

for restudy, including a better and more thorough reconciliation with present and impending water supply projects. We do not oppose the other projects in the third interim report, however, and would suggest that if the Big Walnut project can be extracted from it, this should be done.

We do not think much of a case for any water supply for Indianapolis from Big Walnut can be made. But even if it could, and all the water could be justified, it can be supplied by alternatives to the present design, which would not flood the nationally significant upper valley. A relocation to Reelsville, for example, has a substantially equivalent benefit-to-cost ratio. By controlling 307 square miles of the basin instead of only 197, it would also provide superior flood control; and it would not impair the natural area in any way. The corps has declined to include a benefit factor in alternatives which would preserve the natural area intact.

The November 20, 1967, supplement to the third interim report includes a recommendation for 300 additional acres of land acquisition, "nature" center, "observation" towers, and interpretive facilities, at an additional cost of \$500,000. However, it recommends precisely the same water levels as originally proposed. The best scientific opinion available dismisses such a plan as nothing more than a "post mortem" study of nature. This is a term used by Dr. Robert O. Petty, of Wabash College, who conducted the first ecological study of the valley through a National Park Service grant. The Indiana Academy of Science resolution, and the position of all of Indiana's conservation organizations, fully concur in that judgment.

Moreover, we find it inexplicable that the corps includes no benefits from its version of a "nature center." Philosophically, of course, they are correct. Such a plan, unaccompanied by design changes to prevent any flooding in the upper valley, would be worth nothing. However, as a practical matter, we take exception to the corps refusal to calculate a benefit from nature study, education, esthetic benefits, and scientific research in the life and earth sciences. Such an approach is environmentally irresponsible or, at best, uninformed. The corps also assumes that no increase in visitation to the reservoir complex would result from its "nature" center proposal. And, considering that such a facility under the proposed conditions would be an aberration of nature, perhaps they are right. But again, as a practical matter, it seems preposterous to suggest a "nature" center that would produce no visitations at all. But this is exactly what the corps states in its supplement.

I think we understand why the corps refuses to attribute any benefits to its "nature" center idea. To acknowledge such a benefit would lead inescapably to a discussion of how much more beneficial an unimpaired natural landmark would be. The Indiana Academy of Science has already conducted a statewide survey indicating school students are transported hundreds of miles for field study and appreciation of the types of values which are found in Big Walnut Valley. We appreciate that such factors would tend to complicate the corps' method of calculating benefits. However, the mandate for doing exactly that is found in many documents including Senate Document 97, and Department of the Army regulation ER-1165-2-2. The corps has either rejected these principles in its Big Walnut Valley program, or does not understand what they mean.