



MARINE MAMMAL COMMISSION

25 June 2014

Mr. Timothy J. Van Norman, Chief
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
4401 North Fairfax Drive
Arlington, VA 22203

Re: Permit Application No. 38124B
(Pôles d'images)

Dear Mr. Van Norman:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). A French wildlife film company, Pôles d'images, proposes to film polar bears in September 2014.

Pôles d'images is requesting authorization to take up to 25 individual polar bears up to two times per day by Level B harassment during filming activities. Filming would occur during a 10-day period at the bone pile in Kaktovik and in the waters around Barter Island, Alaska. The filmmakers also could take still photographs of the bears. Up to two non-targeted polar bears could be disturbed incidental to the filming activities each day. Polar bears could be of either sex and any age. Pôles d'images would use the footage for an educational documentary comparing grizzly and polar bears for a television show in France.

The filmmakers would film the bears from small boats during the day and vehicles at night. The filmmakers have experience videotaping and photographing bears, including polar bears. In addition, two local Inupiat men would assist them during the activities. However, if the bear(s) becomes aware of filmmakers' presence or appears disturbed, they would cease their approach and back away from the animal(s). If the bear(s) does not resume its natural behavior, the bear(s) would not be approached again. Although the filmmakers would film females with cubs, they would keep a safe distance and would not separate a female and her cubs. Pôles d'images also would abide by the Polar Bear Viewing Guidelines. Because of the precautionary manner in which Pôles d'images would conduct the filming activities, the Commission recommends that the Fish and Wildlife Service issue the permit, as requested.

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The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA and appreciates the opportunity to comment on this permit application. Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



Rebecca J. Lent, Ph.D.
Executive Director