



MARINE MAMMAL COMMISSION

14 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 Application No. 18694
(Mervi Kunnasranta, Ph.D.,
University of Eastern Finland)

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). Dr. Kunnasranta proposes to film harbor seals in Alaska during a three-year period.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Marine Fisheries Service issue the permit, as requested.

RATIONALE

Dr. Kunnasranta is requesting authorization to take up to 280 harbor seals up to twice per year by Level B harassment during filming at Lake Iliamna, Alaska. Filming would occur during a one-week period, likely during August of each year. Harbor seals would not be filmed during the pupping season. Dr. Kunnasranta would use the footage for a European documentary investigating freshwater seal species.

Filmmakers would use high-definition video and still cameras to film and photograph the harbor seals. Filming would occur from fixed-wing aircraft, small vessels, and shore. Aerial filming would occur during ongoing aerial surveys authorized under the National Marine Mammal Laboratory (NMML) permit 14590. Dr. Kunnasranta and her co-principal investigator would accompany NMML during those activities, if possible. They also would obtain footage using small vessels captained by local personnel familiar with the seals. The vessels would approach the seals no closer than 150 m to obtain the footage. Swimming seals could be filmed as well, if they approach the vessel. In addition, filmmakers would obtain footage while on shore. They would use removable hides and camouflage clothing and would approach the seals slowly, no closer than 50 m. If the seals display any disturbance behaviors or signs of anxiety or distress, the filmmakers would cease their

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activities and film at that haul-out site at a later time or relocate to another site. Additional footage may be obtained from static, digital cameras placed onshore and anchored underwater.

The filmmakers have experience working with endangered and rare seal populations and have worked with female-pup pairs during past activities. They will minimize all potential disturbance to those pairs by conducting filming activities when the pups are larger and at the end of lactation, approaching the pairs slowly and from downwind, and ceasing activities if disturbance occurs. Dr. Kunnasranta also would use local guides familiar with the animals and their behaviors to avoid disturbing the seals. In addition, she would consult with NMML personnel throughout the filming activities.

The Commission supports the filming of marine mammals as films can be an important means of educating the public about these animals, their natural history, and the value of conserving them. Because of the precautionary manner in which Dr. Kunnasranta would conduct the filming activities, the Commission recommends that the National Marine Fisheries Service issue the permit, as requested.

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 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