27 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. 18890
(Alaska Department of Fish and Game)

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). Alaska Department of Fish and Game (ADFG) is seeking to renew its permit to conduct research on cetaceans in the Arctic during a five-year period—permit 14610 authorized similar activities.

ADFG proposed to conduct research on bowhead, beluga, gray, and humpback whales in the Bering, Chukchi, and Beaufort Seas on a year-round basis. The purpose of the research is to investigate (1) abundance, distribution, and stock structure, (2) movements and habitat-use patterns, (3) demographics and life history parameters, and (4) behavior relative to human disturbance. ADFG would harass, observe, photograph, biopsy sample, and attach instruments to numerous individual bowhead, gray, and humpback whales of either sex each year (see the Take Table). Researchers would not biopsy sample or tag bowhead, gray, or humpback whale calves. They also would not biopsy sample or tag female gray or humpback whales with calves, but they would biopsy sample and tag female bowhead whales with calves of the year.

ADFG also would harass, observe, photograph, capture, sample, measure, conduct procedures on, and attach instruments to beluga whales[1] of either sex each year (see the Take Table). Researchers would conduct up to 10 aerial surveys using fixed-wing aircraft for each of the three stocks of beluga whales each year. They also would capture belugas primarily with seine nets[2] and move them to shallow water to conduct health assessments[3]. A net would not be intentionally set on more than two belugas. Although females and neonates (i.e., dark gray calves) would not be pursued for health assessments, calves can be difficult to see in muddy water and occasionally a second adult beluga will join the targeted beluga after the net is set, therefore it is possible that a maximum of three whales could be caught in a net at a given time. If a female with a calf is accidently captured,

[1] Not to include Cook Inlet beluga whales.
[2] Occasionally beluga whales can be herded into shallow water where they strand on shore long enough to attach a rope around the tail and place a net around the head.
[3] Sedatives and drugs would not be used during the proposed activities.

they would be measured, skin would be sampled, and they would be released without tagging. If any non-target species (i.e., bearded, ringed, spotted, or harbor seals) were caught incidentally, the researchers would release them immediately. ADFG would collect blood, skin, blubber, urine, feces, gastric contents, milk, swabs, and breath samples. Researchers also would monitor body temperature, conduct ultrasound and auditory evoked potential measurements on, insert stomach temperature pills, and attach instruments to the whales. In addition, biopsy sampling and tagging would be conducted remotely, similar to the other three cetacean species. However, unlike the other cetacean species, researchers could biopsy sample female beluga whales with neonates but would not biopsy sample the neonates[4]. Samples could be imported and exported for analysis.

ADFG could harass ringed, spotted, bearded, and harbor seals in addition to non-target individuals of the four cetacean species during the proposed activities. ADFG also requested up to three beluga whale mortalities (intentional via euthanasia or unintentional) during the five-year period. To minimize impacts, ADFG would approach the whales slowly and either parallel to their path of travel or from behind. Researchers would not separate female-calf pairs and would cease activities if any whale reacts strongly (e.g., tail slapping and approaching the vessel) to the activities. They also would target individuals or whales in small groups rather than aggregations of whales, and they would move away from the whale once a biopsy dart and/or tag is deployed. ADFG's Institutional Animal Care and Use Committee has reviewed and approved the research protocols. Researchers collaborate with the Alaska Whaling Commission, North Slope Borough, Alaska Beluga Whale Committee, Bristol Bay Native Association, the National Marine Fisheries Service's (NMFS) Southwest Fisheries Science Center, and Cascadia Research Collective and coordinate their activities with the National Marine Mammal Laboratory, NMFS, and Woods Hole Oceanographic Institution. For all of these reasons, the Commission believes that the activities for which ADFG has recommended approval 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,

Rebecca J. Lent

Rebecca J. Lent, Ph.D.
Executive Director

[4] Calves could be biopsy sampled.