

**Members**

**Senator Sharon Hewitt, Chair**  
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**Staff**

Stacy DeLaney, Secretary  
Alan Miller, Attorney

## Lower Pearl River Basin Task Force

September 5, 2018

Via Mail and Email

United States Army Corps of Engineers  
ATTN: Major General Richard G. Kaiser  
Commander, Mississippi Valley Division  
1400 Walnut Street  
Vicksburg, MS 39180

United States Army Corps of Engineers  
ATTN: Colonel Michael C. Derosier  
Commander, Vicksburg District  
4155 Clay Street  
Vicksburg, MS 39183

Watkins & Eager PLLC  
ATTN: Mr. Keith Turner  
Counsel to Rankin-Hinds Pearl River  
Flood & Drainage Control District  
400 East Capitol Street  
Jackson, MS 39201

Dear General Kaiser, Colonel Derosier, and Mr. Turner:

SUBJECT: Rankin-Hinds Pearl River Flood & Drainage Control District - One Lake Proposal  
Integrated Draft Feasibility & Environmental Impact Statement (DFEIS)

The Lower Pearl River Basin Task Force was created by Senate Resolution 219 of the 2017 Louisiana Legislature. The purpose of the task force is "to study and make recommendations to the legislature and federal agencies on the development of a long-term comprehensive master plan to address flood control and drainage issues, while preserving the Lower Pearl River Basin ecosystem." The task force is composed of the following members:

- (1) Senator Sharon Hewitt, appointed by the president of the Louisiana Senate, and who serves as chairperson.
- (2) Representative Malinda White, appointed by the speaker of the Louisiana House of Representatives.
- (3) Secretary Tom Harris of the Department of Natural Resources, or his designee.
- (4) Secretary Jack Montoucet of the Department of Wildlife and Fisheries, or his designee.
- (5) Secretary Chuck Carr Brown of the Department of Environmental Quality, or his designee.
- (6) Secretary Shawn Wilson of the Department of Transportation and Development, or his designee.
- (7) Executive Director Michael Ellis of the Coastal Protection and Restoration Authority, or his designee.
- (8) Washington Parish President Richard "Ned" Thomas, Jr., or his designee.
- (9) St. Tammany Parish President Pat Brister, or her designee.

Review of the Integrated Draft Feasibility Study and the Environmental Impact Statement (DFEIS) for the Pearl River Basin Federal Flood Risk Management Project (One Lake Project) proposed by the Rankin-Hinds Pearl River Flood & Drainage Control District (the District) in the State of Mississippi for any potential impacts on the Lower Pearl River clearly falls within the subject matter of the task force.

The United States Army Corps of Engineers and their local sponsor, the District, have proposed to build a flood control reservoir by making significant channel modifications on the Pearl River to create a 1900-acre lake. The water level of the newly created lake will be maintained by a weir at river mile 284 and minimum flow requirements set during the permitting process will be maintained by a 12 x 12 gate within the weir.

Please find attached specific comments and concerns on the proposed project from the various agencies, departments, and political subdivisions represented on this task force for submission during the DFEIS public comment period. Several themes emerged from their technical reviews:

1. The DFEIS addresses the impact to the Upper Pearl River Basin, but provides little consideration of the potential impacts to the water quantity and the water quality of the Lower Pearl River Basin within Louisiana. Adverse impacts to the water, sediment and nutrient loads carried by the Lower Pearl River could affect the health of our ecosystems that support a diversity of fish and wildlife. Discharge from the Pearl River into Lake Borgne, the Mississippi Sound and the Biloxi Marshes is critical to maintaining the habitat for commercially valuable oyster and shrimp fisheries. Changes to the depths, duration, and frequency of flooding may adversely affect the industries and recreational opportunities on the Pearl. And finally, the loss of coastal wetlands supported by the Pearl River could increase flood risk and storm surge and may hinder coastal restoration efforts.



2. The construction and operation of the proposed project may have reasonably foreseeable effects on coastal land use, water use, and natural resources of the Louisiana Coastal Zone. Hence, we believe a consistency determination is necessary, pursuant to the Coastal Zone Management Act of 1972.
3. Additional information is needed to evaluate the water quality, water quantity, and sediment issues in the Lower Pearl River during project construction.
4. Consideration of downstream mitigation projects and true river restoration that could benefit riverine species should be fully evaluated, along with cost/benefit comparisons. In addition to fish passages to improve migration access at the newly proposed weir and the existing weir at Poole's Bluff, sill removal at Poole's Bluff and the Bogue Chitto River should be considered.
5. Protection of rare, threatened, and endangered species such as the Gulf sturgeon and the Inflated Heelsplitter remain a concern. In addition, Louisiana has identified 47 species of concern in the Lower Pearl River Watershed.
6. Sufficient details have not been provided on how the three hazardous waste sites will be mitigated and the potential short-term and long-term impacts to water quality due to releases from these sites during and after construction.
7. The impact of the potential population growth and future development along the shoreline of the new reservoir on minimum flowrates downstream have not been taken into account.

Additional details are provided in the attached letters.

I appreciate the efforts of the District to inform the Lower Pearl River Basin Task Force and our community along the Lower Pearl River about the project and the District's commitment to address our concerns. And I am committed to continuing to work with the District as this process moves forward. However, given the technical concerns raised by the members of the task force and the uncertainty as to how this project will affect the Lower Pearl River downstream of the proposed project, I cannot support this project as currently proposed.

Also attached is Senate Concurrent Resolution 5 of the 2018 Regular Session of the Louisiana Legislature in opposition of the One Lake project.

Please feel free to contact me at 985-646-6490 or at hewitts@legis.la.gov if you have any questions regarding this matter.

Sincerely,



Sharon W. Hewitt  
Louisiana State Senator, District 1  
Chairman, Lower Pearl River Basin Task Force

ATTACHMENTS

cc: Louisiana Congressional Delegation

The Honorable Bill Cassidy  
The Honorable John N. Kennedy  
The Honorable Steve Scalise  
The Honorable Cedric Richmond  
The Honorable Ralph Abraham  
The Honorable Garrett Graves  
The Honorable Clay Higgins  
The Honorable Mike Johnson

Lower Pearl River Basin Task Force members

Representative Malinda White  
Secretary Jack Montoucet, LDWF  
Michael Ellis, CPRA  
Keith Lovell, LDNR  
Jeff Dautat, LDEQ  
Patrick Landry, LDOTD  
Councilman Perry Talley, Washington Parish  
Gina Campo, CAO St. Tammany Parish





# State of Louisiana

JOHN BEL EDWARDS  
GOVERNOR

August 31, 2018

Major General Richard G. Kaiser  
Commander, Mississippi Valley Division  
United States Army Corps of Engineers  
1400 Walnut Street  
Vicksburg, Mississippi 39180  
[Cemvd-pa@usace.army.mil](mailto:Cemvd-pa@usace.army.mil)

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Commander, Vicksburg District  
United States Army Corps of Engineers  
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[kturner@watkinseager.com](mailto:kturner@watkinseager.com)  
Counsel to the Rankin-Hinds Pearl River Flood and Drainage Control District

RE: Integrated Draft Feasibility & Environmental Impact Statement; Pearl River Basin, Mississippi Federal Flood Risk Management Project Hinds and Rankin Counties, MS; Rankin-Hinds Pearl River Flood & Drainage Control District - One Lake Project Proposal

Dear General Kaiser, Colonel Derosier, and Mr. Turner:

Louisiana's Coastal Protection and Restoration Authority (CPRA) has been informed of the release of a Draft Environmental Impact Statement (DEIS) for the One Lake Flood Control Project (Project) proposed by the Rankin-Hinds Pearl River Flood Control Drainage District (District), which evaluates potential flood control alternatives for Jackson, Mississippi and the surrounding area. According to the DEIS, the selected alternative is a 1,500 acre lake to be constructed on the Pearl River. The water level of the newly created lake will be maintained by a weir at river-mile 284 and minimum flow requirements set during the permitting process will be maintained by a gate within the weir. CPRA is concerned that the DEIS does not adequately address several issues raised by us and others during the public scoping process. We believe and request the following concerns must be addressed both in terms of potential impacts and potential mitigation before any final EIS can be completed.

As part of CPRA's 2017 Coastal Master Plan, an extensive non-structural program proposed to address flood risk and resiliency for our coastal communities. The Master Plan proposal includes 1,400 floodproofings, 22,400 elevations, and 2,400 voluntary acquisitions of property. The non-structural alternative evaluated in the DEIS featured only buy-outs of property, which was deemed unsuitable due to logistics and cost. CPRA recommends the alternative be reevaluated to include structure elevation and floodproofing as less severe non-structural plans to determine if this alternative is viable. We do not believe that simply evaluating an alternative based on buying out every affected structure adequately meets the NEPA requirement of a non-structural alternative evaluation.

CPRA would like to see the Downstream Impacts Fact Sheet expanded and formally added to the DEIS so it can be added to the record. The DEIS, as presented, focuses on the project area as defined in and around Jackson, Mississippi. However, the environmental impacts of the proposed project will be felt further downstream of this project area. While mentioned briefly in the DEIS and in a supplemental fact sheet, CPRA believes this discussion should be expanded and given its own subsection in the DEIS. Within this measure, it has been stated publicly that extensive modeling of downstream impacts has been conducted; however, this modeling has not been captured by the DEIS or appendices. In the past, CPRA has used modeling tools such as Integrated Compartment Models to capture floodplain responses to changes in river hydrology. We believe this approach should be taken for this project to address downstream, coastal and nearshore project impacts.

CPRA would like to review the Sediment Management Plan before it is finalized to ensure that sediment-starved Louisiana wetlands are not further impacted. Outside of the Mississippi River, the Pearl River is the largest driver of sediment to wetlands within the Pontchartrain Basin. Lowering water velocities on the Pearl River as a result of proposed project implementation will cause sediment to fall out of suspension and collect in the project area. At the time of the DEIS publication, the District has no plan for removal of sediment but has stated that one will be needed. CPRA would like to ensure that this project will not affect Louisiana's already fragile wetlands. We would also stress the need for this sediment in the lower reaches of the Pearl River and Coastal Louisiana and Mississippi. The potential for reduced sediment transport to these areas and its effect on coastal wetlands should be thoroughly evaluated and discussed as part of the DEIS. Lastly, CPRA is concerned about the storage capacity of the newly created One Lake storage pool and how that might impact flooding on downstream communities in Louisiana and Mississippi. The DEIS does not address the total volume of the newly created system but frequently cites the 1979 Flood of Record as the need for the project. The District should ensure that the floodwater storage area will not exceed its planned capacity and result in large, potentially catastrophic pulse floods downstream of the reservoir if the District must release floodwaters to ease flood pressure in Jackson.

The Louisiana Coastal Protection and Restoration Authority keenly understands the need for flood control to protect our communities, citizens, and businesses and supports the District in achieving this important goal in a manner that does not compromise our ability to carry out our mission. We look forward to cooperating with the District to ensure the best path forward for all parties.

If you have any questions or concerns regarding the comments put forth by CPRA, please feel free to contact Justin Merrifield, Coastal Resources Scientist Supervisor, at (225)342-4629 or [Justin.Merrifield@la.gov](mailto:Justin.Merrifield@la.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Bren Haase". The signature is written in a cursive, flowing style.

Bren Haase, Deputy Executive Director  
Louisiana Coastal Protection and Restoration Authority



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF THE SECRETARY

August 24, 2018

Major General Richard G. Kaiser  
Commander, Mississippi Valley Division  
United States Army Corps of Engineers  
1400 Walnut Street  
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Colonel Michael C. Derosier  
Commander, Vicksburg District  
United States Army Corps of Engineers  
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Keith Turner  
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400 East Capitol Street  
Jackson Mississippi 39201  
[kturner@watkinseager.com](mailto:kturner@watkinseager.com)  
Counsel to the Rankin-Hinds Pearl  
River Flood & Drainage Control District

RE: Integrated Draft Feasibility & Environmental Impact Statement; Pearl River Basin, Mississippi Federal Flood Risk Management Project Hinds and Rankin Counties, MS; Rankin-Hinds Pearl River Flood & Drainage Control District - One Lake Project Proposal

Dear General Kaiser, Colonel Derosier, and Mr. Turner:

The Louisiana Department of Environmental Quality (LDEQ), Office of Environmental Assessment, Office of Environmental Compliance and Office of Environmental Services reviewed the Integrated Draft Feasibility Study and Environmental Impact Statement (DFEIS) for the Pearl River Basin Federal Flood Risk Management Project, herein referred to as One Lake Project. LDEQ assessed potential impacts to the Lower Pearl River Basin within Louisiana based upon the DFEIS and local, historical knowledge of the Lower Pearl River Basin. LDEQ assessed impacts solely within the regulatory jurisdiction of the LDEQ, which includes Water, Air and Waste programs and has the following comments based upon the aforementioned project.

As required by the National Environmental Policy Act (NEPA), the Rankin-Hinds Pearl River Flood and Drainage Control District prepared a DFEIS. The DFEIS addressed the impact to the Upper Pearl River Basin but falls short in consideration to the potential impacts to the water quantity and the water quality of the Lower Pearl River Basin within Louisiana. To provide the impact of the One Lake Project on the Lower Pearl River Basin, a thorough environmental impact assessment on essential additional information is needed, specifically:

- ***Additional Information is requested, describing how flow will be managed to prevent and/or mitigate impacts to water quantity in the Lower Pearl River during project construction.*** The Study area, as described on page 20 of the DFEIS, does not specifically include the downstream reaches of the Pearl River in Louisiana. Downstream flows are only briefly discussed in Appendix C – Water Quantity Assessment utilizing existing data from the Ross Barnett Reservoir. The Downstream Impacts Analysis Fact Sheet located on the Rankin-Hinds website states assumptions that the project, “once constructed”, would not impact the water quantity and was based solely on minimum flow requirements from the Ross Barnett Reservoir and evaporation estimates. The Fact Sheet addresses only *post-project* construction impacts to water quantity. The DFEIS does not address potential impacts to water quantity *during construction* of Alternative C, the Tentatively Selected Plan (TSP).
- ***Additional Information is requested, describing and evaluating the water quality in the Lower Pearl River during project construction.*** The DFEIS does not adequately address potential impacts to water quality in the portion of the Lower Pearl River Basin within Louisiana, and within the project area, during the construction of the TSP. Page 1 of the DFEIS, Appendix D: Environmental Water Quality states: “In this report, historical and existing water quality conditions are described and evaluated for the Pearl River and its tributaries from the Ross Barnett Reservoir dam to approximately mile 280 on the Pearl River, that is, the Study Area (see Figure 1-1 in the FS/EIS).” And “Taking into consideration each of the proposed alternatives, water quality modeling was used to project water quality conditions of the Pearl River near Jackson<sup>1</sup>.”
- ***Consideration of minimum low flows must be given to major downstream facilities which discharge to and/or utilize the lower Pearl River as a water source.*** Two major facilities, which discharge storm water and waste water into the lower Pearl River near Bogalusa, Louisiana, may potentially be impacted as a result of reduced flows. Their LDEQ issued water quality permit limitations are based upon calculated critical low flow of 1,260 cubic feet per second (cfs). Flow below this minimum rate could impose much stricter permit limitations upon the quantity and quality of their discharge. Page 78 of the DFEIS, Appendix C: Engineering states “the Ross Barnett Reservoir has not reduced the mean annual volume of water received by the Lower Pearl River Basin.” An analysis of temporally varying critical low flows (the 7Q10, for example) and the trends before and after reservoir construction, rather than mean annual flow, would be more relevant to LDEQ for permitting. The DFEIS discusses the purpose of the installation of a 12’X12’ gate within the relocated weir to maintain minimum low flows pursuant to permitted requirements of the J.H. Fewell Water Treatment Plant near Jackson, Mississippi but no such consideration was provided for downstream facilities.



- **Additional information describing how the potential channel stability and sediment issues will be addressed in the project area during and post construction. This description should also address channel hydraulics and sediment transport during seasonal periods of high flow and downstream impacts.** The DFEIS indicates on page 117, Section 3.6.3 Alternative B (Levee Plan) additional floodwalls and conveyance improvements would be constructed. However, there will still be a “risk of overtopping or failure in levee sections during extreme events”. Additionally, the DFEIS states in Section 4.5.2.4 Channel Stability (Erosion and Sedimentation), page 177, Alternative B, direct and indirect impacts: “Structural measures such as levees and floodwalls could have some impact on channel stability. The clearing and conveyance improvements from RM 293.5 to RM 302.0 could increase overbank erosion and accelerate bank erosion in this reach due to removal of vegetation. In addition, with the construction of these features, velocities of flood flows will increase, increasing the possibility of erosion.” According to the DFEIS on page 121, Section 3.6.4 Alternative C - TSP (Channel Improvement/Weir/Levee Plan), 2,500 acres will be disturbed by “Clearing and Grubbing” and 25 million cubic yards by “Excavation/Levee”. The time frame during which “Clearing and Grubbing” and “Excavation/Levee” activities would occur is not specified. However, it is reasonable to assume the timetable for activities will occur over months to years. Most of these activities will occur within the flood plain of the Pearl River. The DFEIS states in Section 4.5.2.4 Channel Stability (Erosion and Sedimentation), page 177, Alternative C - TSP, Direct and Indirect Impacts: “Due to channel excavation and change in potential hydraulic parameters, a more detailed analysis was performed for this alternative. Structural measures such as levees, channel excavation, and construction of an in-channel weir were analyzed to preliminarily determine impacts of channel stability upstream and downstream of the Project Area. Based on the results of this preliminary assessment, it is believed there may be some potential channel stability and sediment issues that will have to be addressed in the project area.”
- **Further clarification of the meaning of the term “flowline” and the related activity necessary to relocate these “flowlines” will be required to fully assess the potential effect of this activity.** Section 3.6.4 Alternative C – TSP (Channel Improvement/Weir/Levee Plan) also mentions “lowering flowlines through the reach.” The term “flowline” is used in oil and gas exploration activities and indicates pipe lines which carry crude oil, gas, and produced water from a well to a production facility. If released or spilled, crude oil and produced water can cause significant negative environmental impacts. However, the DFEIS does not identify what is in the flowlines, how the flowlines will be lowered to prevent releases or spills, or any direct or indirect impacts from “lowering flowlines”.
- **The current DFEIS does not provide sufficient details on how the three HTRW sites will be mitigated and does not address the potential short term and long term impacts to water quality within the project area and in the lower Pearl River due to releases from the above HTRW sites during and after the construction of Alternative C - TSP.** Section 4.3.4 Historical Sites Within the Project Study Area, on pages 139 – 141, identifies three sites within the project area: The *Gulf States Creosote Company Site*; the unpermitted *Lefleur’s Landing Site*; and the unpermitted *Gallatin Street Landfill Site*. These sites are all identified as Hazardous, Toxic and Radiological Waste (HTRW) sites in Section 4.5.14, on pages 221 – 223. The DFEIS identified both inorganic and organic hazardous substances at the *Gulf States Creosote Company Site*. Regarding this site,



the DFEIS states: "The site, or portions thereof, may require avoidance, remediation, or some other mitigating measures." The *Lefleur's Landing Site* was concluded to be "a source of waste residuals and chemicals entering the Pearl River." Regarding this site, the DFEIS states: "Further investigations would be necessary to determine potential leaching of landfill waste chemicals to the groundwater and any movement of the groundwater into the proposed channel improvement." Leachate containing elevated levels of cadmium, lead, and nickel were documented to be in groundwater associated with the *Gallatin Street Landfill Site*. Regarding this site, the DFEIS states: "The proposed channel improvement excavation area would also bisect the unpermitted *Gallatin Street Landfill Site*; therefore, excavation and removal of approximately half of the landfill site would be required to construct the proposed channel improvement. This excavated material would then be incorporated into the current remaining landfill area to further elevate the area, cap the area, and provide bank stabilization. Further investigations may be required to determine potential leaching of landfill waste chemicals to the groundwater and movement of the groundwater into the proposed channel improvement area prior to the initiation of excavation activities at this location." Further complicating the risk to the lower Pearl River is the fact that the three previously mentioned HTRW sites will be inundated during seasonal high river flows.

Based upon the aforementioned information, LDEQ respectfully requests that more information be provided to clearly understand this project's potential impact upon the Lower Pearl River Basin in Louisiana. Without this additional information, the LDEQ cannot support this proposed project.

If you have any questions regarding this matter, please feel free to contact Jeff J. Dautat, Administrator, Emergency and Radiological Services Division at (225) 219-2966 or by email at [Jeff.Dautat@la.gov](mailto:Jeff.Dautat@la.gov).

Sincerely,



Chuck Carr Brown, Ph.D.  
Secretary  
Louisiana Dept. of Environmental Quality

JOHN BEL EDWARDS  
GOVERNOR



THOMAS F. HARRIS  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF THE SECRETARY

August 31, 2018

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

**RE: Integrated Draft Feasibility & Environmental Impact Statement  
Pearl River Basin, Mississippi  
Federal Flood Risk Management Project  
Hinds and Rankin Counties, MS**

Dear Sir/Madam:

The Surface Water Management Program of the Louisiana Department of Natural Resources (LDNR) has the responsibility of coordinating the Louisiana state agencies comments on federal license or permit applications that would impact surface water resources within the State of Louisiana. The sustainable use, development and the multiplicity of interests competing for the surface water resources of the state is something that Louisiana takes very seriously. The State of Louisiana is determined to ensure that the proper management of our surface water resources is performed in a sound and sustainable manner, and is protective of commerce, the wildlife and fisheries resources of the State and the environment.

This letter represents the LDNR's Surface Water Management Program comments on the "Integrated Draft Feasibility & Environmental Impact Statement for the Pearl River Basin Federal Flood Risk Management Project in Hinds and Rankin Counties, Mississippi."

The United States Army Corps of Engineers and their local sponsor, the Rankin-Hinds Pearl River Flood and Drainage Control District, propose to build a flood control reservoir and make significant channel modifications on the Pearl River between River Mile 284 and 293.5. The proposed reservoir would be sited directly downstream from the Ross-Barnett Reservoir. Its stated purpose would be to mitigate future flood risk in the greater Jackson Metropolitan Area.

Based upon our review of the Draft FS/EIS, the LDNR has the following comments:

1. The Draft FS/EIS and associated Downstream Impacts Analysis Fact Sheet present a preliminary assessment of the impacts that the proposed flood control reservoir may have on



downstream flow, specifically the impact at lower flow regimes. The studies, however, do not evaluate the impacts that the proposed reservoir will have during flood (e.g. peak flow) events. Flood events are part of a natural cycle that is necessary for the Bogue Chitto National Wildlife Preserve and Pearl River Wildlife Management Area to thrive. They also affect the geomorphology of the channels, flood plain and estuarine environment. Attenuation of peak flows in the Lower Pearl River would result in areas, which were previously inundated, to remain drier for longer periods of time.

2. The Draft FS/EIS does not assess the potential implications that the proposed flood control reservoir may have on the watershed under possible climatic change scenarios. The 50-year project life expectancy coincides with predicted sea level and climatic changes that should be taken into consideration.
3. As indicated in the Allen Engineering and Science 2014 report (Appendix C of the FS/EIS), the excavation of the Pearl River will alter the local hydrogeology. This is particularly significant when considering the proximity of the Jefferson Street Landfill, the Gallatin Street Landfill and the Gulf State Creosoting Company site from the proposed project. The Surface Water Management Program supports the recommendation included in the report that further investigation is necessary prior to this project to go ahead. This additional information is necessary to evaluate the potential risk posed to the Pearl River water quality under alternative C. More specifically, the Surface Water Management Program is interested in what remedial steps will be taken to minimize impact and to be protective of human health and the environment.
4. The downstream minimum flow regime proposed for the relocated weir, under Alternative C, and in accordance with the Consent Decree between the US Environmental Protection Agency and the City of Jackson for the Savannah Water Treatment Plan, does not take into account the potential population growth presented in the report.
5. Similarly, the study does not research the impact of future development along the shoreline of the new reservoir. This may have significant implication for the Total Maximum Daily Loads (TMDLs) downstream of the relocated weir and the necessary minimum flow regime.

In summary, we recommend that the United States Army Corps of Engineers and their local sponsor perform additional studies prior to considering moving onto the design phase of the Tentatively Selected Plan. This recommendation is made largely due to the questions that remain unanswered as to the viability of the proposed Alternative C.

We appreciate the opportunity to provide comments on these proposed activities and look forward to working with you to resolve any challenges that may arise. You may contact LDNR's hydrologist, Thomas Van Biersel, Ph.D., P.G. [email: [thomas.vanbiersel@la.gov](mailto:thomas.vanbiersel@la.gov) or (225) 342-1813] if you have any questions regarding these comments.

Sincerely,



Keith Lovell  
Assistant Secretary  
Office of Coastal Management





**State of Louisiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**OFFICE OF COASTAL MANAGEMENT**

August 31, 2018

Rankin-Hinds Pearl River Flood and Drainage Control District  
P. O. Box 320790  
Flowood, MS 39232

**RE: C20180088 Coastal Zone Consistency**  
**Integrated Draft Feasibility & Environmental Impact Statement**  
**Pearl River Basin, Mississippi**  
**Federal Flood Risk Management Project**  
**Hinds and Rankin Counties, MS**

Dear Sir/Madam:

The Louisiana Department of Natural Resources, Office of Coastal Management (OCM), is responsible for administering the Louisiana Coastal Resources Program (LCRP), a Federally approved coastal management program. The Coastal Zone Management Act of 1972, as amended, requires that any Federal agency activity, wherever located, must be consistent with the approved coastal management program of any affected State (15 CFR §930.155(a)).

The United States Army Corps of Engineers and their local sponsor, the Rankin-Hinds Pearl River Flood and Drainage Control District, propose to build a flood control reservoir and make significant channel modifications on the Pearl River between River, immediately downstream from the Ross-Barnett Reservoir. Its stated purpose would be to mitigate future flood risk in the greater Jackson, MS, metropolitan area.

OCM has reviewed the "Integrated Draft Feasibility & Environmental Impact Statement for the Pearl River Basin Federal Flood Risk Management Project in Hinds and Rankin Counties, Mississippi," and offers the following preliminary comments.

- 1 OCM is concerned that the construction and operation of the proposed project may have reasonably foreseeable effects on coastal land use, water use, and natural resources of the Louisiana Coastal Zone. This Draft FS/EIS does not adequately address the potential effects to the coastal resources of the Louisiana's Coastal Zone.
- 2 Construction and operation of the proposed dam may result in adverse impacts to the water, sediment and nutrient loads carried by the lower Pearl River into Louisiana marshes, bottomland hardwoods and swamp forests along its lower course. Sediment and nutrients are exchanged with these ecosystems during flood and non-flood stages,

supporting a diversity of fish and wildlife. Lake Borgne, Mississippi Sound and the Biloxi Marshes are also dependent on the discharge from the Pearl River, to maintain habitat for marine and saline marsh organisms including commercially valuable oyster and shrimp fisheries.

- 3 Construction and operation of the proposed dam, and the resultant development near the reservoir, may result in downstream changes to water quality, stream flow, sediment and nutrient loads, bankline erosion, flood stages, and salinities. Changes to the depths, duration and frequency of flooding may adversely affect dependent wetland and marine ecosystems, and the industries and recreational opportunities based upon them.
- 4 Coastal wetlands supported by the Pearl River provide a buffer to storm surge. The proposed project may interfere with Louisiana's efforts to reduce flood risk, may hinder coastal restoration efforts, and may exacerbate the already catastrophic loss of the State's wetlands due to erosion and relative sea level rise.
- 5 The Louisiana Coastal Resources Program specifically identifies "Activities affecting or altering surface runoff quality or quantity in the coastal watershed, and in the coastal zone" as being Federal activities which may be considered to directly affect the Louisiana coastal zone. After review of the Draft FS/EIS and associated Downstream Impacts Analysis Fact Sheet, the OCM has determined that the proposed construction and operation of the proposed dam is subject to the LCRP.
- 6 In light of these concerns, on July 19, 2018, the OCM Consistency Section sent a letter to Colonel Michael C. Derosier, Commander, U. S. Army Corps of Engineers-Vicksburg District, requesting that a consistency determination be submitted pursuant to the Coastal Zone Management Act of 1972, as amended, to ensure that the proposed project is consistent with Louisiana's approved Coastal Management Program. In preparing this consistency determination, the Corps of Engineers must ensure that all reasonably foreseeable effects of the proposed project, including direct, indirect and cumulative effects, are fully consistent with the LCRP.

We appreciate the opportunity to provide comments on these proposed activities. The OCM is available to work the Vicksburg District and the local sponsor in the preparation of the consistency determination. Please contact Jeff Harris of the Consistency Section at (225) 342-7949, or [jeff.harris@la.gov](mailto:jeff.harris@la.gov) if you have any questions regarding these comments.

Sincerely,



Keith Lovell  
Assistant Secretary  
Office of Coastal Management



**JOHN BEL EDWARDS  
GOVERNOR**



**JACK MONToucET  
SECRETARY**

PO BOX 98000 | BATON ROUGE LA | 70898

28 August 2018

Rankin Hinds Pearl River Flood Control and Drainage Control District  
Attn: Mr. Keith Turner  
P.O. Box 320790  
Flowood, MS 39232

RE: Pearl River Basin, Mississippi, Control Project, Integrated Draft Feasibility Study/Environmental Impact Statement Review

Mr. Turner:

The Louisiana Department of Wildlife and Fisheries' (LDWF) evaluation of the Integrated Draft Feasibility Study and Environmental Impact Statement Pearl River Watershed, Hinds and Rankin Counties, MS (FS/EIS), primarily addresses section 2, 4, and 5, and the Biological Assessment section in Appendix D - Environmental. The FS/EIS briefly addresses flow, evaporation, channel geomorphic assessments, and sediment loads and composition in sections 2.5.2 and 4.5.2, and Appendix D – Environmental. The Louisiana Coastal Protection and Restoration Authority (CPRA), the Louisiana Department of Natural Resources Office of Coastal Management (DNR/OCM), and the consistency determination process are state agencies' or regulatory processes that may provide further guidance on these issues. LDWF is particularly concerned about changes in the amount and timing of freshwater discharge into the Mississippi Sound, where considerable oyster resources are located, and about habitat usage by migratory fish as well as rare, threatened and endangered species that occur in the Pearl River.

The primary study area on the Pearl River watershed is between river mile (RM) 280.0 and RM 301.77 (i.e., 21.77 miles of aquatic riverine habitat). The proposed project area is located in the Upper Middle Pearl River sub-basin, and downstream impacts to the Lower Pearl River sub-basin are only briefly addressed in the study. LDWF believes a comprehensive evaluation of downstream impacts is necessary to complete the FS/EIS.



**Marine Resources in the Mississippi Sound:**

The Mississippi Sound area (i.e., Halfmoon Island/Grassy Island/Petit Island/Grand Banks), which is currently productive for oysters, depends on freshwater from the Pearl River to thrive. The addition of impoundments along the watershed have the effect of delaying seasonal river cycles, reducing range of flows, and reducing overall flow, all of which may impact estuarine resources. Changes to the timing and volume of river inputs into the estuary could affect the crucial balance of a system that currently provides an excellent habitat for oysters, as well as a variety of fish, shrimp, crabs, and other organisms in both Mississippi and Louisiana state waters, which support important fisheries for both states.

**Migratory Fish:**

Sixteen different species of migratory fish, anadromous, catadromous, and potadromous, utilize the Pearl River basin. The proposed relocation of the low head weir, resulting in the conversion of swift water (riverine) habitats to slackwater (lacustrine) habitats will adversely affect riverine fish and mussel communities. The project area is located in viable riverine habitat which is currently classified as Critical Habitat for Gulf sturgeon. Consideration of restoration efforts to migratory routes in the lower sub-basin (e.g., sill removal) are necessary when evaluating the impacts of this project. It is counter-intuitive to consider the elimination of riverine habitat upriver while restoration efforts progress in the lower sub-basin that are intended to improve access to those riverine areas for migratory fish species.

**Rare, Threatened and Endangered Species:**

The project area is located within the Critical Habitat designation for the Gulf sturgeon (*Acipenser oxyrinchus*). Efforts to minimize this designation in the project documents (sections 2.2.6.2, 2.5.7.1) should be based on quantifiable analysis and not merely on anecdotal accounts; additional seasonal sampling would be necessary to confirm whether Gulf sturgeon utilize habitats in the Upper Middle Pearl River sub-basin at the current time. Though the existing sills within the lower segment of the Pearl River basin do limit fish migration, passage does take place. This study should also consider efforts to improve utilization of these riverine stretches through removal of sills in the lower Pearl River sub-basin as part of the potential baseline for proposed impacted area.

The Inflated Heelsplitter (*Potamilus inflatus*) is considered critically imperiled in the state of Louisiana. Limiting the movement of the freshwater drum (*Aplodinotus grunniens*), host fish to the Inflated Heelsplitter, would limit potential distribution of this threatened species. In addition to these federally listed species, Louisiana has identified 47 species of concern in the Lower Pearl River Watershed.

**Invasive Aquatic Vegetation:**

The shallow areas of the new reservoir and other protected coves would create new habitat and refuge for noxious invasive aquatic weed species (e.g., Giant salvinia), for which Louisiana spends millions of dollars per year to control/eradicate. Terrestrial invasive vegetation is addressed, but aquatic invasive vegetation is not addressed in the FS/EIS.

**Downstream Mitigation:**

LDWF is concerned about the direct, indirect and cumulative impacts of the proposed reservoir. Critical Habitat should be addressed and not minimized. The FS/EIS proposed mitigation options are limited to constructing fish passages to improve access at both the newly proposed weir and the existing weir at Poole's Bluff. Consideration of downstream mitigation projects and true river restoration that could benefit riverine species, e.g., sill removal at Poole's Bluff and the Bogue Chitto River, should be included; along with cost-benefit comparison of fish passage construction at Poole's Bluff versus total sill removal. In addition, insufficient information has been provided concerning the mitigation of wetlands and waters impacted by the construction and maintenance of the Pearl River Basin, Mississippi, and Federal Flood Risk Management Project. Given the extensive nature of those impacts, and the project's potential for secondary impacts to Louisiana's natural resources, the FS/EIS must provide a complete mitigation plan for agency review.

Additionally, river-floodplain connectivity is important to the ecology of the Pearl River watershed. Therefore, it should be demonstrated that the proposed project will not decrease lateral exchange of energy, material and organisms between fluvial and floodplain systems. This is especially concerning in Louisiana where a national wildlife refuge, state wildlife management area and several state designated natural and scenic rivers are located along the Pearl River and/or its tributary and distributary channels. Any losses of connectivity or further floodplain isolation shall be quantified and mitigated.

**Construction Concerns:**

The FS/EIS must detail the measures taken to ensure that minimum flow rates, acceptable levels of suspended sediments, appropriate water temperatures, adequate dissolved oxygen levels, etc., are maintained downstream of the proposed flood risk management project while construction activities are underway. Given the potential for secondary impacts to downstream waters and adjacent habitats, details concerning the design and operation of the low flow gates must be provided.

**Monitoring:**

LDWF strongly recommends that the FS/EIS include construction and post-construction monitoring and adaptive management plans aimed at assessing and mitigating secondary



impacts to the Pearl River and its adjacent habitats downstream of the proposed weir. Concerns to be addressed in those plans include, but are not limited to, changes in the level of suspended sediments, water temperatures, dissolved oxygen levels, erosion rates, changes to the timing and volume of river inputs, etc.

The Louisiana Department of Wildlife and Fisheries seeks to work with you in a cooperative manner. Please do not hesitate to contact Matt Weigel (985-543-4931) of our Habitat Section should you need further assistance.

Sincerely,



Jack Montoucet  
Secretary



Office of the Secretary  
PO Box 94245 | Baton Rouge, LA 70804-9245  
ph: 225-379-1200 | fx: 225-379-1851

John Bel Edwards, Governor  
Shawn D. Wilson, Ph.D., Secretary

September 4, 2018

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

**RE: Integrated Draft Feasibility & Environmental Impact Statement  
Pearl River Basin, Mississippi  
Federal Flood Risk Management Project  
Hinds and Rankins Counties, MS**

Dear Sir/Madam:

The Louisiana Department of Transportation and Development (LaDOTD) is the state agency responsible for administering and coordinating all public works projects which include: The Louisiana Dam Safety Program, the Statewide Flood Control Program, the levee inspection program for all levee districts outside of the Louisiana Coastal Zone and the National Flood Insurance Program (NFIP), which was created by FEMA several years ago. Additionally, the Public Works Section of DOTD is responsible for review of all hydraulics design on all state roads and bridges.

This letter represents LaDOTD's comments on the "Integrated Draft Feasibility & Environmental Impact Statement" for the Pearl River Basin Federal Flood Risk Management Project in Hinds and Rankin Counties, Mississippi.

The proposed project includes construction of a flood control reservoir downstream of the existing Ross Barnett Reservoir between River Mile Markers 284 and 293 with an intended purpose of mitigating future flood risks in the area in and around Jackson, Mississippi.

LaDOTD provides the following comments regarding the Draft FS/EIS:

1. Due to significant flooding in March and August 2016, LaDOTD along with four other state agencies (GOSHEP, Office of Community Development, Coastal Protection and Restoration Authority and the Department of Wildlife and Fisheries) has formed a coalition based on an Executive Order by Governor John Bel Edwards, titled **The Louisiana Watershed Initiative**, which will model all of the watersheds across the state based on the HUC 8 sub basin level. There are 59 watersheds that fall within state boundaries and several are located in the vicinity of the Lower Pearl River Basin, which will be impacted by the proposed project. Specifically, those impacted watersheds are the Liberty-Tchefuncta watershed, Lower Pearl watershed and the Bogue Chitto watershed. Major infrastructure improvements, as those proposed in this project will have significant impacts on these watersheds. Currently, the **Louisiana Watershed Initiative** plans to enter into contracts with consulting firms next year to initiate surveys and modeling efforts.



2. During low water or draught periods when flows are less from the upstream dam of the Pearl River, sedimentation transportation in the river will be affected. Changes in sedimentation and sedimentation patterns in the river could affect future flooding patterns, navigation routes, channel maintenance costs, bank erosion, and flows and erosion near and at bridges on Parish and State Roads, and Federal and Louisiana State Highways. Changes in flooding patterns will directly affect road flooding, including emergency access routes during floods.
3. During large releases from a dam in the upper basin, both scour and changes in scour patterns at bridges and nearby corresponding access ramps on Parish and State Roads, and Federal and Louisiana State Highway will occur. Scour and changes in scour patterns at bridges and nearby ramps and roads will affect maintenance and inspection costs, including the necessity for costly changes at existing bridges and adjoining roads. Worse case scenarios can include costs for replacement of bridges which may become unsafe due to scour.
4. The effects on downstream flooding due to releases from a large dam during hurricanes or large storms, especially after heavy rains from storms that have tracked through the coastal parishes and have already dropped large amounts of precipitation, will affect how Louisiana manages floods and navigation on the Pearl River during high water periods (i.e.- storms from the gulf coast that track through the eastern parishes in Louisiana - Washington, St Tammany, Orleans and St Bernard). There are costs to changing flood control procedures, flood control structures and preparation for periods of flooding along the Pearl River. Changes affecting the lower Pearl River basin may also require reassessment of the current flood protection including construction of additional flood control structures and embankments in communities along the Pearl River.
5. Additionally, changes in flood flows along the Pearl River may affect releases through Lake Pontchartrian, which may affect flood control along the Mississippi River and may affect flooding along the shores of Lakes Pontchartrian and Borgne and the Rigolets in St Tammany Parish. Changes in releases through Lakes Pontchartrian and Borgne could also affect navigation, recreation and water quality in those water bodies, and may affect the ground water near Lakes Pontchartrian and Borgne and in the Rigolets in Saint Tammany Parish.

We appreciate the opportunity to comment on the proposed infrastructure project and look forward to working with you to resolve outstanding issues that we feel may arise with the construction.

Sincerely,



Patrick J. Landry, P.E.

Deputy Assistant Secretary, Office of Public Works

2018 Regular Session

SENATE CONCURRENT RESOLUTION NO. 5

BY SENATORS MIZELL, HEWITT AND PEACOCK AND REPRESENTATIVES  
CROMER, PEARSON AND WHITE



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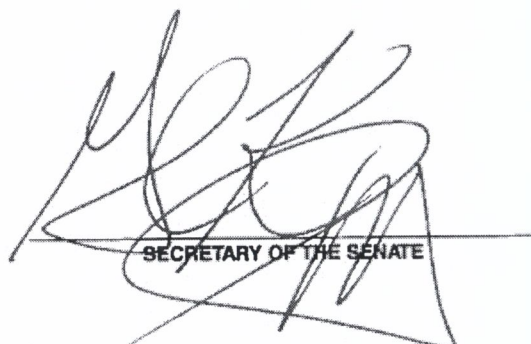
**SENATE**

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BY SECRETARY OF STATE

APR 10 2018

ELECTIONS SERVICES

S-213 (R/83)

  
SECRETARY OF THE SENATE



SENATE CONCURRENT RESOLUTION NO. 5

BY SENATORS MIZELL, HEWITT AND PEACOCK AND REPRESENTATIVES  
CROMER, PEARSON AND WHITE

A CONCURRENT RESOLUTION

To express opposition to the "One Lake" project that proposes to dam the Pearl River and to build a fifteen hundred-acre lake near Jackson, Mississippi, and to urge and request the United States Army Corps of Engineers to deny the pending permit application for the project.

WHEREAS, there is pending a permit application to the United States Army Corps of Engineers, Vicksburg District, to dam the Pearl River and to build a fifteen hundred-acre lake near Jackson, Mississippi; and

WHEREAS, the proposed "One Lake" project requires close scrutiny from all interests that rely on the Pearl River to safely and legally discharge regulated wastewater; and

WHEREAS, the Louisiana Oyster Task Force and the Mississippi Governor's Oyster Council have identified insufficient freshwater quantity flowing down the Pearl River to coastal waters as a threat to oyster production in both states; and

WHEREAS, in Louisiana there are dozens of permit holders in Washington and St. Tammany parishes, including Bogalusa's International Paper mill, and the towns of Bogalusa and Pearl River, that need stable flows and adequate dilution on the Pearl River and its tributaries; and

WHEREAS, the Pearl River is on the Mississippi Department of Environmental Quality's Impaired Waters List due to wastewater going into the Pearl River from runoff from parking lots, farms, and septic tanks, resulting in too much nitrogen and phosphorus ending up in the Pearl River, and necessitating limits on these pollutants in existing permits held by business, industry, and municipalities; and

WHEREAS, increased nitrogen and phosphorus compounds cause excess algae and plankton to grow, and too much algae and plankton choke the life out of a river, which combined with high summer temperatures, rob the water of oxygen and may cause fish kills; and

WHEREAS, water flow of the river where waste mixture is released is important;  
and

WHEREAS, permit holders need adequate water in a receiving stream to mix with  
and dilute wastewater; and

WHEREAS, the Pearl River has reduced water flows in summer and fall when  
rainfall amounts are seasonally low; and

WHEREAS, dams also threaten to limit water flow, making it hard for existing  
wastewater discharge permit holders to comply; and

WHEREAS, in 2013, the St. Tammany Parish engineering department examined  
evaporation predictions for the proposed "One Lake" project and calculated a possible  
reduction of ninety cubic feet per second of flow at their end of the Pearl River, which  
reduction could have a significant adverse impact on permits and the health of the Pearl  
River downstream.

THEREFORE, BE IT RESOLVED that the Legislature of Louisiana does hereby  
express its opposition to the "One Lake" project that proposes to dam the Pearl River and  
build a fifteen hundred-acre lake near Jackson, Mississippi, and urge and request the United  
States Army Corps of Engineers, Vicksburg District, to deny the pending permit application  
for the proposed "One Lake" project.

BE IT FURTHER RESOLVED that a copy of this Resolution be transmitted to the  
commander of the United States Army Corps of Engineers, Vicksburg District.

BE IT FURTHER RESOLVED that a copy of this Resolution be transmitted to each  
member of the Louisiana delegation to the United States Congress.

  
\_\_\_\_\_  
PRESIDENT OF THE SENATE

  
\_\_\_\_\_  
SPEAKER OF THE HOUSE OF REPRESENTATIVES