



MARINE MAMMAL COMMISSION

10 May 2021

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. 23896
(Aleut Community of St. Paul)

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). The Aleut Community of St. Paul (St. Paul) proposes to conduct research on northern fur seals in Alaska during a five-year period—permit 19436 authorized similar activities.

St. Paul proposes to conduct year-round research on northern fur seals in the Pribilof Islands, Alaska. The purpose is to fulfill St. Paul'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. Paul would harass, observe, handle, restrain, photograph/videotape¹, measure/weigh, mark², instrument³, and/or disentangle numerous individual northern fur seals of either sex and any age class each year (see the take table for specifics). Researchers also could harass non-target pinnipeds during the proposed activities.

St. Paul requests authorization for up to two pup and two non-pup northern fur seal mortalities per year during its disentanglement activities, which could be either intentional⁴ or unintentional. It also requests authorization to salvage, receive and export parts from dead stranded and subsistence-hunted marine mammals. Researchers would use various measures to minimize impacts on marine mammals and would be required to abide by NMFS's standard permit conditions. St. Paul is currently preparing its proposed research protocols for Institutional Animal Care and Use Committee review, and the Commission understands that approval would be obtained before the proposed activities begin.

¹ Including with remote aircraft systems.

² Including with flipper tags and fur clips.

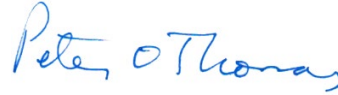
³ With VHF transmitters.

⁴ Via euthanasia for humaneness purposes.

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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,



Peter O. Thomas, Ph.D.
Executive Director