



# MARINE MAMMAL COMMISSION

28 November 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. 18016  
(Tamara McGuire, Ph.D.,  
LGL Alaska Research Associates, Inc.)

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). Dr. McGuire is requesting authorization to amend her permit to conduct research on beluga whales in Alaska—the permit would expire on 1 June 2019. She currently is authorized to harass, observe, and photograph up to 72 beluga whales<sup>1</sup> per year during vessel-based surveys in Cook Inlet. Harbor seals also can be harassed incidental to the authorized activities. The purpose of the research is to identify individual beluga whales and investigate beluga whale movement patterns, habitat use, survivorship, reproduction, and population size.

Dr. McGuire is proposing to increase the number of beluga whales that can be approached during up to 10 vessel surveys from 72 to 340 whales per year<sup>1</sup>. The purpose of the amendment is to increase the effectiveness of photo-identification studies and to decrease the total time spent operating the survey vessel around whales. Prior to the listing of Cook Inlet beluga whales under the Endangered Species Act in 2008, Dr. McGuire would approach a group of whales, quickly photograph them during a few passes, and then leave the group. Since the listing decision, Dr. McGuire has not actively approached the whales for photo-identification. She has waited until the whales approached the vessel or taken photographs at a distance. That has resulted in lower-quality photographs and greater exposure of the whales to both the presence of the vessel and the sound emitted. Thus, Dr. McGuire plans to return to her pre-listing photo-identification protocols. In addition, the group size of belugas in Cook Inlet has increased consistently in recent years to a maximum of 313 whales in a single group in 2015. For these reasons, Dr. McGuire has requested an increase in the number of beluga whale that could be taken in a given year. No other aspects of the permit would change.

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<sup>1</sup> Of either sex and any age class.

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The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA and therefore recommends that the National Marine Fisheries Service issue the permit amendment, provided that the current permit conditions remain in effect.

Please 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 a distinct "Lent" at the end.

Rebecca J. Lent, Ph.D.  
Executive Director