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Attention

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**November 29, 2024**

**Subject:** IUCN Concern and Offer of Expertise Regarding LNG Development on the Sonora Coast

Dear Secretary and Governor,

As the presidents of the Species Survival Commission (SSC) and the World Commission on Protected Areas (WCPA), two expert commissions of the International Union for Conservation of Nature (IUCN), we write to express our concern about the environmental impacts of the proposed Saguaro LNG development near Puerto Libertad on the Sonoran coast.

Given the importance of the marine ecosystems in the Gulf of California—identified by IUCN as an Important Marine Mammal Area, home to over 30 cetacean species, including a resident population of fin whales (*Balaenoptera physalus*), as well as a vast array of other marine species—we believe it is essential to identify, evaluate, and address the numerous risks associated with this project.

### **Potential Risks to Cetaceans, Fisheries, and Tourism**

The Saguaro project poses significant risks to the sensitive ecosystems of the Gulf of California. Increased vessel traffic and underwater noise from industrial activities could severely disrupt marine life, particularly large whales, which are highly vulnerable to vessel impacts—a well-documented and often fatal threat. Noise pollution also interferes with cetaceans' ability to communicate, navigate, and feed, further compromising their resilience.

Beyond cetaceans, the project is likely to impact local fisheries and tourism. Increased underwater noise and vessel activity can disrupt fish behavior and spawning areas, potentially affecting fishing communities and the tourism industry. Additionally, the release of fuel, lubricants, and other chemicals during vessel operations could degrade water quality and marine habitats, threatening these vital economic sectors and the livelihoods they support.

Given Puerto Libertad's ecological significance, including its proximity to the Midriff Islands and critical habitats for large whales, this site may not be suitable for the proposed development.

Exploring alternative locations, such as Guaymas, where ecological sensitivities may be less pronounced, could allow for a more balanced approach to development. Any proposed site must undergo a rigorous assessment to ensure minimal impact on marine ecosystems.

## **Expertise and Knowledge in Mitigating Human-Induced Threats to Cetaceans**

The International Whaling Commission (IWC), recognized for its expertise in cetacean biology and conservation, plays a relevant role in addressing the issues mentioned in this letter. The IWC has extensive experience in assessing and mitigating the impacts of maritime transportation through its Scientific and Conservation Committees. This includes the development of a Strategic Plan to Mitigate the Impacts of Ship Strikes on Cetacean Populations and contributing to guidelines for reducing underwater noise in collaboration with the International Maritime Organization (IMO).

The IWC has also reviewed assessments of ship strike risks and has made recommendations to mitigate these threats in high-risk areas. Through collaboration with IUCN's Marine Mammal Protected Areas Task Force, WCPA has identified sensitive zones such as those potentially impacted by the Saguaro project, including the Islands and Protected Areas of the Gulf of California, a UNESCO World Heritage Natural Property.

## **Environmental Precedents and Proposal for Collaboration**

Globally, many countries are reevaluating LNG projects to address their environmental impacts, including methane emissions—a significant contributor to climate change. For instance, the United States recently paused LNG export approvals until such projects undergo comprehensive evaluations.

To address the aforementioned concerns, we suggest considering the formation of a working group comprising representatives of the Mexican government, along with potential participation from IUCN and IWC experts. This group could:

- Conduct comprehensive environmental assessments using advanced methodologies to identify the most suitable locations for LNG terminals.
- Examine measures to reduce risks to marine ecosystems, such as speed limits, routing adjustments, and noise mitigation for vessel traffic.

We are available to provide additional information and explore how our expertise could contribute to achieving the goal of balancing sustainable development with the protection of the unique ecosystems of the Gulf of California. You can contact us at the address provided at the end of this letter.

Sincerely,

Atentamente,



**Jon Paul Rodríguez**  
Presidente de CSE



**Madhu Rao**  
Presidenta de CMAP

CC.

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