



# MARINE MAMMAL COMMISSION

6 March 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: Request to Amend Permit No. 14330  
(Aleut Community of St. Paul Island)

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 amendment application with regard to the goals, policies, and requirements of the Marine Mammal Protection Act (the MMPA). The Aleut Community of St. Paul Island is seeking to amend permit 14330 that authorizes it to conduct research on pinnipeds 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 14330 authorizes the Community to harass northern fur seals when (1) disentangling individuals, (2) collecting biological samples from dead stranded and subsistence-hunted marine mammals, (3) collecting scat samples, and (4) observing, monitoring, and maintaining remote cameras at haul-out sites and rookeries. It also authorizes the Community to harass Steller sea lions and harbor seals during collection of their scat. The purpose is to fulfill the Community's Biosampling, Disentanglement, and Island Sentinel program responsibilities as established under the co-management agreement between the National Marine Fisheries Service (NMFS) and the Aleut Communities.

The Community is requesting to—

- (1) add new fur seal habitat-use studies, thereby increasing the numbers of fur seals that could be taken by incidental disturbance;
- (2) consolidate and streamline the existing take table based on age class and sex of fur seals, Steller sea lions, and harbor seals and for studies with similar types of incidental disturbance; and
- (3) extend the permit for a one-year period.

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To inform the timeframe for public access to St. Paul Island, the Community proposes to conduct habitat-use studies to (1) determine the timing of the first arrival of adult male northern fur seals at various rookeries, (2) determine the timing of the departure of adult females and pups, and (3) describe terrestrial habitat use of pups beyond the breeding areas or rookeries. All surveys would occur from vantage points overlooking the rookeries or haul-out sites, if feasible, and researchers would approach any animal slowly (including crawling when necessary) to avoid stampedes. Surveys associated with adult males also would occur prior to the arrival of pregnant females. The Community requests to harass 6,450 northern fur seal non-pups and 1,600 pups up to 15 times per year during the habitat-use studies.

The Commission believes the habitat-use data would better inform co-management issues related to northern fur seals, therefore, it recommends that NMFS issue the permit amendment, provided that the current permit conditions 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.

Rebecca J. Lent, Ph.D.  
Executive Director