



MARINE MAMMAL COMMISSION

7 October 2009

Mr. Timothy J. Van Norman
Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive
Arlington, VA 22203

Re: Permit Application No. PRT-220876
(Alaska Department of Fish and Game)

Dear Mr. Van Norman:

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.

The applicant is requesting authorization to satellite-tag and collect skin biopsy samples from up to 45 adult and subadult walrus annually to obtain information on their movements, speed of travel, feeding areas, and haul-out behavior in the waters and beaches of western Alaska. The applicant also requests authorization to harass up to 1,800 walrus annually incidental to the proposed tagging and sampling activities. The applicant states that the proposed research would augment similar research being conducted by the U.S. Geological Survey. The proposed research is being reviewed by the Alaska Department of Fish and Game's Institutional Animal Care and Use Committee.

RECOMMENDATION

The Marine Mammal Commission recommends that the Fish and Wildlife Service—

- ensure that activities to be conducted under this permit and those of other permit holders who might be carrying out research on the same species or in the same areas are coordinated and, as possible, data are shared to avoid unnecessary duplication of research and disturbance of animals. In this regard, before issuing the permit, the Service should consult with the applicant and the U.S. Geological Survey, Alaska Science Center, to ensure that the applicant's proposed tagging protocol is consistent with that of the center and appropriate for use on subadult animals and animals under six years of age;
- consult with the applicant to determine if authorization for a certain number of accidental deaths (e.g., one annually) is warranted and, if such authority is not granted, require that activities be suspended, pending review and authorization to proceed, if a walrus is accidentally killed or seriously injured as a result of research activities;

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- require that the applicant cease an activity if there is evidence that the activity may be interfering with mother/calf bonding or other vital functions;
- require that researchers carefully assess the risk of a possible stampede before approaching walruses, particularly large groups, and delay or abort an approach if it appears that a stampede could occur if activities proceed; and
- before issuing the requested permit, ensure that the proposed research has been approved by the applicant's Institutional Animal Care and Use Committee.

RATIONALE

The applicant proposes to tag adult and subadult walruses and states that tags will not be deployed on animals less than four years of age. The applicant also states that researchers will coordinate activities with the U.S. Geological Survey, Alaska Science Center, which is conducting similar research on walruses. However, the Alaska Science Center's Standard Operating Procedures for Remotely Attaching Subdermally Anchored Satellite Radio-tags to Walruses (copy enclosed) states on page 2 that "[o]nly adult females or males ≥ 6 years of age are targeted, because the combined skin and blubber layers in young animals are too thin to accommodate the harpoon." The Marine Mammal Commission recommends that, before issuing the permit, the Service consult with the applicant and the Alaska Science Center to ensure that the applicant's proposed tagging protocol is consistent with that of the center and is appropriate for use on subadult animals and animals less than six years of age.

The applicant is not requesting authorization for lethal takes that might occur incidental to the proposed research activities. The Commission notes, however, that if animals are startled by the activities and stampede into the water, some animals—particularly those that are small or young—could be seriously injured or killed by trampling. The Marine Mammal Commission therefore recommends that the Service consult with the applicant to determine if authorization for a certain number of accidental deaths (e.g., one annually) is warranted. If no such authority is granted, the Marine Mammal Commission recommends that the activities be suspended, pending authorization from the Service to proceed, if any animal is seriously injured or killed incidental to the proposed activities or if there is evidence that the activity may be interfering with mother/calf bonding or other vital functions. Further, the Marine Mammal Commission recommends that the permit, if issued, require that researchers carefully assess the risk of a possible stampede before approaching walruses, particularly large groups, and delay or abort an approach if it appears that a stampede could occur.

The application states that the Alaska Department of Fish and Game's Institutional Animal Care and Use Committee is currently reviewing the proposed research. The Marine Mammal Commission recommends that issuance of the permit be contingent upon approval of the research by that committee.

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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.

Please contact me if you or your staff has questions concerning any of these comments or recommendations.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director

Enclosure