



His Vision

~

Our Mission

October 29,2024

Ms. Ann Hijuelos
Senior Project Manager, Lower Mississippi River Comprehensive Management Study
United States Army Corps of Engineers, New Orleans District

Lower Mississippi River Comprehensive Management Study Team

Re: Comments regarding the Lower Mississippi River Comprehensive Management Study

Ms. Hijuelos and LMR Comprehensive Management Study Team,

The following comments regarding the Lower Mississippi River Comprehensive Management Study are being submitted by the Theodore Roosevelt Conservation Partnership on behalf of our members and the undersigned organizations including:

The International Gamefish Association
Ducks Unlimited
Delta Waterfowl
American Fisheries Society
B.A.S.S. – Bassmaster
Congressional Sportsmen’s Foundation
American Sportfishing Association

All organizations endorsing these comments represent hunters, anglers, fisheries and wildlife biologists and conservation interests in the lower reaches of the Mississippi River and across the country.

These comments are intended to continue and further an ongoing dialogue among our organizations and representatives from the Corps of Engineers who are working with stakeholders throughout the region to identify projects and policy changes that can improve fish and wildlife habitat, flood control, navigation, sediment management, recreational access and a host of other issues involving the lower Mississippi’s watershed.

We intend to work closely with the Corps and other federal and state agencies and elected and appointed officials at the national, regional, state and local level as the Corps of Engineers continues to move this Congressionally-authorized study into its second year.

529 14TH ST NW

SUITE 500

WASHINGTON, DC 20045

202-639-8727

WWW.TRCP.ORG

lgill@trcp.org

As the Corps begins to identify more specific project types and possible policy changes that will benefit lower river management, we hope these comments and additional engagement will ensure fish and wildlife habitat, fisheries and wildlife productivity and access to fishing and hunting opportunities are an integral part of conclusions reached in the study and prescriptions for changes in lower river management.

We appreciate the opportunity to provide these comments and look forward to continuing to work with the Corps and hunting, angling and conservation advocates as the study moves forward and reaches its final conclusions.

Please email me at cmacaluso@trcp.org or call at (225) 802-4048 if you have any questions or see future opportunities for the TRCP and its partners to meet with the Corps to participate in the ongoing study.

Sincerely,

Chris Macaluso
Director, The Center for Marine Fisheries
The Theodore Roosevelt Conservation Partnership

Lower Mississippi River Comprehensive Management Study Comments

Introduction

These comments are submitted for consideration as a part of the Comprehensive Management Study in the Lower Mississippi River (LMR) – a study to evaluate alternatives for ensuring effective long-term management of the river from Cape Girardeau to the Gulf of Mexico by reviewing all operations and management aspects of the Lower Mississippi River and Tributaries (MR&T). Congress directed the Corps to undertake the study in Section 213 of the Water Resources Development Act of 2020 (Public Law 116-260).

The Lower Mississippi River (LMR) stretches 954 miles from the confluence of the Mississippi and Ohio Rivers in southern Illinois to Head-of-Passes, Louisiana, where it splits into distributaries leading to the Gulf of Mexico. This region encompasses a 3-million-acre floodplain featuring abandoned channels, meander scars, and vast forested wetlands and coastal plain wetlands. However, the active floodplain is now 80% smaller than it was historically.

lgill@trcp.org

The Lower Mississippi River basin is one of the most ecologically and culturally diverse and economically significant regions in the United States. The basin supports a wide range of fish and wildlife species, providing critical habitats for migratory birds, freshwater fish, and numerous other species. These ecosystems are not only vital for biodiversity but also for the local economies and cultures, which rely on them for activities such as fishing, hunting, bird watching, and other forms of outdoor recreation as well as commercially and recreationally harvested seafood such as crawfish, shrimp, blue crabs, catfish and a host of other crustaceans and finfish species. This vast watershed is home to more than 90 freshwater fish species and several federally listed threatened or endangered species. It is also a crucial part of the Mississippi Flyway, the world's largest bird migration route, supporting over 300 migratory bird species and approximately 70% of the nation's migratory waterfowl.

Recreation and tourism along the LMR generate \$17 billion annually, supporting thousands of businesses and employing more than 240,000 people. Fishing, hunting, and wildlife watching alone account for 38 million trips each year, contributing \$1.3 billion in trip expenditures, and providing jobs for more than 54,000 people.

The economic and ecological significance underscores the importance of preserving and enhancing the Lower Mississippi River for fish, wildlife, recreational use and the communities that enable and support access to these resources.

During the Scoping phase of this study, the Corps received considerable comments focused on ecosystem restoration, wildlife habitat conservation, and recreation. The Theodore Roosevelt Conservation Partnership has convened the undersigned conservation and advocacy organizations that represent anglers, hunters and other outdoor enthusiasts from the states of Louisiana, Mississippi, Tennessee, Arkansas, Missouri, Kentucky, and Illinois. We are proud to submit these comments for consideration to further inform the scope and development of the Study, alternatives development and NEPA analysis.

We urge the Corps to prioritize projects, programs and alternatives that enhance the long-term sustainability of natural ecosystems of the Lower Mississippi River and improve public access to those resources.

As the Corps proceeds to the next phase of its comprehensive study spanning the broad reach of its authority over the Mississippi River and its tributaries, we urge you to prioritize these outcomes:

Enhanced Fish and Wildlife Habitat – Taking steps to reconnect the river to its natural floodplain is essential for restoring the natural hydrology of the river. This process can enhance fish spawning

grounds, improve water quality, and increase resilience to floods and droughts.

Increased Recreational Access to Fish and Wildlife Resources - Enhancing access to natural resources encourages outdoor recreation, which is a significant economic driver and culturally integral to the region. Improved access can increase tourism, support local businesses, and foster a greater appreciation for the natural environment.

Prevention and Control of Invasive Species - Invasive species, including a variety of fish, mammals, invertebrates, insects and vegetation, pose a significant threat to the biodiversity and health of the Lower Mississippi River ecosystem. Effective prevention and control measures are necessary to protect native species and maintain the ecological balance of the region.

Utilization of Sediment and Freshwater Diversions - Sediment and freshwater diversions can help restore degraded habitats and maintain the ecological functions of the river. These practices can counteract the effects of erosion, subsidence and saltwater intrusion which are critical issues in the Lower Mississippi River basin and coastal areas and threaten to continue to reduce fish and wildlife productivity and diversity.

Improved Multi-Agency Governance Over Lower Mississippi River - Effective governance requires collaboration among various federal, state, local agencies, and stakeholders. Improved coordination and management can ensure that conservation efforts are comprehensive, efficient, and sustainable.

Specific Program and Project Recommendations for Lower Mississippi River

Fish and Wildlife Habitat

The TRCP and its coalition partners emphasize the importance of long-term sustainability and the need for projects that provide ecological, economic, and social benefits. Studies have shown that restoring natural floodplains can significantly increase biodiversity and improve water quality. For example, the reconnection of floodplains in the Mississippi River basin has been linked to increased fish and bird populations and the reduction in nutrients and water turbidity. Additionally, the removal of barriers has been successful in other

regions, leading to the recovery of fish populations and improved ecosystem health. Some specific measures we support include:

- **Prioritize and incorporate remaining the habitat feasibility studies authorized pursuant to section 402 of the Water Resources Development Act of 2000** and included in the report titled “Lower Mississippi River Resource Assessment; Final Assessment in Response to Section 402 of WRDA 2000” and dated July 2015. Additionally, the Corps should examine a wholistic approach that engages multiple federal, state, and local agencies as well as stakeholders.
- **Prioritize actions to restore Corps bottomland hardwood forests within the LMR Basin.** The U.S. Army Corps of Engineers (USACE) – Vicksburg District manages over 24,000 acres of restored bottomland hardwood forests within the Lower Mississippi Alluvial Valley. Restoring bottomland hardwood forests within the Lower Mississippi River (LMR) Basin is a critical environmental priority for maintaining the ecological health and resilience of this important region. These forests, which once thrived across the Lower Mississippi Alluvial Valley, provide crucial habitat for a diverse array of wildlife, support water quality by filtering runoff, and play a significant role in flood mitigation.
- **Partner with USDA and FWS to support hydrologic restoration, wetland restoration and reforestation in National Wildlife Refuges.** The Corps unique role in managing the Mississippi River is essential to restoring natural water flow patterns, improving water quality, and re-establishing natural connectivity to support hydrologic restoration, wetland restoration, and reforestation in National Wildlife Refuges. More than 20 NWR are located in the natural floodplain of the lower Mississippi River. These federal refuges are managed by the U.S. Fish and Wildlife Service and play a critical role in preserving the unique and diverse ecosystems of the region. Some of the larger of these include Chickasaw NWR (TN), Dale Bumpers White River NWR (AR), St. Catherine Creek NWR (MS), Yazoo NWR (MS), and the Delta NWR (LA).
- **USACE should incorporate the remaining seven conservation reaches identified in the Lower Mississippi River Resource Assessment (LMRRA).** The LMRRA was authored by Lower Mississippi River Conservation Committee (LMRCC), a 501(c)(3) nonprofit initiated by a 1990 resolution of the Mississippi Chapter of

the American Fisheries Society. The LMRRA 2000, established under Section 402 of the WRDA 2000, outlines several key provisions for river management and environmental stewardship. Specifically, it called for assessments to evaluate the information required for effective river-related management, to determine the habitat needs of natural resources, and to address the requirements for river-related recreation and access. The study area is remarkably like that of the Lower Mississippi River Comprehensive Study authorized by Section 213 of the Water Resources Development Act of 2020 (Public Law 116-260).

- **Improve floodwater management, reduce sediment deposition and restore hydrology in the Atchafalaya Basin to improve habitat and restore and enhance fish and wildlife productivity.** The Atchafalaya Basin is North America’s largest floodplain river swamp and has historically been one of America’s most productive recreational and commercial fishing and waterfowl and wildlife basins due largely to its continued connection to annual flooding from the Mississippi River. The Basin also serves a critical role in flood prevention for communities along the lower Mississippi River and the Atchafalaya River and adjacent manmade channels are critical for waterborne commerce in the region. Data collected by Louisiana’s Department of Wildlife and Fisheries and reports from area recreational and commercial fishers indicates fisheries production has declined over the last two-plus decades in the Atchafalaya Basin largely because of increased sedimentation of both natural and manmade waterways and the inundation from flooding during peak spawning times for species like largemouth and spotted bass, catfish and crappie. Sediment deposition in upper reaches of the Basin as well as the isolation of backwater swamps by spoil banks has resulted in poor water movement, limited boat access and extensive aquatic invasive vegetation and chronic low-dissolved oxygen conditions, further limiting fisheries production. Water levels in the Basin are largely dictated by Corps policies that maintain an approximate “70-30” split at the Old River Control Structure that sends 30 percent of the combined flows of the Mississippi and Red Rivers into the Atchafalaya River. Louisiana’s Coastal Protection and Restoration Authority is working with stakeholders to develop an Atchafalaya Basin Master Plan that includes projects to restore hydrology, enhance fisheries, improve flood control and facilitate recreational and commercial access. The Corps should prioritize working with CPRA and stakeholders to identify and enact measures that improve the Basin, including changes to the usage of the Old River Control

Structure and measures that can reduce the current sediment in the Basin and the sediment inputs. The Corps should also examine changes in operation to the Morganza Floodway to identify opportunities to increase use of the control structure to move water and sediment into areas of the Atchafalaya Basin impaired by a lack of water and sediment movement as well as taking pressure off other flood control spillways.

Increased Recreational Access to Fish and Wildlife Resources

Recreational activities such as fishing, hunting, and bird watching contribute billions of dollars to the economy each year. According to the U.S. Fish and Wildlife Service, wildlife-related recreation generated over \$156 billion in economic activity in 2016 alone. Enhancing access to these resources can further boost local economies and provide more opportunities for outdoor enthusiasts. Some specific projects should include:

- **Construction of boat ramps and related facilities to improve access to the Mississippi River and its watershed.** The Corps should coordinate with the US Fish and Wildlife service to leverage funding allocated to support state and local outdoor recreational opportunities, including but not limited to programs funded through the Sport Fish Restoration and Boating Trust Fund. Investing in federal and state partnerships to encourage construction in and around the Mississippi River would enhance access to America's most biodiverse waterway.
- **Maintenance of recreational areas and public hunting facilities connected to and within the area of the Lower Mississippi River.** Corps owned and operated recreational areas along the lower Mississippi River play a crucial role in both local communities and broader regional objectives. USACE-managed recreational areas offer a variety of activities, including boating, fishing, hunting, hiking, camping and picnicking. This diversity caters to different interests and age groups, making these areas popular destinations for families and outdoor enthusiasts.

Prevention and Control of Invasive Species

Invasive species management is crucial for protecting native ecosystems. The U.S. Geological Survey highlights that invasive species cost the U.S. economy an estimated \$120 billion annually. Effective control measures can mitigate these costs and protect the natural heritage of the Lower Mississippi River basin. The Corps should include specific project and programmatic activities, including:

- **The Corps should make specific project and program recommendations that ensure the control of invasive species in the lower Mississippi River through early detection and rapid response.** Early detection of invasive species is crucial for preventing their establishment and spread. Establishing rapid response protocols that utilize existing partnerships at the federal, state, and local levels.
- **The Corps should prioritize funding for public outreach and education regarding invasive species on the Mississippi River by targeting hunters and anglers.** As conservationist on the front line of the dynamics of a vibrant and active ecosystem, hunters and anglers play a crucial role in preventing and managing invasive species, and their involvement can significantly enhance conservation efforts. Activities and programs that encourage the use of their knowledge to identify species, develop best practices for harvest of invasives, and the education for proper cleaning of equipment and avoidance of water transport should be enacted and supported by the Corps.

Optimal Utilization of Sediment and Freshwater Diversions

Sediment and freshwater diversions have been shown to restore habitats effectively by mimicking natural processes that are essential for ecological balance but have been interrupted by flood control structures and other infrastructure. For example, in coastal wetlands and river deltas, sediment diversions introduce nutrient-rich sediments that rebuild land lost to erosion and sea level rise, creating vital new habitats for plants and wildlife. Freshwater diversions, on the other hand, can help restore natural flow regimes, which are crucial for sustaining wetlands, improving water quality, and supporting diverse aquatic species, waterfowl and other wildlife. These restoration techniques not only enhance biodiversity but also increase the resilience of ecosystems to future environmental changes. By emulating natural sediment and water flow patterns, these methods help to rejuvenate degraded areas and support the overall health of ecosystems. Utilizing diversions will cause shifts in fisheries production and will require mitigation for the movements of salt-water dependent fisheries into other parts of coastal basins generally during seasonal operations. However, the overall, long-term benefits for fisheries and wildlife production from habitat improvements through diversion use outweigh short-term, limited negative effects of river re-introduction. Louisiana's Comprehensive Master Plan for a Sustainable Coast prescribes several freshwater and sediment diversions to help restore and improve coastal swamps and marshes

and the Corps should work with Louisiana officials to expedite permitting and construction.

- **Reexamine/Reauthorize Program to Modify of Davis Pond and Caernarvon Diversions.** Originally authorized for construction in 1965, these freshwater diversions have demonstrated the ability to create marsh and support coastal restoration activities. Continued efforts to optimize the operations of these existing diversion structures for the purpose of decreasing the rate of wetland loss, offsetting saltwater intrusion and maintaining and restoring habitat quality should be prioritized as a federal responsibility.
- **Ensure natural crevasses are preserved and utilized in balance with flood protection and navigation concerns.** The Corps should adopt a wholistic approach to the lower river where natural crevasses can play a critical role in sediment deposition and marsh creation that can serve as protection from the main channel of the Mississippi River.
- **Examine LCA Program and its utility to establish an optimal operational regime and necessary technical data to support a suite of freshwater and sediment diversions in deltaic plain of the lower Mississippi River.** In 1998, the Coast 2050 Plan, developed in partnership with the public, provides a technically sound strategic plan to sustain Louisiana's coastal resources and provides an integrated multiple use approach to ecosystem management. This plan led to the authorization of the Louisiana Coastal Area program in WRDA 2007 and the continued implementation of a suite of coastal restoration projects. Additional connections between the Mississippi River and its historic floodplain through diversions such as the Maurepas Swamp, Upper Barataria Basin and Lac Des Allemands can enhance those swamps, reduce the negative effects of saltwater intrusion, improve flood control in the River and benefit recreationally and commercial vital fisheries and wildlife.

Improved Multi-Agency Governance Over Lower Mississippi River

Finally, improved multi-agency governance can enhance the effectiveness of conservation efforts. Collaborative governance models have been successful in parts of the lower river basin and in other regions, such as the CWPPRA Program, RESTORE Act Council, and the Lower Mississippi River Conservation Commission, which have all lead to significant improvements in water quality and habitat restoration.

- **The Corps should support the legislation to expand the membership and responsibility of the Mississippi River Commission.** The 1879 law that established the MRC calls for its membership to consist of three U.S. Army Corps of Engineers officers, one member of the National Oceanic and Atmospheric Administration (formerly the Coast and Geodetic Survey), and three civilians, two of whom must be civil engineers. Each member of the MRC is nominated and appointed by the United States President. They are vetted by the Senate. The inclusion of the U.S. Department of the Interior and the U.S. Department of Agriculture on the Mississippi River Commission would significantly enhance the commission's capacity to manage and develop water resources effectively. Both departments bring specialized expertise that aligns closely with the commission's mission of sustainable water resource management. The Department of the Interior, with its focus on land and water conservation, environmental protection, and management of federal lands, could provide valuable insights into the ecological impacts of water management practices. Meanwhile, the Department of Agriculture's expertise in agricultural practices, rural development, and soil conservation would contribute to a more integrated approach to managing agricultural runoff and land use in the Mississippi River basin. Together, these departments would strengthen the commission's ability to address the complex and interrelated challenges of water resource management, ensuring a more holistic and sustainable approach to maintaining the health and productivity of one of the nation's most vital waterways.
- **CWPPRA Task Force.** The CWPPRA Task Force, established under the Coastal Wetlands Planning, Protection and Restoration Act (CWPPRA) of 1990, has been a crucial player in Louisiana's coastal restoration efforts. However, to address the ongoing and severe challenges facing the lower Mississippi River, the Task Force could play a more significant role in managing and prioritizing restoration efforts. The Corps should consider focusing its leadership of the Task Force to include more wholistic management of the lower Mississippi River. Given the complex and interlinked problems of land loss, flood control, and ecological degradation in the lower Mississippi River, the Task Force could benefit from a broader mandate that includes long-term, integrated management strategies.

Conclusion

In conclusion, the TRCP and its coalition partners urge the Corps to prioritize projects and alternatives that support the long-term sustainability of the

lgill@trcp.org

Lower Mississippi River's natural ecosystems. These efforts are essential for maintaining biodiversity, supporting local economies, and ensuring the health and resilience of this vital region.