



STATE OF MISSISSIPPI  
PHIL BRYANT  
GOVERNOR  
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
GARY C. RIKARD, EXECUTIVE DIRECTOR

September 6, 2018

Rankin-Hinds Pearl River Flood and Drainage Control District  
2101 Airport Road, North  
Flowood, MS 39232

Re: MDEQ Comments to the FS/EIS

The Mississippi Department of Environmental Quality ("MDEQ") offers the following comments to the Integrated Draft Feasibility Study and Environmental Impact Statement (FS/EIS) prepared in support of a flood reduction project known as the One Lake Project. Upon receipt of a 401 water quality application, the agency will formally review impacts of the proposed project on water quality and provide additional comments as needed.

- Within the project area, two historical landfills were identified as sites having potential environmental impacts. The Lefleurs Landing Landfill is an approximate 45 acre site located near RM 288 and appears to be in close proximity to the proposed project excavation; additionally, the Gallatin Street Landfill is an approximate 117 acre site located between RM 286 and RM 285, part of which lies within the limits of the proposed project excavation.

Past efforts following closure of these landfills have been taken to reduce impacts. Certainly remedial actions proposed in the FS/EIS such as slurry walls, clay caps, bank stabilization controls, and groundwater extraction wells, may minimize potential impacts. However, it does not appear that complete excavation of both landfills, in their entirety, have been considered. According to the FS/EIS, the overall project construction would include the excavation of approximately 25 million yards of material between RM 284 and RM 293.5. Presumably, this figure includes the proposed excavation of approximately half of the Gallatin Street Landfill. Excavating both landfills in their entirety would increase the total project excavation by about 1.5 million yards (assuming an average waste depth in both landfills of 15-20 ft). Costs for this additional excavation could be offset by eliminating the need for additional environmental investigations called for at both sites and for remedial actions such as slurry walls, clay caps, bank stabilization controls, and groundwater extraction wells. Further, excavation of both landfills in their entirety would open additional air space for placing excavated riverbank material from adjacent sections of the project.

- A surface water diversion permit will be required for the proposed weir in accordance with Miss Code Ann. § 51-3-5. This permit will establish a minimum flow in accordance with § 51-3-39 (4): “No dam or reservoir, regardless of whether or not written construction authorization therefore is required under this section, may be constructed in such a manner as to impair the common law or other lawful rights of water users below or plans for the proper utilization of the water resources of the state. The board is authorized to prescribe such minimum flow releases from any dam or reservoir as may be found necessary to protect downstream users or otherwise prudently manage available surface water.”
  - The One Lake Project would potentially inundate the former Gulf States Creosoting facility. A Phase I environmental assessment completed by BCM Engineers in 1993, in and around the Gulf States Creosoting facility, found concentrations of semi-volatiles in both the soil and groundwater. Remedial actions were then undertaken by MDEQ and while the latest sampling results indicate that contaminant levels are below action levels, disturbance of the area in and around the site is not without risk. MDEQ notes that the proposed plans in the One Lake Project appear to include soil disturbance in Creosote Slough.
  - As stated above, upon receipt of a 401 water quality application, the agency will formally review impacts of the proposed project on water quality. In regard to the EIS, the agency offers the following limited comments related (directly and indirectly) to water quality matters presented:
    1. On page 64 of the EIS, the document indicates that the minimum low flow from the Ross Barnett dam structure is 112 MGD (174 cfs). It is also noted that critical low flow for the Savannah Street POTW is 290 cfs. The modeling in Appendix D indicates that the timeframe focuses on the month of July with a revised critical low flow of 227 cfs. However, for low flow conditions, the months of September and October have historically lower flows.
    2. On page 62, the document states that existing data indicate the Pearl River is meeting criteria. This is in contradiction to the 2016 305(b) Report.
    3. In Appendix D, MDEQ recommends that calibration statistics other than average flows be included for the hydrodynamic calibration.
    4. From Appendix D (p. 52), MDEQ recommends that the water quality model be run for a period longer than 31 days in order to encompass a wider array of flow and environmental conditions.
    5. MDEQ notes that predicted Chl-A values appear to be consistently lower than observed values (pgs. 101 – 105).
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6. The EIS presents and discusses information from 305(b) reports, 303(d) lists, and TMDL development efforts completed by MDEQ. It should be noted that while the completion of a TMDL would result in a water body segment no longer listed within 305(b) or 303(d) reports, this does not automatically mean that the water body is no longer impaired; rather, the water body would now be covered under a TMDL and would be treated as an impaired water body until future assessments indicate that the water body was fully meeting its designated uses.
7. In regard to water quality impacts in general, MDEQ believes additional evaluation should be done to consider how the proposed project would affect water quality downstream of the project area, including but not limited to changes in stream flow, changes in water availability, changes in velocities, frequency and duration of high/low flow events, and reaeration rates.

MDEQ appreciates the opportunity to comment on the FS/EIS. As in all cases, MDEQ is available to further discuss and work with the District to address these comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary C. Rikard", with a large, sweeping flourish at the end.

Gary C. Rikard  
Executive Director