



MARINE MAMMAL COMMISSION

26 September 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. 19315
(Center for Coastal Studies)

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). Center for Coastal Studies (CCS) is seeking to renew its permit to conduct research on North Atlantic right whales (NARWs) during a five-year period—permit 14603 authorized the same activities.

CCS proposes to conduct research on NARWs in waters off New England, primarily from October through June. The purpose of the research is to investigate (1) population structure and life history parameters, (2) distribution and movement patterns, and (3) anthropogenic impacts on NARWs. Researchers would harass, photograph/videotape¹, conduct focal follows, and instrument² NARWs with suction-cup tags (see the take tables). They would not tag calves or females with those calves. Bowhead, fin, humpback, minke and sei whales also could be targeted for photo-identification on an opportunistic basis (see the take tables). In addition, researchers could collect information on prey via net tows, fish-finding sonars, and other equipment. Various other marine mammal species could be harassed incidental to the proposed activities (see the take table).

Researchers would cease their activities if animals exhibit adverse reactions (e.g., evasive behavior, cessation of feeding, significant increase in dive times, breaching, tail lobbing, etc.). Vessels would approach whales slowly from the side, and a female would not be separated from her calf. To minimize tagging individuals that have already been tagged by other researchers, they would crosscheck the photo-identification catalog³ and consult with other researchers before tagging any individuals. All encounters would be limited to 30 minutes⁴. Researchers would collaborate with

¹ Including using pole cameras.

² The co-investigator (CI) with experience tagging mysticetes was recently removed from the permit application. CCS plans to replace that CI with someone that has sufficient tagging experience. NMFS would not authorize tagging until a qualified replacement has been obtained.

³ Which also includes tagging histories on each individual.

⁴ In addition, aerial surveys would not occur at altitudes below 228 m.

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personnel at the Stellwagen Bank National Marine Sanctuary, Syracuse University, Woods Hole Oceanographic Institution, Duke University, and New England Aquarium. The Institutional Animal Care and Use Committee (IACUC) has yet to review the research protocols, but IACUC approval would be obtained prior to CCS conducting any tagging activities. 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, 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". The signature is written in a cursive style with a large initial 'R' and 'L'.

Rebecca J. Lent, Ph.D.
Executive Director