

March 21, 2007

U.S. Fish & Wildlife Service
Marine Mammals Management Office
1011 East Tudor Road
Anchorage, AK 99503

Attention: Polar Bear Finding

Dear U.S. Fish & Wildlife Service,

The Alaska State Chamber of Commerce believes in a strong, diversified Alaskan economy with the backbone of Alaska's economy primarily based on oil development. Currently, 86% of Alaska's revenues can be attributed to oil development on the North Slope. The proposed listing of polar bears as a "threatened species" under the Endangered Species Act could have disastrous economic affects on the State of Alaska, limiting new oil & gas exploration, expansion or building of a natural gas pipeline.

Under existing scenarios, projections are for Alaska's oil revenue to disappear altogether in 15 years without new oil developments or shipping of Alaska's natural gas. Continued exploration and development for Alaska's oil & gas industry is imperative for the future of the State of Alaska. Litigants could use a listing of the polar bear to challenge virtually any project in the United States that would generate greenhouse gases or provide for fuel stock for a carbon-emitting facility. Future oil and gas development would likely be subjected to extensive litigation if polar bears were listed under the Endangered Species Act (ESA).

Polar bears and their habitat are well managed and protected by numerous international and domestic agreements, regulatory mechanisms and laws, including the Marine Mammal Protection Act, the National Environmental Policy Act, the Outer Continental Shelf Lands Act, and the coastal zone management programs at the federal, state and local levels. Extensive legal authorities and agreements make the polar bear one of the most protected species in the world, and provide more than an adequate basis for addressing realistic threats to its extinction. In fact, these regulatory mechanisms have resulted in the successful conservation and management of polar bears on a global scale. No species has ever been listed under the ESA where the scientific consensus indicates that the species continues to occupy its entire original range at sustaining population levels.

Historically, there has been no impact on polar bears from oil and gas activities in Alaska. In fact, the sustained and continuing growth of polar bear population for the past 30 years has coincided with the development of the oil and gas industry on the North Slope. Mitigation measures, existing regulatory mechanisms and conservation programs continue to offset the effects of oil and gas development in the Arctic on the polar bear. Planning and training requirements set forth in current regulations have increased polar bear awareness among industry personnel and have minimized human-bear encounters. While industrial activity has been prevalent on the North Slope over the past thirty years, polar bears continue to maintain sustainable numbers for perpetuation of the species. Polar bears should not be considered for listing under the Endangered Species Act.

The Alaska State Chamber of Commerce understands that reasons for listing the polar bear may be based on complex modeling for future bear generations. The complexities of the modeling may be too unclear to truly understand by most Alaskans, but it is clear to all Alaskans that listing of the polar bear under the ESA will have detrimental affects on future oil & gas development on the North Slope of Alaska. In turn, this proposed ESA listing will ultimately have dramatic socio-economic affects on all Alaskans by limiting Alaska's access to future state revenues.

Without dramatic bear population losses and with the potential long-term damage to the State's economy, it is un-warranted and un-necessary to list the polar bear under the Endangered Species Act.

Sincerely,

Wayne A. Stevens
President/CEO