



MARINE MAMMAL COMMISSION

5 July 2016

Ms. Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Permit Application No. 19436
(Aleut Community of St. Paul)

Dear Ms. Harrison:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). The Aleut Community of St. Paul (St. Paul) proposes to conduct research on pinnipeds in Alaska during a five year period—permit 14330 authorized similar activities.

St. Paul proposes to conduct year-round research primarily on northern fur seals and Steller sea lions in the Pribilof Islands, Alaska. The purpose is to fulfill St. Paul's Biosampling, Disentanglement, and Island Sentinel Program responsibilities as established under the co-management agreement between the National Marine Fisheries Service (NMFS) and the Aleut Communities. St. Paul proposes to (1) conduct surveys of pinnipeds using an unmanned aerial vehicle (UAV)¹, (2) disentangle² individual northern fur seals, (3) weigh³ non-harvested, weaned northern fur seal pups and tagged northern fur seals, (4) collect⁴ biological samples⁵ from dead stranded and subsistence-hunted marine mammals, (5) collect scat⁶ samples from pinnipeds, and (6) observe and monitor pinnipeds at haul-out sites and rookeries using direct observations and automated time-lapse cameras (see the take tables for specifics). Researchers also could harass non-target pinnipeds during the proposed activities. In addition, St. Paul requests authorization for up to one Steller sea lion and three northern fur seal mortalities⁷ per year.

¹ Which weighs less than 2 kg and likely would be operated by a CI from the National Marine Mammal Laboratory.

² Including capturing, handling, restraining, photographing, weighing, measuring, and marking with flipper tags or shaving hair. Nursing pups and lactating females would not be handled.

³ Including capturing, handling, and photographing.

⁴ Including weighing and measuring.

⁵ Including but not limited to stomach, colon, vibrissae, hair, muscle, teeth, blood, eyes, blubber, liver, skull, and skeletal remains. Samples could be exported for analysis.

⁶ Spew, placentae, and molted hair as well.

⁷ Intentional via euthanasia or unintentional.

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To minimize disturbance from the UAV, the pilot will fly the UAV slowly in straight-line transects and avoid hovering over the animals. Researchers would approach any animal slowly and would keep a low profile (including crawling when necessary) to avoid stampedes. They also would wear clothing that blends into the surroundings and would approach downwind of the animals. Monitoring activities would occur from vantage points overlooking the rookeries or haul-out sites, if feasible. St. Paul would coordinate and collaborate with researchers from the National Marine Mammal Laboratory, National Institute of Standards and Technology, Alaska Department of Fish and Game, Alaska SeaLife Center, University of Alaska, University of Southern Maine, and Mystic Aquarium.

St. Paul does not have an Institutional Animal Care and Use Committee (IACUC). However, given that NMFS is funding St. Paul to conduct the co-management activities, would have its personnel fulfilling co-investigator duties under the permit, and would be provided samples and data, the Office of Protected Resources (OPR) has asked the NMFS IACUC to review the research protocols. The Commission fully supports OPR in its request and believes the same approach should be taken for future St. Paul permits and permit amendments. OPR indicated it would condition the permit, if issued, to prohibit St. Paul from conducting research-related capture and handling activities until the NMFS IACUC approval has been granted.

For all these reasons, the Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that NMFS issue the permit, as requested. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is written in a cursive style.

Rebecca J. Lent, Ph.D.
Executive Director