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The Honourable Ryan Zinke U.S. Department of the Interior 1849 C Street, N.W. Washington DC 20240

6 December 2018

Dear Mr Secretary,

The Species Survival Commission (SSC) of the International Union for Conservation of Nature (IUCN) is a science-based network of more than 8,000 volunteer experts from almost every country of the world. Our members are organized into over 140 Specialist Groups, which address conservation issues related to species of animals, plants, and fungi, as well as other topical issues, such as species reintroductions, climate change and wildlife health.

We are writing to express concern about the proposed exploration for hydrocarbons on the coastal plain of the Arctic National Wildlife Refuge in Alaska. Specifically, that such activity, as proposed, will compromise the already threatened population of polar bears in the Southern Beaufort Sea.

Polar bears are classified as threatened under the United States Endangered Species Act and Vulnerable on The IUCN Red List of Threatened Species – because of global warming induced sea ice loss. The polar bears of the southern Beaufort Sea of Alaska and adjacent Canada in particular, have declined by an estimated 40% in recent years.

Pregnant female polar bears dig snow dens in autumn, give birth in mid-winter and emerge from dens in spring when cubs are large enough to survive the rigors of outside Arctic conditions. While denning, polar bears are unable to simply move away from a disturbance without substantial risk to newborn cubs. The U.S. Fish and Wildlife Service Conservation Management Plan recognize the need to protect denning habitat so that a maximum number of polar bears are able to persist until the climate is stabilized. Nearly one-third of pregnant female polar bears in the Southern Beaufort Sea population depend on the Arctic Refuge Coastal Plain to give birth to their cubs. Recognizing that protecting denning bears is vital to population management and

recovery, the U. S. Fish and Wildlife Service has designated the Arctic Refuge Coastal Plain as critical habitat for polar bears.

Because maternal denning on the Arctic Refuge coastal plain is so important to maintenance of the Southern Beaufort Sea population, we are deeply concerned to learn that the US Bureau of Land Management (BLM) appears ready to approve high intensity seismic surveys there. Based on previous observations of polar bear responses to such activities, the proposed seismic survey could disturb over 96 percent of undetected denning bears on the Coastal Plain. In addition, there is a 23 percent probability that heavy vehicles could drive right over one or more dens with fatal consequences for mother polar bears and cubs.

IUCN, taking into account all of the available evidence, and scientific advice from SSC Polar Bear Specialist Group, has concluded that allowing the proposed seismic testing to go forward in this area would be inconsistent with the polar bear's threatened status and with agreed recovery objectives. Therefore, we urge you to reconsider moving forward with this survey. Our colleagues stand ready to provide technical advice in support of polar bear conservation in the Southern Beaufort Sea and other parts of the range of this species.

Sincerely,

Inger Andersen Director General Jon Paul Rodríguez, PhD Chair, IUCN Species Survival Commission

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Cc:

The Honorable Lisa Murkowski, United States Senator for Alaska

The Honorable Dan Sullivan, United States Senator for Alaska

The Honorable Don Young, Congressman for Alaska

Mr. Joe Balash, Assistant Secretary of the Interior for Land and Minerals Management, Bureau of Land Management

Mr. Ted Murphy, Acting State Director, Bureau of Land Management

Ms. Margaret Everson, Principal Deputy Director United States Fish and Wildlife Service

Mr. Gregory E. Siekaniec, Regional Director United States Fish and Wildlife Service

Dr. James Reilly, Director, United States Geological Survey

Ms. Aimee Devaris, Regional Director, United States Geological Survey

Mr. Mark J. Cassayre, Deputy Permanent Representative, United Nations Office at Geneva