



# MARINE MAMMAL COMMISSION

5 August 2022

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. 26254  
(Alaska Department of Fish and Game)

Dear Ms. Harrison:

In February 2022, the Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, reviewed the above-referenced permit request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). Alaska Department of Fish and Game (ADFG) had proposed to conduct research on ice seals in Alaska during a five-year period. The Commission provided comments on and recommendations for ADFG's application in its [10 March 2022 letter](#).

On 21 July 2022, the National Marine Fisheries Service (NMFS) published a revised version of ADFG's application in the *Federal Register* (87 Fed. Reg. 43500) for public comment. The Commission understands that after the close of the comment period for ADFG's original application, ADFG requested to add the import and export of unidentified pinniped parts to its application. The Commission does not have any further comments or recommendations on ADFG's revised application, and those detailed in its 10 March 2022 letter still stand. The Commission strongly encourages NMFS, to inquire before applications are published in the *Federal Register*, whether an applicant might want to import and/or export samples from marine mammals at some point during the five-year duration of a research permit. This would help avoid such delays in the issuance of a permit.

Please contact me if you have any questions regarding the Commission's comments and recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas".

Peter O. Thomas, Ph.D.,  
Executive Director