



Rebecca J. Lent, Ph.D.
Executive Director
Marine Mammal Commission
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SEP 12 2017

Dear Dr. Lent:

Thank you for your letter regarding the Atlantic Large Whale Take Reduction Team (the Team) and our efforts under the Atlantic Large Whale Take Reduction Plan (the Plan) to recover and protect the North Atlantic right whale. We share your concern about the apparent decline in the right whale population, and we appreciate your suggestions on the best ways in which to move forward.

As noted in your letter, we most recently convened a Team meeting from April 25–27, 2017, in Providence, Rhode Island. During the meeting we discussed a variety of topics with the Team, including the right whale population decline, potential revisions to gear marking requirements, potential new entanglement mitigation measures (e.g., 1,700-lb. breaking strength rope, ropeless fishing), expanding reporting requirements, and research priorities. Further, we expanded our meeting agenda to include an update from a member of your staff concerning the right whale discussions that took place at the Commission's annual meeting held in early April 2017. Each of these topics was addressed in your letter, and we are continuing our dialogue with the Team to make further progress in these areas.

Your letter noted research areas that we should consider to reduce the risk of large whale entanglement in commercial fishing gear. As was provided during the Team meeting, many of the research areas you identified in your letter are already supported by us and are currently in progress. During the Team meeting, we reported progress in each of the six research areas you suggested. In the past, the Team has supported and we have funded research on grappling techniques and pop-up buoys for ropeless fishing. The fishing industry has identified hurdles that prevent the widespread adoption of ropeless fishing, but we remain committed to further investigating this technology. In addition, we plan to report findings to the Team on current and upcoming research in passive acoustics and measuring load force of buoy lines. Lastly, as we discussed during the Team meeting and at the Commission's annual meeting, we are committed to the continued development and refinement of our co-occurrence model to analyze entanglement risk.

While we disagree with your characterization of the Team's effectiveness, we acknowledge that we can make some changes to the take reduction team process to enhance productivity. Negotiating consensus agreements is difficult in any context. In this case, we are particularly challenged given lack of data, small PBR (i.e., very little room for negotiating), and the large size of the team. We describe an approach below to address the lack of data. Having a large team means that we have all the relevant stakeholders at the table. This ultimately enhances buy-in for requirements because they have been engaged in the process. It also keeps people focused



on solving the problem. The Commission is a key member of the Team, and we need you to fully, positively engage in the process for it to be successful.

We have already discussed various options for devoting more time to in-person deliberation on take reduction measures. Examples include relying on webinars prior to team meetings for presenting background information (e.g., updates on abundance and mortality estimation) and work groups between meetings that would develop options for the full team to consider at an in-person meeting. You mentioned a few of these same ideas in your letter.

Looking forward, we recognize the challenges we face in leading the Team, and we are pleased to share with you the following immediate plans to advance right whale conservation. We are awaiting a list of recommendations and data priorities from Team members as a follow-up from the April meeting. These recommendations will help set our agenda as we plan future Team webinars in late summer and early fall. We agree with your recommendations on gear marking and are interested in exploring options to refine our current gear marking requirements to further identify areas and gear types in which entanglements occur most frequently. We have already recovered gear that was marked in accordance with the recent gear marking requirements; we expect even more data with any additional gear marking requirements. We also appreciate your recommendation of a subgroup of the Team to explore this issue further, and we remain committed to making changes to the Plan as needed.

I would also like to take this opportunity to share with you our plans specific to right whale recovery in light of the recent abundance decline. We are in the process of convening a series of work groups to increase our understanding of the right whale population and the threats impeding its recovery. This includes investigating whether current science and management efforts are effective and whether additional studies, analyses, or approaches are necessary to understand and target key threats. We will keep the Commission updated on our progress.

As you identified in your letter and as recommended by the full Commission at its annual meeting, a critical component to right whale recovery is working more closely with our Canadian colleagues to address the risk of entanglement in commercial fishing gear. The recent and unfortunate whale mortalities in the Gulf of St. Lawrence are great cause for concern and urgency. I can assure you that we are working with Canada's Department of Fisheries and Oceans to address this concern. To that end, I appreciate your efforts and that of the Commission in helping us bridge this significant gap in right whale recovery efforts.

We look forward to continuing our work with you through the Team toward our shared goal of promoting right whale recovery.

Sincerely,



Chris Oliver
Assistant Administrator
for Fisheries