

3 February 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. 14330

(Aleut Community of St. Paul Island)

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.

In June 2000 the Aleut Community of St. Paul Island signed a co-management agreement with the National Marine Fisheries Service. The agreement authorizes the Community to (1) take by harassment specified numbers of northern fur seals during disentanglement events, (2) collect biological samples from dead stranded and subsistence-hunted marine mammals, and (3) use visual observations and cameras to monitor haul-out areas and rookeries. The Community also may export samples to researchers studying the northern fur seal population decline. Finally, the Community may take by harassment up to 100 Steller sea lions and 50 harbor seals during the described activities.

The Community is requesting that the permit be amended to authorize the taking by harassment of additional numbers of Steller sea lions and harbor seals during the collection of scat samples used to characterize the diet of marine mammals in the region. Researchers would collect scat samples opportunistically throughout the year from haul-out areas and during the fall and winter (post-breeding season) from rookery areas on the Pribilof Islands, Alaska. The Community is requesting authorization to harass annually up to 100 adult female Steller sea lions, 500 adult male Steller sea lions, 1,400 juvenile male Steller sea lions, 100 male and female Steller sea lion pups, 100 adult female harbor seals, 100 adult male harbor seals, 100 male and female juvenile harbor seals, and 100 male and female harbor seal pups. The amendment would be valid through 31 August 2014.

The Marine Mammal Commission recommends that the National Marine Fisheries Service approve the requested amendment. 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 this recommendation.

Thusty J. Ragen

Timothy J. Ragen, Ph.D. Executive Director