



**MISSISSIPPI
DEPARTMENT OF WILDLIFE, FISHERIES, AND PARKS**

Lynn Posey
Executive Director

June 27, 2023

Eric Williams
U.S. Department of Defense
Army Corps of Engineers
7400 Leake Avenue
New Orleans, Louisiana 70118

Re: Pearl River Flood Risk Management Project, Rankin and Hinds Counties, Mississippi

Dear Mr. Williams:

The Mississippi Department of Wildlife, Fisheries, and Parks (MDWFP) has reviewed your agency's Notification of Intent to Prepare a Draft Environmental Impact Statement dated May 18, 2023, for the Pearl River Basin, Mississippi Federal Flood Risk Management Project, Hinds and Rankin Counties, Mississippi. The U. S. Army Corps of Engineers, Vicksburg District (MVK) is proposing flood control measures along the Pearl River, providing economic and flood control benefits for the Jackson metropolitan area. There is a demonstrated need for flood protection within the Jackson area and we support that need.

The mission of the MDWFP is to conserve and enhance Mississippi's wildlife, fisheries, and parks, provide quality outdoor recreation, and engage the public in natural resources conservation. In accordance with that mission, the MDWFP plans to cooperate with the U. S. Army Corps of Engineers and other federal and state agencies in providing fish and wildlife resources information, reviewing all environmental documents, and participating in coordination meetings as they relate to the Pearl River Basin, Mississippi Federal Flood Risk Management Project.

The Pearl River and its associated oxbows, tributaries, and forested wetlands support biologically diverse fish and wildlife species and their habitats. Bottomland hardwoods comprise the primary wildlife habitat type in the floodplain, while cypress-tupelo swamps add to the diversity of this system. The forested floodplain serves as habitat and a travel corridor for whitetail deer, squirrel, waterfowl, migratory songbirds, furbearers, and other species. The river itself is considered one of the most biologically diverse in the country, supporting 140 species of fish (including largemouth and spotted bass, bluegill and other sunfish, crappie, catfish, paddlefish, striped bass, etc.), 14 species of turtles (including the endemic Pearl River map turtle and ringed map turtle), 40 species of mussels, and other aquatic species. There is significant acreage along the Pearl River within the study area that provides fish and wildlife habitat unique for a metropolitan area.

Additionally, LeFleur's Bluff State Park is MDWFP's only urban state park and is the premier green space in the Jackson area. The park serves as a popular community location by providing fishing, boating, hiking, walking, camping, relaxation, bird watching, photography, and outdoor educational opportunities. The proposed flood control project alternatives may result in terrestrial public land losses and reduced recreational use in LeFleur's Bluff State Park.

Based on current project information provided by the U.S. Fish and Wildlife Service, approximately 2,069 acres of terrestrial habitat may be converted to aquatic habitat. Approximately 1,861 acres of wetlands and “other waters of the U.S.” and approximately 487 acres of existing surface water bodies, including the Pearl River channel and its tributaries, may be impacted. Additionally, converting the portion of the Pearl River within the project area from a riverine system to a lake system will have impacts on flow dependent species including some threatened and endangered species, and may impact resources downstream. We believe that impacts and changes to water quality and water flow affecting fish and wildlife species should be considered and assessed for all project alternatives. We believe any project selected should not result in water quality degradation, especially if future public use of the project area involves water-recreation activities.

We agree there is a demonstrated need for flood protection within the Jackson area. As stated by your agency, we also anticipate that Alternatives A and A1 would have minimal impacts on natural resources. Selecting the proposed Channel Improvement Plan, Alternative C, over other possible flood control alternatives that may be less damaging should be thoroughly vetted in terms of project costs, benefits, and impacts. Furthermore, Alternative C may impact over 1,500 acres of wetlands, including wetlands located within LeFleur’s Bluff State Park. A combination of the best features from the current alternatives may provide the best project alternative.

MDWFP believes that all project alternatives should first seek to avoid fish and wildlife habitat losses and next seek to minimize such losses. If habitat losses are unavoidable, we contend that losses should be fully (100%) mitigated for in a reasonable timeframe by, protecting, enhancing, or restoring the same habitat type that was impacted, reduced, converted, or lost in accordance with Corps of Engineers approved mitigation methods. We believe that an approach which includes separate riverine and aquatic habitat mitigation is preferable. MDWFP also suggests that all mitigation project locations should occur within the Pearl River Basin, if possible.

MDWFP recommends that important aquatic and terrestrial habitats, their functions, values, and their fish and wildlife communities be conserved, protected, and restored where practicable. Many of the species which use these habitats are described in Mississippi’s State Wildlife Action Plan, a comprehensive plan developed to prevent endangered species listings and encourage recovery.

In conclusion, MDWFP believes the ideal project alternative would maximize the amount of flood protection while minimizing the negative impacts to fish and wildlife resources and their habitats. We appreciate the opportunity to submit comments to the Notification of Intent to Prepare a Draft Environmental Impact Statement dated May 18, 2023, for the Pearl River Basin, Mississippi Federal Flood Risk Management Project, Hinds and Rankin Counties, Mississippi.

The MDWFP looks forward to working with the US Army Corps of Engineers, Vicksburg District on this important project.

Sincerely,



Lynn Posey
Executive Director