IUCN/SSC
Tortoise and Freshwater Turtle Specialist Group

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International Union for Conservation of Nature / Species Survival Commission

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August 6, 2024

To: U.S. Army Corps of Engineers

Re: Proposed New Lake Project -- Commentary

Dear U.S. Army Corps of Engineers:

We are writing to you in our capacity as leaders of the IUCN SSC Tortoise and Freshwater Turtle Specialist Group and several other like-minded conservation organizations to share our considerable concern over the proposed "New Lake Project" (specifically the CTO with weir project) that will build another dam and dredge and widen the Pearl River in Mississippi.

The Pearl River is the home for two Federally Threatened turtle species: the Ringed Sawback (*Graptemys oculifera*) and the Pearl River Map Turtle (*Graptemys pearlensis*). The New Lake Project directly threatens the recovery of the Ringed Sawback, a Vulnerable species under the IUCN Red List, and the Pearl River Map Turtle, a species that has been assessed by the IUCN Red List as Endangered. The Pearl River is the only river system in which the Pearl River Map Turtle occurs. This severely range-restricted species was recently listed in July 2024 as Threatened under the Endangered Species Act. The IUCN Red List previously assessed it as Endangered in 2011, and recently re-assessed it at the same level (2024, currently in press), assessing it as facing an even greater extinction risk than the Ringed Sawback.

Survey, monitoring, and research on the Ringed Sawback by our Specialist Group members Robert Jones, Peter Lindeman, Will Selman, and others over the past 30 years have clearly documented that the best population of this charismatic turtle is located upstream and within the proposed New Lake Project area. Furthermore, surveys by Will Selman uncovered populations of the Pearl River Map Turtle that occur within the proposed New Lake Project area. These two map turtle species are ecologically dependent on flowing river habitat, and do <u>not</u> benefit from the increased size of a water body when that is a stagnant or lentic reservoir environment. Thus, the proposed project would irreparably damage a critical part of the Pearl River and its downstream reaches, which would severely impact the unique and endemic Ringed Sawback and Pearl River Map turtle. This comes exactly at a time when State and other conservationists are struggling to meet the species' recovery objectives. Moreover, the project will also affect critical habitat of the Federally threatened Gulf Sturgeon, freshwater mussels, and numerous other aquatic species that depend on this riverine ecosystem.

Civil societies from the Pacific Northwest to the Atlantic Coast to Asia are beginning to recognize that riverine dams bring greater economic and environmental costs and higher risks than projected potential benefits. Hurricane Katrina's devastation of New Orleans and the 2024 Rapidan Dam failure in Minnesota, are just two in a long series of events where dams, reservoirs, and levees made severe flood events even worse. Projections indicate that many dams in the United States are aging and at the end of their expected lifespans, and this provides a greater risk for human populations due to catastrophic failure. In our opinion, following an old, now questionable, approach to dams in regard to this risk-benefit balance would not be conducive to the modern image of the great State of Mississippi.

The IUCN SSC Tortoise and Freshwater Turtle Specialist Group (TFTSG) is a global network of nearly 400 leading scientists and conservationists focused on tortoises and freshwater turtles; collectively and under the auspices of IUCN, we are the main global inter-governmental organization that monitors and assesses the threats facing freshwater turtles and tortoises worldwide. The TFTSG works in close cooperation with the United States Federal and several State Governments, international environmental conventions such as CITES, and a range of US-based and international NGOs focused on tortoise and freshwater turtle conservation. Not only do we work towards recovery of depleted populations, we also seek to anticipate, prevent, minimize and reverse further threats to imperiled turtles.

We, the leaders of the TFTSG and of the Turtle Survival Alliance, Turtle Conservancy, Re:wild, Turtle Conservation Fund, and Chelonian Research Foundation, urge you to reconsider alternatives for Pearl River flood risk mitigation in Jackson that do not structurally alter riverine processes, the natural beauty, and biodiversity heritage of the Pearl River drainage, so that the State of Mississippi may remain a treasured resource for your communities and all who enjoy visiting your beautiful State.

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Pertinent Literature

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