



November 27, 2013

To: **Rankin-Hinds Pearl River Flood and Drainage Control District**

P.O. Office Box 154
Jackson, MS 39205
RankinHinds@gmail.com

From: **Mississippi River Delta Restoration Coalition**

RE: Preliminary Feasibility Study and Draft Environmental Impact Statement for One Lake Project

The Mississippi River Delta Restoration Coalition is comprised of local and national conservation organizations working to restore the Delta, Coastal Louisiana, and ecosystems dependent upon them, including Mississippi Sound and the north-central Gulf of Mexico. Next to the Mississippi River itself, the Pearl River is the largest contributor of freshwater, sediment and nutrients to the lower Pontchartrain Basin and Mississippi Sound. While we understand the desire to reduce flooding in Jackson, time after time, short-sighted and poorly studied upstream alterations to rivers entering the Gulf have had long term deleterious effects on downstream estuaries, from Apalachicola Bay in Florida to the Laguna Madre in Texas. Any proposed project affecting streams entering the gulf must be subjected to rigorous analysis for the entire stream length, and project sponsors bear the burden of proof. Sponsors should also consider all alternatives to achieve the desired reduced flooding in human communities while avoiding and minimizing impacts to human and natural communities downstream.

As you prepare the EIS for the One Lake Project, we recommend the following:

- Expand the geographic scope of the study area.
 - The study area should be defined, at a minimum, as the Pearl River watershed boundaries from the Ross Barnett Reservoir to Mississippi Sound and the Biloxi Marshes of Louisiana.
- Expand the alternatives. The current alternatives under consideration are inadequate. At a minimum alternatives should include the following:
 - Non-structural flood protection measures, including raising buildings, not just buy-outs;
 - Better management of the Ross Barnett Reservoir to reduce flooding and incorporate local input on management, including reduced sediment input into the Reservoir
 - Development of urban stormwater and groundwater management plans to reduce flooding during large rain events.
- Maintain the health of the bottomland hardwood and swamp forest (Bogue Chitto National Wildlife Refuge, Pearl River Wildlife Management Area, Old River Wildlife Management Area, etc.) and the wetlands in the Pearl River Basin and flood area.
 - Bottomland hardwood and swamp forests require periodic flooding to maintain forest health. Changing the hydroperiod, one of the alternatives being considered in Draft EIS, may impact the

health of these forests. Therefore, we would like to see detailed analysis of the potential changes to the hydroperiod downstream of the proposed project area.

- Additionally, healthy swamp needs sediment from floods to stay healthy. Therefore, we would like to see a detailed analysis of how sediment transport will be affected by the proposed One Lake Project.
- The Pearl River Delta acts to buffer storm surge into the lower Pearl River Basin. The potential impact of the project to increased hurricane surge flooding must be assessed.
- Potential changes to habitat and increased development due to the One Lake Project may also impact threatened and endangered species, such as the ringed-necked turtle, gopher tortoise, inflated heel splitter mussel and the Gulf sturgeon. Therefore, we would like to see an analysis on the effect of this project on threatened and endangered species.
- Maintain estuarine health.
 - Project effects on coastal marshes should be thoroughly analyzed for the life of the project, taking into account climate change and relative sea level rise.
 - Analyze effects on estuarine organisms, including important fisheries species like oysters, shrimp, blue crabs, spotted seatrout and redfish.
- Analysis of impacts of the Ross Barnett Reservoir to downstream reaches of the Pearl River and how its impacts compare to those potential with the One Lake Project.
- Finally, in the Pearl River basin there are two sills that have been proposed for de-authorization by the Louisiana Department of Wildlife and Fisheries with the support and encouragement of U.S. Army Corps of Engineers. We would like to see a detailed analysis of how sill removal in conjunction with the proposed alternatives would alter downstream flows and sediment transport in the Pearl River Basin.

We are very interested in the results of the Draft EIS and look forward to reading it upon its release. We strongly encourage you to include the items discussed above. Please feel free to contact us if you have any questions.

Sincerely,

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