13 June 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: Permit Application No. 18016

(Tamara McGuire, Ph.D.,

LGL Alaska Research Associates, Inc.)

Dear Mr. Payne:

The Marine Mammal 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. Dr. McGuire is requesting authorization to conduct research on belugas during a five-year period. She would renew and amend permit 14210.

RECOMMENDATION

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

RATIONALE

Dr. McGuire proposes to conduct research on Cook Inlet beluga whales from April to November of each year. Her objectives are to use photo-identification methods to identify individual Cook Inlet beluga whales and provide information about their movement patterns, habitat use, survivorship, reproduction, and population size.

Dr. McGuire seeks authorization to observe and photograph up to 72 beluga whales per year. Individuals of all age classes and either sex could be harassed and could be approached generally up to two times per year. Researchers would use primarily small vessels (5 m) to approach beluga whales at approximately 50 m to photograph them for no more than 40 minutes. Those whales would be approached at a consistent speed and angle to avoid blocking the intended path of the animals. Beluga whales can approach the vessel after it has ceased its approach (at 50 m or more) but if the whales approach the vessel within 2 m, the captain will put the engine into neutral and/or turn the engine off. Researchers would cease activities if a whale exhibits behaviors such as tail slaps or "snorkeling behavior" (neither surfacing in the typical arch and roll nor diving, but remaining just at or below the surface to breath). In addition, they would not approach female-calf pairs within 50 m and would never intentionally separate a female-calf pair or split larger groups of whales.

Mr. P. Michael Payne 13 June 2013 Page 2

Dr. McGuire collaborates with the National Marine Fisheries Service, Kenai Peninsula Borough, Alaska Department of Fish and Game, and Department of Defense. Annual project reports are made available to the public and the scientific community.

<u>The Marine Mammal Commission</u> supports research on population dynamics of Cook Inlet beluga whales and therefore <u>recommends</u> 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 Marine Mammal Protection Act.

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,

Rebecca J. Lent, Ph.D.

Executive Director