



MARINE MAMMAL COMMISSION

8 December 2011

Mr. P. Michael Payne, Chief
Permits, Conservation, and Education Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Re: Request for Amendment, Permit No. 15126
(National Marine Mammal Laboratory)

Dear Mr. Payne:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the above-referenced permit amendment request with regard to the goals, policies, and requirements of the Marine Mammal Protection Act. Permit 15126 authorizes research on ribbon, spotted, ringed, harbor and bearded seals in the North Pacific Ocean, Bering Sea, Arctic Ocean, and coastal regions of Alaska. The current permit expires on 30 March 2015. The National Marine Mammal Laboratory is requesting amendment of the permit to allow harassment of ribbon, spotted, bearded and ringed seals during low-level aerial surveys for the remainder of the permit.

RECOMMENDATION

The Marine Mammal Commission recommends that the National Marine Fisheries Service approve the requested permit amendment, provided that the conditions contained in the permit remain in effect.

RATIONALE

Permit No. 15126 authorizes the National Marine Mammal Laboratory to harass, capture, restrain, sedate, administer isotopes and Evan's blue to, collect tissue samples from, attach instruments to, and recapture and resample the pinnipeds at a later date. The Laboratory is requesting to take 3,554 ribbon seals, 8,699 spotted seals, 3,872 bearded seals, and 50,653 ringed seals per year for the remainder of the permit. The seals would be harassed incidental to low-level line-transect aerial surveys conducted from fixed-wing or rotary manned or unmanned aircraft. The purpose of the research is to estimate the abundance of various ice seal species. The aerial surveys would coincide with similar surveys being conducted within Russian waters of the Bering and Okhotsk seas. The surveys would occur from 15 March to 30 June 2012 and continue through 2013. Additional surveys in 2013 and beyond would expand the surveyed areas to include more ringed seal habitat, such as the coastal regions of the Bering, Chukchi and Beaufort Seas.

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The Laboratory would use at least two aircraft that would operate simultaneously from strategic airports around the survey region. Photographs would be taken at regularly spaced intervals from a belly porthole along pre-determined transect lines. In addition to the visual photographs, an infrared sensor would be used to improve detection of seals. In some cases, lower altitude surveys (i.e., at a minimum altitude of 122 m) would be flown during traditional line-transect surveys. Because the timing of the surveys overlaps with the nursing period for those species, the Laboratory would conduct surveys at lower altitudes only when species identification is required (i.e., when conducting traditional distance line-transect surveys or when weather conditions require).

In addition, the Laboratory has been exploring the use of new technologies related to visible and infrared sensors, high-resolution camera arrays, and unmanned aircraft. Those technologies would allow the Laboratory to fly at higher altitudes and, in the case of unmanned aircraft, with significantly quieter operations, virtually eliminating the potential for disturbance at proposed altitudes. The surveys planned for the Bering, Chukchi, and Beaufort Seas would rely heavily on those new technologies and may be conducted at 305 m or greater using high-resolution camera arrays and infrared sensors.

The Laboratory has indicated that its Institutional Animal Care and Use Committee has reviewed and approved the proposed protocols. Therefore, the Marine Mammal Commission recommends that the National Marine Fisheries Service approve the requested permit amendment, provided that the conditions contained in the permit remain in effect.

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 have any questions concerning the Commission's recommendation.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director