26 August 2010

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 of Permit No. PRT-690038

(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

<u>The Marine Mammal Commission recommends</u> that the Fish and Wildlife Service approve the amendment request, provided that the conditions currently contained in the permit remain in effect.

RATIONALE

The permit holder currently is authorized to capture, measure and weigh, sample, biopsy, tag, mark, conduct bioelectrical impedance measurements on, and release up to 250 polar bears annually over five years. Up to 50 of these animals may be taken by capture, tagging with "glue-on" or ear-tag radio transmitters, instrumentation, collection of milk samples, muscle biopsies, and implantation with internal body temperature data-loggers. In addition, up to 30 female polar bears may be taken in maternal dens during surveys using forward-looking infrared-equipped aircraft. The permit holder also is authorized to import an unspecified number of blood, tissue, and tooth samples collected from polar bears taken legally in Canada, Greenland, Norway, and Russia and to export samples to researchers in those countries.

The permit holder is requesting that the permit be amended to authorize an increase in the number of animals that could be harassed annually during aerial surveys, biopsy darting, and tagging to 400, 160, and 75, respectively. The permit holder's Institutional Animal Care and Use Committee has reviewed and approved the proposed activities. The permit holder is seeking an amendment on the grounds that (1) current knowledge suggests that as many as 400 polar bears may summer on land in northern Alaska and authorization is needed to observe and potentially harass this number of animals; (2) remote collection of genetic identification may allow researchers to increase sample size for mark-resighting demographic analyses (because of reduced time required), will increase the safety of both study animals and researchers, and will reduce bias (in some cases, genetic identification may be obtainable when capture would not be safe or permitted); and (3) alternative tags (glue-on satellite

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tags and satellite ear tags) will allow researchers to continue to refine their assessment of how polar bears are using sea ice habitat generally, identify polar bear behavior and use of sea ice and land habitat during the transitional melting period, and quantify use of offshore habitats. The permit holder states that the amendment also reflects the U.S. Geological Survey's initiative to develop less invasive methods for conducting research on polar bears.

The Marine Mammal Commission appreciates the potential value of the proposed study and thus the requested increase in sample size. The primary concern with regard to such an increase would be an increase in the number of animals that are accidentally injured or killed in the course of the study. Because the researchers will closely track the animals in this study, and because the permit holder has not requested an increase in the number of allowed serious injuries or deaths, the Commission has no objection to the permit amendment as long as previously established permit conditions remain in effect. Therefore, the Marine Mammal Commission recommends that the Fish and Wildlife Service approve the amendment request.

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 and the Endangered Species Act.

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

Thusty J. Ragen

Timothy J. Ragen, Ph.D.

Executive Director