



MARINE MAMMAL COMMISSION

3 June 2026

Mr. Trevor Spradlin, Supervisor
Directed Take Program
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. 29418
(University of Alaska Southeast)

Dear Mr. Spradlin:

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 (MMPA). The University of Alaska Southeast is seeking to renew its permit to conduct research on cetaceans in Alaska during a 10-year period—permit 24378 authorized similar activities.

The University of Alaska Southeast proposes to conduct research year-round on several species of cetaceans in Alaskan waters. The purpose of the research is to investigate (1) population structure and life history parameters, (2) distribution and movement patterns, (3) foraging ecology, (4) social behavior, and (5) fisheries interactions. Researchers would harass, observe, photograph/videotape¹, record acoustically², sample³, and/or instrument⁴ numerous cetaceans of both sexes and various age classes.

Although Dr. Wild and Mr. Moran are authorized to conduct dart/barb tagging under their current permit, the Commission remains concerned about their lack of experience deploying dart/barb tags. In its [29 March 2021 letter](#) regarding permit 24378, the Commission recommended that NMFS only authorize the principal investigator (PI) and co-investigators (CIs) to conduct invasive procedures that he or she has at least performed under supervision. Dr. Wild's curriculum vitae at the time did not specify her experience deploying dart/barb versus suction-cup tags, and Mr. Moran's qualifications form (QF) did not include any experience with dart/barb tagging. Despite the

¹ With unmanned aircraft systems (UAS).

² Prey fields also would be mapped with echosounders.

³ Including collecting biopsies, sloughed skin, feces, exhaled breath with a pole or UAS, and remains from killer whale predation events. Samples could be exported for analysis.

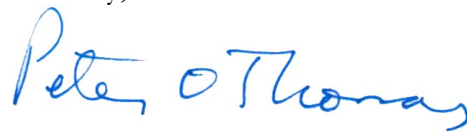
⁴ With suction-cup and/or dart/barb tags. Suction-cup tags would be deployed via pole. Dart/barb tags to be deployed include floating SMRT tags and Multi-Sensor Behavioral and Physiological tags. Those tags contain 3 to 5 darts penetrating up to 10 cm and the Physiological tag includes a dart-attached, secondary electrode that is tethered to the main body of the tag via a 1.5-m cable.

lack of experience provided in the documentation and the Commission's recommendation, NMFS authorized Dr. Wild and Mr. Moran to conduct dart/barb tagging under permit 24378.

For the current permit application, updated QFs were submitted that describe Dr. Wild's dart/barb tagging experience as satellite⁵ tagging two sperm whales in 2017 and Mr. Moran's experience as driving boats and assisting with dart/barb tags, but with no experience deploying them. The Commission appreciates both Dr. Wild's and Mr. Moran's extensive experience with boat handling during close approaches, biopsy darting and suction-cup tagging large whales, disentanglement, and assisting with tagging operations⁶. The Commission also understands that funding for fieldwork focused on and opportunities to gain additional experience in dart/barb tagging have been limited in recent years. However, the Commission does not view close approaches for biopsy darting and suction-cup tagging as sufficient experience to authorize someone to conduct dart/barb tagging unsupervised. The Commission also does not view the deployment of two dart/barb tags almost 10 years ago as sufficient experience for deploying dart/barb tags unsupervised, especially when more complex tags with numerous darts and a tethered, dart-attached, secondary electrode could be deployed. As discussed by Andrews et al. (2019), "inexperience or lack of familiarity with any of the many steps involved [in tag deployment] can present real risks to the health and safety of the study animals and humans alike, as well as compromise data quality." Therefore, the Commission recommends that NMFS issue the permit, but refrain from authorizing Dr. Wild and Mr. Moran to conduct dart/barb tagging until they have successfully deployed a sufficient number of dart/barb tags under supervision.

The Commission believes that the proposed activities are consistent with the purposes and policies of the MMPA. Please contact me if you have any questions concerning the Commission's recommendation.

Sincerely,



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

Reference

Andrews, R.D., R.W. Baird, J. Calambokidis, C.E.C. Goertz, F.M.D. Gulland, M.P. Heide-Jorgensen, S.K. Hooker, M. Johnson, B. Mate, Y. Mitani, D.P. Nowacek, K. Owen, L.T. Quakenbush, S. Raverty, J. Robbins, G.S. Schorr, O.V. Shpak, F.I. Townsend Jr., M. Uhart, R.S. Wells, and A.N. Zerbini. 2019. Best practice guidelines for cetacean tagging. *Journal of Cetacean Research and Management* 20:27-66. <https://doi.org/10.47536/jcrm.v20i1.237>

⁵ i.e., dart/barb.

⁶ For example, by programming and sterilizing tags.