



MARINE MAMMAL COMMISSION

13 July 2015

Mr. Timothy J. Van Norman, Chief
Branch of Permits, MS: IA
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Re: Permit Amendment Application No. 801652
(U.S. Geological Survey)

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 amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). The U.S. Geological Survey (USGS) is seeking to amend permit 801652 to conduct research on walrus in Alaska—the permit expires on 9 May 2018.

USGS is authorized to harass, observe, photograph/videotape, capture, handle, restrain, administer drugs to, measure, sample, instrument, and conduct biological impedance assays on walrus in Alaska year-round. USGS also is authorized to kill¹ up to three walrus per year during anesthesia procedures or up to six walrus per year during any of the proposed activities. The objectives are to continue long-term research investigating (1) abundance and distribution, (2) demographics, (3) population structure and trends, (4) movement patterns and habitat use, and (5) foraging ecology of walrus.

USGS is requesting to amend its permit to include the use of unmanned aerial systems (UASs²) to survey walrus. Researchers could harass walrus of any age class or either sex both on ice during offshore trials and on land during terrestrial surveys. Researchers would conduct up to 120 offshore trials at numerous altitudes, using various hovering times, and including multiple maneuvers (i.e., ascending, descending, flying horizontally) to assess displacement and disturbance behavior³ prior to conducting surveys on land. USGS also requests to add euthanasia to its permit—the numbers of authorized mortalities would remain unchanged.

For the terrestrial surveys, to minimize the likelihood of disturbance and stampedes, researchers would not fly at altitudes or engage in maneuvers that induced even minor disturbance (e.g., head lifts) during the offshore trials. In addition, researchers would fly pre-survey test flights⁴

¹ Unintentionally.

² Rotary-wing systems, primarily hexcopters that weight up to 14 kg.

³ e.g., flush, dive/swim away, head lifts, etc.

⁴ At various altitudes and lateral distances.

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near the periphery of the herd to evaluate disturbance potential and to minimize disturbance prior to surveying the entire herd. If UASs cause even minimal disturbance (i.e., head lifts), researchers would increase the flight altitude until the behavior is no longer observed. If they cause a large disturbance (e.g., stampede), UAS operations would cease. Researchers plans to consult with Alaska Native communities and the North Slope Borough regarding any impacts from the proposed activities on subsistence hunting.

The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA and recommends that the Fish and Wildlife Service issue the permit amendment, contingent on the current permit conditions. Please 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 with a large, sweeping initial "R".

Rebecca J. Lent, Ph.D.
Executive Director