



# LOUISIANA WILDLIFE FEDERATION

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

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June 30, 2023

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

via: [pearlriverfrm@usace.army.mil](mailto:pearlriverfrm@usace.army.mil)

**RE: 2023 Scoping for Pearl River Basin MS, Federal Flood Risk Management Project, Rankin and Hinds Co.**

Dear Colonel Klein,

Louisiana Wildlife Federation (LWF) has long had concerns around the proposed Alternative “C” project in Jackson, Mississippi – known locally as the One Lake project. We strongly urge you to protect the Pearl River by rejecting this alternative. LWF offers the following comments for your consideration as you prepare a Draft Environmental Impact Statement (DEIS) for this project in Rankin and Hinds Counties, Mississippi and analyze flood risk management plans.

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. 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 the Pearl 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.

Recognized as one of the most intact river systems in the southeast U.S., the Pearl River supports a vast diversity of birds, fish and wildlife, and their habitats. Alternative “C” (One Lake) puts these prized resources in jeopardy. Because of these threats, American Rivers has named the Pearl River as #3 on its Most Endangered Rivers list – the second such listing since 2018.

This current proposal involves dredging and widening 10-miles of the Pearl River and building a dam to create a 1,900-acre lake under the guise of providing dubious flood control benefits for the metropolitan area of Jackson, Mississippi. The proposed Alternative “C”/One Lake project would destroy 2,500 acres of mostly wetland habitat and disturb highly contaminated toxic sites with no plan to protect public health. Even more habitat will be lost as the fundamental changes to the form and function of the Pearl River system play out over time, including reduction and elimination of natural floodplain inundation. This project poses serious threats to the ecology of Mississippi, Louisiana, and the Gulf of Mexico as well as to local and downstream communities and the region's economy.

It would adversely affect hundreds of species of fish and wildlife, 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.”

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 and the Ringed Sawback Turtle – which, along with the Pearl River map turtle, is endemic to Louisiana and Mississippi. The dredging and snag removal would destroy basking and nesting sites for these species. Mississippi Wildlife Federation has identified several priority species that would be impacted by Alternative “C”/One Lake including Prothonotary Warbler, Swainson’s Warbler, Swallow-tailed Kite, Clapper Rail and the endemic Pearl River Map Turtle.

The Pearl River provides resting and feeding areas for migratory birds that cross the Gulf of Mexico. LeFleur’s Bluff State Park has been identified as an Important Bird Area (IBA) by Audubon Mississippi. The Pearl River is the stronghold of the swallow-tailed kite. Reduced flow caused by Alternative “C”/One Lake will increase toxin concentrations in the Pearl, which will bioaccumulate in the birds that feed on aquatic insects like dragonflies and mayflies.

Five Mississippi counties, two Louisiana parishes, towns in both states, and the Louisiana Legislature all passed resolutions opposing Alternative “C”. On an already dammed and regulated river, dredging another lake carries the most risk to habitat and wetlands in the project area and to channel stability. USGS researchers at the Lower Mississippi Gulf Water Science Center are modeling downstream and estuary sensitivities to flow alterations upstream on dammed Gulf-drainage rivers, including the Pearl; this modeling is being paid for by RESTORE Act funds. Basic research questions still need answers. Jackson, MS needs better flood protection, but creating another lake on the Pearl River with Alternative “C” is not the answer.

Much more study must be done to properly assess the full extent of the harm to fish and wildlife from the proposed project. This includes properly conducting fish and wildlife surveys in the study area as well as within the Pearl River basin above the project (i.e. near and around the existing Ross Barnett Reservoir) and 200-miles downstream below the proposed dam in order to properly quantify the project’s anticipated wildlife impacts. A water budget for the river needs to be developed and presented so we know the true picture of water input, water use, evaporation under present conditions and with the lake project in place. The Study Area for this project should go all the way to Lake Borgne and the Rigolets. The Rigolets is a tidal pass and Lake Borgne is an estuary in St. Bernard Parish, Louisiana directly south of the mouth of the river.

The Alternative “C”/One Lake project poses significant, irreversible damages to the Pearl River, birds and their habitats and the ecological impacts go well beyond the immediate project footprint to include the downstream resources that lie along the 200-mile stretch of the Pearl below the proposed dam as well as Mississippi Sound, Lake Borgne, and the Gulf of Mexico.

A new dam on the river (as is proposed in Alternative “C”) would change the hydrology of the whole system. This could result in an alteration of the freshwater and sediment flows to resources downstream, endangering fisheries, threatening oyster production, potentially jeopardizing the success of millions of dollars of coastal restoration efforts that are underway or planned in the area, and endangering thousands of acres of important bottomland hardwood and swamp forests.

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”/One Lake’s impacts to these state and federal public landholdings and considers any impacts unacceptable.

The impacts of Alternative “C”/One Lake are so potentially dire that the Louisiana Legislature unanimously passed a joint 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 in Louisiana.

LWF has long opposed the Alternative “C”/One Lake project. In 2018, LWF signed a letter of opposition with 55 other organizations and businesses – representing millions of members and supporters from across the country – expressing concerns about Alternative “C”. Those concerns still hold strong today which is why we urge you to reject Alternative “C” and find a viable solution for Jackson’s flooding issues that will not result in more harm for surrounding and downstream communities in Mississippi and Louisiana.

A reasonable alternative is one that will not risk altering river flow or temperature from more water impoundment. Altered flows threaten the health and productivity of additional downstream habitats that support an array of fish, birds, and wildlife.

The US Army Corps of Engineers, US Environmental Protection Agency, and US Fish and Wildlife Service must protect the Pearl River for people and wildlife by rejecting Alternative “C”/One Lake. These agencies should prioritize non-structural and natural infrastructure solutions to provide effective, environmentally sustainable flood relief to Jackson while protecting the river’s unique ecology and wildlife. Instead of subsidizing private real estate development, the federal government should invest in already identified flood relief solutions, including setting some levees farther back from the river, investing in floodplain and wetland easements, targeted elevations, and voluntary relocations of structures in flood-prone areas.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 19 affiliate organizations and more than 8,000 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for the opportunity to submit these comments for consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacy Ortego". The signature is fluid and cursive, with the first name "Stacy" and last name "Ortego" clearly distinguishable.

Stacy Ortego  
Coastal Policy Manager