



# MARINE MAMMAL COMMISSION

28 April 2015

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. 19133  
(HDR, Inc.)

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 application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). HDR, Inc., is requesting authorization to conduct research on ice seals in Alaska during a five-year period.

HDR proposes to conduct semi-annual aerial surveys for ringed, bearded, and spotted seals in the Colville River Delta area on Alaska's North Slope. The purpose of the proposed research is to characterize the occurrence, relative abundance, and distribution of the ice seal species and provide a framework for understanding the potential impacts of oil and gas explorations and development on them. HDR would harass, observe, and photograph ice seals of either sex and any age class during fixed-wing overflights (see the Take Table). Bowhead and beluga whales could be taken incidental to the proposed activities.

To minimize disturbance, HDR would conduct the surveys at an altitude of 262 m and drop to 213 m only when pinnipeds are observed. Researchers would circle the hauled-out pinnipeds up to three times. If any behavioral disturbance is observed during the pupping season, the aircraft would return to an altitude of 262 m. HDR also would remain at an altitude of 262 m if any species for which take is not authorized are observed with or near the seals. In addition, HDR will coordinate with the National Marine Fisheries Service (NMFS) and industry scientists to ensure duplicative surveys are not conducted. Further, HDR would communicate with the Kuukpik Subsistence Oversight Panel, subsistence hunters, and other stakeholders regarding the proposed activities. For 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".

Rebecca J. Lent, Ph.D.  
Executive Director