

RE: Polar Bear **EMERGENCY**

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Dear Supporter,

The new year has begun with a shocking development that threatens polar bear and hunting for all time. The USF&WS is taking the Endangered Species Act where it has never been. It is proposing that all the polar bear in the world be listed even though population numbers are at or near record highs. Never before has any species been listed when it was at or near record numbers.

Far worse, the USF&WS has irresponsibly issued misleading press releases that its proposed listing would provide for "recovery" and significant benefits in foreign lands where most polar bear range. To the contrary, the ESA's domestic recovery programs, critical habitat designations, cooperative agreements, land acquisitions and funding have never applied to foreign lands! They have promised recovery efforts that are beyond any authority or capacity they ever hope to have to recover a species – much less recover one that has not yet declined! The misinformation itself is dangerous because it misleads everyone and undermines opposition to this preposterous proposal. They also falsely suggest that trophies might still be importable. Nothing could be further from the truth!

Why mislead the public and foreign stakeholders? It smacks of a hidden agenda as surely as the one-sided proposal which is so skewed that it reads like an argument. The truth is, the proposed listing is the greatest present threat to all bears beyond the borders of Alaska. It cannot provide significant benefits to the bear, but most certainly would harm it.

The USF&WS is supposed to "take into account" foreign nations' conservation programs before listing those country's species, but it has conspicuously neglected to do that. It does not even suggest to foreign interests that listing is inappropriate if it interferes with their programs, such as their user-pay sport hunting. The Marine Mammal Protection Act has a prohibition that no marine mammal that is listed as "threatened" under the ESA is importable, 16 USC 1362 (1)(C). That will immediately stop the fee of \$1,000.00 per trophy import that has been directed to Russian bear conservation. It will eliminate the millions of dollars per year that underlies the Canadian and Nunavut program. The USF&WS does admit those are the best managed polar bear populations in the world but does not consider the irreparable damage this listing will do to that program.

The proposal should not have gotten this far. It is based solely upon doomsday projections and exaggerations. One lone population is cited as having declined by 20 percent over 17 years, down 258 bear. Even that one case is overstated. The period being compared to is not representative. They've selectively compared the population to a point in time 17 years ago when that population was at its all time high following an unprecedented population increase. It's an overstatement. What is inexplicably unstated is the probability that population has simply shifted from the survey sight and is still believed to be living well in the same region. It is a highly flawed comparison without a sound reference point.

