

10 May 2012

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

Re: Request for Amendment, Permit No. MA220876

(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. Permit MA220876 authorizes the Alaska Department of Fish and Game to conduct research on walruses throughout their range in Alaska. The current permit expires on 20 December 2014. The Department is requesting to add procedures to the current permit.

RECOMMENDATION

<u>The Marine Mammal Commission recommends</u> that the Fish and Wildlife Service issue the permit amendment, provided that the conditions contained in the current permit remain in effect.

RATIONALE

The purpose of the Department's research is to study walrus movement patterns and foraging ecology. The studies involve harassing, observing, biopsy sampling, and instrumenting with satellite tags numerous individuals. The existing permit authorizes the Department to biopsy sample and tag individuals of either sex that are six years of age or older.

The Department is requesting two changes to the permit: (1) biopsy sampling and tagging walruses in the water and (2) deploying tags via a harpoon-style pole. Currently, the Department is authorized to biopsy sample and tag individual walruses on land and on ice and by crossbow only. Under the amendment, Department scientists would use a small boat to approach adult walruses to a distance of no less than 2 m. At that time, they would deploy the same type of tag currently being applied with a crossbow. However, under the permit amendment, the scientists would deploy the tag using a harpoon-style pole by jabbing or throwing the pole a short distance. They also would use a crossbow to collect a biopsy sample. The scientists have used the harpoon-style tagging method to instrument bowhead and gray whales in Alaska and Canada.

The entire encounter would last no more than 10 minutes. The scientists would not approach groups of more than 30 walruses or pursue non-target walruses. The number of walruses

Mr. Timothy J. Van Norman 10 May 2012 Page 2

that could be biopsy sampled, tagged, and harassed incidental to the activities under the current permit would not change.

The Department's Institutional Animal Care and Use Committee reviewed and approved the proposed amendments to its research protocols. <u>The Marine Mammal Commission</u> believes the proposed tag attachment method is reasonable and <u>recommends</u> that the Fish and Wildlife Service issue the permit amendment, provided that the conditions contained in the current 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.

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Executive Director