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October 22, 2007

The Honorable Dirk Kempthorne
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Mr. Secretary:

I am writing as Governor of Alaska to re-affirm our previous conclusion that there is insufficient information to justify a listing of the polar bear as threatened under the Endangered Species Act (ESA). We find nothing in the nine newly released reports by the U.S. Geological Survey (USGS) to support a determination that the polar bear is likely to become an endangered species throughout all or significant portions of its range within the foreseeable future. We also conclude that due to the ranging behavior of polar bears, neither the 19 "subpopulations" of polar bears worldwide as described by the International Union for the Conservation of Nature and Natural Resources for research and management purposes, nor the 4 ecoregion "populations" described in the newly released USGS reports could reasonably be considered to represent distinct population segments. Further, the new USGS reports do not show any evidence that any of these "populations" are not well managed through international agreements and the Marine Mammal Protection Act.

The listing of a currently healthy species based entirely on highly speculative and uncertain climate and ice modeling and equally uncertain and speculative modeling of possible impacts on a species would be unprecedented. Such a listing, based entirely on modeling, could have severe repercussions both in Alaska and throughout the United States and could be expected to open the floodgates for thousands of listing petitions that would drain the Service's resources away from substantive research and conservation efforts.

As a former governor having had experiences with the ESA, you understand the repercussions and implications such a listing could have both in Alaska and throughout the United States. I urge you to carefully review the substantial and detailed information the state submitted to the U.S. Fish and Wildlife Service in April of this year, along with the comments submitted in response to the USGS reports (enclosed) as you move forward with your decision process.

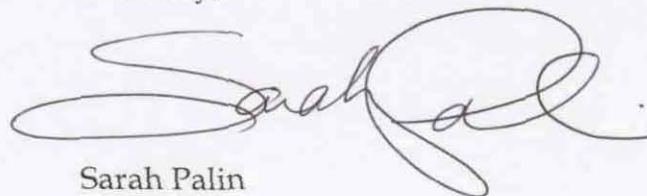
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As a trustee of this resource, Alaska stands ready to assist you through this important decision. We share the goal of maintaining a healthy and well managed polar bear population, and recognize that climate change may eventually require more active management to preserve many species, including polar bears. However, at this time, a decision to list the species would be premature and conservation goals can be better met through continued and expanded climate change and polar bear research and monitoring. We are deeply concerned that listing this species could actually harm many of the existing and highly successful polar bear conservation measures currently in place under several international agreements and treaties and that it could result in the loss of other options that might be useful in assuring the continued viability of the species.

In addition to the concerns expressed above, we believe there is substantial disagreement regarding the sufficiency and accuracy of the available information, especially regarding the validity and predictive value of climate modeling but also regarding population modeling based on modeled environmental changes. Given this, we do not believe that a one month comment period has been adequate to allow a thorough review of the USGS reports by appropriate experts, and we request you consider extending your listing determination period for an additional six months to allow additional comment and more thorough consideration of these issues.

Finally, we note that the polar bear has become a metaphor in the highly charged climate change debate. We question the use of a listing under the ESA by the petitioners to address global issues such as climate change and carbon emissions. We feel such concerns are more appropriately addressed through other channels.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Palin", with a large, stylized flourish at the end.

Sarah Palin
Governor

cc: The Honorable Ted Stevens, United States Senate
The Honorable Lisa Murkowski, United States Senate
The Honorable Don Young, United States Congressman

Enclosures: (1) State of Alaska Comments of April 9, 2007, on proposed polar bear listing; (2) Supplemental State of Alaska Comments of October 5, 2007, on proposed polar bear listing.