

**Congress of the United States**  
Washington, DC 20515

December 6, 2021

Public Comments Processing, U.S. Fish and Wildlife Service Headquarters,  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
Attn: FWS-R7-ES-2021-0075

Dear Acting Director Martha Williams,

We are writing to you regarding the five-year status review of the polar bear (*Ursus maritimus*) under the Endangered Species Act (ESA) by the U.S. Fish and Wildlife Service (Service) and to express our support for future protections of this iconic species in the face of development and the climate crisis.

The Arctic region, including northern Alaska, is one of the fastest-warming places on earth. Average annual temperatures have already increased by nearly 1.7°F compared to the first half of the 20<sup>th</sup> century, and sea surface temperatures have increased by 1.0°F. Consequently, Arctic sea ice is also rapidly diminishing. Arctic ice extent reaches its annual minimum in the month of September; over the period of 1979 to 2021, that minimum has declined of 12.7 percent per decade, from 6.9 million km<sup>2</sup> in the 1980s to 4.4 million km<sup>2</sup> in the 2010s. The year 2012 saw the record minimum of sea ice extent and was also the worst year for polar bear survival in the Southern Beaufort Sea.

Polar bears depend on sea ice as a platform for finding and catching seals, their main food source. Female polar bears also give birth in snow dens on thick, stable pack ice. Because of their dependence on this disappearing habitat, the polar bear is rightly considered the “poster child” of climate change and was among the first species listed under the ESA due to climate change impacts.

Given that it will take decades to reduce atmospheric carbon to levels that will allow the restoration of sea ice habitat, conserving remaining polar bear habitat is a critical immediate conservation strategy. The Service must take all available steps to conserve polar bears and habitat while solutions to reduce greenhouse gas emissions and mitigate their impacts are implemented globally over the coming decades.

This is particularly important for the Southern Beaufort Sea bears, one of the most imperiled populations in the world. This population was reduced by about 50% from approximately 1990-2010, and there is not yet an updated abundance estimate using more recent data. The Service should provide an updated estimate using data developed since 2010. Existing evidence points toward continued deteriorating health and fitness, as animals struggle to find sufficient food to meet energetic needs. The Service should seek to reduce and eliminate additional sources of disturbance and displacement for these beleaguered bears.

Due to the disappearance of huge expanses of sea ice habitat, Southern Beaufort Sea bears are spending more time in terrestrial habitat. A majority of denning bears now den on land; protection of that denning habitat is identified as a key strategy in the Service's Polar Bear Conservation and Management Plan, developed pursuant to the ESA and Marine Mammal Protection Act (MMPA). Industrialization of a large percentage of polar bear terrestrial denning critical habitat would not affect just "small numbers" of bears, nor could the impact on the population be considered "negligible" as required by the MMPA. Yet that is what the Service has authorized to date in Alaska – in the Arctic Refuge, the National Petroleum Reserve-Alaska, and across Alaska's northern coast.<sup>1</sup>

The impacts of oil and gas development on what remains of polar bear critical habitat would be significant. First, it is simply not possible with current technology to reliably detect denning bears, so it is also not possible to eliminate the risk of serious injury and mortality to both mother bears and cubs from industry activities including seismic exploration, blasting and construction. But even if dens could be detected, industrialization destroys and fragments critical habitat, disturbing and displacing bears from preferred areas and increasing energetic losses. The substantial human settlements and development activities inevitably increase the risk of negative human-bear interactions – which monitoring reports from recent years indicate are increasing.

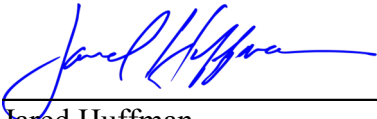
In short, everything we know and continue to learn about the impacts of climate change on polar bears and their habitat indicates a dire trend toward extinction. Broad climate considerations and the site-specific impacts of industrializing polar bear critical habitat counsel strongly toward protecting that habitat from additional oil and gas development that will only compound the problems. The Service's status review should provide an updated and clear-eyed assessment of the threat that climate change poses to polar bears' continued existence, especially Southern Beaufort Sea bears, and should inform the Service's conservation priorities over the coming years. One key priority should be the firm protection of polar bear critical habitat from oil and gas development and other incompatible uses.

We urge you to compile and assess the best available scientific information regarding the threat of climate change and habitat loss and fragmentation to polar bears, and to relentlessly pursue the strategic implementation of conservation and recovery actions befitting the steep challenge facing this iconic species.

Sincerely,

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<sup>1</sup> Even if the Arctic Refuge Coastal Plain Leasing Program is eliminated, the majority of polar bear terrestrial denning critical habitat on Alaska's coast would still be open to oil and gas leasing and development. See attached map.



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Jared Huffman  
Member of Congress  
Chair, Subcommittee on  
Water, Oceans, and Wildlife



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James P. McGovern  
Member of Congress



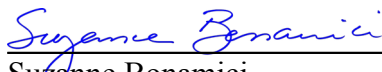
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Rashida Tlaib  
Member of Congress



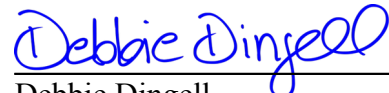
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Alan Lowenthal  
Member of Congress



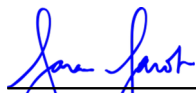
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Suzanne Bonamici  
Member of Congress



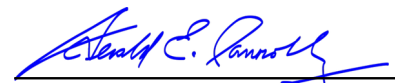
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Debbie Dingell  
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Sara Jacobs  
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Gerald E. Connolly  
Member of Congress



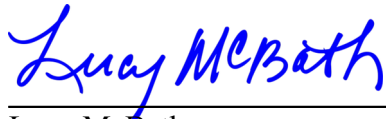
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Eleanor Holmes Norton  
Member of Congress



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Earl Blumenauer  
Member of Congress



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Lucy McBath  
Member of Congress



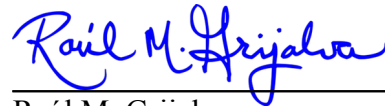
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Al Lawson, Jr.  
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Chair, Committee on Natural  
Resources



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## Polar Bear Onshore Critical Denning Habitat Affected by Oil and Gas Activities in Alaska's Arctic

