

**State of Alaska statement at hearing Thursday, March 1, 2007, in Anchorage
Presented by Tina Cunning, Special Assistant to the Commissioner
Alaska Department of Fish and Game**

The State of Alaska is reviewing the FWS analysis of available scientific information that was provided in the federal register proposed rule to list polar bears as "threatened."

The State understands that evidence provided to FWS indicates that the arctic is warming disproportionately to other parts of the world and that sea ice is currently diminishing; however, polar bears are currently managed in healthy numbers and they provide for sustainable subsistence harvests by Alaska Natives and guided and subsistence hunts in Canada.

We are concerned that some scientific information may have been omitted or may not have been evaluated in preparing the draft rule, so we are preparing a detailed analysis for consideration.

For example, there are many global warming sea-ice models, of which some models predict loss of summer and multiyear sea ice anywhere from 40 to 100 years. Despite this uncertainty among models, the proposed finding of polar bears as 'threatened to become endangered within the foreseeable future of 45 years' is based on a presumption that sea ice is the most important factor for survival of polar bears and that sea ice will be significantly diminished. However:

- Polar bears do not use the majority of the ice cap, but favor near shore ice.
- Polar bears are adaptable to use land for hunting and to den, and data from several areas indicate that bears are already adapting.
- Preferred food sources such as some ice seal populations may be declining, but data indicate that the bears are adapting to use alternative food sources, including food sources that may be expanding.
- Polar bear survival may in fact be more dependent upon snow for denning than on the presence of sea ice.

Thus, we question the reliability of the computer modeling and analysis, which should more fully address the adaptability of polar bears, alternate food sources, alternate denning options, and climatic conditions. Given that polar bear have survived at least two major warming periods in their existence and are currently at historic high population levels, it is not evident that sea ice loss itself will cause a decline in polar bear habitat or numbers. Therefore, further modeling of population information and other parameters should be conducted before FWS reaches a conclusion on this issue.

As another example, information on the decline of the Canadian Western Hudson Bay subpopulation – the only declining population with long term monitoring – indicates that the quotas for harvest in the past decade were not sustainable; those quotas were corrected this past year. The only other population that has information indicating a decline in the past five years does not show a statistically significant decline.

It is not apparent what value an ESA listing based on general concerns about global warming will have for polar bear when the FWS clearly recognizes that specific human activities such as oil and gas development and subsistence use are not implicated.

In fact, the guided harvests in Canada are a significant economic component of the Canadian villages, providing financial incentive to minimize shooting of nuisance bears because it reduces their quota available for guided hunts, which also provide meat for the villages and contribute significant funds for current conservation monitoring and research.

If polar bears are listed under ESA, then importation of hides from Canada is prohibited and polar bears are automatically considered 'depleted' under the Marine Mammal Protection Act, which also restricts imports. With a decrease of US hunters due to these import prohibitions, the economic incentives for the Canadian villages to avoid shooting polar bears, and some of the conservation and management funding for polar bear work, may evaporate.

Thus, we are concerned that a listing of polar bears under ESA in the United States may actually be harmful for the conservation of polar bear populations internationally.

Numerous federal, Canadian provincial, and Alaska agencies have considerable expertise on arctic populations. Ongoing conservation at an international level is consistent with current international agreements and will provide for proactive monitoring and research toward the long term health of all arctic populations.

Thus, in addition to providing data and analyses, we are also preparing options for FWS to consider that may provide greater measures toward conservation of polar bears than an Endangered Species Act listing.

Thank you for the opportunity to share the State of Alaska's preliminary concerns.