaps the magnitude of the environmental implications of this project has escaped your scrutiny.

A proposed Bass Pro Shop in North Little Rock has a prominent location at the junction of Interstates 30 and 40, but remains undeveloped because it contains significant expanses of forested and herbaceous wetlands. Dark Hollow is an undeveloped island of habitat amid the urban development of North Little Rock. The project site contains 31 acres of forested wetlands, bordered on the south by a large ditch (Big Ditch) that drains high volumes of storm-water runoff from a large portion of North Little Rock. The ditch overflows frequently into the wetlands, which temporarily stores and filters urban runoff before it enters the Arkansas River only a couple of miles downstream.

This wetland drainage is part of a larger wetland complex that comprises the Arkansas River Valley flood plain and serves as a valuable component of the wetland/river tributary corridor, providing riparian habitat for fish and wildlife, reducing the input of sediments, storing flood waters, and filtering pollutants entering the system from highways, commercial, industrial, and residential developments. Wooded wetlands susceptible to seasonal flooding which are adjacent to large rivers, such as the Arkansas, provide important habitat for mammals, amphibians, reptiles, and migratory waterfowl both annually and seasonally. Additionally, wetland complexes such as this are a key component in maintaining the quality of the Arkansas River's water and nutrients, which enables this system to support a diversity of flora and fauna. These wetland habitats along with the nutrients and forage produced are vital to maintaining the quality and quantities of the resident fish and wildlife throughout the year as well as the migratory birds foraging and reproducing in this wetland seasonally.

Belz-Burrow/Hocker proposes to clear and fill all 31 acres of wetlands on the project site. This action will exacerbate flooding problems in North Little Rock, impact migratory bird habitat and cause adverse impacts to water quality in this Arkansas River tributary. Further channelization of Big Ditch and flood plain reduction would have substantial

environmental consequences. The channelization of streams and filling of floodplains such as this are decreasing the available flood storage, which contributes to habitat destruction and flooding of developed areas. Flooding of developed areas, in addition to the obvious human and economic consequences, increases pollutant runoff of chemicals and sediments that might otherwise be contained in upland locations.

To compensate for the loss of flood storage, Belz-Burrow/Hocker has proposed to excavate approximately 23 acres of upland farmland located east of North Hills Boulevard and south of the proposed wetland mitigation site within Dark Hollow. The mitigation that has been proposed by Belz-Burrow/Hocker is inadequate to compensate for the damage, and in fact will destroy at least five more acres of wetlands adjacent to the project site. The U.S. Fish and Wildlife Service has concluded that this project does not comply with the Environmental Protection Agency's Section 404(b)(1) guidelines to first avoid, then minimize damage to the aquatic ecosystem, and finally mitigate for unavoidable adverse impacts to "obtain no overall net loss to wetlands" as agreed to within the 1990 EPA/Corps MOA concerning the Determination of Mitigation.

It is important for Bass Pro Shops to understand that the Arkansas Game and Fish Commission and the U.S. Army Corps of Engineers embarked three years ago on an ambitious, long-term initiative to restore the once-renowned largemouth bass fishery on the Arkansas River. The destruction of the 31 acres of frequently flooded forested wetland at Dark Hollow by Bass Pro Shops is inconsistent with the goals of this endeavor and threatens to locally undermine the project.

We collectively as the Arkansas Chapter of the American Fisheries Society and individually as consumers of recreational products are strongly urging you to consider an alternative site for a Bass Pro Shop. The US Fish and Wildlife Service has recommended an alternative adjacent site which would minimize wetlands modification and impact. This site should meet both the economic realities of maintaining a business in addition to the environmental realities of maintaining our wetlands. We would hope that Bass Pro Shops would not knowingly and willingly contribute to the degradation of any fish and wildlife habitats, especially those that support the very outdoor recreation upon which its business depends.

Sincerely,

Ronald L. Johnson  
Director of Environmental Affairs  
American Fisheries Society, Arkansas Chapter

February 9, 2004

Colonel Benjamin H. Butler  
c/o Mr. Brent Jasper, Regulatory Branch  
U.S. Army Corps of Engineers  
Post Office Box 867  
Little Rock, AR 72203-0867  
Subject: Environmental issues at proposed location in North Little Rock, Arkansas

Dear Colonel Butler:

The American Fisheries Society, Arkansas Chapter and its membership have a long history of supporting and endorsing businesses that promote outdoor and recreational activities. Bass Pro Shops for many years has served to foster recreation as well as good environmental stewardship. Our Chapter recently mailed a letter to Bass Pro Shops regarding a proposed development in Little Rock; we feel compelled to express our concerns to your agency as supporting the feasibility of this project, as well.

A proposed project by Belz-Burrow/Hocker with Bass Pro Shops as a primary tenant in North Little Rock has a prominent location at the junction of Interstates 30 and 40, but remains undeveloped because it contains significant expanses of forested and herbaceous wetlands. Dark Hollow is an undeveloped island of habitat amid the urban development of North Little Rock. The project site contains 31 acres of forested wetlands, bordered on the south by a large ditch (Big Ditch) that drains high volumes of storm-water runoff from a large portion of North Little Rock. The ditch overflows frequently into the wetlands, which temporarily stores and filters urban runoff before it enters the Arkansas River only a couple of miles downstream.

This wetland drainage is part of a larger wetland complex that comprises the Arkansas River Valley flood plain and serves as a valuable component of the wetland/river tributary corridor, providing riparian habitat for fish and wildlife, reducing the input of sediments, storing flood waters, and filtering pollutants entering the system from highways, commercial, industrial, and residential developments. Wooded wetlands susceptible to seasonal flooding which are adjacent to large rivers, such as the Arkansas, provide important habitat for mammals, amphibians, reptiles, and migratory waterfowl both annually and seasonally. Additionally, wetland complexes such as this are a key component in maintaining the quality of the Arkansas River's water and nutrients, which enables this system to support a diversity of flora and fauna. These wetland habitats along with the nutrients and forage produced are vital to maintaining the quality and quantities of the resident fish and wildlife throughout the year as well as the migratory birds foraging and reproducing in this wetland seasonally.

Belz-Burrow/Hocker proposes to clear and fill all 31 acres of wetlands on the project site. This action will exacerbate flooding problems in North Little Rock, impact migratory bird habitat and cause adverse impacts to water quality in this Arkansas River tributary. Further channelization of Big Ditch and flood plain reduction would have substantial environmental consequences. The channelization of streams and filling of floodplains such as this are decreasing the available flood storage, which contributes to habitat destruction and flooding of developed

areas. Flooding of developed areas, in addition to the obvious human and economic consequences, increases pollutant runoff of chemicals and sediments that might otherwise be contained in upland locations.

To compensate for the loss of flood storage, Belz-Burrow/Hocker has proposed to excavate approximately 23 acres of upland farmland located east of North Hills Boulevard and south of the proposed wetland mitigation site within Dark Hollow. The mitigation that has been proposed by Belz-Burrow/Hocker is inadequate to compensate for the damage, and in fact will destroy at least five more acres of wetlands adjacent to the project site. The U.S. Fish and Wildlife Service has concluded that this project does not comply with the Environmental Protection Agency's Section 404(b)(1) guidelines to first avoid, then minimize damage to the aquatic ecosystem, and finally mitigate for unavoidable adverse impacts to "obtain no overall net loss to wetlands" as agreed to within the 1990 EPA/Corps MOA concerning the Determination of Mitigation.

We as the Arkansas Chapter of the American Fisheries Society are strongly urging you to consider not supporting the site proposed for this development. The US Fish and Wildlife Service has recommended that alternative sites should be explored which would minimize wetlands modification and impact. This alternative site should meet both the economic realities of businesses in addition to the environmental realities of maintaining our wetlands.

Sincerely,

Ronald L. Johnson  
Director of Environmental Affairs  
American Fisheries Society, Arkansas Chapter

February 9, 2004

Scott Henderson  
Director,  
AR Game and Fish Commission  
#2 Natural Resources Dr.  
Little Rock, AR 72205  
Subject: Environmental issues at proposed location in North Little Rock, Arkansas

Dear Mr. Henderson:

The American Fisheries Society, Arkansas Chapter and its membership have a long history of supporting and endorsing businesses that promote outdoor and recreational activities. Bass Pro Shops for many years has served to foster recreation as well as good environmental stewardship. Our Chapter recently mailed a letter to Bass Pro Shops regarding a proposed development in Little Rock; we at the Chapter have recently discovered that the Arkansas Game and Fish Commission has distanced itself from this project by relocating a proposed nature center originally proposed within this development. We enthusiastically support you in that change in plans for the nature center.

The proposed project by Belz-Burrow/Hocker with Bass Pro Shops as a primary tenant in North Little Rock has a prominent location at the junction of Interstates 30 and 40, but remains undeveloped because it contains significant expanses of forested and herbaceous wetlands. Dark Hollow is an undeveloped island of habitat amid the urban development of North Little Rock. The project site contains 31 acres of forested wetlands, bordered on the south by a large ditch (Big Ditch) that drains high volumes of storm-water runoff from a large portion of North Little Rock. The ditch overflows frequently into the wetlands, which temporarily stores and filters urban runoff before it enters the Arkansas River only a couple of miles downstream.

This wetland drainage is part of a larger wetland complex that comprises the Arkansas River Valley flood plain and serves as a valuable component of the wetland/river tributary corridor, providing riparian habitat for fish and wildlife, reducing the input of sediments, storing flood waters, and filtering pollutants entering the system from highways, commercial, industrial, and residential developments. Wooded wetlands susceptible to seasonal flooding which are adjacent to large rivers, such as the Arkansas, provide important habitat for mammals, amphibians, reptiles, and migratory waterfowl both annually and seasonally. Additionally, wetland complexes such as this are a key component in maintaining the quality of the Arkansas River's water and nutrients, which enables this system to support a diversity of flora and fauna. These wetland habitats along with the nutrients and forage produced are vital to maintaining the quality and quantities of the resident fish and wildlife throughout the year as well as the migratory birds foraging and reproducing in this wetland seasonally.

Belz-Burrow/Hocker proposes to clear and fill all 31 acres of wetlands on the project site. This action will exacerbate flooding problems in North Little Rock, impact migratory bird

habitat and cause adverse impacts to water quality in this Arkansas River tributary. Further channelization of Big Ditch and flood plain reduction would have substantial environmental consequences. The channelization of streams and filling of floodplains such as this are decreasing the available flood storage, which contributes to habitat destruction and flooding of developed areas. Flooding of developed areas, in addition to the obvious human and economic consequences, increases pollutant runoff of chemicals and sediments that might otherwise be contained in upland locations.

To compensate for the loss of flood storage, Belz-Burrow/Hocker has proposed to excavate approximately 23 acres of upland farmland located east of North Hills Boulevard and south of the proposed wetland mitigation site within Dark Hollow. The mitigation that has been proposed by Belz-Burrow/Hocker is inadequate to compensate for the damage, and in fact will destroy at least five more acres of wetlands adjacent to the project site. The U.S. Fish and Wildlife Service has concluded that this project does not comply with the Environmental Protection Agency's Section 404(b)(1) guidelines to first avoid, then minimize damage to the aquatic ecosystem, and finally mitigate for unavoidable adverse impacts to "obtain no overall net loss to wetlands" as agreed to within the 1990 EPA/Corps MOA concerning the Determination of Mitigation.

Again, we as the Arkansas Chapter of the American Fisheries Society are in strong support of your decision to not become involved with this particular project.

Sincerely,

Ronald L. Johnson  
Director of Environmental Affairs  
American Fisheries Society, Arkansas Chapter