



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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August 5, 2024

Colonel Christopher Klein
District Commander
U.S. Army Corps of Engineers, CEMVK-PMP
4155 East Clay St
Vicksburg, MS 39183

Delivered via email to pearlriverfrm@usace.army.mil

RE: Pearl River Basin, Mississippi, Federal Flood Risk Management Project – Commander's Report and Environmental Impact Statement

Dear Colonel Klein:

Louisiana Wildlife Federation (LWF) is a statewide, nonprofit organization that represents 23 affiliate organizations and more than 11,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for the opportunity to submit these comments for consideration.

In comments LWF made in 2023 related to preparing the Draft Environmental Impact Statement (DEIS) for the 2023 Scoping for Pearl River Basin MS, Federal Flood Risk Management Project, Rankin and Hinds Co., LWF urged the Corps to reject proposed Alternative C project in Jackson, Mississippi – known locally as the One Lake project.

The DEIS added Alternatives D and E in addition to Alternative C. LWF requests that the USACE reject the "One Lake" project (Option C) and all similar plans that dam and/or dredge the Pearl River. Please reject Alternatives C, D, and E.

Alternative A1 is an action LWF can support to achieve the goals of flood prevention and mitigation. On behalf of LWF, I urge the Corps to pursue effective flood relief through Alternative A1's home elevations and flood-proofing buildings and expand this plan to benefit more homes and structures, restore floodplains, raise roads, and include levee setbacks and protections for vulnerable Jackson neighborhoods such as the Canton Club-Parkway-McLeod area.

In the DEIS, Alternative A1 includes "participation in the non-structural plan would be on a voluntary basis by the individual property owners. **This alternative would not require habitat mitigation, nor would it have any impacts on federally listed species.** Alternative A1 was assessed as a standalone nonstructural plan and as a combination nonstructural plan with construction of the Canton Club Levee. The Canton Club Levee is a levee segment of approximately 1.5 miles proposed on the west bank of the Pearl River in northeast Jackson. This levee would provide additional flood risk reduction for approximately 100 acres of high density developed neighborhoods and reduce flood risk for over 250 homes."

From the DEIS, “Potential adverse disproportionate impacts are identified for Alternative C, D, and E that include flood inducements that occur predominately in areas of EJ (environmental justice) concern. Alternative A1 is a NS (nonstructural) plan that may require those eligible participants to undertake financial burdens such as relocation costs during elevation that those in disadvantaged communities may not be able to afford. Another consideration is that nearly 50% of the structures in this area are considered rental property. Mitigation of adverse disproportionate impacts is required. Potential impacts to homeowners in disadvantaged communities may occur from Alternative A1, if at the time of implementation, it is determined that low-income residents cannot afford the costs to participate in the elevation plan. Using a whole-of-government approach that would identify other public entities that can provide financial assistance may be required to bridge the financial gap so eligible residents in disadvantaged communities can participate in the elevation plan. Other options should be explored, possibly voluntary buyouts, and offered to those in disadvantaged communities who cannot afford to participate in the plan. Alternatives D and E do offer voluntary buyouts as part of the NS Plan.” Disparity can be addressed by including funding in Alternative A1 for participation in the voluntary relocation or elevation of structures and the added costs of temporary relocation.

On July 9, 2024, the U.S. Fish & Wildlife Service (USFWS) listed the Pearl River map turtle as a threatened species only found in the Pearl River. While USFWS has not yet made a decision to designate the Pearl River as critical habitat for recovery of this threatened species, further changes to the river’s hydrology and morphology can negatively impact recovery efforts. Proposed Alternative A1 requires no mitigation for species impact because it would not fundamentally alter the Pearl River as the other alternatives would.

The Pearl River provides habitat for more than 300 species of birds, fish, and wildlife, and 125,000 acres of wetland and bottomland hardwood conservation lands, including numerous species listed under the Federal Endangered Species Act or otherwise federally designated as at-risk, due to the habitat losses and fundamental transformation of the Pearl River ecosystem. As the U.S. Department of the Interior has advised, “[w]ildlife resources within the Pearl River Basin are dependent upon the diverse floral composition of associated forested wetlands” and “a higher percentage” of vertebrate wildlife species in the Basin “use bottomland hardwoods as primary habitat (habitat a species depends upon for reproduction and/or feeding during all or a portion of the year) than any other habitat type.”

Modeling by National Audubon Society’s science team has found that an estimated minimum of 32 million birds depend on the central-lower Pearl River Basin for nesting and migration. Many of these are Neotropical Migrants, a group of birds that are in trouble everywhere. Their long migrations from North America to Latin America and the Caribbean expose them to habitat destruction at any point in their life cycle so LWF remains concerned about how Alternative C, D and E add to loss of habitat.

Reductions to downstream flow of freshwater through the Pearl River would jeopardize water quality, the productivity of seafood, hundreds of millions of dollars of coastal restoration projects, and degrade or destroy critical habitat for vulnerable species like the federally protected Gulf sturgeon, Ringed Sawback Turtle, and the Pearl River Map Turtle. Other species that would be impacted by degraded or loss of quality habitat by Alternative C and the similarly proposed Alternatives D and E include the Alligator Snapping Turtle, Louisiana Pigtoe, Northern Long-

eared bat, Monarch Butterfly, Bald Eagles, Tri-colored Prothonotary Warbler, Swainson's Warbler, Swallow-tailed Kite, and Clapper Rail.

The Pearl supplies freshwater flows critical to the health of the Gulf of Mexico; the region's oyster, crab, shrimp and tourism industries; and hundreds of industrial and municipal users. Dredging and damming Pearl River could destroy vital fish and wildlife habitat, worsen Jackson's flooding and drinking water crisis, increase toxic contamination, and reduce freshwater flows critical to the region's important seafood and tourism economies.

In addition to habitat that would be lost by damming and dredging, the fundamental changes to the function of the Pearl River system will pose threats to maintaining the natural floodplain inundation during flood stages downstream. These changes would negatively impact local communities.

While the city of Jackson has flooding problems to address, downstream impacts must not be ignored. The Ross Barnett Reservoir on Pearl River above Jackson already adds to impacts downstream.

The Pearl River is a major source of freshwater to the Gulf of Mexico and such reductions in flow could alter water quality and coastal salinities, affect sediment transport, and increase saltwater intrusion upriver. This would threaten the health and productivity of many downstream habitats including more than 125,000 acres of existing – and mostly public – conservation lands such as Bogue Chitto National Wildlife Refuge, Pearl River Wildlife Management Area, and Hancock County Coastal Preserve. LWF is concerned about Alternative C and D for building more dams and weirs on the Pearl River as this is damaging to these state and federal public landholdings and degrades the habitat and recreational enjoyment. Alternative E calls for dredging portions of the river that reduce or remove riparian habitat important to protected species.

Again, we strongly urge consideration of Alternative A1 as the viable option to meet the goals of reduced flooding in Jackson without irreversibly damaging habitat that cannot be mitigated and causing more problems downstream.

Sincerely,



Rebecca Triche
Executive Director