



## LOUISIANA WILDLIFE FEDERATION

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PO Box 65239, Baton Rouge, LA 70896  
8480 Bluebonnet Blvd. Suite F, Baton Rouge, LA 70810

(225) 344-6707  
[www.lawildlifefed.org](http://www.lawildlifefed.org)

August 13, 2025

U.S. Army Corps of Engineers, Environmental Branch  
Regional Planning and Environmental Division South CEMVN-PDS  
Attention: Mr. Jason Emery  
Public Notice: **Pearl River Basin Mississippi Federal Flood Risk Management Project**  
7400 Leake Avenue, New Orleans, Louisiana 70118-3651

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

**RE: Pearl River Basin Mississippi Federal Flood Risk Management Project RDEIS**  
**United States Army Corps of Engineers (USACE)**  
**Date: July 15, 2025; Comment Period Expires August 15, 2025**

Dear Mr. Emery,

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 on the above referenced USACE Pearl River Basin Mississippi Federal Flood Risk Management Project RDEIS.

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 current RDEIS has included Alternatives D1 and E1 into its proposal and has eliminated Alternative A1 from consideration. **LWF requests that the USACE reject Option D1 and E1 (“One Lake”) and all similar plans that dam and/or dredge the Pearl River. We urge you to reconsider Alternative A1.**

Any plan that digs up the Pearl River would be ecologically devastating and encourage new development that puts more people and property in harm's way. These plans would worsen Jackson's flooding and drinking water crisis, expose local and downstream communities to toxic contamination, destroy hundreds of acres of wildlife habitat, and alter freshwater flows critical to the region's important seafood and tourism economies. Taxpayers are on the hook to foot the bill yet the true costs of Alternative D1 and E1 continue to be woefully underestimated. The USACE latest assessment of D1 and E1 in the RDEIS shows that the costs will skyrocket, compared to DEIS estimates.

Alternative A1 is an action LWF can support to achieve the goals of flood prevention and mitigation through home elevations and flood-proofing buildings that can be expanded 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 addition, LWF requests that the USACE conduct a “Downstream Impact Study” on the possible environmental effects of Alternative A1, D1, and E1, on the Pearl River. As identified in the USACE presentation of the RDEIS, the current study only reflects concerns within a ten-mile area of the project. We feel a more comprehensive study should be conducted to evaluate concerns further downstream, particularly concerns for wildlife, wildlife habitat, and water hydrology issues in Louisiana. Lastly, LWF asks that the USACE follow through with the request that an additional public meeting on the project be held in Washington Parish, Louisiana, as requested by Louisiana State Representative Stephanie Hunter Berault.

To reiterate LWF’s position from past comments, we provide the following information.

In the DEIS, Alternative A included “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 impact on federally listed species. Alternative A 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 Alternatives D and E that include flood inducements that occur predominately in areas of EJ (environmental justice) concern. Alternative A is an 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 decided 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, “wildlife 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. Their long migration routes make them vulnerable to habitat loss.

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.

Fundamental changes to the function of the Pearl River system will pose threats to maintaining the natural flood plain 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.

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

Sincerely,



Rebecca Triche  
Executive Director  
Louisiana Wildlife Federation