

PACIFIC SCIENTIFIC REVIEW GROUP

A Regional Advisory Group to the National Marine Fisheries Service

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Dr. Michael Payne,
Chief, Permits, Conservation and Education Division,
Office of Protected Resources,
National Marine Fisheries Service
1315 East-West Highway, Room 13705,
Silver Spring, MD 20910

9 December 2010

Dear Dr. Payne,

I am writing in regards to an amendment to Permit No. 781-1824-01 submitted by the National Marine Mammal Laboratory to tag and track killer whales from the Northeast Pacific Southern Resident stock. As chairman of the Pacific Scientific Review Group, I wanted to inform you that we have repeatedly recommended to the NMFS that such tagging be done.

The Pacific Scientific Review Group was created under Section 117(d) of the Marine Mammal Protection Act. Its duties are to advise the Secretary of Commerce on:

- “(A) population estimates and the population status and trends of such stocks;
- (B) uncertainties and research needed regarding stock separation, abundance, or trends, and factors affecting the distribution, size, or productivity of the stock;
- (C) uncertainties and research needed regarding the species, number, ages, gender, and reproductive status of marine mammals;
- (D) research needed to identify modifications in fishing gear and practices likely to reduce the incidental mortality and serious injury of marine mammals in commercial fishing operations;
- (E) the actual, expected, or potential impacts of habitat destruction, including marine pollution and natural environmental change, on specific marine mammal species or stocks, and for strategic stocks, appropriate conservation or management measures to alleviate any such impacts; and
- (F) any other issue which the Secretary or the groups consider appropriate.”

Over the span of the last 16 years, the Pacific SRG has reviewed NMFS research and management of marine mammals in U.S. waters off California, Oregon, Washington, Hawaii, and other U.S. islands in the Pacific. The SRG annually makes recommendations about the research needed to better manage these marine mammal populations.

The Pacific SRG research has regularly reviewed research on the Eastern North Pacific Southern Resident stock of killer whales, and this population has been the subject of several of our recommendations over the years.

At its 13th meeting in January 2002, the Pacific SRG recommended that:

“The Southern Resident stock of killer whales is being considered for an ESA listing. Despite the long-term studies on this population, significant gaps in our information exist that hinder our ability to fully identify critical habitat, determine population discreteness, and assess the potential for Allee effects and inbreeding. The SRG recommends that the following studies be conducted to fill these gaps in our knowledge.

1) Satellite tagging of Southern Resident killer whales to determine their habitat and movements during the seasons when they are not seen in Puget Sound.

2) Biopsy sampling to determine population discreteness, genetic relationships, and genetic diversity within these pods.

The SRG also recommends that management, enforcement, and education activities be conducted in concert by the NMFS, Washington State Dept. of Fish and Wildlife, and Canadian agencies to reduce the harassment of killer whales by boats.”

At its 15th meeting in January 2005, the Pacific SRG updated and expanded its recommendation:

“The Southern Resident stock of killer whales has been proposed for an ESA listing. Despite the long-term studies on this population, significant information gaps hinder our ability to fully identify critical habitat, determine population discreteness, and assess the potential for Allee effects and inbreeding. The SRG recommends that the following studies be conducted to fill these gaps in our knowledge.

1) Satellite tagging of Southern Resident Killer Whales, in addition to acoustic and visual surveys, to determine their habitat and movements during the seasons when they are not in Puget Sound.

2) Biopsy sampling of all individuals to determine population discreteness, genetic relationships, and genetic diversity within these pods.

3) Obtaining tissue samples for contaminant studies.

The SRG realizes the sensitivity of conducting this type of research in this area, but the research needs are critical and these methods have proven to be the most effective for providing the required information. The SRG stresses that these studies should be conducted soon. The opportunity to sample older members of the population is limited, and delaying biopsy studies may result in irretrievable loss of data.”

At its 16th meeting in November 2005, the Pacific SRG repeated this recommendation, noting that “Studies are being considered, but the apparent loss of one adult in the past year emphasizes the urgency of quick action.” At its 17th meeting in November 2006, the Pacific SRG noted that “Tag development research is being conducted to begin satellite tracking, and biopsy sampling has begun for genetics and contaminants studies.” It now appears that NMFS is now going through the permit

process to make long-overdue progress on the Pacific SRG's recommendation to initiate satellite tagging of Southern Resident killer whales. As the Pacific SRG has noted in its recommendations, there is a both need and urgency to conduct these studies, and the Pacific SRG supports this research.

Sincerely,

Michael Scott, PhD.

Chairman, Pacific Scientific Review Group