



LOUISIANA WILDLIFE FEDERATION

"... conserving our natural resources and your right to enjoy them since 1940."

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August 24, 2018

Board of Directors
Rankin Hinds Pearl River Flood and Drainage Control District
PO Box 320790
Flowood MS 39232

Dear Board Members:

On behalf of the Board of Directors for Louisiana Wildlife Federation, I am submitting the following comments in opposition to the proposed "One Lake" project.

"One Lake" proposes to dam the Pearl River near Jackson, Mississippi, to create a 1,500-acre lake and develop residences and structures along the lake, immediately impacting a total of 2,500 acres of wildlife habitat. If approved, the project would also include dredging 10 miles of the Pearl River. Louisiana Wildlife Federation opposes the "One Lake" project for the severe negative impacts this would have on the Pearl River watershed and its ecosystem benefits.

The planning documents as presented are deficient in several crucial areas. This project is required to be in full compliance with all federal environmental laws and planning requirements, including the National Environmental Policy Act (NEPA) and the Water Resources Development Act (WRDA) due to the perceived severe and extensive harm caused by the tentatively selected "One Lake" alternative.

The Fish and Wildlife Coordination Act Report from the U.S. Fish and Wildlife Service (USFWS) calls the proposed plan the "most environmental damaging plan". The report suggests more detail be given in another draft Environmental Impact Statement and include natural resource agencies such as USFWS in the planning process.

At the August 13, 2018 meeting of the Louisiana Joint House and Senate Lower Pearl River Ecosystem Task Force, several Louisiana state agencies provided critical comments about the lack of attention to details in the planning documents regarding the project construction and stated that impacts downstream appeared to be largely ignored. Louisiana Department of Wildlife and Fisheries noted that insufficient data was used to determine that Gulf sturgeon does not use the protected critical habitat area of the Pearl River that will be dredged and widened for the lake. Louisiana Department of Natural Resources noted a coastal zone consistency review is needed for this project. Louisiana Department of Environmental Quality noted the number of landfills and polluted industrial sites in the Jackson, Mississippi area that will need to be disturbed by dredging or bisecting, which could lead to run off and underground leaching into the Pearl River in the short term. Inadequate data and analysis on long term impacts from reduced flow and changes in water quality were also identified. These and other issues identified must be answered.

Impacts downstream of the proposed project alternative should be considered when potentially altering the flow to this degree, which would affect the flow dynamics and the ecology of the surrounding bottomland hardwood forests downstream, as it would the entire watershed, including swamps and freshwater marsh.

There are important flooding dynamics for downstream habitat that benefit from regular Spring floods along the Pearl River system, including the Pearl River Swamp (Honey Island Swamp). Habitat areas in the Bogue Chitto National Wildlife Refuge and Louisiana's Pearl River Wildlife Management Area require periodic flooding to maintain healthy forests. This would be impeded by damming upstream.

If the project is approved, mitigation for the more than 2,000 acres of habitat destroyed should be fully addressed. It is not clear in the Environmental Impact Statement that the entire watershed has been identified for mitigation needs due to impact.

Changes in the river upstream to form a lake and the subsequent downstream reduction in flow will degrade or destroy critical habitat for the federally-protected Gulf sturgeon, Ringed Sawback Turtle (endemic), Wood Stork, and Northern long-eared bat. It will also negatively impact important breeding habitat for the following species of conservation concern: Swallow-tailed Kite, Bald Eagle, and Pearl River Map Turtle (endemic). It is not clear that there is mitigation in the plan for these negative impacts to wildlife throughout the watershed.

The Pearl River is the fourth largest source of freshwater into the Gulf, east of the mouth of the Mississippi River. Reductions to downstream flow of freshwater through the Pearl River would jeopardize water quality, the productivity of seafood, and hundreds of millions of dollars of coastal restoration projects. Also, a water budget for the Pearl River does not currently exist but needs to be identified in order to make a determination about the amount of water needed in the entire system to maintain its biological health.

The Louisiana Legislature unanimously passed a resolution in opposition of this project as has St Tammany and Washington Parishes, the cities of Slidell and Bogalusa, and the town of Pearl River. Their resolutions note limitations on freshwater flow that can threaten industry users downstream, reduce oyster production, and restrict benefits from coastal restoration projects needed in Louisiana.

Non-structural alternatives should be given more consideration or at least provide more explanation about why elevating structures or relocating structures in the flood-prone area was considered more expensive than altering an entire watershed.

Louisiana Wildlife Federation is a statewide conservation education and advocacy organization with 22 affiliate organizations and 6,800 members representing a broad constituency of conservationists including hunters, anglers, campers, birders, boaters, and other outdoor enthusiasts. Thank you for the opportunity to comment.

Sincerely,



Rebecca Triche
Executive Director