

*Submitted via first-class and electronic mail*

August 23, 2017

Greg Sheehan, Acting Director  
U.S. Fish and Wildlife Service  
1849 C St. NW  
Washington, D.C. 20240  
Ph: (202) 208-4717

**Re: Pacific Walrus Warrants Endangered Species Act Listing**

Dear Acting Director Sheehan,

On behalf of our millions of supporters, we urge you to list the Pacific walrus, *Odobenus rosmarus divergens*, as a threatened or endangered species under the Endangered Species Act (ESA). Listing the Pacific walrus under the ESA would be the first step in providing this majestic species the protections it needs to survive. We are profoundly concerned that the walrus will suffer massive population declines due to the loss of sea ice in the foreseeable future. Action is needed now, more than ever before, to protect this iconic species.

The ESA was enacted in 1973 by a Congress primarily focused on the “overriding need to devote whatever effort and resources were necessary to avoid further diminution of national and worldwide wildlife resources.”<sup>1</sup> The Act, “beyond doubt” was intended to give imperiled species the highest of priorities.<sup>2</sup> Since its enactment the ESA has been wildly successful, preventing extinction for 99% of species under its protection. In addition, the Act recognizes the sovereign status of Alaska Natives and their rights to maintain traditional lifeways, by affirming Alaska Natives right to “take” endangered species if such take is primarily for subsistence purposes. Alaskan Natives have played a central role in the healthy management of Pacific walrus populations and continue to be essential in those efforts today.

The Pacific walrus is at an extreme risk of population decline and extinction due to rapidly shrinking sea ice resulting from climate change. The walrus relies on sea ice for all of its essential life functions: as a resting platform while foraging for food, and as a place for courtship, giving birth, and nursing its young. Sea ice provides walruses protection from predators and gives them the ability to stay near their benthic food sources. When sea ice is unavailable, walruses compete for haul-out spots on land, resulting in increased competition for prey and a high potential for mass mortalities as a result of trampling. Scientists agree that the Pacific walrus will face significant population decline, even extinction, as global warming rapidly melts sea ice in the Arctic and ocean acidification alters prey availability.

Sea ice decline has accelerated dramatically in recent years. The Arctic sea ice extent, on which the Pacific walrus so heavily relies, hit record lows during fall 2016 and winter 2017, and

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<sup>1</sup> *TVA v. Hill*, 437 U.S. 153, 177 (1978) (citation omitted).

<sup>2</sup> *Id.* at 174.

sea ice in the Chukchi Sea off Alaska retreated at a record rate this May. September sea ice extent is now declining at a rate of 13.3 percent per decade.

The Fish and Wildlife Service has previously found that Pacific walrus warrants ESA listing, and we strongly urge you to list the walrus now as an endangered or threatened species so the appropriate protections can be put in place. The ESA has a track record of success. Listing the Pacific walrus would be the first step to helping conserve and protect this much beloved animal.

Sincerely,

Center for Biological Diversity

Sierra Club

Friends of the Earth

WildEarth Guardians

Mission Blue

Ocean Defenders Alliance

Endangered Habitats League

World Animal Protection

Moloka'i Community Service Council

Oceanic Conservation Society

Klamath Forest Alliance

Environmental Protection  
Information Center

Wildcoast

Ocean Conservation Alliance

Blue Sphere Foundation

San Francisco Baykeeper

Los Angeles Waterkeeper

Animal Welfare Institute

350 Louisiana – New Orleans

Turtle Island Restoration Network

Louisiana Bucket Brigade