



# MARINE MAMMAL COMMISSION

16 April 2014

Dr. Tammy Adams, Acting 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. 14610  
(Alaska Department of Fish and Game)

Dear Dr. Adams:

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 (the MMPA). Alaska Department of Fish and Game (ADFG) is seeking to amend permit 14610 that authorizes it to conduct research on beluga, gray, bowhead, and humpback whales in Alaska. The current permit expires on 31 May 2015.

## RECOMMENDATION

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

## RATIONALE

ADFG is authorized to determine cetacean (1) abundance, distribution, and stock structure, (2) movements and habitat-use patterns, (3) demographics and life history parameters, and (4) behavior relative to human disturbance. Authorized activities include harassing, photographing, biopsy sampling, and attaching instruments to various numbers of individuals of each cetacean species. ADFG is authorized to conduct the specified activities on individuals of various age classes and either sex.

ADFG is requesting two changes to its permit, including—

- (1) adding photo-identification of up to 300 gray whales per year during biopsy sampling and tagging activities and adding harassment of 50 gray whales per year incidental to those activities—vessels would approach the whales no closer than 50 m to obtain the images; and
- (2) adding a new attachment mechanism of a releasable baseplate (a time-release mechanism (e.g., corrosive magnesium bolt)) with two shorter anchors (9-cm dual anchors vs. a 20-cm single anchor as currently authorized) for dart tagging of bowhead whales with short-term acoustic tags.

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To minimize effects from photo-identification activities, ADFG would approach the whales slowly and either parallel to their path of travel or from behind. Researchers would not separate female-calf pairs and would cease activities if any whale reacts adversely (e.g., tail slapping and approaching the vessel) to the activities. ADFG's Institutional Animal Care and Use Committee has reviewed and approved the research protocols. Therefore, the Commission recommends that the National Marine Fisheries Service issue the permit amendment, provided that the conditions contained in the current permit remain in effect.

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

The Commission appreciates the opportunity to comment on this permit amendment application. Kindly 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".

Rebecca J. Lent, Ph.D.  
Executive Director