

1 March 2016

Ms. 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 Amendment Application No. 18537 (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 amendment 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 amend permit 18537 that authorizes it to conduct research activities on Steller sea lions in Alaska—the permit expires on 31 August 2019.

ADFG is authorized to conduct research year-round on Steller sea lions in Alaska. The purpose of the research is to investigate (1) abundance, distribution, and stock structure, (2) survival and reproductive success, (3) movement patterns and habitat use, (4) foraging ecology and fisheries interactions, (5) disease and health, and (6) effects of natural and anthropogenic factors on Steller sea lions. Authorized activities include harassing, observing, capturing, handling, restraining, administering drugs to, measuring, weighing, photographing, sampling, marking/tagging, conducting other procedures¹ on, and/or attaching instruments to numerous Steller sea lions each year. ADFG is authorized to conduct the specified activities on individuals of various age classes and either sex (see the Take Tables).

ADFG is requesting to (1) increase the number of California sea lion Level B harassment takes to 10,000 and Steller sea lion Level B harassment takes to 75,000 during aerial surveys due to the northerly movement of California sea lions into the study area and greater numbers of Steller sea lions using the Alsek and Akwe River haul-out sites and (2) increase the volume of blood draws to 4 mL/kg to assess the impacts of contaminants on immune and endocrine parameters in young Steller sea lions. ADFG's Institutional Animal Care and Use Committee currently is reviewing the new research protocols—ADFG will ensure that approval has been granted before the research is initiated. The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and recommends that the National Marine Fisheries Service issue the permit amendment, provided that the current permit conditions remain in effect.

-

¹ i.e., ultrasound, bioelectrical impedance, metabolic chamber, and administration of deuterium oxide, sodium bromide, and Evans blue dye with serial blood sampling.

Ms. Jolie Harrison 1 March 2016 Page 2

Kindly contact me if you have any questions concerning the Commission's recommendation.

Sincerely,

Rebecca J. Lent, Ph.D.

Executive Director