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8/1/2024

Mr. Eric Williams
Chief, Environmental Branch, U.S. Army Corps of Engineers
Regional Planning and Environmental Division South, CEMVN–PDS
7400 Leake Avenue; New Orleans, Louisiana 70118

Re: Pearl River Basin, Mississippi Federal Flood Risk Management Project DEIS

Dear Mr. Williams,

Thank you for the opportunity to comment on the Pearl River Basin, Mississippi Federal Flood Risk Management Project DEIS. The Nature Conservancy (TNC) is a global environmental non-governmental organization with the mission to conserve the lands and waters on which all life depends. With the support of more than one million members globally, TNC has protected more than 120 million acres of land, 5,000 river miles and currently manages more than 150 marine conservation projects around the world. Across 79 countries and all 50 states in the U.S, TNC has been working to conserve, protect, and restore coastal and marine habitats and species for over four decades. We use a science-based and consensus-oriented approach to find solutions that are good for people and nature.

Across our state chapters in Louisiana and Mississippi we conserved over 120,000 acres of land through the Lower Pearl River Partnership. Created in 2002 by TNC chapters and Department of Environmental Quality in both states, the group partnered with agencies, landowners and others to restore and protect ecologically significant areas along the Pearl River and its tributaries. TNC owns and manages over 6,400 acres in five preserves in the Pearl River basin and helped acquire 22,765 acres for the Bogue Chitto National Wildlife Refuge in Louisiana. An additional 13,206 acres were obtained for the Old River Wildlife Management Area of Mississippi.

TNC has a long history of interest in the Pearl River. In 2001 and 2002 TNC identified the Pearl as one of six high priority Southeastern U.S. freshwater systems requiring protection (Smith, R.K. et al. Freshwater Conservation Action: A Biodiversity Assessment of the Southeastern United States. 68 pp. 2002; East Gulf Coast Ecoregional Plan, The Nature Conservancy. 35pp. 2001). In 2004 TNC authored a Conservation Area Plan for the Pearl River which was submitted to the Louisiana Department of Environmental Quality under a CFMS Cooperative Agreement No. 583066. TNC also submitted public comments in 2018 on a previous DEIS for the Pearl River.

The Pearl River supports 120-140 types of fish and nearly 40 species of freshwater mussels, making it one of the most species-rich river systems in North America. The Gulf sturgeon (*Acipenser oxyrinchus desotoi*) is virtually unchanged from the time its ancestors swam these waters thousands of years ago. it is one of just a few types of fish that journeys each spring from the Gulf to freshwater areas to reproduce. In July 2024, the U.S. Fish and Wildlife Service (USFWS) granted federal protection to the Pearl River Map Turtle, listing it as threatened. Only about 22,000 of these turtles remain in the wild.[1] The USFWS lists habitat loss and degradation (including channel modification and impoundments) as one of several factors that have caused this species to decline in population size. The Pearl River also supports 16 rare and threatened species of fish and mussels, one of the richest assemblages in the Southeast. Other species of conservation interest that exist in the Pearl River Basin include the Swallow-Tailed Kite and the Louisiana Black Bear. There are also large blocks of bottom-land hardwood and swamps in the Basin.

Broadly speaking, we believe that any possible alterations on the upper Pearl must also consider possible effects to the Lower Pearl. Across the Southeast, hydrological modifications on rivers that flow to the Gulf have created long-term consequences to biological diversity that are very difficult to reverse. Some of these consequences include the decimation of oyster populations and the subsequent economies that rely on them due to dams and reservoirs on the Chattahoochee and Flint Rivers which flow into the Apalachicola Bay in Florida. In Alabama, TNC is pursuing a project with the U.S. Army Corps of Engineers to build fish bypass channels around two dams that currently block migrations on the river. Some of the most expensive river restoration projects in the country are seeking to reverse river engineering projects (including dams, levees, reservoirs, channel modifications and river training structures) that have, since their construction, had devastating impacts to human economies and natural environments. Extensive river engineering on the Mississippi River has robbed coastal Louisiana of sediment that has contributed to land loss and wetland degradation. We are concerned that any proposed channel clearing, dams, weirs or levees will also create drastic consequences for species and habitats, particularly on the lower Pearl River.

Louisiana produces more oysters than any other state in the country and Mississippi continues to invest money into restoring their oyster resources. In 2018, TNC authored a report entitled "Oyster Restoration in the Gulf of Mexico"[2]. This report highlights many of the challenges associated with restoring oyster populations in the Gulf. We are concerned that any alterations of the Pearl River could jeopardize these restoration efforts.

We are concerned with potential impacts downstream from river modifications that include dredging or the construction of dams. For residents and properties that experience reoccurring flooding, the DEIS reported non-structural floodproofing, elevations, and buy-outs to be cost

[1] https://www.fws.gov/species/pearl-river-map-turtle-graptemys-pearlensis
[2] https://www.nature.org/content/dam/tnc/nature/en/documents/OysterRestorationintheGulf.pdf

efficient and effective. However, we encourage all concerns of stakeholders in both the upper and lower Pearl River to be addressed and further refined in the final EIS.

As a longtime partner in conservation and a landowner in the basin we appreciate your consideration of these comments. Please contact us if we can provide additional information or assistance.

Sincerely,

Karen Gautreaux

Louisiana State Director