



MARINE MAMMAL COMMISSION

19 October 2009

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: Request for Amendment, Permit No. MA801652
(U.S. Geological Survey, Alaska Science Center)

Dear Mr. Van Norman:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act.

RECOMMENDATION

The Marine Mammal Commission recommends that the Fish and Wildlife Service approve the permit amendment request, provided that the conditions contained in the current permit remain in effect and that all due caution is used to avoid possible adverse effects from research-related activities.

The permit holder currently is authorized to conduct research on the distribution, abundance, and foraging behavior of Pacific walrus over a five-year period. The permit authorizes the taking annually of up to 40 walrus of both sexes (except females with dependent young or near-term pregnant females). Takings would be by capture, anesthesia, blood-sampling, biopsy-sampling, tagging on the tusks with electronic devices, removal of two vibrissae, and procedures related to biological impedance, ultrasound, and doubly-labeled water studies. The permit authorizes the taking by harassment of up to 500 walrus incidental to conducting the research each year. The permit holder is authorized to kill accidentally up to six animals a year. The proposed research procedures have been approved by the Alaska Science Center's Institutional Animal Care and Use Committee.

The permit holder is requesting that the permit be amended to authorize an increase from 500 to 1,500 in the number of walrus that can be harassed incidental to conducting the research each year. The increase is being requested due to the unusually high number of walrus that are hauled out on land as a result of reduced ice conditions and that might be disturbed incidental to tagging operations.

Although the Commission supports this work, which may provide insights into the effects of climate change on walrus, it also notes that walrus may be particularly vulnerable to disturbance because of changes in their ice habitat and the fact that, in some cases, they are being forced to haul out on land. There, research-related disturbance may cause them to stampede to the water, trampling

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and sometimes killing young animals. To avoid such occurrences, the Commission believes that the researchers must use great caution in conducting their studies. The Commission also notes that animals killed in such a manner should be counted against the limit of six accidental deaths, even when they were not directly involved in research.

The Commission also urges caution when selecting adult animals for study. It is not clear that researchers can always tell whether an adult female is pregnant and near full term. Because these animals are likely to be stressed by climate change, they may be in relatively poor condition and more vulnerable to additional stress from capture or disturbance. With that in mind, the Commission urges the researchers to select only females that clearly do not appear to be pregnant.

The Commission believes that the activities for which it has recommended approval are consistent with the purposes and policies of the Marine Mammal Protection Act.

Please contact me if you have any questions concerning this recommendation.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director