



# MARINE MAMMAL COMMISSION

5 July 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 Application No. 19592  
(St. George Traditional Council)

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). St. George Traditional Council (St. George) proposes to conduct research on pinnipeds in Alaska during a five year period—permit 14331 authorized similar activities.

St. George proposes to conduct year-round research primarily on northern fur seals and Steller sea lions on St. George Island, Alaska. The purpose is to fulfill St. George's Biosampling, Disentanglement, and Island Sentinel program responsibilities as established under the co-management agreement between the National Marine Fisheries Service (NMFS) and the Aleut Communities. St. George proposes to (1) disentangle<sup>1</sup> individual northern fur seals, (2) weigh<sup>2</sup> non-harvested, weaned northern fur seal pups and tagged northern fur seals, (3) collect<sup>3</sup> biological samples<sup>4</sup> from dead stranded and subsistence-hunted marine mammals, (4) collect scat<sup>5</sup> samples from pinnipeds, and (5) observe and monitor pinnipeds at haul-out sites and rookeries using direct observations and automated time-lapse cameras (see the take tables for specifics). Researchers also could harass non-target pinnipeds during the proposed activities. In addition, St. George requests authorization for up one northern fur seal mortality<sup>6</sup> per year.

To minimize disturbance, researchers would approach any animal slowly and keeping a low profile (including crawling when necessary) to avoid stampedes. They also would wear clothing that blends into the surroundings and would approach downwind of the animals. Monitoring activities

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<sup>1</sup> Including capturing handling, restraining, photographing, weighing, measuring, and marking with flipper tags or shaving hair. Nursing pups and lactating females would not be handled.

<sup>2</sup> Including capturing, handling, and photographing.

<sup>3</sup> Including weighing and measuring.

<sup>4</sup> Including but not limited to stomach, colon, vibrissae, hair, muscle, teeth, blood, eyes, blubber, liver, skull, and skeletal remains. Samples could be exported for analysis.

<sup>5</sup> Spew, placenta, and molted hair as well.

<sup>6</sup> Intentional via euthanasia or unintentional.

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would occur from vantage points overlooking the rookeries or haul-out sites, if feasible. St. George would coordinate and collaborate with researchers from the National Marine Mammal Laboratory and NMFS's Alaska Region Office.

St. George does not have an Institutional Animal Care and Use Committee (IACUC). However, given that NMFS is funding St. George to conduct the co-management activities and would be provided samples and data, the Office of Protected Resources (OPR) has asked the NMFS IACUC to review the research protocols. The Commission fully supports OPR in its request and believes the same approach should be taken for future St. George permits and permit amendments. OPR indicated it would condition the permit, if issued, to prohibit St. George from conducting research-related capture and handling activities until the NMFS IACUC approval has been granted.

For all 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,



Rebecca J. Lent, Ph.D.  
Executive Director