



MARINE MAMMAL COMMISSION

12 September 2013

Mr. P. Michael Payne, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3225

Re: Request to Amend Permit No. 14325
(Alaska Department of Fish and Game)

Dear Mr. Payne:

The Marine Mammal Commission (the MMC), 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). The Alaska Department of Fish and Game (ADFG) is seeking to amend permit 14325 that authorizes it to conduct research on Steller sea lions in Alaska during a five-year period.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit amendment, provided that the current permit conditions remain in effect.

RATIONALE

Permit 14325 authorizes ADFG to harass, observe, photograph, capture, restrain, sedate, measure, sample, collect digestive contents from, inject Evan's blue dye and deuterium oxide, conduct ultrasound on, mark/tag/brand, and instrument Steller sea lions throughout their range in Alaska. ADFG is authorized to conduct those activities on both the eastern and western distinct population segments (eDPS and wDPS, respectively). The permit also authorizes incidental harassment of northern fur seals, California sea lions, and harbor seals. The purpose of the research is to study Steller sea lion population status, vital rates, foraging ecology, habitat requirements, and effects of natural and anthropogenic factors on Steller sea lions.

ADFG is requesting four changes to its permit, including—

- (1) conducting opportunistic aerial surveys using fixed-wing aircraft on up to 25,000 eDPS and 25,000 wDPS Steller sea lions per year of either sex and any age class;
- (2) conducting aerial surveys using unmanned aerial systems (less than 6 kg in mass) on up to 25,000 eDPS and 25,000 wDPS Steller sea lions per year of either sex and any age class;
- (3) adding incidental harassment of 1,000 northern fur seals, 700 California sea lions, and 3,500 harbor seals per year of either sex and any age class associated with the proposed aerial surveys; and

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- (4) clarifying in the co-investigator table the activities that each co-investigator is authorized to conduct.

The aerial surveys would provide band-resight and entanglement data, in addition to abundance and habitat mapping data. For the opportunistic aerial surveys, ADFG would take advantage of flights that are being conducted for purposes of collecting other data (e.g., marine debris, herring, and salmon surveys) or transport staff to/from study sites. Those aerial overflights would not replace or duplicate the population surveys conducted by the National Marine Mammal Laboratory and would complement ADFG's ground surveys. ADFG also would conduct aerial surveys using both fixed-wing and unmanned aerial systems at an altitude no less than 500 m and at rookeries only during the non-breeding season. Therefore, the MMC recommends that the National Marine Fisheries Service issue the permit amendment, provided that the current permit conditions remain in effect.

The MMC believes that the activities for which it has recommended approval are consistent with the purposes and policies of the MMPA.

The MMC appreciates the opportunity to comment on this permit amendment. Kindly contact me if you have any questions concerning the MMC'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".

Rebecca J. Lent, Ph.D.
Executive Director